

Planning Committee

Agenda 18 July 2025

10.00am

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

John Packman, Chief Executive – Friday 11 July 2025

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

Introduction

1. To receive apologies for absence
2. To receive declarations of interest (see [Appendix 1](#) to the Agenda for guidance on your participation having declared an interest in the relevant agenda item)
3. **To receive and confirm the minutes of the Planning Committee meeting held on 30 May 2025** (Pages 4-8)
4. To note whether any items have been proposed as matters of urgent business
5. Chairman's announcements and introduction to public speaking
Please note that public speaking is in operation in accordance with the Authority's [Code of Practice for members of the Planning Committee and officers](#).
6. Request to defer applications included in this agenda and/or vary the order of the agenda

Planning and enforcement

7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**
 - 7.1. BA/2025/0079/COND & BA/2025/0141/OTHER Swallow Cottage, Horsefen Road, Ludham (Pages 9-18)
 - 7.2. BA/2025/0077/FUL Wherry Cottage, 50 Puddingmoor, Beccles (Pages 19-33)
 - 7.3. BA/2025/0120/FUL Broad View, Fleet Lane, South Walsham (Pages 34-45)
8. **Enforcement update** (Pages 46-52)

Report by Development Manager

Tree Preservation Orders

9. **BA/2025/0002/TPO site visit 2A The Street, Geldeston** (Pages 53-60)
Report by Heritage and Design Manager

Heritage

10. **Beccles Conservation Area Article 4 Directions – Confirmation** (Pages 61-90)
Report by Heritage and Design Manager

Policy

11. **Postwick with Whitton Neighbourhood Plan – Adoption** (Pages 91-92)
Report by Planning Policy Officer
12. **Norfolk Strategic Planning Framework** (Pages 93-201)
Report by Planning Policy Officer
13. **Local Plan – Regulation 19 consultation** (Pages 202-267)
Report by Planning Policy Officer
14. **Consultation responses** (Pages 268-295)
Report by Planning Policy Officer

Matters for information

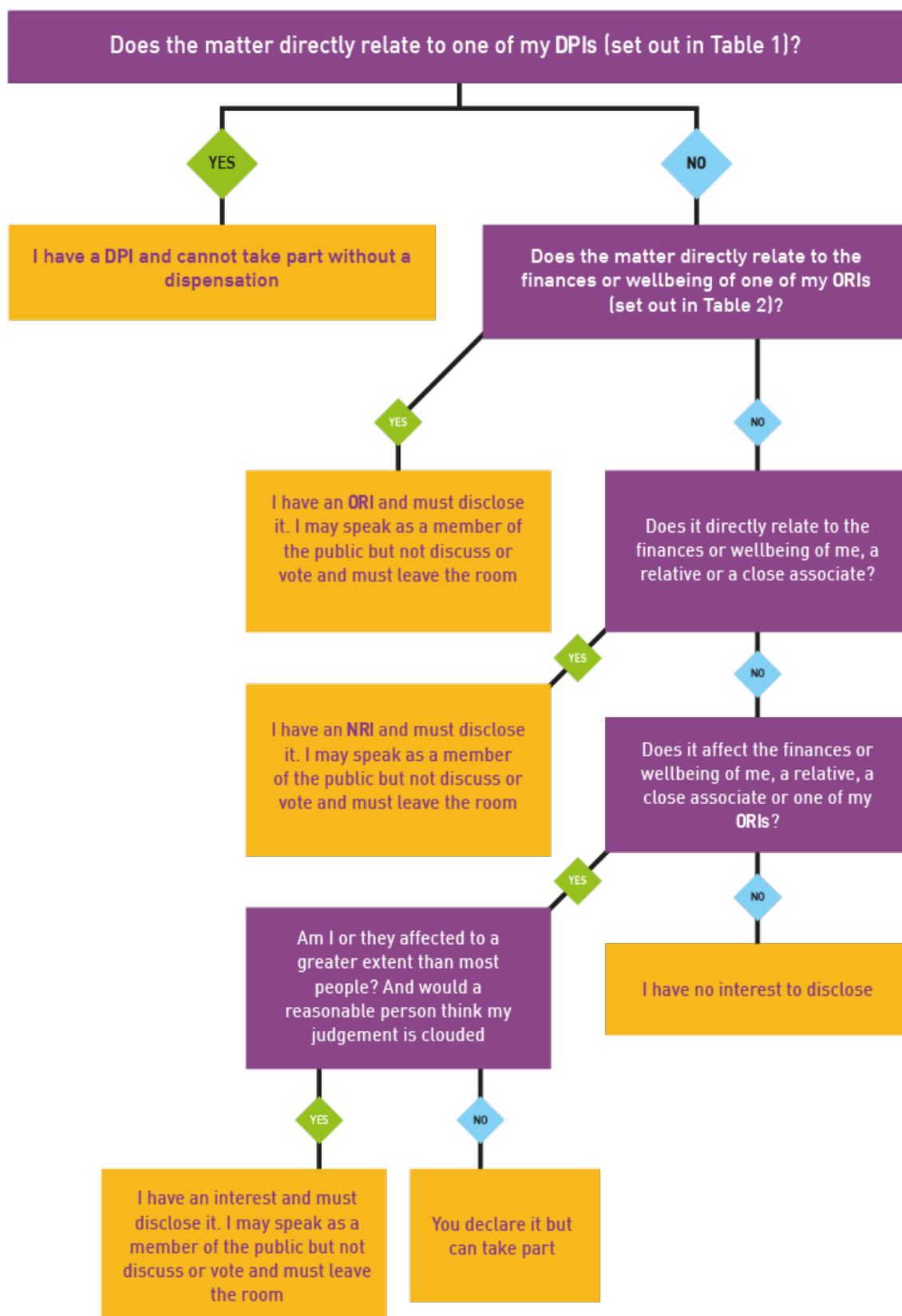
15. **Notes of the Heritage Asset Review Group meeting held on 13 June 2025**
(Pages 296-300)
16. **Appeals to the Secretary of State update** (Pages 301-302)
Report by Development Manager
17. **Decisions made by Officers under delegated powers** (Pages 303-307)
Report by Development Manager

Other matters

18. Other items of business
Items of business which the chairman decides should be considered as a matter of urgency pursuant to Section 100B (4)(b) of the Local Government Act 1972
19. **To note the date of the next meeting – Friday 15 August 2025 at 10.00am at The King's Centre, 63-75 King Street, Norwich, NR1 1PH**

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

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



Planning Committee

Minutes of the meeting held on 30 May 2025

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Present

Tim Jickells – in the Chair, Harry Blathwayt, Stephen Bolt, Andrée Gee, Tony Grayling, James Harvey, Martyn Hooton, Matthew Shardlow, Vic Thomson and Fran Whymark.

In attendance

Natalie Beal – Planning Policy Officer (items 9-10), Jason Brewster – Governance Officer, Steve Kenny – Development Manager, Ruth Sainsbury – Head of Planning and Rob Thomas – Head of Governance.

Members of the public in attendance who spoke

No members of the public in attendance.

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

Apologies were received from Gurpreet Padda and Melanie Vigo di Gallidoro.

Openness of Local Government Bodies Regulations 2014

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

2. Declarations of interest and introductions

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

3. Minutes of last meeting

The minutes of the meeting held on 2 May 2025 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business.

5. Chair's announcements and introduction to public speaking

No members of the public had registered to speak. The Chair noted the decision of Great Yarmouth Borough Council, at the council meeting on 22 May 2025, to replace Leslie Mogford as their appointee to the Broads Authority. Leslie had been the council's appointee to the Broads Authority since June 2019 and had been a member of the Planning Committee since

July 2019. The Chair thanked Leslie for his service and observed that the committee would miss his wisdom, sound advice and knowledge of the Broads.

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

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

7. Applications for planning permission

There were no applications for consideration.

8. Enforcement update

Members received an update report from the Development Manager on enforcement matters previously referred to the Committee.

The report was noted.

9. Carlton Colville Neighbourhood Plan adoption

The Planning Policy Officer (PPO) introduced the report on the adoption of the Carlton Colville Neighbourhood Plan. The PPO confirmed that, since the report was published, the plan had completed its referendum with 73% of the participants voting in favour of the plan. As more than 50% voted in favour of the plan, the plan was ready to be made (adopted).

Andrée Gee proposed, seconded by Stephen Bolt

It was resolved unanimously to recommend to the Broads Authority that the Carlton Colville Neighbourhood Plan was made/adopted.

10. Local Plan - Preparing the Publication Version

The Planning Policy Officer (PPO) presented the report which included the residential moorings need clarification letter, an updated Great Yarmouth Gypsy and Traveller accommodation assessment and the Duty to co-operate statement. The PPO proposed to discuss each section of the report in turn and welcomed members' feedback.

Residential moorings need clarification letter

The PPO reminded Members that the local plan period end had been revised from 2041 to 2042. The Residential Moorings Need Assessment had originally been commissioned up to 2041 and the PPO had requested the consultants to review this assessment based on an amended end period of 2042. The consultants had confirmed that the additional year had not altered the residential moorings requirements previously identified in the assessment.

Members supported the residential moorings need clarification letter.

Great Yarmouth Gypsy and Traveller Accommodation Assessment Addendum

Members were reminded of the investigative work at the Cobholm Island site undertaken by the Geographic Information System Officer, Planning Enforcement Officer, Development

Manager and the PPO (Planning Committee meeting 8 November 2024). The conclusion of this investigation had subsequently been reported to the consultants responsible for the Great Yarmouth Gypsy and Traveller Accommodation Assessment and the assessment (Appendix 2 of the report) had been updated to indicate a current need of 12 and a future need of five.

A Member asked, given a demonstrable need for gypsy and traveller accommodation, whether the failure of the call for sites to identify suitable sites would prove problematic. The PPO confirmed that there was no requirement for gypsy and traveller accommodation in the current Local Plan. The PPO expected this area would be debated through the examination and it was an issue for both the Broads Authority and Great Yarmouth Borough Council. Great Yarmouth's Local Plan was five months ahead of that of the Broads and that Great Yarmouth's Local Plan examination would no doubt discuss and investigate the issue in detail.

Members supported the updated Great Yarmouth Gypsy and Traveller Accommodation Assessment.

Duty to co-operate statement

The duty to co-operate statement outlined how the Broads Authority worked with other local authorities to address strategic issues across boundaries. Since the report had been published the PPO had received additional comments from a Member. In response to a comment regarding the omission of references to the Broadland Futures Initiative the PPO proposed including a new section detailing duty to co-operate considerations relating to flood risk. In response to comments relating to Appendix 3 of the Duty to co-operate statement (Assessment of Local Plan against Marine Plans), the PPO proposed to amend references to "Not relevant to the Local Plan" to say "Relates only to areas of open sea, not relevant". In addition, references to marine policies E-AQ-1 and E-CAB-1 would be updated to indicate the relevant local plan policies appropriate to these forms of development proposal.

The Member added that marine policy E-FISH-2 stated that fish spawning areas were offshore and had concluded that this policy was not relevant to the local plan. The Member believed that fish spawning could occur on river estuaries, that water pollution from the Broads could impact these inland spawning areas and therefore fish spawning areas were relevant to the local plan. The Member proposed an amendment to Appendix 3 of the Duty to co-operate statement to say 'The Local Plan for the Broads has relevant policies – see the Natural Environment section'.

A Member asked for the Broads Nature Recovery Strategy to be included in the list of biodiversity plans on page 28 of the Duty to co-operate statement and the PPO agreed to this change.

Members supported both the Duty to co-operate statement (Appendix 3 of the report) and the additional amendments described. The PPO agreed to issue the amended Duty to co-operate statement to the Chair of the Planning Committee for approval.

Tony Grayling proposed, seconded by Matthew Shardlow

It was resolved unanimously to endorse the Residential moorings need clarification letter, the Great Yarmouth Gypsy and Traveller Accommodation Assessment and, subject to subsequent changes being agreed with the Chair of the Planning Committee, the Duty to co-operate statement as evidence to the Local Plan.

The Head of Planning reminded Members that they should have received a draft publication version of the Local Plan for the Broads and that if Members had any further feedback on this document to please return it to the PPO no later than 4pm on 13 June 2025.

11. Customer Satisfaction Survey 2025

The Head of Planning (HoP) introduced the report that analysed responses to a questionnaire issued to all planning applicants who received a decision in the first quarter of 2025. The HoP highlighted that the average marks for all five assessment categories were greater than 3.86 (out of 5). The low number of respondents, despite being greater than 2024, warranted a degree of caution when interpreting the results. Given the greater motivation of respondents when they received poor customer service, the positive marks were indicative that on the whole customers were satisfied with the service they received. In addition, the survey results indicated that respondents had valued the free pre-application advice service. The HoP believed these results were a positive reflection on the Planning Team and she commended them for their efforts.

The report was noted.

12. Appeals to the Secretary of State

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

13. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 17 April to 15 May 2025 and any Tree Preservation Orders confirmed within this period.

14. Other items of business

There were no other items of business.

15. Date of next meeting

The Chair reminded Members that the meeting previously scheduled for 27 June 2025 had been cancelled. The next meeting of the Planning Committee would be on Friday 18 July 2025 at 10:00am at The King's Centre, 63-75 King Street, Norwich.

The meeting ended at 10:32am.

Signed by

Chair

Planning Committee

18 July 2025

Agenda item number 7.1

BA/2025/0079/COND & BA/2025/0141/OTHER Swallow Cottage, Horsefen Road, Ludham

Report by Planning Officer

Proposal

BA/2025/0079/COND - Removal of Condition 2, occupation of dwelling, of Planning
Permission BA/2014/0220/COND

BA/2025/0141/OTHER - Discharge of planning obligation under S106 Agreement dated
11 May 1999

Applicant

Mr & Mrs Buttifant

Recommendation

Approve

Reason for referral to committee

A departure from the development plan policies

Application target date

18 August 2025

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1. Description of site and proposals

- 1.1. The application site, known as Swallow Cottage, is located almost at the end of Horsefen Road in Ludham on the southwest side. The dwellinghouse is associated with Swallowtail Boatyard ('the Boatyard') business which operates from the adjacent site, both of which are within the Ludham Conservation Area and Flood Zone 3.
- 1.2. The immediate locality is populated with a mix of development including residential properties and other boatyard businesses.
- 1.3. The background and information provided in this report covers two associated applications, one for the removal of Condition 2, occupation of dwelling, of Planning Permission BA/2014/0220/COND (current application reference BA/2025/0079/COND).

The second application relates to the associated Discharge of planning obligation under s106 Agreement dated 11 May 1999 varied by a Deed of Variation on 16 March 2015 (current application reference BA/2025/0141/OTHER).
- 1.4. Application reference BA/2025/0079/COND has been considered against the requirements of the relevant adopted policies of the Local Plan for the Broads 2019.
- 1.5. Application reference BA/2025/0141/OTHER has been considered in relation to the legal context regarding S106 agreements. Section 106A of the Town and Country Planning Act 1990 provides that a planning obligation may be modified or discharged by formal application to the local planning authority at the end of the period of five years beginning with the date when the obligation was entered into.

Where an application is made to an authority under this section the authority may determine:
 - (a) that the planning obligation shall continue to have effect without modification;
 - (b) if the obligation no longer serves a useful purpose, that it shall be discharged; or

(c) if the obligation continues to serve a useful purpose but would serve that purpose equally well if it had effect subject to the modifications specified in the application, that it shall have effect subject to those modifications.

2. Site history

- 2.1. The Boatyard is a family business that was set up by Mr and Mrs Buttifant in 1993 and has been in continuous operation since then. When the business was first set up it was important to have a person on-site to assist customers visiting the Boatyard during both the day and the night therefore planning permission was granted by North Norfolk District Council on behalf of the Broads Authority (reference 01/98/1632) on 17 May 1999 to allow a dwelling to be erected on the site to be occupied by a yard manager subject to the following condition (number 8):

“The dwelling shall be occupied only by a person (and any dependants residing with such person) solely or mainly employed in the operation or management of Swallowtail Boatyard.”

Reason:

“The site of this proposal lies outside an area in which the Local Planning Authority normally permits residential development and permission has been granted in this instance having regard to the need for a dwelling on this site in association with the boatyard.”

- 2.2. The 1999 permission was also subject to a Section 106 Agreement dated 11 May 1999. Clause 2 of the S106 Agreement states the following:

“The Owners hereby jointly and severally covenant with the Authority that in the event of planning permission being granted for the Development they will not cause or permit the dwelling:-

- i) to be occupied other than by persons (including the spouse and dependent children of such persons) directly associated with the operation management or every day running of the boatyard situated on the Blue Land and presently know as Swallow Tail Boatyard (“the Boatyard”) or
- ii) to be sold other than in association with the Boatyard

- 2.3. In 2015, (application reference BA/2014/0220/COND) the Broads Authority granted a variation of Condition 8 of the 1999 permission to allow the following:

“The occupation of the dwelling (known as Swallow Cottage) shall be limited to a person solely or mainly working, or last working, at Swallow Tail Boatyard, or a widow or widower of such a person, and to any resident dependants, resident carers and resident family members.”

- 2.4. The original S106 agreement is also subject to a Deed of Variation (DoV) dated 16 March 2015 as follows:

The 2015 DoV varied the S106 Agreement by the deletion of clause 2(i) (the occupancy restriction), and the amendment of clause 2(ii) as follows, so that the property is not: “to be sold other than in association with the boatyard situated on the Blue Land and presently known as Swallow Tail Boatyard (“the Boatyard”)”.

- 2.5. Mr and Mrs Buttifant have now retired from the business and their son has been running the Boatyard on a day-to-day basis for the past four years while living in Catfield, approximately seven-minute drive from the Boatyard.
- 2.6. Since first setting up the business, technology has moved on considerably which has meant that Mr and Mrs Buttifant’s son is easily contactable at any time of the day and/or night and only a short journey from the Boatyard should visitors need assistance.
- 2.7. As the Boatyard is a family business, started by Mr and Mrs Buttifant and is being continued by their son, they have no intention of selling it however there is no longer a need for Swallow Cottage to be tied to the Boatyard operation.

3. Consultations received

Parish Council

- 3.1. Please note that Ludham Parish Council supports this application.

In order to minimise light pollution, Ludham Parish Council recommends that any outdoor lights associated with this proposed development should be:

1. fully shielded (enclosed in full glass cut-off fittings)
2. directed downwards (mounted horizontally to the ground and not tilted upwards)
3. switched on only when needed (no dusk to dawn lamps)
4. white light low energy lamps (Philips Cosmopolis or fluorescent) and not orange or pink sodium sources)

North Norfolk District Council

- 3.2. Assuming you are satisfied the obligations no longer required to serve a planning purpose, North Norfolk District Council has no objection.

4. Representations

Broads Society

- 4.1. Having considered the case made by the applicant, we can advise you that we have no objections to the proposed changes to occupancy conditions.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).

5.2. The following policies were used in the determination of the application:

- DM26 – Protecting General Employment
- DM35 – Residential Development within Defined Development Boundaries
- DM38 - Permanent and Temporary Dwellings for Rural Enterprise Workers

6. Assessment

6.1. The report combines the assessment and recommendation of two applications. The main issue in the determination of application BA/2025/0079/COND is whether the material considerations of the specific situation substantially weigh in favour of removing the occupancy restriction placed on Swallow Cottage given this is contrary to Policy DM35 and DM38 of the Local Plan for the Broads 2019.

6.2. In terms of the Discharge of the associated S106 Agreement to allow Swallow Cottage to be sold other than in association with the Boatyard in the future, this relates to a legal framework as set out in section 1.6 above.

Principle of development

6.3. The original planning permission was granted in May 1999 to allow a dwelling to be erected on the site to be occupied by a yard manager in association with the running of the adjacent boatyard operation. Permission was granted having considered the need for a dwelling on the site in association with the business needs of the Boatyard at that time. The permission was subject to an occupancy restriction as the site lies outside an area in which the Local Planning Authority (LPA) would normally permit residential development.

6.4. While a variation to the original planning permission was granted in 2015, the occupancy of the property known as Swallow Cottage remains limited to a person solely or mainly working, or last working, at Swallow Tail Boatyard and cannot be sold other than in association with the Boatyard as controlled by the Deed of Variation S106 agreement dated 16 March 2015.

Local Plan Policies DM35 and DM38

6.5. The current Broads Local Plan was adopted in 2019. The site remains outside an area in which the LPA would normally permit residential development, and therefore Policy DM35 (Residential Development within defined Development Boundaries) and Policy DM38 (Permanent and temporary dwellings for rural works) are most relevant to the determination of application BA/2025/0079/COND.

6.6. Policy DM35 seeks to ensure development is within defined development boundaries to consolidate development around existing built-up communities which has a dual purpose of protecting the surrounding countryside. The original permission for the dwelling was granted because of the need for a yard manager to be on site of the existing boatyard at all times.

- 6.7. While Ludham is not within a designated development boundary, the village is populated with other boat related businesses, tourism facilities and residential properties. It is an established and thriving Broads village with several local shops including a village store, with post office and delicatessen. There is also a butcher's, doctor's surgery, hairdresser's and garage available to residents and those visiting the area. The Boatyard also provides a much-needed service to local and visiting boat enthusiasts thereby contributing to both the local economy of Ludham and the Broads as a whole and as an existing employment site, is protected as such under Policy DM26 (Protecting General Employment) of the Local Plan 2019. The village is accessible by road, including a regular bus service to the village from Norwich and Great Yarmouth, and by boat.
- 6.8. Policy DM38 allows the development of new dwellings for rural enterprise workers but does not specifically relate this to a boatyard operation. However, given the site is not within a development boundary, it can be argued that it is therefore in a countryside location where Policy DM38 is relevant.
- 6.9. DM38 does allow for the removal of occupancy conditions in exceptional circumstances where the following can be demonstrated:
- i) There is no longer a long-term need for the dwelling to be associated with the particular enterprise; and
 - ii) Unsuccessful attempts have been made to sell or rent the dwelling at a realistic price that takes account of the occupancy restrictions.
- 6.10. Regarding point i) above, the application is supported by a statement outlining why there is no longer a long-term need for the dwelling to be occupied by a yard manager.
- 6.11. Since the Boatyard was set up by Mr and Mrs Buttifant in 1993 it has remained in operation. They are local people who have spent their life in the Broads boating industry and are now in their mid-70s and retired from the business. Their son has been running the Boatyard on a day-to-day basis for the past four years. He does not live in Ludham but some seven minute drive from the site in Catfield.
- 6.12. Given the advances in technology since the business was first established and since the dwelling was first occupied by Mr and Mrs Buttifant, the need for a yard manager to be on site at all times is no longer required.
- 6.13. This is also reflected in the fact that based on a planning history search, there appears to be no other boatyards within the Broads that have yard managers residing on or near the site in dwellings with similar occupancy restrictions.
- 6.14. As Mr and Mrs Buttifant remain in the dwelling and their son has his own property with his family, and there is no longer a need for a yard manager to be available on site at all times, the occupancy restriction has become redundant and no longer meets a specific need.

- 6.15. While Mr and Mrs Buttifant wish to remain in the dwelling, they are aware of advancing years and the possibility that they may need to sell the dwelling for health reasons to help with care costs as they become older. However, as the dwelling is tied to the Boatyard business, this would mean selling both and potentially leaving their son without a business to run and therefore a loss of income.
- 6.16. This leads onto point j) providing evidence of unsuccessful marketing attempts to sell the property taking account of the occupancy restriction, as required by Policy DM38.
- 6.17. As Mr & Mrs Buttifant's son is now running the family business, it is impossible to try to sell the dwelling to prove such unsuccessful attempts since both the dwelling and associated Boatyard would have to be advertised as one. Mr and Mrs Buttifant do not wish to sell the business as it would not only leave their son without employment it would result in the loss of their family business which they have built and retained for many years.
- 6.18. Equally, if Mr & Mrs Buttifant tried to sell the dwelling separately from the Boatyard in breach of the condition (and the associated S106 obligation), they would never be able to find a purchaser because any future occupier would not be able to comply with the restriction requiring them to work at the Boatyard because their son would still be running the business.
- 6.19. These scenarios therefore demonstrate that any attempts to sell or rent the property pursuant to paragraph (j) of Policy DM38 would be unsuccessful.
- 6.20. Local Plan Policy DM38 allows for the removal of such an occupancy condition in exceptional circumstances subject to points i) and j) as outlined in section 6.8 above.
- 6.21. As demonstrated in the supporting statement, there is no longer a need for the occupancy restriction nor are there any other such restrictions attached to other boatyards in the Broads.
- 6.22. While the site is located outside of a development boundary, Ludham is a thriving community which offers a good level of shops, local services and is accessible by car, public transport and by boat and contributes to the economy and tourism of the Broads as a whole. In this specific instance, as the dwelling already exists, these factors materially outweigh the presumption in favour of development within development boundaries in accordance with Policy DM35 of the Local Plan 2019 and the overarching principles of the NPPF.
- 6.23. Furthermore, Mr and Mrs Buttifant's wish is for the Boatyard business to remain within the family providing a source of income for their son and his family while retaining a well-established boatyard on the Broads, which also continues to provide economic and social benefits to local residents and visitors. This is also of material consideration and is reflected in the need to protect general employment as per Policy DM26 of the Local Plan 2019, as noted in point 6.7 above.

- 6.24. Given this unique situation, it is not possible to demonstrate compliance with paragraph (j) of Policy DM38 in terms of unsuccessful marking attempts as to do so would mean trying to sell the Boatyard with the dwelling (which would result in their son losing his business) or the dwelling would have to be offered on its own (which would be in breach of the condition and the associated S106 obligation).
- 6.25. It is therefore concluded that Condition 2, occupation of dwelling, of planning permission BA/2014/0220/COND is acceptable and can be removed in this instance.

Discharge of Associated S106 Agreement – DoV agreement dated 15 March 2015

- 6.26. In terms of discharging the associated S106 planning obligation (current application reference BA/2025/0141/OTHER), the original purpose of the restriction in the S106 agreement was to ensure that occupancy of Swallow Cottage is restricted to persons associated with the boatyard business only and also to ensure that the dwelling is not sold separately from the boatyard. This was a belt and braces approach alongside the occupancy condition.
- 6.27. Based on the evidence provided the LPA has concluded that the occupancy restriction is no longer relevant. In addition, the original decision to allow a dwelling for a yard manager to be present at all times is unique to this site and no longer meets a specific planning need.
- 6.28. In this instance, it therefore follows that the obligation requiring the dwelling to be sold only in association with the Boatyard no longer serves a planning purpose and can be discharged.

7. Conclusion

- 7.1. By removing the occupancy restriction and discharging the associated S106 obligation this will enable the thriving Boatyard business to continue providing both employment and an income to the Mr and Mrs Buttifant's son and his family in the event that the dwelling is sold separately to meet future care costs without impacting on their son's financial situation. In addition, by allowing the existing Boatyard business to continue without impingement this will also enable the business to maintain its contribution to the aims of The Broads as an internationally important wetland promoting opportunities for understanding and enjoying the special qualities of the Broads by the public.

8. Recommendation

- 8.1. It is recommended that Condition 2, occupation of dwelling, of Planning Permission BA/2014/0220/COND is removed.
- 8.2. It is recommended that the planning obligation under S106 Agreement dated 11 May 1999 and the associated Deed of Variation agreement dated 15 March 2015 are discharged.

9. Reason for recommendation

- 9.1. The removal of the occupancy restriction, while contrary to Policy DM35 no longer meets a specific planning need and given the established community and services available in Ludham as well as its accessibility, Swallow Cottage is not an isolated property without access to everyday facilities and services which in this instance, materially outweighs the requirement to comply with Policy DM35 of the Local Plan 2019.
- 9.2. It has also been demonstrated that it is not possible to comply with criterion (j) of Policy DM38 of the Local Plan 2019 as the owner/occupiers of Swallow Cottage do not wish to sell the Boatyard business which they have built over many years.
- 9.3. Evidence submitted with both applications has demonstrated that the occupancy restriction related to Swallow Cottage is no longer relevant and no longer meets a specific planning need. It therefore follows that the associated S106 obligation to only sell Swallow Cottage in association with the Boatyard operation is no longer relevant and therefore can be discharged.
- 9.4. By allowing the removal of the occupancy restriction and associated S106 obligation, this will help secure the longevity of the thriving Boatyard business which currently provides employment and an income to the Mr and Mrs Buttifant's son and his family without any future impingement, supported by Policy DM26 of the Local Plan 2019. In addition, the continued provision of boatyard operations is vital to the future of the Broads for existing and future generations to enjoy.

Author: Jane Fox

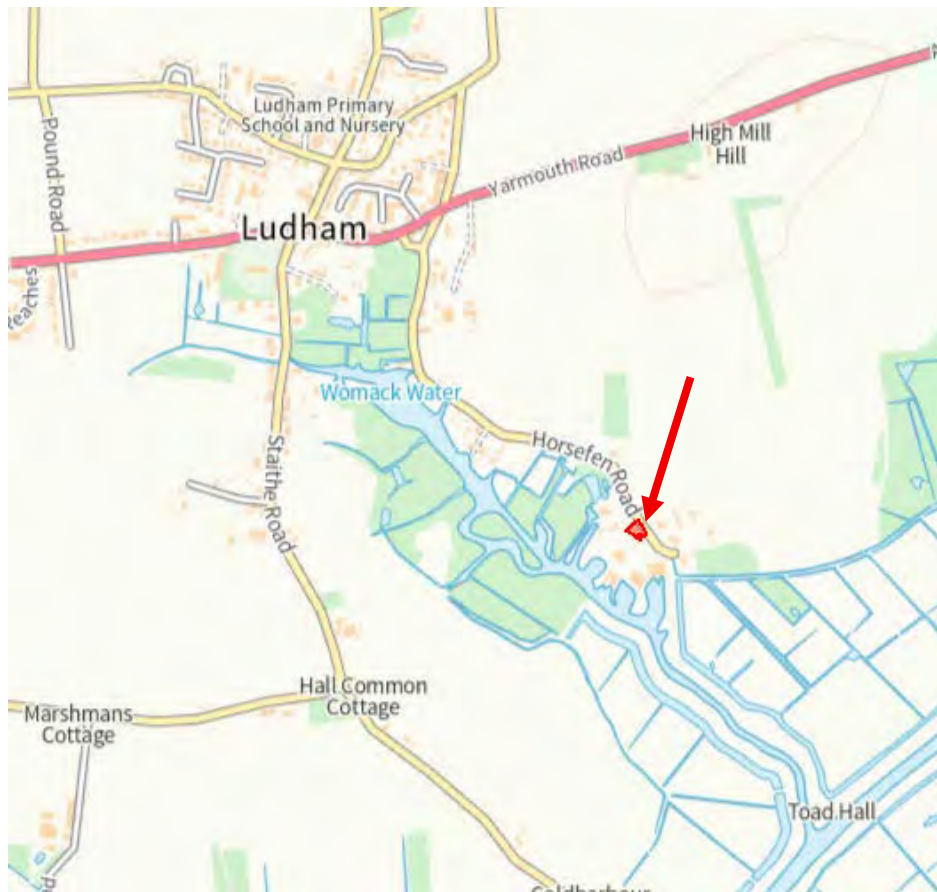
Date of report: 30 June 2025

Background papers: N/A

Appendix 1 – [Location map](#)

Appendix 1 – Location maps

BA/2025/0079/COND & BA/2025/0141/OTHER Swallow Cottage, Horsefen Road, Ludham



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Planning Committee

18 July 2025

Agenda item number 7.2

BA/2025/0077/FUL Wherry Cottage, 50 Puddingmoor, Beccles

Report by Planning Officer

Proposal

Redevelopment of site with 3 new dwellings

Applicant

A T Bent Properties Ltd

Recommendation

Approve with conditions

Reason for referral to committee

A departure from the development plan policies

Application target date

24 June 2025

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1. Description of site and proposals

- 1.1. The subject site contains a twin pitched and gabled roof building comprising a residential flat above a ground floor store, the building is located to the eastern end of a boatyard site, on the western side of Puddingmoor in Beccles. The site is situated within the riverside part of the Beccles Conservation Area and is clearly visible from Puddingmoor, from above on Ballygate and from the River Waveney. The sloping nature of the old valley side means that the dwelling is in effect split level presenting a single storey to Puddingmoor and Ballygate and two storeys within the boatyard. In views from within the boatyard the building has an unusual appearance with windows serving the first floor only, although it is noted there are two blocked up openings at ground floor level, one an entrance, and the other a window. The north facing façade is particularly unusual in providing only one modest opening, the wall comprising waney edge boarding, and the ground floor providing squat openings along most of its length, resulting in a confusing building scale. The property in part forms a portion of the historic boundary wall between the site and Puddingmoor resulting in a strong and positive element of streetscene within the conservation area. Residential properties face the property on the opposite side of Puddingmoor, a public car park and Waveney Meadow sit to the south/south-west of the wider boatyard site, and a commercial property sits directly to the north, beyond which are residential properties.
- 1.2. The proposal is for a redevelopment of the site comprising demolition of the existing building which provides a single unit of residential accommodation and store, and replacement with a building with a much larger footprint. The existing building footprint is 72sqm, the proposed building footprint is 190sqm. The proposed building length extends further into the boatyard area by approximately 4 metres and

represents a near doubling in width. The overall height is for the most part not increased. The building in design partly replicates the twin pitched and gabled roof, although with a lower perpendicular pitched roof at a slightly lower level between the two gabled elements. The subject site includes parking to the front (south elevation) of the dwellings, a cycle store and a bin store, with private amenity space for each dwelling to the rear (north elevation) of the dwellings.

- 1.3. The existing building is predominantly constructed of brick with a pantiled roof, the exception to this being the waney edge boarded façade on the north elevation, and a rendered wall fronting Puddingmoor. The proposed building would comprise a mix of brick and render to the south elevation, brick at ground floor and timber boarding at first floor to the north and west elevations, and brick to the east elevation. The roof covering would be pantiles. The existing boundary wall on Puddingmoor will be retained, this would include the street side wall of the existing building below eaves level, with the current window and gate openings replaced with an iron gate and railings.
- 1.4. The site is in the Beccles Conservation Area and the building referred to in the Conservation Area Appraisal but is not included in the list of Non-Designated Heritage Assets. The site is located in the Beccles Neighbourhood Plan area and the Angles Way footpath runs along Puddingmoor and passes the site.
- 1.5. The site is outside of flood zones 2 and 3, although is directly adjacent to flood zone 2. It is outside the Wensum and Broads Nutrient Neutrality Catchment Area.

2. Site history

- 2.1. In 2015 planning permission was granted for the demolition of most of the existing sub-standard store with residential flat over, and the erection of a store and shower block to ground floor level with residential flat over (planning reference BA/2014/0420/FUL).
- 2.2. In 2016 the above planning permission was amended to allow alterations to entrance area and internal layout (planning reference BA/2015/0392/COND).
- 2.3. In 2024 an application was submitted for redevelopment of site with 3 new dwellings. The application was withdrawn (planning reference BA/2024/0340/FUL).

3. Consultations received

Parish Council

- 3.1. The committee still strongly objects to this application.
- 3.2. The committee considers the plans inappropriate for this part of the conservation area and believes they would intrude upon the streetscape.

Beccles Society

- 3.3. The Beccles Society objects to this second proposal to demolish Wherry Cottage and replace it with a terrace of three houses. While not a listed building, Wherry Cottage is specifically mentioned in Beccles Conservation Area Appraisal when describing the character of Puddingmoor. The building's historic use was originally light industrial, and it was used in connection with the granary and malthouse on the site. It is a fascinating survivor and now rare survival which harks back to the earlier uses of the buildings along the river. We feel that its loss would start to erode part of the former industrial character of this part of the river frontage.
- 3.4. The proposed design would create a building of a larger volume than the existing. The design of the roof would be raised above the existing with the potential loss of views from Puddingmoor. While we appreciate that the developer has tried to use materials which are in the vernacular style, The design of the new facades bears little relation to the existing building that it replaces in particular, the quirky chimney flue that projects from the south wall.
- 3.5. It is unfortunate that it has been allowed to deteriorate to the extent that there is little option but to rebuild. The Beccles Society would question, to what extent building requires rebuilding and whether there were possibilities to save and maintain the brick existing facades and strip out and reinstate the rotten timber elements and roofs reusing the existing pantiles.
- 3.6. We suggest, that as this is a rare example of Puddingmoor's former industry, every effort should be made to retain elements and reinstate it as it was, rather than over-develop the site and lose the openness of this part of streetscape which allows long views onto the Waveney valley. The repaired/reconstructed elements of the building would ensure that the character of the conservation area is maintained and enhanced.

The Broads Society

- 3.7. The Broads Society objects to the amended proposal on the basis of it being an unacceptable overdevelopment of the site which has a detrimental impact on the character of the Conservation Area.

Suffolk County Council (SCC) Highways

- 3.8. No objection subject to conditions.

Suffolk Fire and Rescue Service

- 3.9. Advice given.

East Suffolk Council Environmental Health Officer

- 3.10. Environmental Protection can advise that, despite the recommendation to carry out soil testing upon completion, it is satisfied from the Tier 1 assessment that the development poses a low risk to end users, the environment and construction workers/those in the vicinity.

- 3.11. Nevertheless, if contamination is identified post construction, the Local Planning Authority / Environmental Protection will need to be notified and provided with an updated conceptual site model detailing how this will be remediated. This can be addressed by condition.

BA Heritage and Design Manager

- 3.12. Comments in response to receipt of amended plans

- The reduction in length of the unit next to Puddingmoor is an improvement and improves the proportions of the building as well as the street frontage.
- It is also considered that the addition of chimney stacks and the proposed changes to the fenestration, segmental brick arches and addition of a plinth are also an improvement.
- Although I have no objection to the proposed cycle store design, it does not work in this location as there would only be approximately 50cm between the cycle store and a parked car adjacent to it. This needs to be reconsidered.
- It is noted that a red brick wall is proposed along the northern boundary. Elevations of this will be required but could potentially be conditioned.
- It has been stated that there will be no changes to the ground levels on the west side of the retaining wall between the site and Puddingmoor and also that the proposal will not affect the stability of the wall. Although a structural survey has not been provided as requested, this is acceptable given that the wall is within the Beccles Conservation Area and as such would need planning permission for works to it. As previously stated, the wall is an important feature within this part of the conservation area and as such permission would not be granted for alterations to it. However, its appropriate repair as part of the application would be strongly encouraged.
- I had also requested further information on the 'wine tunnels'. However, it has been stated that the Section 78 Dangerous Buildings notice precludes access at present. As such, please could a condition be attached to state that following the demolition of the building but prior to further redevelopment, a survey of the wine tunnels (drawings and photographic survey) should be carried out, along with details of proposals to retain and repair them.
- It will be important that all joinery details are conditioned along with material samples. High quality materials will be expected including timber joinery, dark-stained timber cladding to the north elevation, a good quality red brick blend and clay pantiles.

4. Representations

- 4.1. Four local residents raised objections to the proposal, summarised as follows:

- The proposed development spoils the character of this part of Beccles and mars the much-photographed view from Stepping Hill and parts of Ballygate.
- The view from Stepping Hill and above will be lost for good, I'm sure many people don't realise that with the roof line and building of the 3 new properties, you will no longer see the boats and trees to the valley ascending Stepping Hill steps.
- Original plans to replace to replace like for like footprint size have developed into a row of houses.
- Tripling the size of the original seems wholly inappropriate.
- The roof of the proposed development will appear enormous when viewed from Puddingmoor.
- Little or no storage space inside and outside.
- Puddingmoor is a narrow road, already heavily congested with traffic, not only from Puddingmoor residents also people parking to work in town. Likewise, a huge volume of continuous pedestrians and cars visiting the Lido.
- I cannot think of anything worse than 3 new build houses in a picturesque conservation area street like Puddingmoor. Admittedly the road has a mix of ages of property, but they are all pre conservation area time and now tend to blend in.
- I cannot see how the proposed development can enhance or protect the character of this historic road and only open the floodgates to future erosion of conservation, history and character.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
 - DM2 - Water Quality and Foul Drainage
 - DM4 - Water Efficiency
 - DM5 - Development and Flood Risk
 - DM11 - Heritage Assets
 - DM13 - Natural Environment
 - DM16 - Development and Landscape
 - DM21 - Amenity
 - DM22 - Light pollution and dark skies
 - DM23 - Transport, highways and access

- DM35 - Residential development within defined Development Boundaries
- DM40 - Replacement Dwellings
- DM43 - Design

5.3. Material planning considerations:

- National Planning Policy Framework
- Planning Practice Guidance
- Beccles Conservation Area Appraisal
- Beccles Neighbourhood Plan
- Landscape Character Area 3 Waveney - Barsham, Gillingham and Beccles Marshes
- Design Guide and Code for the Broads

6. Assessment

6.1. The proposal is in two parts, firstly the demolition of the existing building with a store at ground floor level and a single unit of residential accommodation at first floor level, and secondly the construction of a replacement building with a larger footprint, providing three units of residential accommodation at ground and first floor level. The main issues in the determination of this application are the principle of development, the design and appearance of the proposed building, impact on the character of the Beccles Conservation Area, landscape and street scene, and impact on neighbouring amenity and privacy.

6.2. Amendments to the building were made in response to consultation comments made by the BA Heritage and Design Manager, this prompted a second consultation. Comments have been received from the BA Heritage and Design Manager; members will be updated verbally should any further comments be received.

Principle of development

6.3. In relation to the demolition of the existing building, the building owners have been served with a Section 78 Dangerous Building Notice by East Suffolk Council, a structural survey has been carried out providing evidence that the building is in a very poor condition, and the demolition of the building was assessed in 2015 under planning reference BA/2014/0420/FUL and approved. The BA Heritage and Design Manager commented that 'the 2014 application allowed for the demolition of the building due to its poor condition and the erection of a new dwelling. The building has continued to deteriorate since this date to the point where a Section 78 Dangerous Building Notice has now been served on the building. It has therefore been demonstrated that demolition of the property is required'. The demolition of the existing building is therefore considered to be acceptable in principle.

- 6.4. The existing building has an established residential use, therefore the redevelopment of the site to provide residential accommodation would be acceptable in principle. However, the proposal is for the replacement of one unit of residential accommodation with three units of residential accommodation and it is outside of the development boundary defined in the Broads Local Plan.
- 6.5. Proposals for new residential development are considered against Policy DM35 which stipulates that it will only be permitted within defined development boundaries. The purpose of DM35 is to promote sustainable development, this is done through consolidating 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.
- 6.6. Policy DM35 goes on to state that outside the defined development boundaries, new residential development will not be permitted except in the circumstances defined in the other housing policies. Replacement dwellings outside of the development boundaries are considered under Policy DM40 of the Local Plan for the Broads, this stipulates that replacement dwellings will be permitted on a one-for-one basis only, as this application is for the replacement of one existing dwelling with three proposed dwellings the proposal would not accord with Policy DM40 and again would therefore be a departure from the Local Plan.
- 6.7. The purpose of a development boundary in promoting sustainable development is to provide a mechanism for the appropriate location of new residential development. It is recognised that the site is not within a development boundary defined in the Broads Local Plan however it is adjacent to the settlement limit defined for Beccles in the Waveney Local Plan, now under East Suffolk Council. This recognises that Beccles is a large market town and has very good range of services commensurate with its town status including a hospital and two high schools. The site is less than 200m from the nearest edge of the town centre, and approximately 500m from the hospital. Public transport links are very good with a range of buses to numerous destinations, and a railway station with services to Lowestoft and Ipswich.
- 6.8. On the basis of the above information, the site is not considered to be remote from services, the town of Beccles has all the services required for everyday living a broad range of services. The site is considered to be in a sustainable location and does not conflict with the criteria of the Settlement Study used to define sustainable patterns of development and which formed part of the evidence basis of the Local Plan for the Broads. The site is previously developed land and there is residential development to the north and east of the site. The site assessed on its own merits is considered to be a sustainable location which complies in principle with the NPPF, therefore on balance it is considered that, taking into account the site location and proximity to services and transport options, the proposed increase in residential provision from one unit to three

units is considered acceptable and the departure from Policies DM35 and DM40 of the Local Plan for the Broads can be justified.

Design and impact on the landscape

- 6.9. The existing building is of a straightforward design, with its interest being in part forming the boundary wall on Puddingmoor, and in providing a store at ground floor level reflecting the previous use of the building. The BA Heritage and Design Manager has assessed the application and commented as follows: the building is much-altered and not a great deal of historic fabric survives, but it is of some historic interest and retains features that appear to indicate a commercial as well as residential use, presumably in conjunction with the granary and malthouses that previously occupied the site.
- 6.10. As well as contributing to the history of the conservation area, the existing building contributes to the streetscene, primarily due to its distinctive roofline and gables, which due to the changes in levels are visible above the red brick wall that separates the boatyard from the street. This wall is also an important feature, and the front wall of the building is incorporated into it, which creates a strong and positive element of streetscape. It is noted that this will be retained as part of the proposal, which is beneficial, although the new building will be slightly set back.
- 6.11. Due to the changes in level between pavement level and the site, the pair of steeply-pitched red pantiled roofs and slender chimney stack, along with the waney-edged weather-boarded north-facing gables are particularly prominent in terms of their streetscape value. These elements are visible as one travels north and south along Puddingmoor. It is recognised that the proposed demolition of the existing building will therefore result in a change to this. However, the amendments made to the scheme are an improvement; in particular the reduction in the roof height so that the ridge height is now only slightly taller than that of the existing building, changes to a more traditional roof form and the adoption of a more staggered building plan - all of which help to reduce the massing of the building. More traditional fenestration and the use of timber cladding as well as other vernacular materials should also ensure that the building relates more appropriately to the conservation area.
- 6.12. In their initial response the BA Heritage and Design Manager made recommendations to improve the design and appearance of the proposed building, this was followed by the submission of amended plans to which the following updated response comments were received. The reduction in length of the unit next to Puddingmoor is an improvement and improves the proportions of the building as well as the street frontage. It is also considered that the addition of chimney stacks and the proposed changes to the fenestration, segmental brick arches and addition of a plinth are an improvement.
- 6.13. Further information on the 'wine tunnels' had been requested. However, it has been stated that the Section 78 Dangerous Buildings notice precludes access at present. Following the demolition of the building but prior to further redevelopment, a survey of

the wine tunnels (drawings and photographic survey) should be carried out, along with details of proposals to retain and repair them. This can be secured by planning condition.

- 6.14. It will be important that all joinery details are conditioned along with material samples. High quality materials will be expected including timber joinery, dark-stained timber cladding to the north elevation, a good quality red brick blend and clay pantiles, timber barge-boards, cast or aluminium rainwater goods, a coloured render - perhaps to match the render on the building's Puddingmoor elevation - and a high quality brick and clay pantile. This is necessary because of the location of the property within the Beccles Conservation Area and its contribution to the appearance of the site, street scene, and surrounding area.
- 6.15. It is acknowledged that the proposed building is somewhat more domestic in style than the existing building (albeit that did most recently have a domestic use), but it is not out of keeping with other houses along this part of Puddingmoor. There is a variety of design and appearance in the residential dwellings near the site, the proposed building would reasonably complement the existing domestic street scene and sit comfortably within this setting. The prominence of the twin gabled roof is repeated somewhat which acknowledges the previous building and contributes to the appearance of the building within the conservation area, this includes providing timber cladding to the north elevation at first floor level which acknowledges the most prominent aspect of the existing building. The retention of the existing boundary wall is important in maintaining the overall appearance of this element of the site, and in maintaining the existing openings (re-provided with iron railings) offers evidence of the previous situation and ensures an acceptable appearance of the street scene.
- 6.16. There are views of the site down from Ballygate, a road that runs parallel to Puddingmoor approximately 40 metres to the east, and at a much higher level than Puddingmoor. The views are around where Stepping Hill leads down to the site, with two pockets of views, one giving clear views of the existing building, the other a little more obscured by buildings and vegetation, but still visible to some extent. From this level the site is always seen in the context of the boatyard, with workshop buildings visible beyond the building, dry and wet boat storage, and a mooring dyke leading into the site from the River Waveney beyond. The buildings to the foreground (between Puddingmoor and Ballygate) are red brick and pantiled, an appearance which is common to the existing building and would be replicated in the proposed building. There would be some change in the overall view perception due to the increase in length of the proposed building but would still be seen within the context of the boatyard and buildings, and would not interrupt views of the River Waveney and landscape beyond.
- 6.17. The site is visible from the River Waveney which is located approximately 140 metres to the west. On the opposite bank there is a publicly accessible footpath which runs along the riverbank. The subject site is visible from the river and path beyond. Due to the

various buildings and workshops in close proximity to the river, along with the distance from the vantage points, and the backdrop of a continuous band of development on noticeably higher ground, the existing building is not a prominent part of the landscape and river scene. The proposed building, taking into account its scale, design, appearance, and materials, would be acceptable in terms of the character and appearance of the landscape and river scene, and would protect the character and appearance of the Beccles Conservation Area.

- 6.18. On this basis the revised design of the replacement building is considered to be an acceptable design which would be appropriate for its location and would protect the character and appearance of the landscape, river scene, and conservation area, and is therefore considered to be in accordance with Policies DM11, DM16, and DM43 of the Local Plan for the Broads.

Amenity of residential properties

- 6.19. There are residential properties to the opposite side of Puddingmoor. The existing dwelling appears single storey from the point of view of Puddingmoor with a height of 2.75 metres above the lowest section of boundary wall. The proposed building would be 0.75m taller, although further from the boundary wall on Puddingmoor by 1.25m. The proposed building would not have an unacceptable impact on the amenity and privacy enjoyed by the residents on Puddingmoor opposite the subject site.
- 6.20. Within the wider boatyard site is a site office and a building occupied by Quayside Conservatories. The proposed building would not impact on the function or openings of those buildings.

- 6.21. With regard to the above the proposed replacement building is acceptable with regard to protecting neighbour amenity under Policy DM21 of the Local Plan for the Broads.

Ecology and biodiversity

- 6.22. The application has been assessed by the BA Ecologist who made a request for bat emergence surveys. These were subsequently submitted and reviewed with no objections to the proposed development raised subject to conditions. The proposed development is therefore considered acceptable with regard to Policy DM13 of the Local Plan for the Broads.
- 6.23. A Biodiversity Net Gain statutory metric and Design Stage Report were submitted in support of the application. This demonstrates that the post development site will provide well in excess of the BNG on-site, post-intervention required 10% increase in appropriate habitat. The Biodiversity Net Gain will be secured by planning condition supported by an informative, subject to which the proposal is considered to be acceptable with regard to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

Highways

- 6.24. The proposal includes 6 parking spaces which equates to 2 spaces per dwelling, and an open fronted cycle storage area. The application has been assessed by Suffolk County Council as Highways Authority which has raised no objections subject to conditions. The proposal is therefore considered acceptable with regard to Policy DM23 of the Local Plan for the Broads.

Other issues

- 6.25. Taking into account the use of the site as part of a wider boatyard site a contamination desk study and risk assessment was submitted in support of the application. This was assessed by the East Suffolk Council Environmental Protection team which raised no objections subject to conditions.
- 6.26. The site is within Dark Sky Zone category 2, with Policy DM22 requiring strict control of external lighting, it is noted that no external lighting is shown on the submitted plans and this can be controlled by planning condition. In relation to internal lighting, the policy seeks the avoidance of increased light spill from internal lights. The NPPF seeks an approach to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The subject site is within a boatyard, next to commercial sites, and with extensive residential provision to the opposite side of Puddingmoor and at sites to the north. While the proposed building is larger and has more openings, the openings facing towards the river and open landscape beyond number the same as the existing. Any increase in light spill, taking into account the existing situation, surrounding development, and the urban setting would not be unacceptable in relation to impact on dark skies. The proposal is therefore acceptable with regard to Policy DM22 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The proposal development is for the replacement of a building providing a single unit of residential accommodation and store with a building providing three units of residential accommodation. While the site lies outside of a defined settlement boundary and includes additional residential development and is technically a departure from the Local Plan for the Broads Policies DM35 and DM40, there are a number of considerations which weigh in favour of the proposal. The site has been assessed as a sustainable location with good links to services and good levels of public transport.
- 7.2. The proposed building has an acceptable design and is of a suitable scale for the site and setting, it would not be detrimental to the character of the surrounding area, street scene, or Broads landscape, and would protect the character and appearance of the Beccles Conservation Area. The proposed building and its use would not unduly impact on the amenity and privacy enjoyed by neighbouring residents. The proposal is acceptable in consideration of the area dark skies status, will have no adverse impact on ecology, and has provided sufficient information regarding Biodiversity Net Gain. In these respects, the proposal is considered to be in accordance with Policies DM2, DM4,

DM11, DM13, DM16, DM21, DM22, DM23, DM40 and DM43 of the Local Plan for the Broads, and the National Planning Policy Framework (2024) which are material considerations in the determination of this application.

8. Recommendation

8.1. That planning permission be granted subject to the following conditions:

- Time limit
- In accordance with plans and documents
- Details of Demolition Method Statement
- Details of Construction Environment Management Plan (CEMP)
- Submission of full historic building recording
- Details of materials and large scale details of joinery
- Details and elevation of red brick boundary wall
- Details of BNG plan
- Details of electric vehicle charging infrastructure
- Archaeological watching brief
- Wine tunnels survey (drawings and photographic survey) and details of proposals to retain and repair them
- Landscaping retention
- Ecologist check if demolition during main bird breeding/nesting season
- Water consumption rate of no more than 110 litres/person/day
- Unexpected contamination process
- Noise assessment for all proposed plant and machinery
- No burning of waste
- Provision of areas for manoeuvring and parking of vehicles
- Provision of cycle storage
- Provision of bin storage
- No external lighting without prior written permission
- Roof membrane traditional type 1F bitumen only
- Provision of one integrated bat box & one soffit box
- Provision of nest boxes for house sparrow, robin and starling
- Removal of Permitted Development rights (Part 1 all relevant, and Part 2 Class A)

9. Reason for recommendation

9.1. The development is considered to be in accordance with Policy DM2, DM4, DM11, DM13, DM16, DM21, DM22, DM23 and DM43 of the Local Plan for the Broads. While the residential development is not in compliance with Policies DM35 and DM40 and is therefore a departure from the Local Plan, in this instance other material planning considerations mean that on balance this development is considered to be sustainable development and is therefore acceptable.

Author: Nigel Catherall

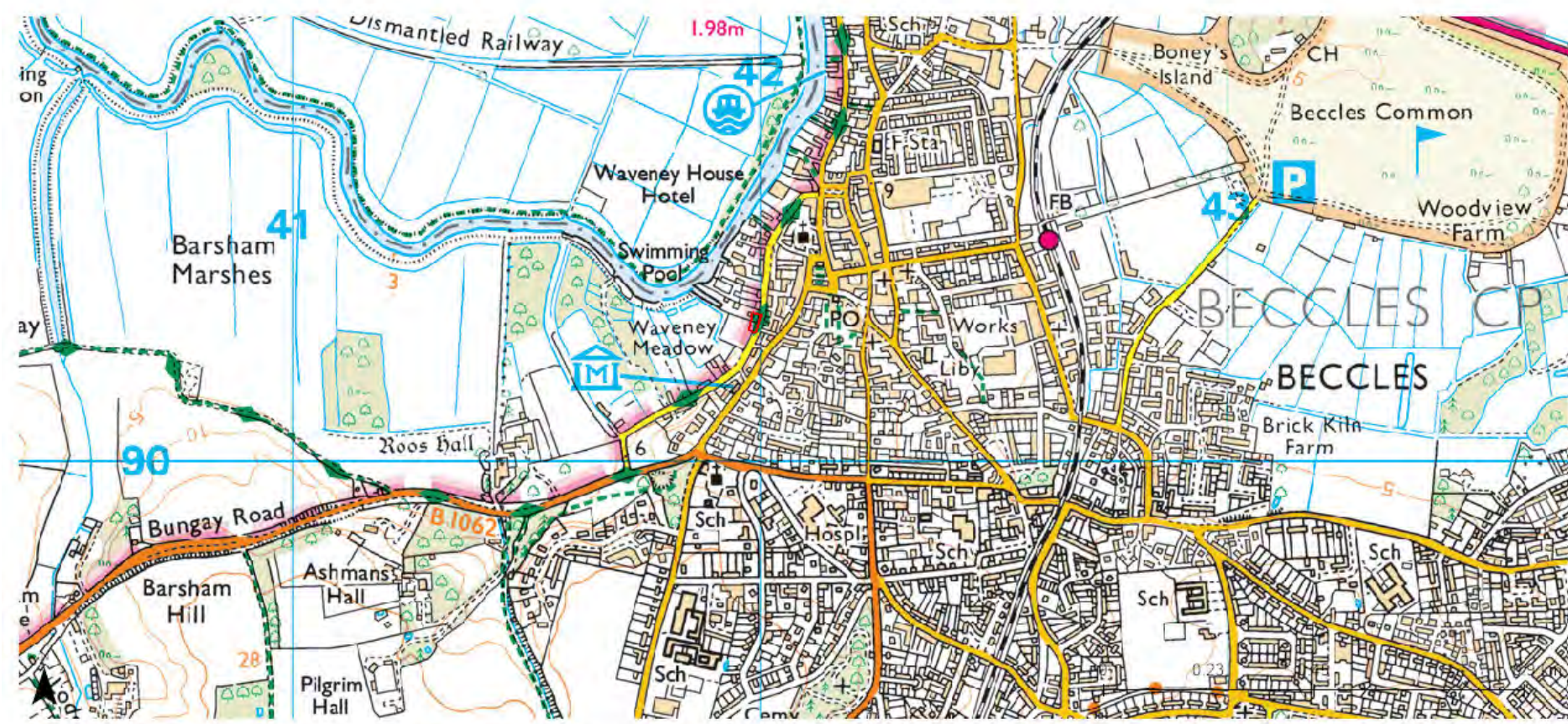
Date of report: 30 June 2025

Background papers: BA/2025/0077/FUL

Appendix 1 – Location map

Appendix 1 – Location map

BA/2025/0077/FUL - Wherry Cottage, 50 Puddingmoor, Beccles, NR34 9PL



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Planning Committee

18 July 2025

Agenda item number 7.3

BA/2025/0120/FUL Broad View, Fleet Lane, South Walsham

Report by Planning Officer

Proposal

Demolish existing cabin and outbuildings. Replace with new dwelling house. Install canoe and dinghy pontoon along front for safe egress.

Applicant

Mr Alan Goodchild

Recommendation

Approve with conditions

Reason for referral to committee

Applicant is BA Member

Application target date

27 June 2025

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1. Description of site and proposals

- 1.1. The subject comprises a residential plot on the eastern bank of South Walsham Broad, accessed via Fleet Lane, a narrow tarmacked road which runs parallel to the Broad on part of its eastern side. Fleet Lane in this section is a private road also forming a Public Right of Way, known as South Walsham Footpath 1. The plot contains a cabin which has a lawful use as a dwellinghouse located adjacent to the northern boundary of the site, to the immediate east of which is a storage shed. The cabin features black painted timber walls and a thatched roof. Both the cabin and shed are located on the eastern half of the plot which is mostly hard surfaced and includes areas for dinghy storage, car parking, and slipway access. The western half of the plot is laid to lawn. The southern side of the site features a mooring cut with a slipway to the rear.
- 1.2. The area is predominantly rural, with development around the Broad being limited to the areas along Fleet Lane and the adjacent Kingfisher Lane. The remaining areas around the Broad comprise woodland. Development along Fleet Lane and Kingfisher Lane is generally small and domestic in scale. There is a boatyard to the northern end of Fleet Lane which offers moorings, launching and other boating services, currently operated by Bondons Moorings Ltd. The proposed location is in an area dominated by chalet type dwellings and boathouses adjacent to the water's edge. The buildings are almost exclusively clad with dark-stained timber shiplap cladding and have thatched roofs.
- 1.3. The Broad bank along the developed areas is hard engineered, predominantly with timber quayheading. Along Fleet Lane the boundary to the Broad side of the road is generally a mix of >1.8m high closed panel fences and hedges, the obvious exception being the South Walsham staithe and slipway which is open to the road.

- 1.4. The site is located within flood zones 2 and 3, with the proposed dwelling being sited in both flood zones. The site is not within a Conservation Area and does not contain any listed buildings.
- 1.5. The proposal is to demolish the existing cabin and shed, and to replace these with a 1.5 storey dwellinghouse featuring a gable fronting the Broad and 2 gabled roof dormers to either side of the roof. The dwelling would measure 8.0m x 10.5m, with a maximum height of 8.05m, falling to 4.2m at eaves. The external finish of the dwelling would be black stained timber cladding with a cedar shingle roof. The dwelling would be raised above ground level by 0.91m, with hit and miss boarding to screen the void beneath the building, apart from on the northern side where the proximity of the boundary fence would screen the void. A raised terrace is proposed to the western and southern sides of the dwelling, along with a smaller section in a recessed area within the south-west corner of the dwelling. The roof would include the provision of flush fitting solar pv panels sited between the two dormers on the southern roof slope.
- 1.6. In addition to the proposed dwellinghouse, the application proposes a canoe and dinghy pontoon to the front of the existing hard engineered bank, this would measure 13m by 1.9m. At the eastern end of the site the concrete hard surface would be removed, with bound gravel hardstanding provided for access, parking and slipway use. To the south and west of the dwelling would be laid to lawn.

2. Site history

- 2.1. In 2020 planning permission was granted for the re-location of the southern boundary of the site, provision of a replacement building on the site to the south, and relocation of the site access. The permission included the replacement of timber quay heading with galvanised steel, and a new mooring cut (planning reference BA/2020/0055/FUL).
- 2.2. In 2022 a Lawful Development Certificate for established use of a building as a dwellinghouse within Class C3 was not issued due to a lack of evidence being provided in support of the application (planning reference BA/2022/0475/CLEUD).
- 2.3. In 2023 a Lawful Development Certificate for established use of a building as a dwellinghouse within Class C3 was issued following submission of additional evidence (planning reference BA/2023/0467/CLEUD)

3. Consultations received

Environment Agency

- 3.1. No objection subject to flood risk considerations

Norfolk County Council Public Rights of Way

- 3.2. We have no objection in principle to the application but would highlight that a Public Right of Way, known as South Walsham Footpath 1 is coincident with Fleet Lane. The

full legal extent of this footpath must remain open and accessible for the duration of the development and subsequent occupation.

BA Historic Environment Manager

- 3.3. No objection subject to conditions

BA Ecologist

- 3.4. No objection subject to conditions

BA Project Support Officer

- 3.5. Works Licence required for the installation of the Pontoon. Confirmation pontoon will be used for just Dingy & Canoes and not for large, beamed vessels.

BA Navigation

- 3.6. From the plans the pontoon is just over 2 metres wide. Providing it is not used for permanent mooring of large vessels, and kept for the use of canoes, kayaks and small dinghies this should not impact on the navigation.

4. Representations

- 4.1. One representation was received, summarised as follows:

- This development warrants careful scrutiny, given its potential implications for the environment, the local community, and the future of our cherished Broads.
- Concern this project might encourage landowners with smaller plots and existing structures such as cabins or boathouses to seek similar permissions to expand or develop their properties.
- Troubled by the prospects of how foul water management will be handled post-construction. Particularly concerned about the disposal of effluent.
- Appears to be limited space around the proposed site for an effective and compliant sewage treatment plant.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
- DM5 - DM2 - Water Quality and Foul Drainage
 - DM4 - Water Efficiency
 - DM5 - Development and Flood Risk
 - DM6 - Surface water run-off
 - DM13 - Natural Environment

- DM16 - Development and Landscape
- DM21 - Amenity
- DM22 - Light pollution and dark skies
- DM23 - Transport, highways and access
- DM31 - Access to the Water
- DM40 - Replacement Dwellings
- DM42 - Custom/self-build
- DM43 - Design

5.3. Material planning considerations:

- National Planning Policy Framework
- Planning Practice Guidance
- Self-build and custom Housebuilding Act 2015
- Landscape Character Area 23 Bure Valley - Wroxham to Fleet Dyke, South Walsham
- Design Guide and Code for the Broads
- Broads Authority Flood Risk SPD

6. Assessment

- 6.1. The proposal is for demolition of the existing cabin and shed, and replacement with a 1.5 storey dwellinghouse. The main issues in the determination of this application are the principle of development, the design and appearance of the proposed dwelling, impact on landscape and river scene, impact on neighbouring amenity and privacy, and flood risk and biodiversity net gain.

Principle of development

- 6.2. The site lies outside of a development boundary. Policy DM40 of the Local Plan for the Broads permits replacement dwellings in this circumstance on a one-for-one basis. The site contains a cabin which has a lawful use as a dwellinghouse. Taking into account the existing dwelling would be demolished to make way for the proposed dwelling, the proposal is considered to represent one-for-one development and therefore acceptable in principle.
- 6.3. Policy DM40 provides criteria for the consideration of a proposed replacement dwelling. Under criterion a) the policy requires that the existing dwelling has a lawful use. The lawful use of the existing dwelling was established through a Certificate of Lawful Use and is therefore compliant with criterion a) of Policy DM40.

- 6.4. Under criterion b) the policy requires that the existing dwelling has no historic, architectural or cultural significance making it worthy of retention. The existing dwellinghouse does not retain historic, architectural, or cultural value to be worthy of retention and its loss is therefore acceptable with regard to criterion (b) Policy DM40.

Design and impact upon the landscape

- 6.5. Criterion c) of policy DM40 requires that the scale, mass, height, design and external appearance of the replacement dwelling are appropriate to its setting and the landscape character of the location. Design considerations are also assessed against Policy DM43 and landscape considerations against Policy DM16, along with Landscape Character Areas 23: Bure Valley.
- 6.6. It is acknowledged that the building is very different in all aspects to the existing chalet, save for the external cladding material. Although the proposed building will be substantially larger than the existing building, the simple form and use of black timber cladding should ensure that the building has some visual relationship with its neighbours. It will have a slightly more contemporary form, but as it is positioned between the more traditional buildings to the south and the more recent utilitarian buildings of the boatyard to the north this is considered acceptable.
- 6.7. The appearance of the Broad edge in this location is developed, for the plots running parallel to Fleet Lane there is a near continuous band of development, with the only exception still featuring an engineered bank edge, lawn, and close boarded boundary fence. In this context the proposed dwelling would not appear unexpected or out of place, taking into account the scale of some development on this section of the Broad, particularly the dwellings known as Fleet House (100m north of the subject site), The Boathouse (40m south of the subject site), Staithside (140m south of the subject site), Waterside (230m south-west of the subject site), and Kingfisher (245m south-west of the subject site), would not represent an overbearing or dominant form of development, and is of a scale which is comparable to other dwellings on Fleet Road and visible from the Broad.
- 6.8. There have been extensive pre-application which has resulted in improvements to the proposed scheme including a reduction in size of the building, a design more appropriate to its setting, a refined appearance, a better quality of materials, and a reduction in glazing. There has been much discussion regarding the roofing material, which would preferably have been thatch. However, the use of solar PV panels is to be welcomed and these are not compatible with thatch roofing. As such, the proposed cedar shingles are considered an acceptable compromise, being a natural and vernacular material used in the vicinity (for example next door), which will weather-down to a grey not dissimilar to that of thatch, whilst enabling the property to be more sustainable which will provide some wider public benefit. The solar panels will be integrated into the roof and arranged in such a way that their visual impact should be limited, especially once the shingles become a darker grey.

- 6.9. Views from Fleet Lane of the Broad are to the most part restricted by boundary fences and hedges, generally to 1.8m as a minimum, this includes the subject site. Due to the presence of a tall fence adjacent to the road, views of the broad across the site from the road would not be impacted by the provision of a building of a larger size than the existing. Although the proposed building will be more visible, in the context of existing development along Fleet Lane this will not have an unacceptable impact on the wider landscape and street scene.
- 6.10. In order to ensure that the design and appearance of the building is not undermined it is recommended that Permitted Development rights for works under Part 1 (Development within the curtilage of a dwellinghouse) are removed, this would be secured by planning condition.
- 6.11. Taking into account the above assessment the proposal is considered to be acceptable in terms of design and impact on the landscape, with regard to criterion c) of the Policy DM40, along with Policies DM16 and DM43 of the Local Plan for the Broads.

Amenity of neighbouring properties

- 6.12. The subject site sits to the north of a leisure/mooring plot, and to the south of a mooring cut within the wider Bondons boatyard site. The existing building is adjacent to the northern boundary of the site, this siting would be replicated by the proposed building. While the scale of the building would noticeably increase, taking into account the use of the boatyard site, and the layout including a mooring cut adjacent to the shared boundary, there would be no loss of amenity or privacy for users of that site.
- 6.13. The adjacent property to the south has a summerhouse to the Fleet Lane side of the site, to the front of which is grassed amenity space with a mooring cut roughly to the centre. Due to the siting of the proposed building there is a separation to the plot to the south, this along with the 1.5 storey scale would ensure that the building is not an overbearing presence when viewed from the neighbouring site, and due to the orientation of the sites would not result in overshadowing or a loss of sunlight to the amenity areas to the Broads side of the site. The proposed dwelling includes a glazed first floor balcony, however this is not an uncommon feature in this area, and taking into account the open Broads frontage of the properties, there would not be an undue loss of privacy for users of the site to the south of the subject site.
- 6.14. Taking into account the above assessment the proposal is considered to be acceptable in terms of the amenity and privacy of neighbours, with regard to Policy DM21 of the Local Plan for the Broads.

Flood risk

- 6.15. Criterion d) of policy DM40 requires that the replacement dwelling would be located within the same building footprint as the existing dwelling or in an alternative location within the same curtilage, which would be at a lower risk of flooding or would provide benefits for landscape, wildlife or cultural heritage. The replacement dwelling is of a larger size than the existing dwelling, however the flood zone categorisation at the site

shows that half the existing building is in flood zone 3, whereas the proposed dwelling would have a larger portion of its footprint within flood zone 2. In this respect the replacement dwelling would be at a lower risk of flooding with regard to the published measures available, and therefore compliant with criterion d). However, this is a simplistic approach which does not address the fact that the proposed building still remains within the same flood zone as the existing. The proposal provides betterment in the raising of the building above ground level, this ensures that the building footprint at ground level of the site is reduced, in doing so this reduces flood risk for residents at the site and provides additional areas for flood waters within the site, both of which are beneficial when considering flood risk.

- 6.16. The Environment Agency (EA) have noted that finished ground floor levels have been proposed at 2.11m AOD which is above the 1% (1 in 100) and 0.5% (1 in 200) annual probability flood level including climate change of 1.52 m AOD and therefore dry in this event. Finished first floor levels have been proposed at 4.77 m AOD and therefore there is refuge above the 0.1% (1 in 1000) annual probability flood level. Flood resilience/resistance measures have been proposed. The EA have raised no objections on flood risk access safety grounds as an Emergency Flood Plan has been submitted, this is considered to be sufficient for the proposal and location. The recommendation from the EA is to sign up for Flood Warnings, as this is an essential part of ensuring the safety of occupants it is proposed to include this as a requirement secured by planning condition.
- 6.17. In order to ensure that the potential for additional and uncontrolled development under Permitted Development rights does not undermine the improvements made in terms of flood risk, it is considered necessary to remove those rights as detailed under Part 1 (Development within the curtilage of a dwellinghouse), this would be secured by planning condition.
- 6.18. The EA has discussed the need to pass the Sequential and Exception Tests as detailed in paragraphs 168 and 170 of the NPPF. As the proposal is for a replacement of an existing dwelling it is considered that the tests as set out in the NPPF do not apply to this application.
- 6.19. The proposed development is considered acceptable in flood risk terms with regard to Policy DM5, criterion d) of Policy DM40, the Broads Authority Flood Risk SPD, and the NPPF.

Highways and public rights of way

- 6.20. The site is established with residential use of the existing cabin, the site being accessed from a private road (Fleet Lane). There is no change to the access to the site and a reasonable level of on site parking is provided. The private road also form part of a public right of way known as South Walsham Footpath 1, the County Council's Public Right of Way team have raised no objection subject to the full legal extent of the footpath remaining open and accessible for the duration of the development and

subsequent occupation. The proposal is therefore acceptable with regard to Policy DM23 of the Local Plan for the Broads.

Other issues

- 6.21. Policy DM4 of the Local Plan for the Broads stipulates that all replacement dwellings will be designed to have a water demand equivalent to 110 litres per head per day. This will be secured by planning condition.
- 6.22. The external areas of the site comprise lawn and hard surfaced areas and are of low ecological value. A preliminary roost assessment was submitted and indicates negligible bat roosting and bird nesting potential in the buildings to be demolished. Planning conditions have been proposed by the BA ecologist to enhance biodiversity at the site. The proposal is acceptable with regard to Policy DM13 of the Local Plan for the Broads.
- 6.23. With regard to Biodiversity Net Gain the applicant stated in the planning application form that the application is exempt from the general Biodiversity Gain Condition, confirming that the dwelling meets the legal definition of "Self-build and Custom Housebuilding" as set out in section 1(A1) of the Self-build and Custom Housebuilding Act 2015. The application conforms with the criteria set out in Regulation 8 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024 and is eligible to an exemption from the mandatory biodiversity gain planning condition. Following this the applicant submitted the Broads Authority Proforma for schemes that are self/custom build providing additional information and confirmation that the application is for a self build dwelling. This is considered sufficient to demonstrate that the proposal is not subject to Biodiversity Net Gain.
- 6.24. The proposal is for a replacement dwellinghouse on a 1 for 1 basis and therefore falls outside of the scope for Nutrient Neutrality.
- 6.25. The site is within Dark Sky Zone category 2, with Policy DM22 requiring strict control of external lighting, this would be controlled by planning condition stipulating that details must be submitted for any proposed external lighting; it is noted that no external lighting is shown on the submitted plans. In relation to internal lighting, local policy seeks the avoidance of increased light spill from internal lights. The NPPF seeks an approach to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. The existing dwelling is predominantly glazed to the broad frontage, although only single storey. The design of the proposed dwelling has evolved through pre-application discussions, the previous iterations being presented in the Planning and Design Statement. It is notable when comparing the previous to the current proposal how the amount of glazing has been reduced, and the level currently proposed is considered to take a reasonable approach in balancing natural light to serve the building, making the most of views across the Broad, while not proposing excessive openings. The level of glazing proposed is comparable to the other inhabited properties fronting South Walsham Broad and

would be in keeping. The proposal is considered to be in acceptable with regard to Policy DM22 of the Local Plan for the Broads.

- 6.26. The proposal includes provision of a canoe platform to the broad frontage of the site. The platform comprises a floating pontoon which covers the area from the northern boundary of the site to the nearest edge of the existing slipway, a length of 13 metres. The platform would extend from the broad edge by a maximum of 2.1 metres. There are existing finger jetties at the site immediately north of the subject site, these protrude into the broad by approximately 8 metres. The BA Navigation team commented that the proposed canoe platform, providing it is not used for permanent mooring of large vessels, and kept for the use of canoes, kayaks and small dinghies should not impact on the navigation. This requirement would be secured by planning condition. The proposal would not have an unacceptable impact on navigation and is therefore acceptable with regard to Policy DM31 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The proposed replacement dwelling is acceptable in principle as the existing dwelling has an existing lawful use, it is a one-for-one replacement, and is not worthy of retention. The proposed dwelling has a good quality design and is of a reasonable scale for the site and setting, it would not be detrimental to the character of the surrounding area or South Walsham Broad and would not unduly impact on the amenity and privacy of neighbours. The proposal provides improvements in terms of flood risk including flood water storage capacity. Subject to the proposed conditions the proposal is acceptable in consideration of the area dark skies status and will have no adverse impact on ecology. The proposed canoe platform would not have an unacceptable impact on navigation. Consequently the proposal is considered to be in accordance with Policies DM2, DM4, DM5, DM13, DM16, DM21, DM22, DM31, DM40, and DM43 of the Local Plan for the Broads, the National Planning Policy Framework (2024), Landscape Character Assessment Area 23, the Design Guide and Code for the Broads, and the Broads Authority Flood Risk SPD which are material considerations in the determination of this application.

8. Recommendation

- 8.1. That planning permission be granted subject to the following conditions:

- Time limit
- In accordance with plans and documents
- In accordance with Pollution Prevention Plan
- In accordance with materials
- Details of large scale details of joinery
- Water consumption rate of no more than 110 litres/person/day

- PROW to remain open and accessible
- Sign up to Flood Warnings
- Void beneath dwelling to remain unobstructed
- No external lighting without prior written permission
- Provision of bat boxes
- Provision of bird cup or box
- Pontoon to be used for dingy and canoes and not for large, beamed vessels
- Removal of Permitted Development rights (Part 1 all relevant)

Author: Nigel Catherall

Date of report: 3 July 2025

Background papers: BA/2025/0120/FUL

Appendix 1 – [Location map](#)

Appendix 1 – Location map

BA/2025/0120/FUL - Broad View, Fleet Lane, South Walsham, NR13 6ED



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Planning Committee

18 July 2025

Agenda item number 8

Enforcement update

Report by Development Manager

Summary

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

Recommendation

To note the report.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
14 September 2018 BA/2018/0047/ UNAUP3	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravans (Units X and Y)	- Authority given to serve an Enforcement Notice requiring the removal of unauthorised static caravans on land at the Beauchamp Arms Public House should there be a breach of planning control and it be necessary, reasonable and expedient to do so. - Site being monitored. October 2018 to February 2019. - Planning Contravention Notices served 1 March 2019.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			• Site being monitored 14 August 2019. • Further caravan on-site 16 September 2019. • Site being monitored 3 July 2020. • Complaints received. Site to be visited on 29 October 2020. • Three static caravans located to rear of site appear to be in or in preparation for residential use. External works requiring planning permission (no application received) underway. Planning Contravention Notices served 13 November 2020. • Incomplete response to PCN received on 10 December. Landowner to be given additional response period. • Authority given to commence prosecution proceedings 5 February 2021. • Solicitor instructed 17 February 2021. • Hearing date in Norwich Magistrates Court 12 May 2021. • Summons issued 29 April 2021. • Adjournment requested by landowner on 4 May and refused by Court on 11 May. • Adjournment granted at Hearing on 12 May. • Revised Hearing date of 9 June 2021. • Operator pleaded 'not guilty' at Hearing on 9 June. Trial scheduled for 20 September at Great Yarmouth Magistrates Court. • Legal advice received in respect of new information. Prosecution withdrawn and new PCNs served on 7 September 2021.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			• Further information requested following scant PCN response and confirmation subsequently received that caravans 1 and 3 occupied on Assured Shorthold Tenancies [27/10/2021] • Verbal update to be provided on 3 December 2021 • Enforcement Notices served 30 November, with date of effect of 29 December 2021. Compliance period of 3 months for cessation of unauthorised residential use and 4 months to clear the site [06/12/2021] • Site to be visited after 29 March to check compliance. 23 March 2022 • Site visited 4 April and caravans appear to be occupied. Further PCNs served on 8 April to obtain clarification. There is a further caravan on site [11/04/2022] • PCN returned 12 May 2022 with confirmation that caravans 1 and 3 still occupied. Additional caravan not occupied. • Recommendation that LPA commence prosecution for failure to comply with Enforcement Notice [27/05/2022] • Solicitor instructed to commence prosecution [31/05/2022] • Prosecution in preparation [12/07/2022] • Further caravan, previously empty, now occupied. See separate report on agenda [24/11/2022] • Planning Contravention Notice to clarify occupation served 25 November 2022 [20/01/2023] • Interviews under caution conducted 21 December 2022 [20/01/2023] • Summons submitted to Court [04/04/2023]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			- Listed for hearing on 9 August 2023 at 12pm at Norwich Magistrates' Court [17/05/2023] - Operator pleaded 'not guilty' at hearing on 9 August and elected for trial at Crown Court. Listed for hearing on 6 September 2023 at Norwich Crown Court [09/08/2023] - Hearing at Norwich Crown Court adjourned to 22 September 2023 [01/09/2023] - Hearing at Norwich Crown Court adjourned to 22 December 2023 [26/09/2023] - Hearing postponed at request of Court, to 8 April 2024 rescheduled date [16/01/2024] - Hearing postponed at request of Court, to 14 May rescheduled date [10/04/2024] - Court dismiss Defendants' application to have prosecution case dismissed. Defendants plead 'not guilty' and trial listed for seven days commencing 23 June 2025 [14/05/2024] - Officers attended pre-trial hearing and date of full trial confirmed as above. No further information added by defendant. [21/03/2025] 26th June 2025 - Trial took place at Crown Court. All defendants pleaded guilty before Jury sworn in. Proceeding adjourned until 25th July 2025 for sentencing hearing.
13 May 2022 BA/2022/0023/ UNAUP2	Land at the Beauchamp Arms Public House,	Unauthorised operation development	- Authority given by Chair and Vice Chair for service of Temporary Stop Notice requiring cessation of construction 13 May 2022 - Temporary Stop Notice served 13 May 2022.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
	Ferry Road, Carleton St Peter	comprising erection of workshop, kerbing and lighting	• Enforcement Notice and Stop Notice regarding workshop served 1 June 2022 • Enforcement Notice regarding kerbing and lighting served 1 June 2022 • Appeals submitted against both Enforcement Notices [12/07/2022] • Appeals dismissed and Enforcement Notices upheld 29 July 2024. • Workshop to be dismantled and removed off site within two months; all associated structures and fixtures to be removed off site, services (electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months • Kerbed structure and lighting columns to be taken down and electricity connections to be taken up, all within two months; all structures, materials and associated debris arising from the above to be removed off site and the land to be made good within three months [30/07/2024] • Site visit to be carried out and owner reminded of compliance periods [27/09/2024] • Discussions continuing, held up by court case on other issue. [19/12/2024]
21 September 2022 BA/2017/0006/ UNAUP1	Land at Loddon Marina, Bridge Street, Loddon	Unauthorised static caravans	• Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravans. • Enforcement Notice served [04/10/2022] • Enforcement Notice withdrawn on 19 October due to minor error; corrected Enforcement Notice re-served 20 October 2022 • Appeals submitted against Enforcement Notice [24/11/2022] • Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			- Residential use of the caravans to cease, the caravans and associated structures, fixtures, fittings and domestic paraphernalia to be removed off site, services (including water and electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good, all within six months [30/07/2024] - Owner to be reminded that notice to be complied with by 29 January 2025 [27/09/2024] - Discussions continuing [26/11/2024]
9 December 2022 BA/2018/0047/ UNAUP3	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravan (Unit Z)	- Planning Contravention Notice to clarify occupation served 25 Nov 2022. - Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravan - Enforcement Notice served 11 January 2023 [20/01/2023] - Appeals submitted against Enforcement Notice [16/02/2023] - Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024. - Residential use of the caravan to cease within two months; the caravan and associated structure or fixtures to be removed off site, services (electricity and water) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months [30/07/2024] - Site visit to be carried out and owner reminded of compliance periods [27/09/2024] - Discussions continuing, held up by court case on other issue. [19/12/2024]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
31 March 2023 BA/2023/0004/ UNAUP2	Land at the Berney Arms, Reedham	Unauthorised residential use of caravans and outbuilding	• Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of the caravans • Enforcement Notice served 12 April 2023 • Enforcement Notice withdrawn on 26 April 2023 due to error in service. Enforcement Notice re-served 26 April 2023 [12/05/2023] • Appeal submitted against Enforcement Notice [25/05/2023] • Appeals dismissed and notice upheld with variations [22/04/2025]
2 February 2024 BA/2022/0007/ UNAUP2	Holly Lodge, Church Loke, Coltishall	Unauthorised replacement windows in listed building	• Authority given to serve a Listed Building Enforcement Notice requiring the removal and replacement of the windows and the removal of the shutter. Compliance period of 15 years • LPA in discussions with agent for landowner [10/04/2024] • No resolution achieved through discussion. Legal advice sought [29/08/2024] • Case review – Listed Building Enforcement Notice to be served, in process of content being considered and drafted. • Listed Building Enforcement Notice served by hand on Friday 24th January. • Appeal submitted and valid – start date 19/03/2025. Will be dealt with by compliance officer [21/03/2025]

Author: Steve Kenny

Date of report: 30 June 2025

Background papers: Enforcement files

Planning Committee

18 July 2025

Agenda item number 9

BA/2025/0002/TPO site visit 2A The Street, Geldeston

Report by Heritage and Design Manager

Summary

Objections have been received to a provisional Tree Preservation Order (TPO) BA/2025/0002/TPO and, as required by the Authority's Scheme of Delegation, this TPO will therefore need to be determined by the Planning Committee. This report considers whether a site visit is required prior to the determination of the TPO.

Recommendation

That Members of the Planning Committee do not undertake a site visit to the provisional TPO at 2a The Street, Geldeston (BA/2025/0002/TPO).

1. Background

- 1.1. As part of its duty as a Local Planning Authority (LPA), the Broads Authority is required to consider the serving of Tree Preservation Orders (TPOs) on trees which are considered to be of amenity value and where it is expedient to do so. The Town and Country (Tree Preservation) (England) Regulations) 2012 sets out the procedure relating to TPOs and government guidance (Tree Preservation Orders and Trees in Conservation Areas, 2014) provides further information.
- 1.2. This report explains how this process has been carried out in respect of a sycamore and an oak tree at 2a The Street, Geldeston (BA/2025/0002/TPO).

2. Tree Preservation Order procedure

- 2.1. There are two prerequisites which must be met for a tree to be considered for protection through a TPO. Firstly, the tree must be of amenity value, and secondly the expediency of serving the order. There are many trees in the Broads (and elsewhere) which are of sufficient amenity value to qualify for TPO status, but which are not protected as it is not considered expedient to do so. When considering expediency, one of the factors considered by the LPA is whether the trees are under threat. The TPO process is not a designation like, for example, a conservation area which is made following an assessment of particular character, it is a response to a set of circumstances.

- 2.2. Typically, the consideration of a tree for a TPO designation will arise in connection with a development proposal, either through a formal planning application or a pre-planning application discussion. At a site visit or when looking at photos or other visuals a case officer will see there is a tree on the site which is potentially of amenity value and under threat from the proposed development and this triggers the TPO process. The case officer consults the Authority's Arboricultural Consultant who will visit the site and make an assessment of the tree under the 2012 Regulations. If the tree is considered to meet the criteria in the Regulations, then the LPA will consider whether a provisional TPO should be served.
- 2.3. After a provisional TPO has been served there is a consultation period, which gives the opportunity for the landowner and other interested parties to comment. The Regulations require that a provisional TPO must be formally confirmed by the LPA within 6 months of it being served; if it is not confirmed then it will automatically lapse.
- 2.4. The Authority's scheme of delegation allows provisional TPOs to be served under delegated powers and for non-controversial TPOs (i.e. where no objections have been received) to be confirmed by officers under delegated powers. Where an objection has been received as part of the consultation process Members can decide to undertake a site visit to view the tree prior to making a decision on whether or not to confirm the TPO. Guidance on when it is appropriate to undertake a site visit is similar to that which applies to a planning application. This is set out in Appendix 3 of the [Code of Practice for members of the Planning Committee and officers \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/code-of-practice-for-members-of-the-planning-committee-and-officers). The circumstances in which this would be appropriate include:
- where the issues are finely balanced;
 - where the impacts on neighbour amenity or the wider landscape are difficult to envisage other than by site assessment; or
 - it is beneficial in the interests of local decision-making to demonstrate that all aspects of the proposal have been considered on site.
- 2.5. The grounds of the objection will be reported to the Planning Committee in order to inform the decision on whether or not to undertake a site visit, and a recommendation will be made by officers.
- 2.6. The details of the objection will only be discussed at the meeting where a decision is to be made on whether or not to confirm the TPO.

3. BA/2025/0002/TPO at 2a The Street, Geldeston

- 3.1. The subject trees are an oak (T1) and a sycamore (T2).
- 3.2. The site is located on the corner of Station Road and The Street, just to the west of Geldeston village centre, within the Geldeston Conservation Area (Appendix 1). The site is a prominent one with the north boundary facing The Street and the west boundary on Station Road. A bungalow occupies the site and is the only property on the east side

of Station Road with open water meadows immediately to the south. The site has a hedge surrounding it to its north and west boundaries and a post and rail fence to its southern boundary.

- 3.3. Both trees are healthy, early mature specimens. T1 (the oak) is located within the hedge towards the corner of Station Road and The Street and is a prominent feature on this crossroads. There are a number of other trees in the vicinity and these large trees are characteristic of the area. T1 is also a particularly prominent feature when entering the village from the north travelling south down Geldeston Hill and equally when entering from Station Road to the south (where along with the sycamore the cluster of trees marks the entrance into the village from the more open countryside beyond). T2 (the sycamore) is positioned just to the south along Station Road and is set back from the boundary by a couple of metres. It is close to the southern boundary of the plot, beyond which are open water meadows, which result in it being very prominent when viewed from the south and also filtering the views of the village from the rural area beyond.
- 3.4. On the 25th of March 2025 a treeworks application was received to pollard T1 to a height of 3-4m and to pollard T2 to the same height. Our arboricultural consultant advised that the proposed works are inappropriate on the basis that both trees are situated close to the road frontage and have high visual amenity as an integral part of the streetscene. It was recognised that some management of the trees may be required but it was considered that the pollarding as proposed was inappropriate as it would compromise both the visual amenity of the trees and also their future health. Geldeston Parish Council also objected to the works on the grounds of visual impact on the landscape and conservation area and that the severity of the pollarding would potentially kill the trees.
- 3.5. On 24 April 2025 a provisional TPO was served on the trees. This must be confirmed by 24 October 2025.
- 3.6. On 28 April 2025 one letter objecting to the TPOs was received.

4. Site visit consideration

- 4.1. A copy of the objection to the provisional TPO and the response from the Authority's Arboricultural Consultant to the representation received are set out in a Statement of Case, attached at Appendix 1.
- 4.2. The issues raised by the objection are: that other trees in the area should also be considered for protection with a TPO, that the owners of the property do manage the trees and have no intention of felling them and that the LPA budget should be spent elsewhere.
- 4.3. A presentation on the TPO will be provided at the 18 July 2025 meeting of the Planning Committee with photographs of the tree and its context, including the neighbouring properties and the local area.

- 4.4. Officers are satisfied that Members can get a full and clear understanding of the tree, its context and the issues raised in the objection from the presentation and that a site visit is not required in order to make a considered and sound judgement in this case.
- 4.5. If a site visit is deemed necessary then it must be held with consideration for the report deadline of the end of August associated with the Planning Committee meeting when the TPO is to be determined.
- 4.6. The report for the 12 September 2025 meeting of the Planning Committee will detail recommendations for consideration regarding the confirmation of the TPO.

5. Recommendation

- 5.1. That Members do not undertake a site visit.

Author: Kate Knights

Date of report: 24 June 2020

Background papers: TPO BA/2025/0002/TPO file and Treeworks application
BA/2025/0087/TCAA file

Appendix 1: [Statement of Case and site location plan for provisional TPO at 2a Station Road, Geldeston](#)

Appendix 1 – Statement of Case – Provisional TPO at 2a Station Road, Geldeston

1. Introduction

- 1.1. It is the Authority's practice to provide Members with a Statement of Case, outlining the issues under consideration.
- 1.2. A single objection has been raised to the provisional TPO.
- 1.3. As well as the points raised by the objector and the Authority's response which are set out in the table below, there are other considerations. The trees are early mature trees and as such will have some longevity of life; they are considered to contribute to the visual amenity of the area and are therefore of benefit to the general public; the trees increase resilience to climate change and improve air quality in the area, aid biodiversity and encourage wildlife.

2. Representations and responses

- 2.1. The three issues raised by the single objector, and the Broads Authority's Arboricultural Consultant's response are set out below:

No.	Representation	Response
1.	The TPO is considered totally unnecessary and the objector would like to ask why other trees in Dockney and the local area have not also had a TPO?	A treeworks application was received for severe pollarding of both trees to a height of 3-4m. The BA could <i>either</i> allow these works to proceed <i>or</i> serve a TPO. As the proposed works would be detrimental to both the amenity of the area and conservation area and the long-term health of the trees, we had no option but to serve a TPO to ensure the trees' retention and appropriate management in the future. Other trees (such as three trees suggested by the objector in Dockney) have not been served with a TPO as it would not be expedient to do so, given that there is no known threat to those trees.
2.	The residents have no intention of felling either tree and have always managed the trees to the best of their ability.	Although the owner may not intend to fell the trees, the proposed works would significantly alter the appearance of the trees in such a way that it would be detrimental to the visual amenity of the area and wider landscape. They would also compromise the future health of the trees. It is positive that the owners want to maintain the

No.	Representation	Response
		trees and we will work with them to find an appropriate manner of doing so.
3.	Budget could be better spent elsewhere.	One of the statutory functions of the Local Planning Authority required by planning legislation is to ensure that trees are protected where necessary and that conservation areas are protected and enhanced. It is therefore necessary for budget to be spent on this obligation.

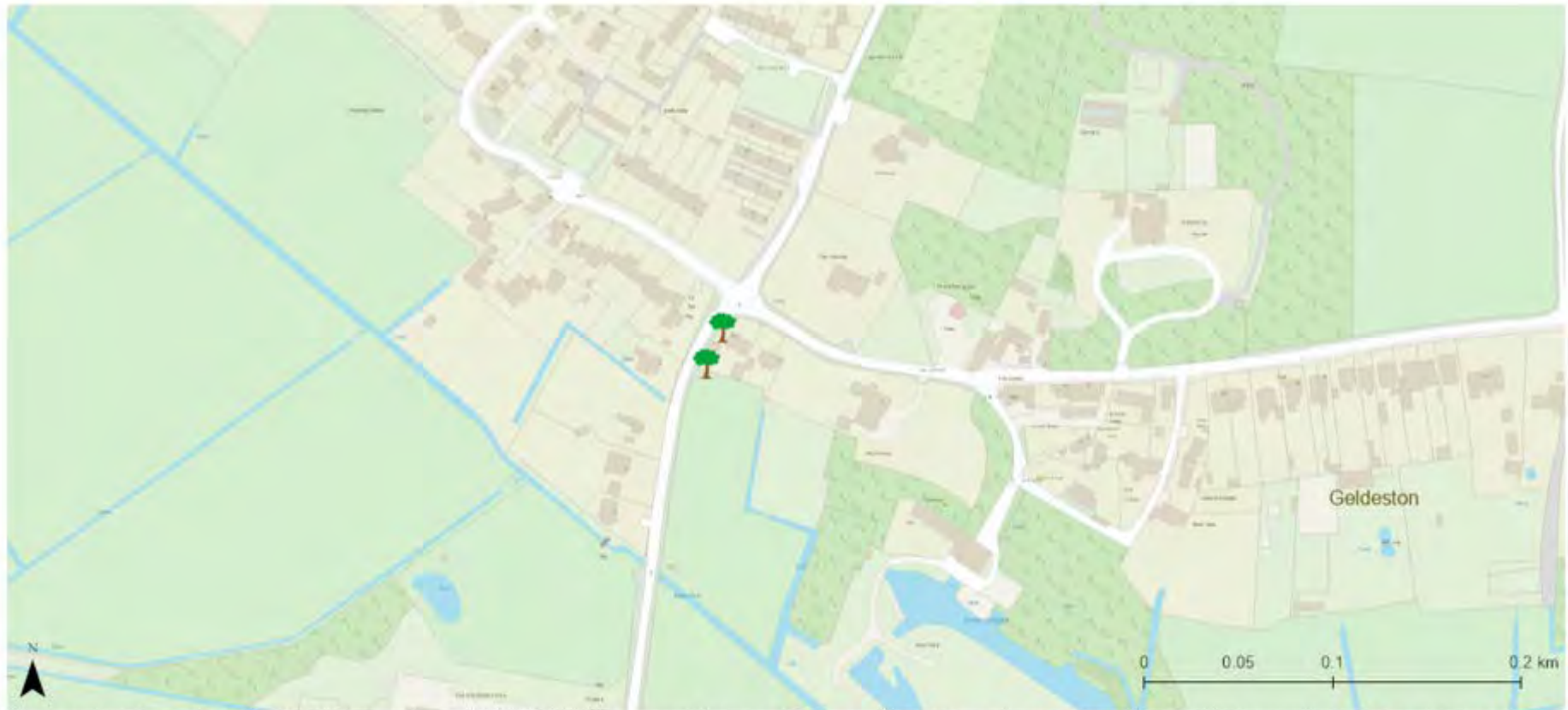
- 2.2. Members should consider this Statement of Case when deciding whether to confirm the TPO.

3. Location maps

BA/2025/0002/TPO - 2A The Street, Geldeston



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Planning Committee

18 July 2025

Agenda item number 10

Beccles Conservation Area Article 4 Directions-Confirmation

Report by Heritage and Design Manager

Summary

Further to the making of the two Article 4 directions in Beccles Conservation Area as approved by the Planning Committee 4 April 2025 and following public consultation, it is now proposed to confirm the Article 4 directions so that they can be served.

Recommendation

To approve:

- i. the confirmation of the Article 4 direction to cancel the existing Beccles Article 4 direction; and
- ii. the confirmation of the Article 4 direction covering a smaller area and fewer development classes.

1. Introduction

- 1.1. Article 4 directions are made under Article 4(1) of the Town and Country Planning (General Permitted Development) Order 2015 ("GDPO").
- 1.2. An Article 4 direction is a planning regulation that removes specified permitted development rights to help protect what is special about buildings and the amenity of the area in which they are located. It means that planning permission will be required for those works. As set out in the legislation, the GDPO covers works fronting a 'relevant location' which is a highway, open space or waterway.
- 1.3. An Article 4 direction only applies to non-listed houses because flats, commercial properties and listed buildings already have different, generally more restrictive, permitted development rights. Current good practice is that Article 4 directions should be based on sound evidence and should cover a limited geographical area. Paragraph 54 of the National Planning Policy Framework (NPPF) states that Article 4 directions should be 'limited to situations where an Article 4 direction is necessary to protect local

amenity or the well-being of the area....in all cases, be based on robust evidence, and apply to the smallest geographical area possible’.

2. Background

- 2.1. Historically, Article 4 directions were able to cover wide geographical areas, and the former Waveney District Council implemented a series of blanket Article 4 Directions, one of which, dating from 1997, covered almost all of the Beccles Conservation Area, including the area now within the Broads Authority Executive Area. East Suffolk Council (ESC) has commenced a review of these and we have been working with their officers to review the Beccles Article 4 direction. Another consideration is that the GDPO has changed several times since 1997, and it is important to ensure that the Article 4 directions refer to the correct sections of that Order.
- 2.2. The existing 1997 Article 4 Direction covers all of the area between the River Waveney and Fen Lane, Northgate and Puddingmoor for most of its length (see Appendix 1). It restricts the following works where they front a relevant location:
 - Enlargement, improvement or other alteration to elevations
 - Alterations to roofs
 - Construction of a porch
 - Provision of a building, enclosure or pool
 - Hard surfacing
 - Installation of a satellite antenna
 - Erection or alteration of a chimney
 - Alteration or demolition of a fence or boundary wall
 - Painting of an elevation.
- 2.3. Research and site survey work has been carried out to meet the requirements of the NPPF. Condition surveys of the Beccles Article 4 area were carried out to assess level of intactness and change, with the focus on those properties that are considered to contribute positively to the character and appearance of the conservation area but are not protected by statutory listing. The results of the survey are presented in map form (see Appendix 2). It should be noted that this does not fully assess the river frontage where there are additional structures that contribute to the area such as the boathouses and walls to the Scores (alleys which run down to the river).
- 2.4. Following this survey, it was concluded that the 1997 Beccles Article 4 direction covers a wider geographical area than it should given current good practice and also covers some classes of development that it is no longer considered appropriate to restrict. It is also necessary to ensure that the Article 4 references the current GDPO.

- 2.5 The review of the Article 4 directions meets the following Broads Plan objectives: D1 (record, protect and enhance local built and cultural features); D3 (maintain up-to-date conservation area designations, appraisals and management proposals) and F4 (provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits).

3. Progress to date

- 3.1. Two new Article 4 directions were made on the 4 April 2025: one for the cancellation of the 1997 Article 4; the second for a new reduced Article 4 area with fewer restrictions. They were non-immediate and do not come into force until the 4 August 2025, subject to confirmation at Planning Committee on 18 July 2025. The existing Article 4 direction remains valid until its cancellation by the new Article 4.
- 3.2. The 'new' Article 4 direction covers a reduced area between the river Waveney and Fen Lane, Northgate and the northern end of Puddingmoor (see Appendix 3). The southern end of Puddingmoor has been removed as this has a higher concentration of business premises, fewer traditional properties and more buildings that do not positively contribute to the character of the conservation area due to an erosion of their original features. It is proposed that the new Article 4 direction will remove permitted development rights covering the following works, again only where fronting a relevant location:
- Enlargement, improvement or other alteration to elevations
 - Alterations to roofs
 - Construction of a porch
 - Provision of a building, enclosure or pool
 - Hard surfacing
 - Erection or alteration of a chimney
 - Alteration or demolition of a fence or boundary wall.
- 3.3. The removal of permitted development rights relating to the installation of a satellite dish has been withdrawn as few houses now have television delivered by satellite dishes. The painting of properties has also been removed. It is considered that the wording of Schedule 1, Part 2, Class C of the GDPO, 'the painting of the exterior of any building or work', means that it is necessary to remove this from the Article 4 direction as it has a very broad scope and would mean that any painting, including redecoration for maintenance and painting window frames would need planning permission. This is not proportionate and is onerous for homeowners and the Local Planning Authority.

4. Consultation

- 4.1. A consultation period ran between 14 April to 23 May. Information was published on our website and provided for the public at Beccles library. Property owners were sent a letter, guidance notes and copies of the notices. Site notices were displayed in both Article 4 areas and press notices were published. The Secretary of State, Suffolk County Council, East Suffolk Council and Beccles Town Council were all informed. A public drop-in session was held on the afternoon and evening of the 9 May in Beccles with officers from the Broads Authority and East Suffolk Council in attendance.
- 4.2. Three responses to the consultation were received. The details of the comments and our responses can be found in Appendix 6 but officers do not consider that any of the points raised through the consultation necessitate a change to the Article 4 directions as already made.
- 4.3. It should be noted that as a result of the consultation, East Suffolk Council has decided not to confirm the Article 4 direction that was made for their part of the Beccles Conservation Area in April 2025. They will be carrying out additional survey work before reviewing the existing Article 4 direction in 2026. This does not affect our review of the Beccles Article 4 direction.

5. Financial Implications

- 5.1. There are circumstances where the LPA may become liable to pay compensation when imposing a new Article 4 direction, when it does so without giving 12 months' notice to members of the public who would be affected.
- 5.2. This liability may arise if the LPA:
 - Refuses planning permission for development which would have been permitted development if it were not for the Article 4 direction; or
 - Grants planning permission subject to more limiting conditions than the GDPO would normally allow, as a result of the Article 4 direction being in place.
- 5.3. However, officers judge this to present a limited risk only, as the properties covered by the new direction are already covered by an existing more onerous direction. There will be no additional restrictions.
- 5.4. On this basis, officers judge that there is no necessity to wait 12 months before confirmation of the Article 4 directions.

6. Risk Implications

- 6.1. Regulatory risk: there is no right of appeal against the making of an Article 4 direction. There could be an application for judicial review if it were thought that the LPA had not considered the merits of the Article 4 direction properly. This is considered to be low

risk given the evidence on which the directions are based and the public consultation that was undertaken.

- 6.2 Reputational risk: The LPA has a duty to pay special attention to the preservation and enhancement of the character and appearance of conservation areas, as set out in Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. If the Article 4 directions are confirmed they would support this statutory duty by ensuring the directions are up-to-date.
- 6.3 Confirming the Article 4 Directions would also support the delivery of consistent planning and planning enforcement decisions, which would reduce the risk of reputational damage in the future.

7. Conclusion

- 7.1 Members are asked to consider two recommendations:
- i. To approve the confirmation of the Article 4 direction to cancel the existing 1997 Beccles Article 4 direction.
 - ii. To approve the confirmation of the new Article 4 direction for the Broads Authority part of the Beccles Conservation Area

Author: Kate Knights

Date of report: 24 June 2025

[Broads Plan](#) strategic objectives: D1: Record, protect and enhance local built and cultural features

D3: Maintain up-to-date conservation area designations, appraisals and management proposals

F4: Provide up-to-date planning policy, site-specific allocations and planning guidance to support local community needs and ensure development happens within environmental limits.

Appendix 1 - [Map of existing Beccles Conservation Area Article 4 Direction area to be cancelled](#)

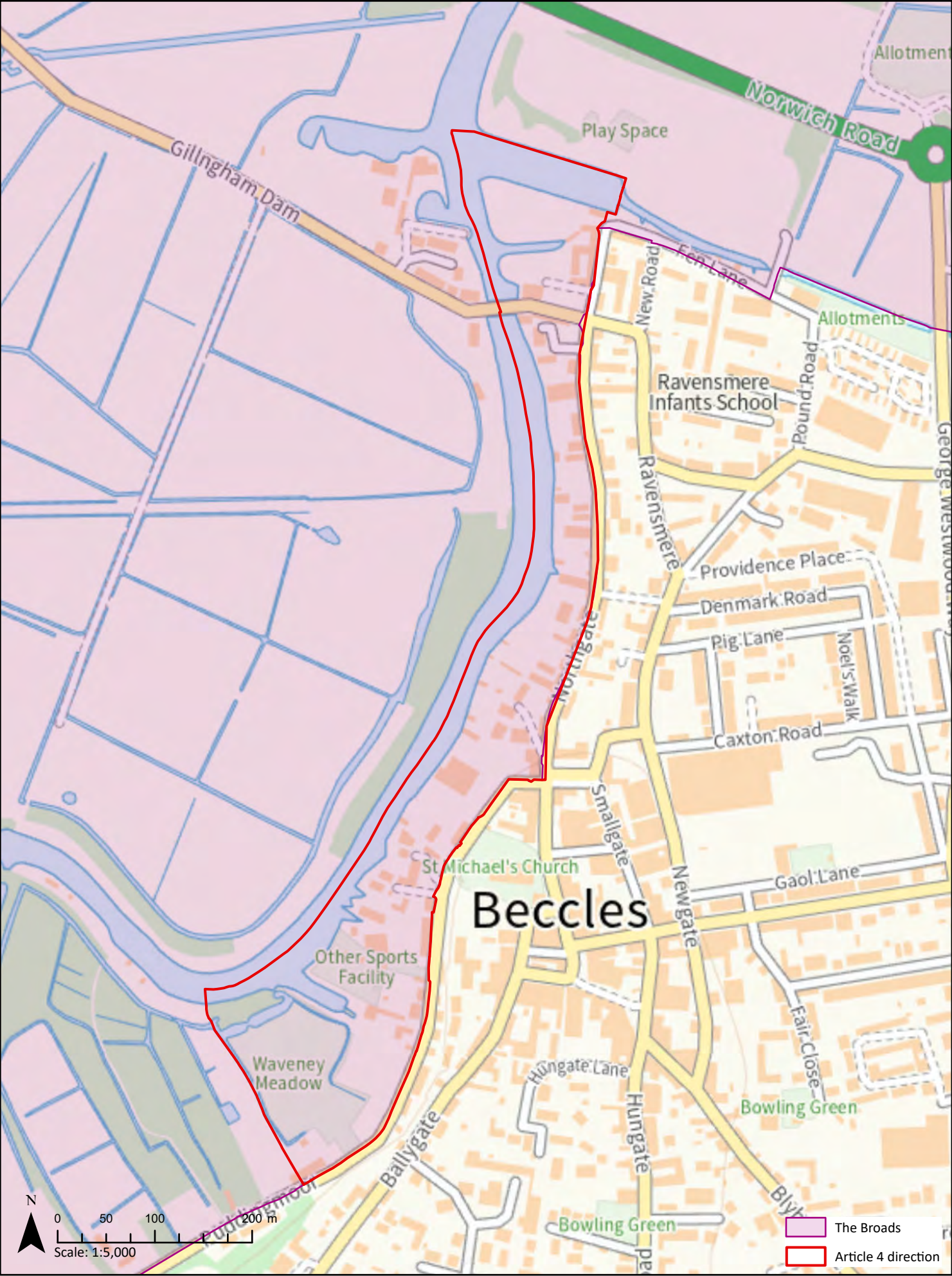
Appendix 2 - [Survey mapping of existing Article 4 Direction](#)

Appendix 3 - [Proposed new Beccles Conservation Area Article 4 Direction area](#)

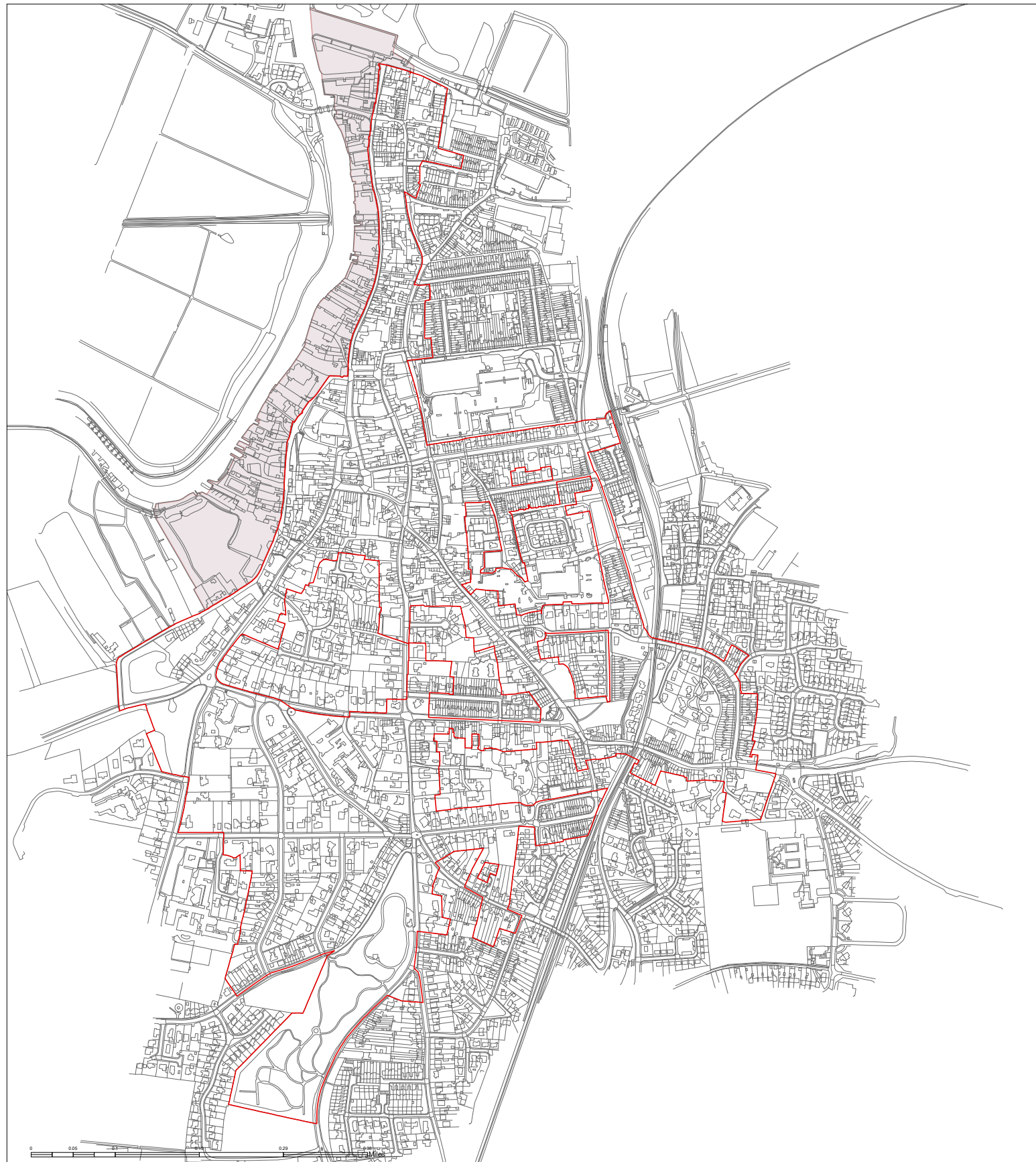
Appendix 4 - [Article 4 Direction for cancellation of existing Article 4 direction](#)

Appendix 5 - [Article 4 Direction for new area](#)

Appendix 6 - [Public Consultation responses](#)



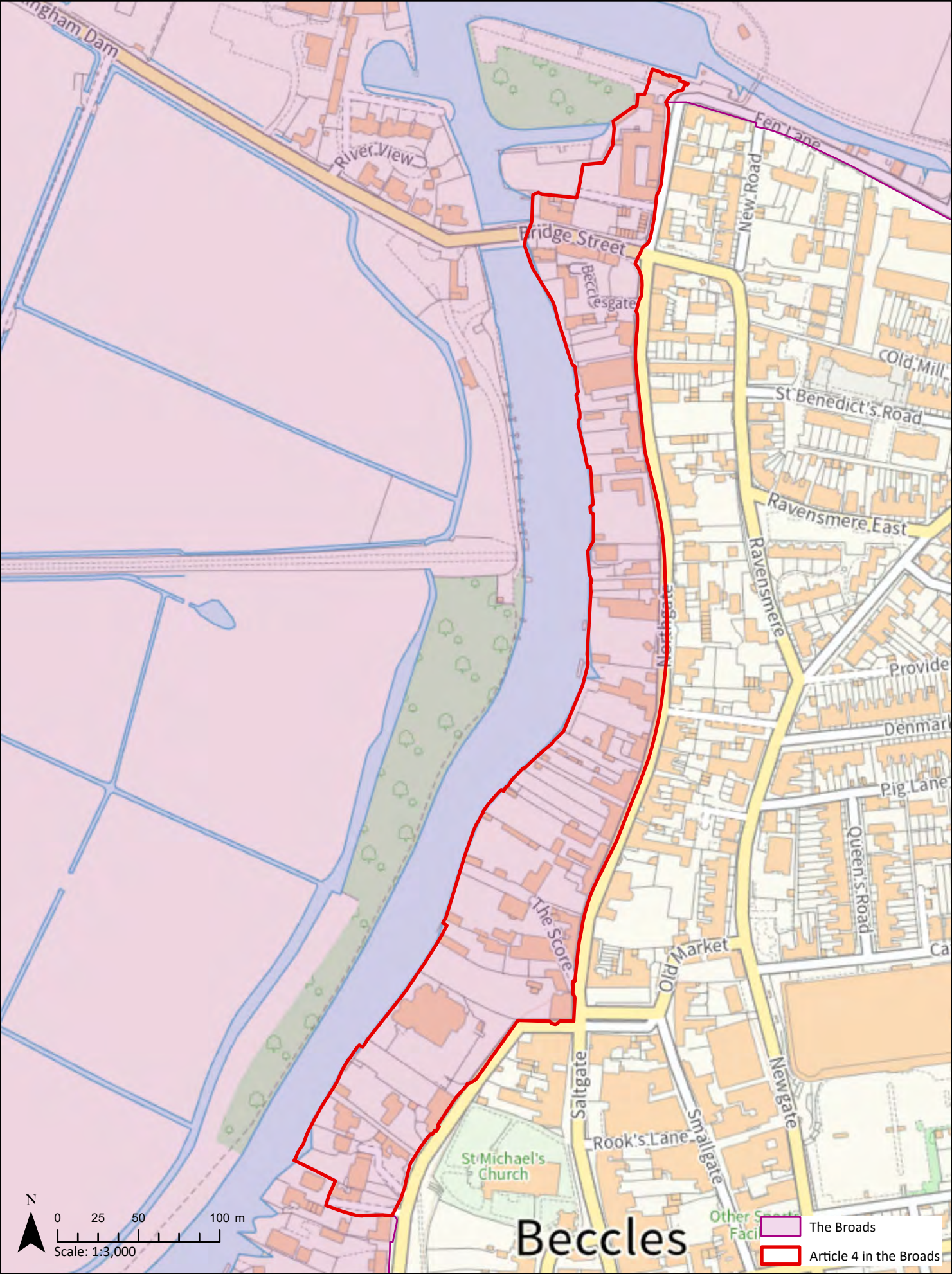
Beccles Conservation Area Article 4 Review



-  Beccles Conservation Area
-  Beccles Conservation Area - Broads Authority

A larger version of this map is available:

[Beccles CA Article 4 Review Map \(broads-authority.gov.uk\)](http://broads-authority.gov.uk)



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**THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED
DEVELOPMENT) (ENGLAND) ORDER 2015**

Direction Made under Article 4(1)

BROADS AUTHORITY

**CANCELLED DIRECTION (No. 1) 2025:
BECCLES CONSERVATION AREA DIRECTION 1997**

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND)
ORDER 2015 (AS AMENDED)**

DIRECTION WITHOUT IMMEDIATE EFFECT

MADE UNDER ARTICLE 4(1)

CANCELLATION DIRECTION (No.1) 2025:

BECCLES CONSERVATION AREA DIRECTION 1997

WHEREAS THE BROADS AUTHORITY (the “Authority”) being the appropriate local planning authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), is satisfied that it is expedient that the Article 4(2) direction for Beccles Conservation Area 1997 (a copy of which is attached as Schedule 1 to this Direction) should be cancelled.

NOW THEREFORE the said Authority in pursuance of the power conferred on them by Article 4(1) AND Schedule 3, paragraphs (1) to (13) of the Town and Country Planning (General Permitted Development) (England) Order 2015 as amended, hereby direct that the Beccles Conservation Area Article 4 Direction 1997 made on 29 July 1997 is cancelled. The cancellation will come into force on 4 August 2025.

SCHEDULE 1

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)

ORDER 1995

DIRECTION MADE UNDER ARTICLE 4(2)

BECCLES CONSERVATION AREA

WHEREAS the Council of the District of Waveney being the appropriate Local Planning Authority within the meaning of Article 4(6) of the Town and Country Planning (General Permitted Development) Order 1995 are satisfied that it is expedient that development of the descriptions set out in the Schedule below should not be carried out within the whole area of land designated as the Beccles conservation area (such land and the extent thereof being shown by heavy black outlining and black cross hatching on the plan annexed hereto) unless permission is granted on an application made under Part III of the Town and Country Planning Act 1990 and (as appropriate) Part II of the Planning (Listed Building and Conservation Areas) Act 1990

NOW THEREFORE the said Council in pursuance of the power conferred on it by Article 4(2) of the Town and Country Planning (General Permitted Development) Order 1995 ("the Order") HEREBY DIRECT that the permission granted by Article 3 of the Order shall not apply to development of the descriptions set out in the Schedule below within the whole of the said Beccles conservation area

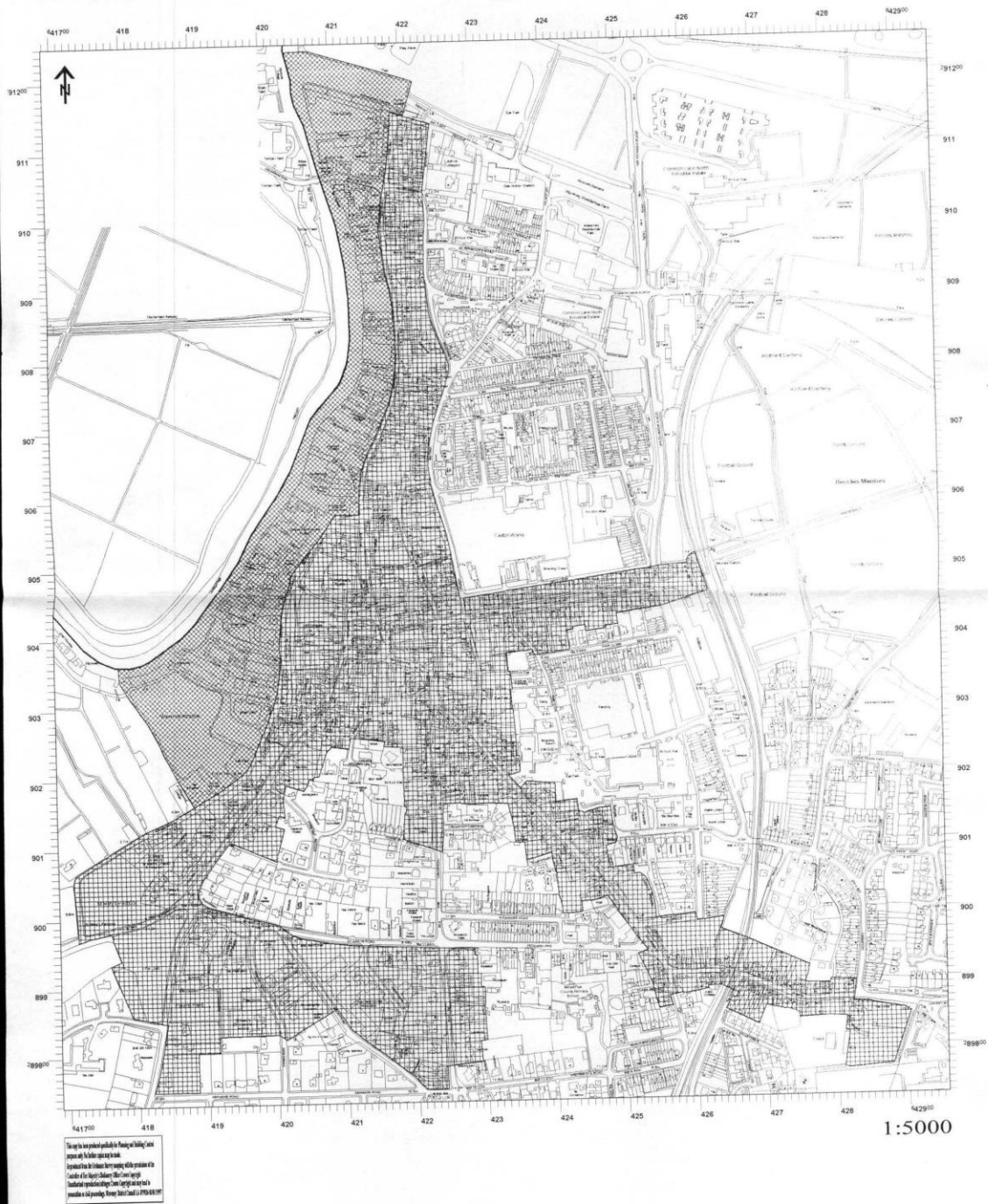
SCHEDULE

- (a) The enlargement, improvement or other alteration of a dwellinghouse, being development comprised within Class A of Part I of Schedule 2 to the Order, where any part of the enlargement, improvement or other alteration would front a relevant location (for the purposes of this Direction and in accordance with the provisions of article 4(6) of the Order the expression 'relevant location' (wherever it may appear) shall mean a highway, waterway or open space).
- (b) Any alteration to the roof of a dwellinghouse, being development comprised within Class C of Part I of Schedule 2 to the Order, where any such alteration would be to a roof slope which fronts a relevant location
- (c) The erection or construction of a porch outside any external door of a dwellinghouse, being development comprised within Class D of Part I of Schedule 2 to the Order, where the external door in question fronts a relevant location

- (d) The provision within the curtilage of a dwellinghouse of any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure, being development comprised within Class E of Part I of Schedule 2 to the Order, where the building or enclosure, swimming or other pool to be provided would front a relevant location or where the part of the building or enclosure maintained, improved or altered would front a relevant location
- (e) The provision within the curtilage of a dwellinghouse of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse as such, being development comprised within Class F of Part I of Schedule 2 to the Order, where the hard surface would front a relevant location
- (f) The installation, alteration or replacement of a satellite antenna on a dwellinghouse or within the curtilage of a dwellinghouse, being development comprised within Class H of Part I of Schedule 2 to the Order, where the part of the building or other structure on which the satellite antenna is to be installed, altered or replaced fronts a relevant location
- (g) The erection, alteration or removal of a chimney on a dwellinghouse or on a building within the curtilage of a dwellinghouse being development within Part I of Schedule 2 to the Order
- (h) The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure, being development comprised within Class A of Part 2 to Schedule 2 of the Order, where the gate, fence, wall or other means of enclosure would be within the curtilage of a dwellinghouse and would front a relevant location
- (i) The painting of the exterior of any building or work, being development comprised within Class C of Part 2 of Schedule 2 to the Order, consisting of the painting of the exterior of any part, which fronts a relevant location of
 - (a) a dwellinghouse; or
 - (b) any building or enclosure within the curtilage of a dwellinghouse
- (j) Any building operation consisting of the demolition of the whole or any part of any gate, fence, wall or other means of enclosure where the gate, fence, wall or other means of enclosure is within the curtilage of a dwellinghouse and fronts a relevant location

GIVEN UNDER the common seal of the Waveney District Council of Town Hall, Lowestoft,
Suffolk this 29 day of July 1997

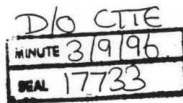
A MAP OF THE BECCLES CONSERVATION AREA, SHOWING THE AREA COVERED BY THE ARTICLE 4 (2) DIRECTION



The Common Seal of the
Council was affixed to
this Direction in the
presence of

M. Benji

CHIEF EXECUTIVE



29th July 1997

**TOWN & COUNTRY PLANNING (GENERAL
PERMITTED DEVELOPMENT) ORDER 1995**

Direction Made Under Article 4(2)

BECCLLES CONSERVATION AREA

[Legal\Orders\6.PRC]

SCHEDULE 2

Properties comprised in the land affected by this Direction:

1 Northgate, Beccles, Suffolk, NR34 9AS
3A Northgate, Beccles, Suffolk, NR34 9AS
3B Northgate, Beccles, Suffolk, NR34 9AS
5 Northgate, Beccles, Suffolk, NR34 9AS
7 Northgate, Beccles, Suffolk, NR34 9AS
River Lodge, 9 Northgate, Beccles, Suffolk NR34 9AS
11 Northgate, Beccles, Suffolk, NR34 9AS
13 Northgate, Beccles, Suffolk, NR34 9AS
15 Northgate, Beccles, Suffolk, NR34 9AS
17 Northgate, Beccles, Suffolk, NR34 9AS
19 Northgate, Beccles, Suffolk, NR34 9AS
25 Northgate, Beccles, Suffolk, NR34 9AS
27 Northgate, Beccles, Suffolk, NR34 9AS
29 Northgate, Beccles, Suffolk, NR34 9AS
31 Northgate, Beccles, Suffolk, NR34 9AS
35 Northgate, Beccles, Suffolk, NR34 9AU
43 Northgate, Beccles, Suffolk, NR34 9AU
51 Northgate, Beccles, Suffolk, NR34 9AU
69 Northgate, Beccles, Suffolk, NR34 9AY
71 Northgate, Beccles, Suffolk, NR34 9AY
73 Northgate, Beccles, Suffolk, NR34 9AY
8 Puddingmoor, Beccles, Suffolk, NR34 9PL
12 Puddingmoor, Beccles, Suffolk, NR34 9PL
Middle Cottage, 14 Puddingmoor, Beccles, Suffolk, NR34 9PL
18 Puddingmoor, Beccles, Suffolk, NR34 9PL
20 Puddingmoor, Beccles, Suffolk, NR34 9PJ
22 Puddingmoor, Beccles, Suffolk, NR34 9PL
26 Puddingmoor, Beccles, Suffolk, NR34 9PL
Gable House, 30 Puddingmoor, Beccles, Suffolk, NR34 9PL
40 Puddingmoor, Beccles, Suffolk, NR34 9PL
44 Puddingmoor, Beccles, Suffolk, NR34 9PL
Loaves And Fishes, Fen Lane, Beccles, Suffolk, NR34 9BB
1 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
2 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
3 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
4 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
5 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
6 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
9 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
10 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
11 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
12A The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
12 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
21 Northgate, Beccles, Suffolk, NR34 9AS
Home Lodge, 33 Northgate, Beccles, Suffolk, NR34 9AS
47 Northgate, Beccles, Suffolk, NR34 9AU

49 Northgate, Beccles, Suffolk, NR34 9AU
59 Northgate, Beccles, Suffolk, NR34 9AU
Waveney Lodge, 63 Northgate, Beccles, Suffolk, NR34 9AU
Riverside House, 65 Northgate, Beccles, Suffolk, NR34 9AU
Broome Cottage, Northgate, Beccles, Suffolk, NR34 9AS
The Moorings, Northgate, Beccles, Suffolk, NR34 9AS
The Staithe, 41 Northgate, Beccles, Suffolk, NR34 9AU
Flat 1, 23 Northgate, Beccles, Suffolk, NR34 9AS
Riversdelle, 24 Puddingmoor, Beccles, Suffolk, NR34 9PL
The Reaches, 38A Puddingmoor, Beccles, Suffolk, NR34 9PL
42 Puddingmoor, Beccles, Suffolk, NR34 9PL
Flint House, Puddingmoor, Beccles, Suffolk, NR34 9PL
Lime Kiln House, Puddingmoor, Beccles, Suffolk, NR34 9PL
Telport, Puddingmoor, Beccles, Suffolk, NR34 9PL
Meadow View, Puddingmoor, Beccles, Suffolk, NR34 9PJ
Tylers, Puddingmoor, Beccles, Suffolk, NR34 9PL
Vista, Puddingmoor, Beccles, Suffolk, NR34 9PL
Waveney House Hotel, Puddingmoor, Beccles, Suffolk, NR34 9PL
Waveney Valley Boats, Puddingmoor, Beccles, Suffolk, NR34 9PL
Wherry Landings, Puddingmoor, Beccles, Suffolk, NR34 9PL
The White House, The Score, Northgate, Beccles, Suffolk, NR34 9AR
39 Northgate, Beccles, Suffolk, NR34 9AU
The Tannery, 61 Northgate, Beccles, Suffolk, NR34 9AU
Wherry Cottage, 50 Puddingmoor, Beccles, Suffolk, NR34 9PL
St Peters House, Old Market, Beccles, Suffolk, NR34 9AP
The Old Maltyngs, The Score, Northgate, Beccles, Suffolk, NR34 9AR
The Maltings, 41 Northgate, Beccles, Suffolk, NR34 9AU
Poolcraft, Puddingmoor, Beccles, Suffolk, NR34 9PL
Primrose Cottage, The Score, Northgate, Beccles, Suffolk, NR34 9AR
Harbour Master Office, Fen Lane, Beccles, Suffolk, NR34 9BD
Quayside Conservatories, Puddingmoor, Beccles, Suffolk, NR34 9PL
Arrow Boats Ltd, 32A Puddingmoor, Beccles, Suffolk, NR34 9PL
Waveney Valley Boats, Puddingmoor, Beccles, Suffolk, NR34 9PL
The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
Cambridge House, 23 Northgate, Beccles, Suffolk, NR34 9AS
8 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
Popes Head Cottage, Northgate, Beccles, Suffolk, NR34 9AR
45 Northgate, Beccles, Suffolk, NR34 9AU
5 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
6 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
7 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
10 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
11 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
The Ship, Bridge Street, Beccles, Suffolk, NR34 9BA
2 Becclesgate Bridge Street Beccles Suffolk NR34 9ED
4 Becclesgate Bridge Street Beccles Suffolk NR34 9ED
9 Becclesgate Bridge Street Beccles Suffolk NR34 9ED
The Hermitage Bridge Street Beccles Suffolk NR34 9BA
37 - 39 Northgate Beccles Suffolk NR34 9AU
Annexe The White House The Score Northgate Beccles Suffolk NR34 9AR

The Annex The Old Maltyns The Score Northgate Beccles Suffolk NR34 9AR
1 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
3 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
8 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
7 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
Beccles Swimming Pool, Puddingmoor, Beccles, Suffolk, NR34 9PL
4 The Score, Northgate, Beccles, Suffolk, NR34 9AR
Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
48 - 50 Puddingmoor, Beccles, Suffolk, NR34 9PL
Petchem House (corner Cottage), The Score, Northgate, Beccles, Suffolk, NR34 9AR
1 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
2 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
3 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
4 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
5 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
6 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
Butterfield House, 1 The Score, Northgate, Beccles, Suffolk, NR34 9AR
The Pickerell, 38 Puddingmoor, Beccles, Suffolk, NR34 9PL
32 Puddingmoor, Beccles, Suffolk, NR34 9PL
34 Puddingmoor, Beccles, Suffolk, NR34 9PL
Tourist Information Centre, Fen Lane, Beccles, Suffolk, NR34 9BB
The Quay Shop and Café, Fen Lane, Beccles, Suffolk, NR34 9BD
47A Northgate, Beccles, Suffolk, NR34 9AU

THIS DIRECTION is made under Article 4(1) of said Order and, in accordance with paragraph 1(4)(e) of Schedule 3 to the Order, shall come into force on 4 August 2025.

MADE under the Common Seal of the Broads Authority

This 4th day of April 2025

The Common Seal of the Authority was hereto
affixed to this Direction in the presence of



Authorised Signatory



BA1784 (S) .

2. **CONFIRMED** under the Common Seal of the Broads Authority

This day of..... 20[]

The Common Seal of the Authority was hereto
affixed to this Direction in the presence of

.....
Authorised Signatory

**THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED
DEVELOPMENT) (ENGLAND) ORDER 2015**

Direction Made under Article 4(1)

BROADS AUTHORITY

**BECCLES CONSERVATION AREA DIRECTION (No. 1)
AMENDED AREA 2025**

**TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (ENGLAND)
ORDER 2015 (AS AMENDED)**

DIRECTION WITHOUT IMMEDIATE EFFECT

MADE UNDER ARTICLE 4(1)

BECCLES CONSERVATION AREA DIRECTION (No. 1) 2025

WHEREAS THE BROADS AUTHORITY (the “Authority”) being the appropriate local planning authority within the meaning of Article 4(5) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), is satisfied that it is expedient that development of the descriptions set out in Schedule 1 below should not be carried out on the land shown edged in solid red lines on the attached plan (“the Land”), unless planning permission is granted on an application made under Part III of the Town and Country Planning Act 1990 as amended.

NOW THEREFORE the said Authority in pursuance of the power conferred on them by Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended (the “Order”), hereby direct that:

1. The permission granted by Article 3 of the said Order shall not apply to development on the Land of the descriptions set out in Schedule 2 below.
2. For the purposes of this Direction the expression ‘relevant location’ (whenever it appears) shall mean a highway, waterway or open space.

SCHEDULE 1

Categories of permitted development which are restricted under Article 4(1) of the Town and Country Planning (General Permitted Development) (England) Order 2015 upon confirmation of this Direction.

- (a) The enlargement, improvement or other alteration of a dwellinghouse, being the development comprised of Class A of Part 1 of Schedule 2 of the Order where any part of the enlargement, improvement or other alterations would front a relevant location.
- (b) The enlargement or alteration of a dwellinghouse consisting of an addition or alteration to its roof, being the development comprised of Class B and Class C of Part 1 of Schedule 2 of the Order where any such alteration would be to a roof slope which fronts a relevant location.

- (c) The erection or construction of a porch outside any external door of a dwellinghouse, being the development comprised within Class D of Part 1 of Schedule 2 of the Order where any such alteration would front a relevant location.
- (d) The provision within the curtilage of the dwellinghouse of any building or enclosure, swimming or other pool required for a purpose incidental to the enjoyment of the dwellinghouse as such, or the maintenance, improvement or other alteration of such a building or enclosure; or a container used for domestic heating purposes for the storage of oil or liquid petroleum gas, being the development comprised within Class E of part 1 of Schedule 2 of the Order, where the building or enclosure, swimming or other pool to be provided would front a relevant location or where the part of the building or enclosure maintained, improved or altered would front a relevant location.
- (e) The provision within the curtilage of a dwellinghouse of a hard surface for any purpose incidental to the enjoyment of the dwellinghouse as such; or the replacement in whole or in part of such a surface, being the development comprised within Class F of Part 1 of Schedule 2 of the Order where the development would front a relevant location.
- (f) The installation, alteration or replacement of a chimney, flue or soil and vent pipe to a dwellinghouse, being the development comprised within Class G of part 1 of Schedule 2 of the Order where any such alteration would be to a wall or roof slope which fronts a relevant location.
- (g) The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure, being the development comprised within Class A of Part 2 of Schedule 2 of the Order where the erection, construction, maintenance improvement or alteration of a gate, fence, wall or other means of enclosure would be within the curtilage of a dwellinghouse and would front a relevant location.

SCHEDULE 2

Properties comprised in the land affected by this Direction:

1 Northgate, Beccles, Suffolk, NR34 9AS
3A Northgate, Beccles, Suffolk, NR34 9AS
3B Northgate, Beccles, Suffolk, NR34 9AS
5 Northgate, Beccles, Suffolk, NR34 9AS
7 Northgate, Beccles, Suffolk, NR34 9AS
River Lodge, 9 Northgate, Beccles, Suffolk, NR34 9AS

11 Northgate, Beccles, Suffolk, NR34 9AS
13 Northgate, Beccles, Suffolk, NR34 9AS
15 Northgate, Beccles, Suffolk, NR34 9AS
17 Northgate, Beccles, Suffolk, NR34 9AS
19 Northgate, Beccles, Suffolk, NR34 9AS
25 Northgate, Beccles, Suffolk, NR34 9AS
27 Northgate, Beccles, Suffolk, NR34 9AS
29 Northgate, Beccles, Suffolk, NR34 9AS
31 Northgate, Beccles, Suffolk, NR34 9AS
35 Northgate, Beccles, Suffolk, NR34 9AU
43 Northgate, Beccles, Suffolk, NR34 9AU
51 Northgate, Beccles, Suffolk, NR34 9AU
69 Northgate, Beccles, Suffolk, NR34 9AY
71 Northgate, Beccles, Suffolk, NR34 9AY
73 Northgate, Beccles, Suffolk, NR34 9AY
8 Puddingmoor, Beccles, Suffolk, NR34 9PL
12 Puddingmoor, Beccles, Suffolk, NR34 9PL
Middle Cottage, 14 Puddingmoor, Beccles, Suffolk, NR34 9PL
18 Puddingmoor, Beccles, Suffolk, NR34 9PL
20 Puddingmoor, Beccles, Suffolk, NR34 9PJ
22 Puddingmoor, Beccles, Suffolk, NR34 9PL
Loaves And Fishes, Fen Lane, Beccles, Suffolk, NR34 9BB
1 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
2 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
3 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
4 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
5 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
6 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
9 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
10 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
11 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
12A The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
12 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
21 Northgate, Beccles, Suffolk, NR34 9AS
Home Lodge, 33 Northgate, Beccles, Suffolk, NR34, 9AS
47 Northgate, Beccles, Suffolk, NR34 9AU
49 Northgate, Beccles, Suffolk, NR34 9AU
59 Northgate, Beccles, Suffolk, NR34 9AU
Waveney Lodge, 63 Northgate, Beccles, Suffolk, NR34 9AU
Riverside House, 65 Northgate, Beccles, Suffolk, NR34 9AU
Broome Cottage, Northgate, Beccles, Suffolk, NR34 9AS
The Moorings, Northgate, Beccles, Suffolk, NR34 9AS

The Staithe, 41 Northgate, Beccles, Suffolk, NR34 9AU
Flat 1, 23 Northgate, Beccles, Suffolk, NR34 9AS
Flint House, Puddingmoor, Beccles, Suffolk, NR34 9PL
Telport, Puddingmoor, Beccles, Suffolk, NR34 9PL
Tylers, Puddingmoor, Beccles, Suffolk, NR34 9PL
Vista, Puddingmoor, Beccles, Suffolk, NR34 9PL
Waveney House Hotel, Puddingmoor, Beccles, Suffolk, NR34 9PL
Wherry Landings, Puddingmoor, Beccles, Suffolk, NR34 9PL
The White House, The Score, Northgate, Beccles, Suffolk, NR34 9AR
39 Northgate, Beccles, Suffolk, NR34 9AU
The Tannery, 61 Northgate, Beccles, Suffolk, NR34 9AU
St Peters House, Old Market, Beccles, Suffolk, NR34 9AP
The Old Maltyns, The Score, Northgate, Beccles, Suffolk, NR34 9AR
The Maltings, 41 Northgate, Beccles, Suffolk, NR34 9AU
Primrose Cottage, The, Score, Northgate, Beccles, Suffolk, NR34 9AR
The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
Cambridge House, 23 Northgate, Beccles, Suffolk, NR34 9AS
8 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
Popes Head Cottage, Northgate, Beccles, Suffolk, NR34 9AR
45 Northgate, Beccles, Suffolk, NR34 9AU
5 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
6 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
7 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
10 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
11 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9E
The Ship, Bridge Street, Beccles, Suffolk, NR34 9BA
2 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
4 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
9 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
The Hermitage, Bridge Street, Beccles, Suffolk, NR34 9BA
37-39 Northgate, Beccles, Suffolk, NR34 9AU
Annexe, The White House, The Score, Northgate, Beccles, Suffolk, NR34 9AR
The Annex, The Old Maltyns, The Score, Northgate, Beccles, Suffolk, NR34 9AR
1 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
3 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
8 Becclesgate, Bridge Street, Beccles, Suffolk, NR34 9ED
7 The Maltings, Fen Lane, Beccles, Suffolk, NR34 9BT
4 The Score, Northgate, Beccles, Suffolk, NR34 9AR
Becclesgate Bridge Street Beccles Suffolk NR34 9ED
Petchem House (Corner Cottage), The Score, Northgate, Beccles, Suffolk, NR34 9AR
1 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
2 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU

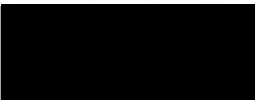
3 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
4 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
5 The Tannery, Northgate, Beccles, Suffolk, NR34, 9AU
6 The Tannery, Northgate, Beccles, Suffolk, NR34 9AU
Butterfield House, 1 The Score, Northgate, Beccles, Suffolk, NR34 9AR
47A Northgate, Beccles, Suffolk, NR34 9A
Harbour Master Office, Fen Lane, Beccles, NR34 9BD
Beccles Quay Shop and Café, Fen Lane, Beccles, NR34 9BH
Tourist Information Centre Fen Lane Beccles Suffolk NR34 9BB

THIS DIRECTION is made under Article 4(1) of said Order and, in accordance with paragraph 1(4)(e) of Schedule 3 to the Order, shall come into force on 4 August 2025.

1. **MADE** under the Common Seal of the Broads Authority

This 4th day of April 2025

The Common Seal of the Authority was hereto
affixed to this Direction in the presence of


.....
Authorised Signatory



2. **CONFIRMED** under the Common Seal of the Broads Authority

BA 1790 (5).

This day of..... 20[]

The Common Seal of the Authority was hereto
affixed to this Direction in the presence of

.....
Authorised Signatory

Appendix 6: Beccles Article 4 Direction - Consultation responses

Ref no.	Respondent	Comment	Response	Action
1	Respondent 1	The proposed reduction in the Article 4 area risks undermining the architectural and historical significance of Beccles and the conservation area by allowing unsuitable permitted developments which, even if individually relatively minor, are likely over time to have a cumulative effect of undermining the town's historic significance, appearance and overall attractiveness. Once historic features have been lost, they are generally lost forever. Would urge us to reconsider the boundary,	As demonstrated by the background survey work, those areas that contain the buildings with the most historic features will remain in the Article 4 direction area. The area proposed to be removed does not include buildings with the same level of retention of historic features. It should also be noted that the whole area remains in the conservation area and planning permission would still be needed for more changes than properties outside the conservation area or Broads authority area, such as the removal of a chimney stack or changing timber windows to UPVC.	None required.

Ref no.	Respondent	Comment	Response	Action
2	Respondent 1	Would not support the removal of the Article 4 direction from the southern end of Puddingmoor (nos. 30 southwards to Wherry Cottage). The buildings in this area contribute to Puddingmoor's fundamental character which is derived from the cottage-style dwellings that have historically developed along the east side of the river Waveney with a rural charm. While many of the buildings are not architecturally significant in their own right, the collection of buildings along the street has a collective harmony and character. This part of Puddingmoor is also very visible from the elevated position of Ballygate and the long views from 'The Cliff' over Puddingmoor to the river and floodplain beyond. These views are specifically mentioned in the Conservation Area Appraisal and highlighted as significant. Therefore, easement of the Article 4 directive of this area could also have an impact on the appearance and significance of the Ballygate area of the conservation area.	Although there are some historic cottages in the area described, these have lost many of their architectural features and an Article 4 direction cannot be served as a tool to retrospectively improve a property – rather it is to preserve what is there. In terms of views from the elevated area close to the church and The Cliff, this predominantly overlooks the area that will still be included in the Article 4 Direction area and the listed buildings at nos. 26 and no 30 Puddingmoor, with the exception of two modern houses along the river frontage. The relatively minor alterations that may now be permitted development through the removal of the Article 4 are unlikely to have an impact on this wider view. Planning permission would still be required for more substantial alterations.	None required.

Ref no.	Respondent	Comment	Response	Action
3	Respondent 1	There also seems little logic in removing the Article 4 from the 4 properties on the river frontage directly north of the Lido, these would be the only properties on the town part of the river which did not have restrictions and these properties are important as their position is in the foreground of the long views of St Micheal's Church and the tower when viewed by boat from the river. We strongly feel that the Article 4 directive be retained on these properties.	There are only two riverside houses being removed from the Article 4 direction (Riversdelle and Lime Kiln House) and the two northern-most properties referred to (Wherry Landings and Tylers) remain in the Article 4 area. Riversdelle and Lime Kiln House are properties that do not have historic features that warrant protection by an Article 4 direction. Again, the relatively small and incremental changes that could take place due to permitted development rights being gained are not considered such that they should have a big impact on wider and long views of the town and the church from the river and opposite bank. If substantial changes to the properties were proposed, such as an increase in roof height, these would require planning permission.	None required.

Ref no.	Respondent	Comment	Response	Action
4	Respondent 1	We also query the logic of reducing the Article 4 directive to exclude the commercial premises of the Lido and boatyard. We note that within these 'commercial zones' there are buildings with residential use or buildings that could be converted to residential use. Protection of the Article 4 directive over these areas will help protect the character and appearance of the conservation area now and into the future.	The Article 4 direction only applies to dwellinghouses, therefore it never has applied to the commercial properties in this area and as such the removal of the Article 4 direction covering commercial properties does not change anything. If existing commercial premises were due to be changed into residential use, a change of use planning application would be required and any external alterations would also require planning permission. The residential properties in this area do not have the same level of architectural detailing as those in the proposed Article 4 area. It must also be stressed that the area remains in the Beccles CA and is also within the Broads Authority Executive Area and as such is subject to reduced permitted development rights.	None required.
5	Respondent 2	The BA are retaining the Article 4 Direction for most of their area, which itself is subject to reduced permitted development rights, so no objection.	Noted	None required.

Ref no.	Respondent	Comment	Response	Action
6	Respondent 3	Whilst understanding the general intent of government to limit further Article 4 areas, I believe that the proposals of both ESC and the BA are detrimental to the maintenance of Northgate Street 'as the one that most reflects the essence of the conservation area and Beccles itself'. (Beccles Conservation Character Appraisal). The degradation of the town environment is ongoing and exemplified by the loss of retail and leisure facilities, the unaddressed speeding traffic and unaddressed issue of the high volume of empty buses that pass through Beccles daily, clearly illustrates the failure of the Authorities and councillors to properly address these real issues.	The significance of Northgate is noted. The Article 4 Direction will still cover the whole of Northgate within the BA area. The issues mentioned re traffic, buses and loss of retail etc are not issues controlled by an Article 4 Direction.	None required.
7	Respondent 3	Removal of any restriction on Northgate on the colour of the property elevations (except randomly 15 properties under ESC proposal) has no merit and will merely over time ensure that the historic character of the street will be lost to future generations. For this proposal to be made in the full knowledge of the numerous listed properties on the street is in my opinion extraordinary.	It must be stressed that the removal of the PD restriction regarding painting does not apply to listed buildings, as they have different PD rights and painting may still require listed building consent. Painted render and brickwork buildings are characteristic of Beccles, with pink, white, blue and green painted buildings all currently found on Northgate and elsewhere in the wider area – for example Bridge Street in Bungay. In most instances, owners paint their buildings sympathetic colours and where this is not the case, decoration is generally a transient change with redecoration taking place again within a relatively short period of time.	None required.

Planning Committee

18 July 2025

Agenda item number 11

Postwick with Wotton Neighbourhood Plan- Adoption

Report by Planning Policy Officer

Purpose

The Postwick with Wotton Neighbourhood Plan has been examined. The Examiner made some changes to the Plan. The Plan will be subject to referendum, early August 2025. The Parish Council is keen to ensure the Plan is made/adopted as soon as possible. This report seeks support for adopting the Plan in line with the recommendations set out.

Recommended decision

That Planning Committee recommends that Broads Authority:

- Adopt/make the Postwick with Wotton Neighbourhood Plan.
 - Note that the adopting/making of the plan is subject to the Parish Council Referendum and Broadland and South Norfolk Councils adopting/making the Plan.
 - Delegate any final changes to the Chief Executive in consultation with the Chair of Planning Committee prior to publishing.
-

1. Introduction

- 1.1. The submitted Postwick with Wotton Neighbourhood Plan was approved by the Broads Authority's Director of Strategic Services for consultation in February 2025. This was followed by a statutory publication period between 19 March and 2 May 2025, in which the Plan and its supporting documents were available to the public and consultation bodies online at [Postwick with Wotton Neighbourhood Plan | Broadland and South Norfolk](#).
- 1.2. During the publication period, representations were received from different organisations/individuals. The representations may be viewed via the following links: [Postwick with Wotton Neighbourhood Plan Reg 16 - Consultee Response Summaries | Broadland and South Norfolk](#)
- 1.3. These representations were submitted, along with the Neighbourhood Plan and supporting information, to the independent Examiner, Mr Andrew Ashcroft. The

examination was conducted via written representations during April/May 2025 (the Examiner deciding that a public hearing would not be required).

1.4. Legislation directs that an Examiner considers whether:

- a) the draft plan meets the [basic conditions of a Neighbourhood Development Plan](#);
- b) the draft plan complies with the definition of a Neighbourhood Development Plan and the provisions that can be made by such a plan;
- c) the area for referendum should extend beyond the neighbourhood area; and
- d) the draft plan is compatible with the Convention of Human rights.

2. The Examiner's Report

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

3. Referendum

- 3.1. The Parish Council is keen to get the Plan adopted/made as soon as possible in order to receive increased CIL receipts from Planning Applications in the Parish that are being determined. As such, at the time of writing, the Referendum had not taken place. The referendum is scheduled for early August 2025.
- 3.2. The recommendations seek adoption/making of the Plan subject to the Plan passing referendum.

4. Next steps

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

Author: Natalie Beal

Date of report: 6 June 2025

Planning Committee

18 July 2025

Agenda item number 12

Norfolk Strategic Planning Framework

Report by Planning Policy Officer

Summary

The Norfolk Strategic Planning Framework is a Statement of Common Ground and sets out how Norfolk Local Planning Authorities cooperate on strategic, cross boundary issues. An updated version of the Norfolk Strategic Planning Framework has been produced. It has been endorsed by Members of the Norfolk Strategic Planning Member Forum. It is now for each Local Planning Authority to endorse.

Recommendation

That the Planning Committee endorses the updated Norfolk Strategic Planning Framework and recommend that the Broads Authority also endorses it.

1. Introduction

- 1.1. The "duty to cooperate" is a legal requirement, particularly in the context of planning, that mandates local planning authorities, county councils, and other public bodies to engage constructively and actively on an ongoing basis when addressing strategic, cross-boundary issues. This duty, established by the Localism Act 2011, aims to maximise the effectiveness of local plan preparation by ensuring that strategic matters impacting multiple areas are dealt with appropriately.
- 1.2. The aim of producing the Norfolk Strategic Planning Framework (NSPF) is to:
 - Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
 - Demonstrate compliance with the duty to co-operate (or any successor approach requiring strategic cooperation) and consistency with the National Planning Policy Framework;
 - Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
 - Influence subsequent high-level plans such as Local Economic and Infrastructure Strategies and;

- Maximise the opportunities to secure external funding to deliver against agreed objectives.
- 1.3. The previous version of the NSPF was endorsed by all Norfolk Local Planning Authorities in May 2021. This version updated version of the NSPF (2025) considered the plan making requirements of the National Planning Policy Framework (NPPF) published in December 2024¹. It is clear that Norfolk's local planning authorities needed to continue to work closely together to address strategic planning matters and therefore the Norfolk Strategic Planning Member forum agreed to continue to formally cooperate on strategic planning activities and to update the NSPF.
 - 1.4. This document continues to fulfil the requirement for Norfolk Local Planning Authorities to produce a statement of common ground setting out the effective and on-going joint working across the county on strategic planning matters. It addresses key cross-boundary issues and progress in cooperating to address these.
 - 1.5. The development of this Framework is overseen by the Norfolk Strategic Planning Member Forum. This consists of one Member from each of the Borough Council of King's Lynn and West Norfolk, Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, South Norfolk Council and Norfolk County Council. The membership of the group will be determined by each authority via annual nomination preferably of the Planning Portfolio Member or equivalent for each authority. The operation of the Member Forum and officer support group is governed by formal terms of reference available from the [Norfolk Strategic Planning Member Forum | norfolk.gov.uk](https://www.norfolk.gov.uk/norfolk-strategic-planning-member-forum).
 - 1.6. The document includes a set of agreements that address the numerous cross boundary strategic issues that occur in Norfolk. The agreements are summarised in Section 2 of the NSPF.
 - 1.7. The Broads and Broads Authority are referred to in a number of the agreements. Indeed, two of the agreements relate to our constituent districts taking on our housing need if required (Agreement 10 and 11).

2. Financial implications

- 2.1. The Authority contributes £5,000 each year to the Norfolk Strategic Planning pot, administered by Norwich City Council. Other LPAs in Norfolk contribute £10,000.

¹ See [National Planning Policy Framework - GOV.UK](https://www.gov.uk/national-planning-policy-framework)

3. Risk implications

- 3.1. The NSPF is a key document in meeting the Duty to Cooperate. To not endorse this could result in queries regarding the Authority's approach to Duty to Cooperate. The NSPF is a key element of our approach to Duty to Cooperate in Norfolk.

Author: Natalie Beal

Date of report: 11 June 2025

Appendix 1 – [Norfolk Strategic Planning Framework 2025](#)

Norfolk Strategic Planning Framework

Shared Spatial Objectives and Statement of Common Ground for a Growing County

June 2025



Signatories

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Natural England
- Environment Agency
- Anglian Water
- Marine Management Organisation (MMO)
- Active Norfolk
- Water Resources East

Acknowledgements

The authors would like to thank the following organisations for their support in the production of this document:

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Suffolk County Council
- Babergh & Mid Suffolk District Councils
- East Suffolk Council
- West Suffolk Council
- Fenland District Council
- East Cambridgeshire District Council
- South Holland District Council
- Natural England
- Environment Agency
- Anglian Water
- UK Power Networks
- Cambridgeshire and Peterborough Combined Authority
- Norfolk and Waveney CCG
- NHS Sustainability and Transformation Partnership Estates for Norfolk and Waveney
- Mobile UK
- Water Resources East
- Marine Management Organisation (MMO)

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Summary of Formal Agreements within the Statement of Common Ground

Please Note: 'Norfolk Planning authorities' and 'Norfolk Authorities' refers to the 7 district authorities that make up Norfolk (see section 1.4), the Broads Authority and Norfolk County Council.

Agreement 1 - That when preparing new Local Plans, the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2041.¹

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision. (See section 2.2 for Vision)

Agreement 3 - By the end of the local plan period, through co-operation between the Norfolk Authorities and preparation of development plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

- To realise the economic potential of Norfolk and its people*
- To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change*
- To address housing needs in Norfolk*
- To improve the quality of life and health for all the population of Norfolk*
- To improve and conserve Norfolk's rich and biodiverse environment*

*Full details of each objective are in section 2.3 of this document

Agreement 4 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

Agreement 5 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will implement the Greater Norwich Local Plan (adopted March 2024) and various other existing Local Plan documents in this area, whilst also considering how best to address national changes to local plan making.

Agreement 6 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

Agreement 7 - The list of locations in [Section 5](#) are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors and protected from loss to other uses.

¹ Applicable to plans submitted for examination after Jan 2025

Agreement 8 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the cross-boundary issues and interventions in section 5.4.

Agreement 9 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2041.

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

Agreement 11 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Agreement 12 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs such as elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Agreement 13 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

Agreement 14 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:

- **Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.**
- **Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.**

Agreement 15 - Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity and fully integrate these into local design codes (which will inform planning application decisions, local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthy Life and Active Design.

Agreement 16 - Norfolk authorities agree to endorse updates to the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments.

Agreement 17 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to give consideration to the approaches in the NSPF Climate

Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Agreement 18– Norfolk Authorities will remain members of WRE and will work collaboratively with its other members in the development of the Norfolk Water Strategy Programme to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to support delivery of WRE's Regional Water Resources Plan and develop future iterations of the plan.

Agreement 19 – 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) or lower residential development.

Agreement 20 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure.

Agreement 21 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 22: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places. This includes making provision for those with Special Educational Needs (SEND), providing land for school expansion or new schools and/or where no suitable solution for sustainable access to schools exists, appropriate contributions for home to school transport. S106 and / or Community Infrastructure Levy funds will be used to deliver additional school places and/or contributions to home to school transport, where appropriate. The County Council's Planning Obligations Standards will be used to inform any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure. The authorities agree to support Norfolk County Council in securing contributions towards infrastructure where justified and, in the case of planning obligations, suitably evidenced as being in compliance with S122 of the Community Infrastructure Levy Regulations 2010.

Agreement 23 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:

- Aquaculture
- Biodiversity
- Cabling
- Climate change
- Coastal erosion and coastal change management
- Coastal management, including defence, inundation, and Coastal Change Management Areas
- Co-existence
- Defence
- Displacement
- Dredging and disposal
- Energy – offshore wind and oil and gas
- Fishing
- Governance
- Heritage
- Historic environment
- Infrastructure
- Landscapes and seascapes
- Marine aggregates
- Marine and coastal employment
- Marine Litter
- Marine net gain
- Marine protected areas
- Marine related renewable energy
- Natural capital
- Non-native species
- Oil and Gas
- Port and marine infrastructure and employment
- Sustainable fisheries and aquaculture in small harbour towns
- Sustainable port development
- Tidal Energy
- Tourism and recreation
- Underwater noise
- Water quality/water supply and sewerage

Agreement 24: In recognition of:

- a) the importance the Brecks, the Broads and the Norfolk Coast National Landscape, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;**
- b) the pressure that development in Norfolk could place on these assets; and**
- c) the importance of ecological connections between habitats.**

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

Agreement 25:

It is agreed that:

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.**
- 2) As the Mineral Planning Authority, Norfolk County Council will plan for steady and adequate supply of minerals to support sustainable economic growth through allocating sufficient sites to meet the forecast need for sand and gravel, carstone, as well as allocating sites and providing a criteria-based policy to assess applications to meet the forecast need for silica sand in the Norfolk Minerals and Waste Local Plan.**
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.**
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.**
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period.**
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns using criteria-based**

policies. Priority for the location of new waste management facilities will be given to the re-use of previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.

7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk and surrounding areas.

Agreement 26: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

Agreement 27: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.

Section 1 – Introduction

1.1 Purpose of this Document

Norfolk's Local Planning Authorities (including Norfolk County Council) have a long track record of working together to achieve shared objectives. In early 2015 they, working through the Norfolk Strategic Planning Member Forum, agreed to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of the Norfolk Strategic Planning Framework (NSPF).

The aim of producing the framework is to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
- Demonstrate compliance with the duty to co-operate (or any successor approach requiring strategic cooperation) and consistency with the National Planning Policy Framework;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high-level plans such as Local Economic and Infrastructure Strategies and;
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

The previous version of the NSPF was endorsed by all Norfolk Local Planning Authorities in May 2021. This version updated version of the NSPF (2025) considered the plan making requirements of the National Planning Policy Framework (NPPF) published in December 2024². It is clear that Norfolk's local planning authorities needed to continue to work closely together to address strategic planning matters and therefore the Norfolk Strategic Planning Member forum agreed to continue to formally cooperate on strategic planning activities and to update the NSPF.

This document continues to fulfil the requirement for Norfolk Local Planning Authorities to produce a statement of common ground setting out the effective and on-going joint working across the county on strategic planning matters. It addresses key cross-boundary issues and progress in cooperating to address these.

For further information on the work of the Norfolk Strategic Planning Member Forum and the process for updating this framework please see the Forum's website: [Norfolk Strategic Planning Member Forum - www.norfolk.gov.uk/nsf](https://www.norfolk.gov.uk/nsf)

This document is intended to be strategic in nature. It provides only an overview of background information and shared research. A wealth of information has been produced by working groups used to produce much of this evidence; however, a decision has been made to keep this document concise and to concentrate on the matters where there is a clear need for agreement between the Local Planning Authorities. We acknowledge that not all factors have been considered, but where

² See [National Planning Policy Framework - https://www.gov.uk/government/publications/national-planning-policy-framework--2](https://www.gov.uk/government/publications/national-planning-policy-framework--2)

appropriate, relevant additional information has been highlighted. The absence of certain issues does not diminish their importance or value.

In December 2024 the government published the English devolution white paper³. This sets out an enhanced Devolution Framework for all of England to benefit from devolution. At the time of updating the Norfolk Strategic Planning Framework it is unclear how Local Government Reorganisation (LGR) will impact on the local government structure in Norfolk; however, it is likely to result in changes to local plan coverage with the creation of new unitary authorities. The Planning and Infrastructure Bill introduces the requirement to develop a spatial development strategy (SDS), this will be the responsibility of a new Mayoral Combined County Authority for Norfolk and Suffolk.

A new standard methodology for assessing housing need is also introduced by the new NPPF, further details are set out in section 6, but this significantly increases the level of new housing that needs to be delivered in Norfolk.

As a result of these changes any future iterations of this document or the SDS will need to consider the how this level of growth is best delivered over the county, and the most sustainable spatial distribution will need to be agreed within the relevant authorities created by devolution.

Details of the current lead contact in each Local Planning Authority on strategic planning matters are included in Appendix 1.

1.2 Governance Arrangements for the creation of this document

Norfolk Strategic Planning Member Forum

The development of this Framework is overseen by the Norfolk Strategic Planning Member Forum. This consists of one Member from each of the Borough Council of King's Lynn and West Norfolk, Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, South Norfolk Council and Norfolk County Council. The membership of the group will be determined by each authority via annual nomination preferably of the Planning Portfolio Member or equivalent for each authority. The operation of the Member Forum and officer support group is governed by formal terms of reference available from [the Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf).

Chairmanship is determined by the Forum and reviewed each year. The meetings of the Forum are held every three months and held in public. An agenda and papers are circulated in advance of each meeting and informal action notes are taken and published on the Norfolk Strategic Planning Framework website. The Member Forum oversees the production of this document and then each authority endorses it through their relevant committees or cabinets.

Norfolk Strategic Planning Officers Group

The Norfolk Strategic Planning Officers Group consists of key planning policy officers from each Planning Authority in Norfolk as well as other key statutory agencies. Through the update process, the group has reviewed the progress of document production on a monthly basis. The group have ensured that the document progresses to the timetable and meets any government and legislative requirements.

³ [English Devolution White Paper - GOV.UK](https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper) - <https://www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundations-for-growth/english-devolution-white-paper>

The Steering Groups

A steering group has been responsible for the creation of the document.

Technical Sub Groups

The Technical Sub Groups have provided technical evidence and recommendations in relation to the document to the Steering Group. They consist of officers from the Authorities involved in the production of the document and a range of bodies who have expertise and interest in matters related to the group's subject.

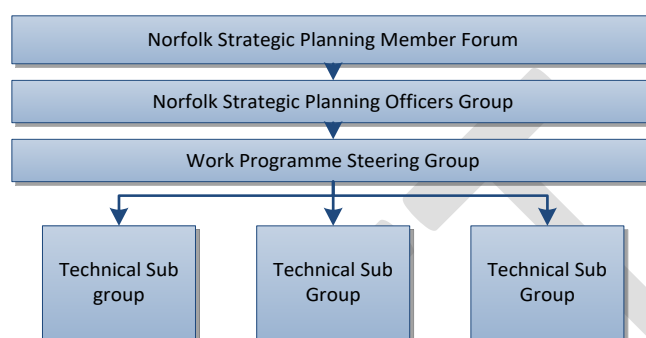


Figure 1: Governance arrangements for the Norfolk Strategic Planning Framework

1.3 Changes to the document

In updating this document Norfolk's local planning authorities sought to ensure the NSPF is up to date with all relevant information and legislation. The document has been updated after the completion of a number of county wide studies looking at:

- A review of the Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy following the introduction of a county wide tariff to mitigate against the impact on existing Natura 2000 sites in March 2022
- A review of the health section and Health Protocol to highlight the importance of health provision and health living as a strategic cross boundary issue
- Updates to remaining sections to take account of new or updated information
- The growing Evidence base following the introduction of Nutrient Neutrality requirements in Norfolk from March 2022, including mitigation strategies

1.4 Timescale for and coverage of the Document

This document relates to the whole of Norfolk and all Norfolk Local Planning Authorities which are:

Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, Norwich City Council, North Norfolk District Council, South Norfolk Council and Norfolk County Council.

This Statement of Common Ground has been prepared with the understanding that the signatories undertake their statutory duties in accordance with relevant legislation, policy and guidance; and in the context of other relevant Statements of Common Ground, Memoranda of Understanding and Position Statements which they are party to.

All Norfolk Local Planning Authorities have agreed to plan to at least 22041 in their next generation of local plans. This is reflected in the evidence base for this framework insofar as it seeks to provide

statistical information looking ahead to this period. This is also the date by when objectives are to be achieved. However, in parts, notably the vision, it is necessary for the document to take a longer-term view.

Agreement 1 - That when preparing new Local Plans the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2041.⁴

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⁴ Applicable to plans submitted for examination after Jan 2025

Section 2 – Vision and Objectives

2.1 Introduction

Norfolk is a diverse county. It covers a land area of 5,370 sq. km (2,074 sq. miles) and has a population of 916,120⁵. It is a largely rural county with a relatively low population density, although over half of the population lives in the built-up areas of Norwich, Great Yarmouth and Gorleston, King's Lynn and a number of market towns⁶. These built-up areas have a very considerable stock of historic assets and can offer a very attractive quality of life to residents.

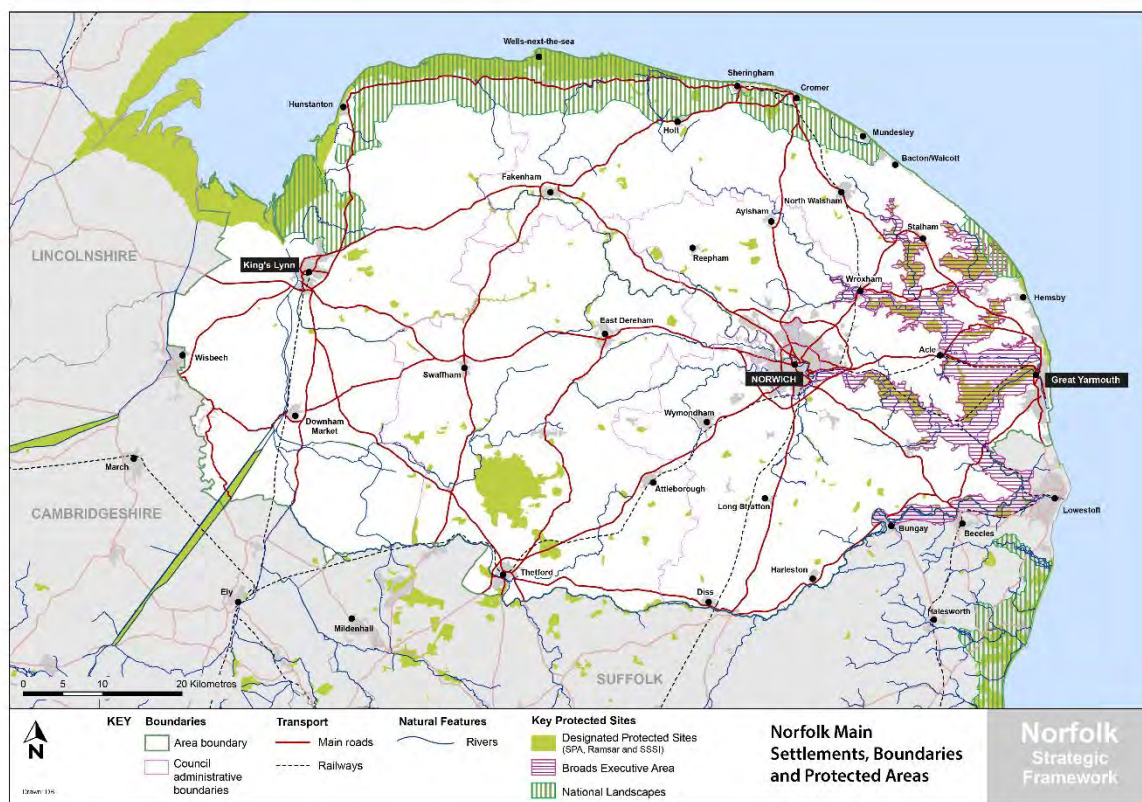


Figure 2: Map of Norfolk's main settlement, Authority boundaries, major transport routes and land-based protected areas. 2021

Norfolk borders Suffolk to the south, Cambridgeshire to the southwest, and Lincolnshire to the west. It also has a long coastal boundary stretching from The Wash to the south of Great Yarmouth which is covered by the East Inshore and Offshore Marine Plan⁷. Norfolk contains many environments which are highly valued for their landscape and seascape, and for their biodiversity and/or geodiversity interests. In particular, the Norfolk Coast National Landscape, the Brecks and the Broads, which is a

⁵ Based on 2021 Census see [Norfolk Insight web page - http://www.norfolkinsight.org.uk/population](http://www.norfolkinsight.org.uk/population)

⁶ The 21 largest others centres are Attleborough, Aylsham, Cromer, Dereham, Diss, Downham Market, Fakenham, Harleston, Holt, Hunstanton, Loddon, Long Stratton, North Walsham, Sheringham, Stalham, Swaffham, Thetford, Wroxham/Hoveton, Wymondham, Watton, Wells-Next-The-Sea

⁷ See [East Inshore Marine Plan - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf)

unique network of protected rivers and lakes that extends partly into Suffolk and has the equivalent status to a National Park.

Norfolk's economy is also diverse. It is home to a number of world class industries on sites such as the Norwich Research Park and the offshore energy sector in Great Yarmouth. Employment levels are growing; there is a highly skilled and versatile population with good graduate retention rates and improving links to the thriving markets of Cambridge, London and the wider South East. However, it is not without challenges; there are high levels of deprivation especially in urban areas and skill levels in the workforce are relatively low⁸

Norfolk's infrastructure is under developed compared to many other parts of the wider South and East of England. For many years Norwich was the largest city in England not connected to the motorway network by a dual carriageway. Cross county trips tended to be slow and unreliable and rail journey times from London were comparable to places in the north of England such as York and Warrington. However, the dualling of the A11 and the completion of the Broadland Northway (previously known as the Northern Distributor Road) have improved travel time and connectivity considerably, and both A47 upgrades, and Greater Anglia rail franchise changes have improved this further. Norwich Airport offers regular flights to various destinations in the UK and Europe. Many of the key road and rail links connecting Norfolk to the rest of the UK are still in need of improvement as are many of the links within the county. The need to enhance the capacity of infrastructure networks can add considerable costs and increase delays to development.

Patchy mobile coverage is a continuing frustration to residents and businesses⁹ with Norfolk ranked 83rd out of 96 areas in the UK for mobile coverage. Thanks to the work of Norfolk County Council, the picture regarding superfast broadband coverage has improved; currently 96% of the county's homes and businesses are able to access super-fast broadband, up from 41% in 2011¹⁰.

Through working together and with government, businesses and residents, Norfolk's Local Authorities hope to successfully address the challenges faced and maximise the potential of the county. As a basis for guiding this shared endeavour, the following shared vision and objectives have been agreed by the Strategic Planning Member Forum. For further information on the background to this material please see the papers previously considered by the Member Forum¹¹.

2.2 Proposed Spatial Vision

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.

"By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of

⁸ New Anglia LEP Economic Strategy - <https://newanglia.co.uk/wp-content/uploads/2022/01/FINAL-Norfolk-and-Suffolk-economic-strategy-Jan-2022.pdf>

⁹ See [Mobile coverage in Norfolk for EE, O2, Three, Vodafone | Signalchecker.co.uk](#)

¹⁰ See [Hundreds of public buildings in Norfolk upgraded to ultrafast broadband - Norfolk County Council](#))

¹¹ See [papers for the 13th October 2016 Member Forum at www.norfolk.gov.uk/nsf](#)

settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life and health for residents. Housing needs will be met in full in socially inclusive communities. The county will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will help minimise the need to travel and residents will have choice about how they meet their demand for local travel.”

2.3 Proposed Shared Objectives

Agreement 3 - By the end of the local plan period, through co-operation between the Norfolk Authorities and preparation of development plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region’s business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk’s main settlements and across county boundaries to strengthen inward investment;
- strengthening Norfolk’s connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure;
- strengthening Norfolk’s competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities;
- recognising the role of our city centre and the need to re-examine and revitalise the role of town centres as a focus for investment and enhancing the quality of life for residents;
- recognising that the long-term conservation, investment in and enhancement of Norfolk’s natural environment and heritage is a key element of the county’s competitiveness and contributor to the Norfolk economy;
- ensuring a healthy workforce through well planned sustainable communities where people can walk and cycle to work or use public transport or work effectively from home;
- recognise that high quality housing underpins economic growth;
- Maximising opportunities that a clean/green economic recovery presents for the region and the new jobs which will be required to achieve the Government’s net zero target

To reduce Norfolk’s greenhouse gas emissions and improve air quality, as well as reducing the impact from, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- reducing unnecessary car use and supporting the roll out of new technologies (such as electric vehicles and alternative fuels e.g. hydrogen) and Sustainable and active modes of travel including public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and

- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

Together these measures will help create healthier more sustainable communities.

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the county and address in full the identified need for new homes ;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, health services, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or the Community Infrastructure Levy);
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

To improve the quality of life and health for all the population of Norfolk by:

- promoting development and design which seeks to actively improve health, prevent ill health and tackle widespread health inequalities;
- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, healthy active lifestyles and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at the local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- meeting environmental challenges including those set out in new legislation such as the 2021 Environment Act; e.g. habitat mitigation, achieving Biodiversity Net Gain (BNG), and addressing issues of Nutrient Neutrality affecting the River Wensum and Broads Special Area of Conservation/ Ramsar sites;
- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;
- protecting the landscape setting of our existing settlements and preventing the unplanned coalescence of settlements;

- maximising the use of previously developed land within our urban areas to minimise the need to develop greenfield land;
- minimising development on the best and most versatile agricultural land;
- maximising the environmental benefits where the development of greenfield sites is needed;
- protecting, maintaining and enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources;
- protecting and enhancing water, air, soil and other natural resource quality where possible; and
- leaving the environment in a better state for future generations.

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Section 3 – Understanding the County

3.1 Administrative Boundaries

Within Norfolk there are seven separate district council areas¹² (as shown in Fig.2), each of which is a local planning authority. Overlying parts of five of these areas (and also part of East Suffolk district in Suffolk) is the Broads Authority which is the local planning authority for its area rather than the district councils. The Broads Authority Executive Area (in which the Broads Authority are the planning authority) overlays these administrative areas and is illustrated in the figure below.

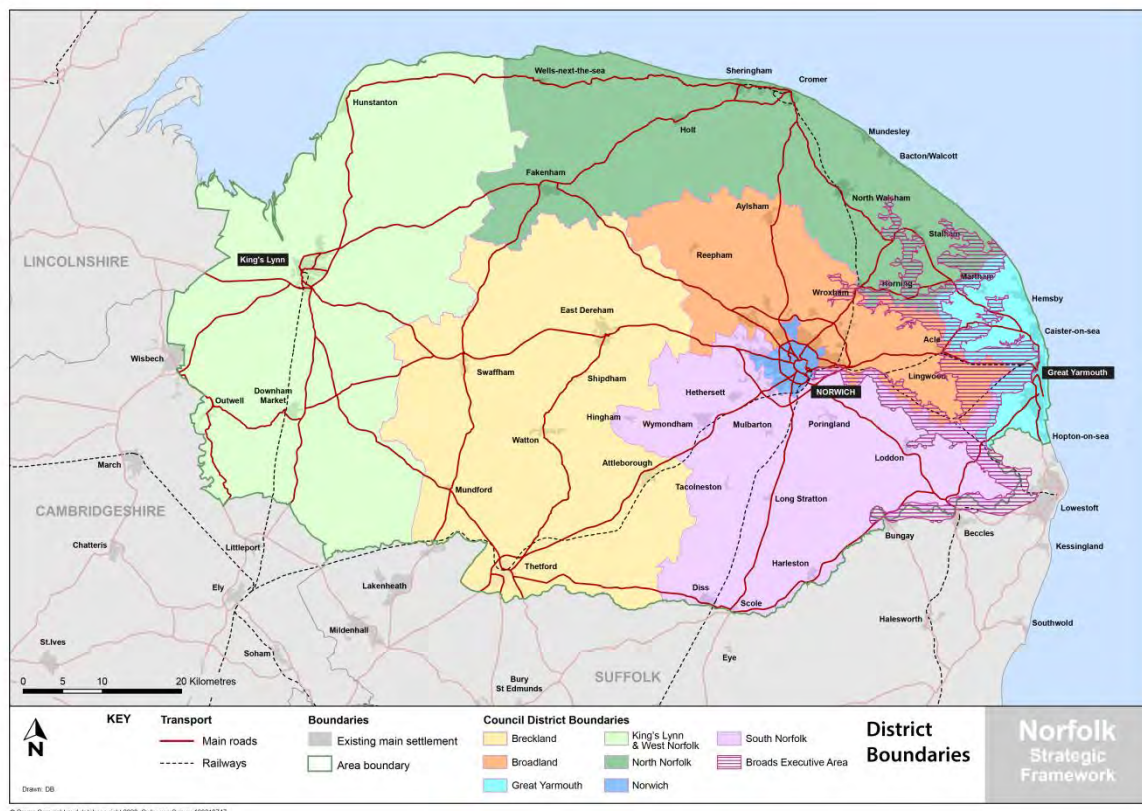


Figure 3: Map of Norfolk district boundaries and the major transport connections. 2021

In addition to the eight local planning authorities the county council are also a local planning authority responsible for minerals and waste planning as well as certain operational developments related to their functions (most notably as highways authority, Lead Local Flood Authority and educational development). The Marine Management Organisation (MMO) is relevant to the coastal parts of the area as well as some inland waters. The 25 Year Environment Plan¹³ requires that marine plans are adopted by 2021. The Marine and Coastal Access Act 2009 provides the domestic legislative basis for the marine planning system. The Marine Policy Statement was adopted by all UK Administrations (England, Wales, Scotland and Northern Ireland) in March 2011, which provides the policy framework

¹² Breckland District Council, Broadland District Council, Great Yarmouth Borough Council, King's Lynn and West Norfolk Borough Council, North Norfolk District Council, Norwich City Council and South Norfolk Council - collectively, these are referred to as 'the districts' locally.

¹³ [25 Year Environment Plan - GOV.UK](https://www.gov.uk/government/publications/25-year-environment-plan) - <https://www.gov.uk/government/publications/25-year-environment-plan>

for the preparation of all UK marine plans and taking decisions affecting the marine environment. It has been prepared and adopted for the purposes of section 44 of the Marine and Coastal Access Act 2009. It contains a range of high-level policy objectives and considerations, which provide the context for the development, monitoring and amendment of national and sub-national marine plans .

Marine plans translate the Marine Policy Statement into detailed policy and spatial guidance for each marine plan area. Section 58 of the Marine and Coastal Access Act 2009 states that all public bodies making authorisation and enforcement decisions which affect or might affect the UK marine area, must do so 'in accordance' with the relevant adopted marine plan. All other decisions must 'have regard' to the marine plan, for example, when a public or local authority creates or reviews a local plan.

Under delegation from the Secretary of State for Environment, Food and Rural Affairs, the Marine Management Organisation (MMO) is the marine planning authority for England and is responsible for preparing marine plans for English inshore and offshore waters. The MMO is a prescribed body as set out in Section 33A of the Planning and Compulsory Purchase Act 2004 and the MMO is listed in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as a body which is subject to the duty to co-operate. The East Inshore and East Offshore Marine Plans, which cover the area from Flamborough Head to Felixstowe, will inform and guide decision-makers on developments which may have an impact on the marine and coastal environment. At its landward extent, the East Inshore Marine Plan applies up to the mean high water springs mark, which includes the tidal extent of any rivers. The East Inshore and East Offshore Marine Plans will therefore overlap with terrestrial plans which generally extend to the mean low water springs mark. On 2 April 2014 the East Inshore and Offshore Marine Plans were published, becoming a material consideration for public authorities with decision making functions, and providing guidance for sustainable development from Flamborough Head to Felixstowe. The Secretary of State for Environment, Food and Rural Affairs agreed with the MMOs recommendation made in 2022 to replace the East Inshore and East Offshore Marine Plans with a new 'East Marine Plan', which will be the first of a second generation of plans for English waters. The new document will be referred to as the 'East Marine Plan'.

Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the county, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed, some settlements straddle the boundaries of planning authorities (for example, some settlements are partly in the Broads Authority planning area and partly in the relevant district, such as Horning, Loddon and Brundall) and some settlements are very close to each other, but in different local planning authority areas (namely Hoveton and Wroxham with Wroxham being in Broadland Council area and Hoveton in North Norfolk area with the Broads Authority also being the Local Planning Authority for part of the two settlements), as does the infrastructure which is necessary to support development.

The economic geography of Norfolk is complex as it reflects a multicentric area and boundaries tend to be fuzzy. Overall, the county has a relatively high level of self-containment as the vast majority of the resident workforce stay in Norfolk for work, although there are some strong functional cross county boundary linkages. The linkages between Great Yarmouth and Lowestoft; the settlements in the Waveney Valley; and between King's Lynn and the Fens and Cambridge being particularly important

Within the county the three larger urban areas of Norwich, King's Lynn and Great Yarmouth have a considerable influence providing jobs, retail, health care and a broad range of services and facilities as

well as homes for a significant proportion of the county's population. These three centres are located in the east, west and centre of the county and have relatively limited functional connection with one another, notwithstanding the A47 linking all three.

3.2 Housing Markets

Housing Market Areas (HMAs) are defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. In defining them, regard is given particularly to house prices and rates of change in house prices; household migration and search patterns; and contextual data (for example travel to work area boundaries, retail and school catchment areas). They tend to represent “...the geographical area in which a substantial majority of the employed population both live and work and where those moving house without changing employment choose to stay”¹⁴. All areas need to be identified as being within a housing market although housing market areas can overlap. Norfolk HMAs can be seen in Figure 4.

Prior to the introduction of a new housing methodology in the revised National Planning Policy Framework, the Norfolk Districts and the Broads Authority had produced Strategic Housing Market Assessments (SHMAs) which covered the entire County¹⁵. Within the Central Norfolk SHMA area (comprising of Broadland District Council, Norwich City Council and South Norfolk Council) a case can also be made for the identification of a core area based around Norwich and its immediate environs including parts of both South Norfolk and Broadland District Councils. Outputs from the Central Norfolk SHMA include separate conclusions in relation to this core area.

The boundaries of Housing Market Areas will rarely correspond with the administrative boundaries of Local Authorities (Fig.3). In Norfolk there are three distinct HMAs centred on Norwich, King's Lynn, Yarmouth and their surrounding hinterlands. However, there are some areas of the County which are distant from any of these centres; functional links are less apparent, and the case for inclusion within one HMA rather than another is less compelling. To ensure comprehensive coverage the Norfolk Authorities have agreed that the boundaries of the Housing Market Areas should be co-terminus and because housing targets will be set for each Planning Authority area the boundaries of HMAs should be 'snapped to' Authority boundaries.

¹⁴Local Housing Systems Analysis: Best Practice Guide. Edinburgh: Scottish Homes

¹⁵ See [Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)
[KLWN HNA - https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf)
[KLWN HNA - https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf)
[Great Yarmouth SHMA - https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241](https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241)

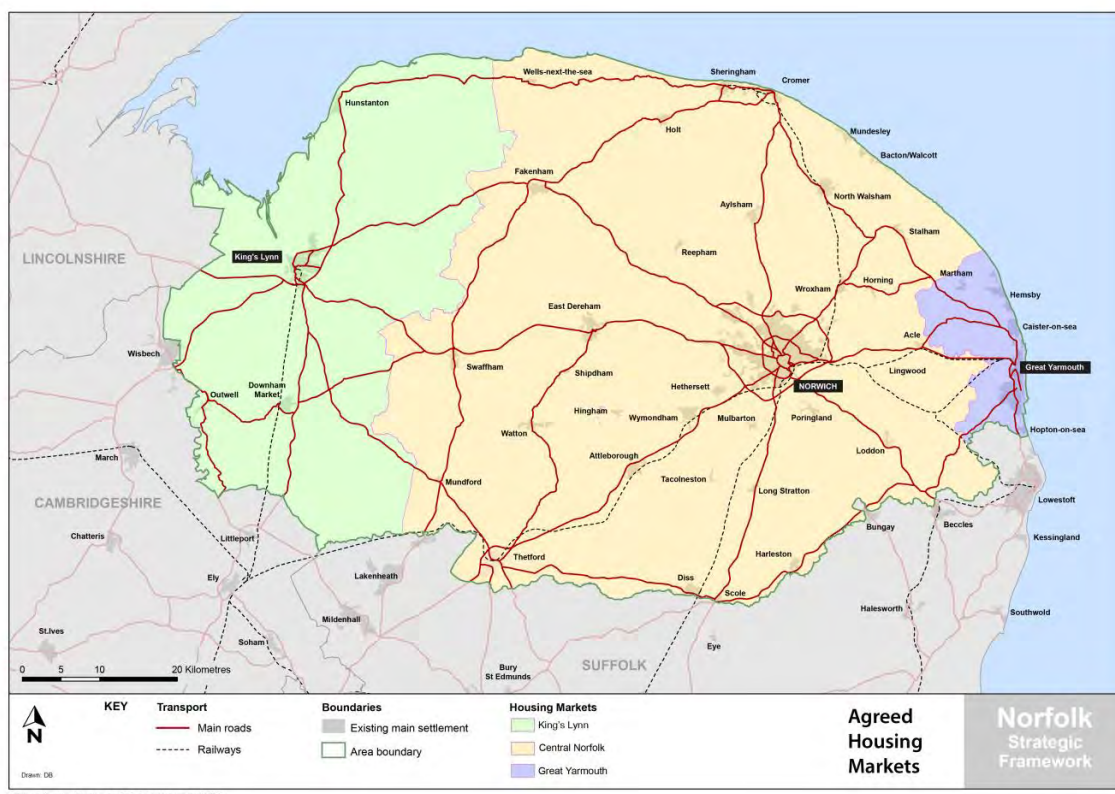


Figure 4: Map of Norfolk Agreed Housing Market Areas. 2021

The housing needs of the Broads Authority Area are included within the Local Housing Needs Assessment for Great Yarmouth¹⁶ and the related addendum¹⁷. The Broad Authority have also assessed the need for residential Moorings¹⁸. The new Government methodology cannot be used to calculate the housing requirements within the Broads area, therefore there remains a requirement for the Broads Authority to calculate a separate housing need when it reviews its local plan.

Local planning authorities are also expected to plan for the right mix of home types and tenures to reflect local needs. The evidence base for such planning is only currently available from the local SHMAs and HMAs.

¹⁶ See Great Yarmouth Borough Council and The Broads Authority: Local Housing Needs Assessment 2022 Version 2 - https://www.broads-authority.gov.uk/_data/assets/pdf_file/0026/432476/Great-Yarmouth-and-The-Broads-Authority-LHNA_Final-Version-2.pdf

¹⁷ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0034/569329/Local-Housing-Needs-Assessment-Addendum-March-2025.pdf

¹⁸ See Broads Authority Boat Dwellers Accommodation Assessment - https://www.broads-authority.gov.uk/_data/assets/pdf_file/0028/439075/Broads-Authority-BDAA-Report-August-2022.pdf

To help understand for the right mix of home types and tenures King's Lynn and West Norfolk have commissioned a Housing Needs Assessment in 2020¹⁹, North Norfolk has commissioned a SHMA update in 2019²⁰, Great Yarmouth commissioned a SHMA update in 2022. and Breckland commissioned a Housing Needs and Economic Development Assessment in 2023²¹, which was further updated in 2025

3.3 Strategic Functional Economic Market Areas

Government guidance recognises that since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area. However in recognising these areas it is possible to define them by taking account of factors including:

- extent of any Local Economic Strategies within the area;
- travel to work areas;
- housing market area;
- flow of goods, services and information within the local economy;
- service market for consumers;
- administrative area;
- catchment areas of facilities providing cultural and social well-being; and
- transport networks.

Boundaries of Travel to Work Areas (TTWAs) are illustrated over the page in Figure 5. Information on retail matters are captured within the existing evidence base supporting Local Plans²². Both these sources suggest that whilst Norwich is a major Regional Centre and draws trade from an extensive catchment across Norfolk and the wider region, both King's Lynn and Great Yarmouth retain a sufficient degree of self-containment to be considered in different functional economic market areas for most purposes.

It should also be noted that there are some very strong and significant cross boundary functional economic relationships. Great Yarmouth has particularly strong links with Lowestoft to the South. Within the Waveney Valley there are strong relationships between settlements on both sides of the County boundary. In the West of the County, King's Lynn in particular has functional economic linkages to the Lincolnshire and Cambridgeshire Fens. Settlements such as King's Lynn, Downham Market and Thetford also benefit to some extent by good access to the Cambridge economy.

The position within the Central Norfolk area is again more complicated as for certain economic functions (such as higher order retail and cultural activities) the catchment area extends over the whole of Central Norfolk areas; there are far weaker connections in other areas of economic activity. In outer parts of the Central Norfolk area there is little functional connection for convenience shopping

¹⁹ See [West Norfolk Housing Needs Assessment - https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf)

²⁰ See [North Norfolk Housing Needs Assessment - https://www.north-norfolk.gov.uk/media/5528/shma-local-housing-needs-assessment-2019.pdf](https://www.north-norfolk.gov.uk/media/5528/shma-local-housing-needs-assessment-2019.pdf)

²¹ [HEDNA-Final-Report May 2024 - https://www.breckland.gov.uk/media/21638/HEDNA-Final-Report/pdf/Breckland_HEDNA_Final_Draft_Report_31.05.24_-_Clean_-_PDF.pdf](https://www.breckland.gov.uk/media/21638/HEDNA-Final-Report/pdf/Breckland_HEDNA_Final_Draft_Report_31.05.24_-_Clean_-_PDF.pdf)

²² See [in particular the Employment, Town Centre and Retail Study for the greater Norwich Local Plan - https://gnlp.oc2.uk/document/14/4552#d4552](https://gnlp.oc2.uk/document/14/4552#d4552)

and the proportion of working residents who work in the Norwich urban area is very low²³. Both Thetford and Mildenhall and Cromer and Sheringham are still regarded as being distinct Travel to Work Areas. These are illustrated below.

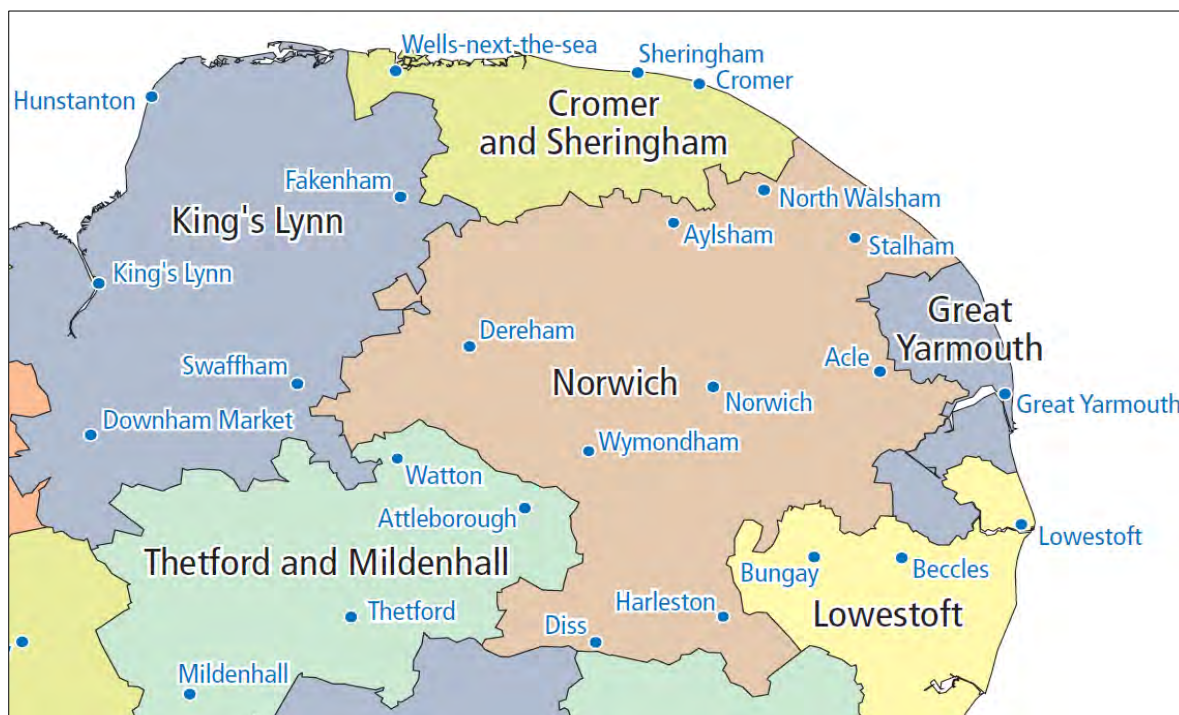


Figure 5: Norfolk's 2011 travel to work areas (TTWAs). Source: ONS 2015

The information available, including particularly the TTWAs and the higher retail analysis, suggests that the boundaries of strategic functional market areas are likely to be similar to the Housing Market Areas described above albeit, for many purposes significant sub-areas within these strategic areas will exist for a number of economic functions, especially within the Central Norfolk area.

3.4 Implications of Changing Infrastructure on Market Areas

Norfolk has benefitted from a number of significant improvements to its transport infrastructure. It is arguable that these, and others expected to be built over the next few years, have had, and will continue to have some effect on the functionality of the housing and economic markets. For example, the dualling of the A11 (Fiveways to Thetford) was completed and opened in December 2014, significantly improving the road connectivity between much of the County, Cambridge, the wider South East and the Midlands. The Third River Crossing at Great Yarmouth, which opened in February 2024, and the A47/A143 link road, which opened in December 2015, now better connect the A47 trunk road to the port and the southern peninsula of the town, and Great Yarmouth's Enterprise Zone at Beacon Park to further growth areas. The Broadland Northway, which was completed in Spring 2018, was a key part of the former Norwich Area Transportation Strategy, now reviewed and replaced by the Transport for Norwich Strategy which also includes proposals for a range of other

²³ The Central Norfolk SHMA identified the following settlements within the area of the 5 Central Norfolk Districts as having less than 10% of their resident workforce working in Norwich: Diss, Harleston, Sheringham, Swaffham, Thetford, Watton and Wells.

improvements across Norwich²⁴. The county is served by two trunk roads, the A47 and A11. Government identified the Major Road Network, a category of the road network comprising the country's busiest and most economically important A class roads in local-authority control, which includes the A17, A140, A10, A134, A1270 and A146, all serving longer-distance trips.

The Government's most recent Roads Investment Strategy contains a number of improvement schemes for the A47 as part of the trunk road programme. These were due to be delivered by 2025, although this was delayed by a legal challenge which has now been dismissed:

- A47 Vauxhall and Gapton Roundabouts, Great Yarmouth
- A47 Blofield to Burlingham Dualling
- A47 Easton to Tuddenham Dualling
- A47/A11 Thickthorn junction

The Blofield and Easton schemes have started on site, Thickthorn is due to start in 2025, whilst the Vauxhall improvement scheme was cancelled in government's 2024 budget announcement.

Additionally further improvement to the main road network of the County will be delivered by the Long Stratton bypass which commenced in 2024.

The majority of rail services in Norfolk are operated by Greater Anglia. The nine-year franchise, which commenced in October 2016, has delivered a variety of improvements) including the following that are of particular significance for Norfolk:

- Replacement of the entire fleet of trains;
- More services and faster journeys across the network, including 'Norwich in 90' trains;
- Norwich to Cambridge services extended to Stansted Airport;
- Work with Network Rail to implement specific schemes to drive up performance and reliability throughout the franchise;
- Increase in seats into London in the morning peak period, and an increase of more than 1,000 seats per week on the franchise network; and
- Various other improvements including improvements to WiFi, stations and ticketing systems.

The Greater Anglia franchise will be brought under public control by autumn 2025. East Midlands Railway operates Norwich to Liverpool services whilst Great Northern operate King's Lynn, via Cambridge, to London services.

Priorities include improvement of the Cambridge to Norwich services to half hourly frequency, and construction of East West Rail, which would open up destinations such as Bedford, Oxford and Milton Keynes with direct rail services.

Whilst the recently delivered and announced infrastructure enhancements are welcomed and cumulatively will assist the County in reaching its economic potential it is not considered likely they will result in any significant change to the functional geography of the County in the immediate future with regard to either housing or economic markets. East/West travel across the County will remain relatively slow and lack reliability, therefore it is likely that both King's Lynn and Great Yarmouth will retain similar levels of self-containment in housing and economic matters as present. The functional

²⁴ See [Transport for Norwich Strategy https://www.norfolk.gov.uk/media/21800/Transport-For-Norwich-Strategy-2021/pdf/51transport-for-norwich-strategy-2021.pdf](https://www.norfolk.gov.uk/media/21800/Transport-For-Norwich-Strategy-2021/pdf/51transport-for-norwich-strategy-2021.pdf) for further information

geography of the County will remain broadly as it is at least for the period of the preparation of the next round of Local Plans.

In the revised NPPF the government retained the requirement to produce a Statement of Common Ground (SCG) over the housing market area or other agreed geographical area where justified and appropriate.

In light of this requirement and the above analysis of our functional economic geography it is the view of the Norfolk Local Planning Authorities that there is a strong case to produce a single statement of common ground across Norfolk rather than seeking to produce three separate ones based on one large and two small Housing Market Areas. The reasons for this are:

- The recognised desire of the government not to disrupt existing joint working arrangements where these are effective;
- The high overall rate of self-containment of the Norfolk economy;
- The somewhat weak functional relationship between the outer areas of the Central Norfolk Housing Market Area and its core and the similarity of the strategic issues faced by these outer areas with the adjoining coastal and rural areas of Kings Lynn and West Norfolk and Great Yarmouth Boroughs; and
- The way in which the Broads Authority area overlaps both the Great Yarmouth and Central Norwich Housing Market Areas and five of the District planning authority areas which are signatories to this Framework.

Furthermore the shared understanding of economic geography has led to a number of agreements being reached about appropriate Local Planning areas for Norfolk.

Agreement 4 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

With regard to Central Norfolk, the evidence does suggest that there may be some possibility for some of the growth pressures evident within the five Districts of Central Norfolk to be met within the different administrative areas of Central Norfolk. These five District authorities (Breckland, Broadland, North Norfolk, Norwich City and South Norfolk, along with the Broads Authority that partly overlaps 4 of their administrative areas) already co-operate closely. However, as noted above the Central Norfolk Housing Market Area is broad and contains places that have little relationship within one another and a weaker relationship with Norwich at the centre of the area. In the light of this the Local Authorities have reached agreement that whilst it will be necessary to closely co-operate on strategic planning matters and shared evidence, it is considered appropriate to seek to plan jointly over the area closer to Norwich with much stronger functional connectivity.

Agreement 5 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will implement the Greater Norwich Local Plan (adopted March 2024) and various other existing Local Plan documents in this area, whilst also considering how best to address national changes to local plan making. The issue of whether it is appropriate to define any sub market areas or not will be a matter for those Plans. This approach does not preclude the possible redistribution of growth across the Central Norfolk area should this be supported by evidence and agreed by the relevant planning authorities.

Furthermore, the Broads Authority Area overlaps functional housing and travel to work areas of Central Norfolk, Great Yarmouth and Lowestoft.

Agreement 6 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

For further information on the current Local Plans in the County and the timetable for review please see the latest minutes of the Norfolk Strategic Planning Member Forum²⁵.

3.5 Other Joint Initiatives and Neighbouring Strategic Partnerships

Given the high degree of self-containment in relation to the housing market and travel to work areas the framework relates principally to the county of Norfolk although where appropriate cross boundary initiatives are in place. For example, planners from all of the Norfolk and Suffolk coastal local planning authorities, including the Broads Authority have worked together to produce a separate 'Coastal' Statement of Common ground²⁶ and have also produced a coastal adaption Supplementary Planning Document. Other joint working arrangements include a Statement of common ground between Great Yarmouth and East Suffolk and the Cambridge Norwich Tech corridor; further details of cross boundary initiatives are in appendix 2.

Norfolk is bounded by Suffolk to the south and Cambridgeshire and Lincolnshire to the west. Strategic partnerships are being developed in these neighbouring areas in response to national objectives for additional homes, jobs and enhanced infrastructure.

Following the formation of the Combined Authority (CA) for Cambridgeshire and Peterborough, the CA produced the Cambridgeshire and Peterborough Strategic Spatial Framework²⁷ in March 2018 which brings together the current growth ambitions of the area, and how the Combined Authority can support local jobs and housing growth ambitions. The Combined Authority are engaging with its partners and other stakeholders to continue to develop the second half of the Strategic Spatial Framework.

In Suffolk, the Suffolk's Inclusive Growth Framework²⁸ has been refreshed and relaunched by the Suffolk Growth Partnership in November 2020. The Framework brings together the shared growth work that is being taken forward across Suffolk into a single, cohesive programme.

The Framework:

- Presents the starting point and ambitions to allow local authorities to engage with communities, partners and Government with a clear and consistent message
- Sets out a single, concise summary of the work being taken forward to plan, coordinate and deliver growth across Suffolk

²⁵ See [Norfolk Strategic Planning Member Forum - www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf)

²⁶ See [Statement of common ground coastal zone planning report - https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/nspmf-statement-of-common-ground-coastal-zone-planning-report-180712.pdf](https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/nspmf-statement-of-common-ground-coastal-zone-planning-report-180712.pdf)

²⁷ See [Cambridgeshire and Peterborough Strategic Spatial Framework - https://stneotsmasterplan.co.uk/reports/cambridgeshire-and-peterborough-spatial-framework/](https://stneotsmasterplan.co.uk/reports/cambridgeshire-and-peterborough-spatial-framework/)

²⁸ See [Suffolk's Inclusive Growth Framework - https://27ea8bdd-fa24-451b-baf1-35bcfe30437b.filesusr.com/ugd/43f74e_988022cc644f4ac79d4bf0743468fa32.pdf](https://27ea8bdd-fa24-451b-baf1-35bcfe30437b.filesusr.com/ugd/43f74e_988022cc644f4ac79d4bf0743468fa32.pdf)

- Enables connections between programmes of work across the public sector, thereby minimising duplication and ensuring greater benefit is delivered through our investments

To the west of Norfolk, the South East Lincolnshire Local Plan²⁹ was adopted in March 2019 by the Joint Strategic Planning Committee. The Committee is a partnership of Boston Borough, South Holland District and Lincolnshire County Councils who are working together to plan the future of South Holland District and Boston Borough.

Across the wider region Norfolk is represented at the East of England Local Government Association and on the East of England Planning Officers' Group (EEPO). The role of the latter is to coordinate technical and policy work relevant to councils in the East of England on strategic economic, planning and infrastructure challenges, with a particular focus on engagement with London and the Wider South East.

Norfolk Authorities will continue to work with authorities in the region through their strategic partnerships and national initiatives to ensure a complementary, integrated approach to growth and to optimise investment opportunities to achieve mutually beneficial outcomes.

²⁹ See [South East Lincolnshire Local Plan](http://www.southeastlincslocalplan.org/adopted-plan/) - <http://www.southeastlincslocalplan.org/adopted-plan/>

Section 4 – Projections of growth

As a baseline for planning activity published projections for the County must be considered, including projections regarding population, households and employment. These are summarised below. However, it should be recognised that these are statistical projections and tend to be very heavily based on the extrapolation of past trends. In forward planning it is essential that other factors are given due weight. This is done in subsequent sections of this document and these projections are only produced for information.

4.1 Population Projections

The most recent set of national population projections were published by the Office for National Statistics (ONS) in March of 2020³⁰. These show an increase in the rate of overall population growth from the 2016 ONS figures, Table 1 shows a growth in population levels of 13-14% over the period from 2018-2041 and 2042. Districts are projected to see a significant variation in levels of population growth of between 5% in King's Lynn and West Norfolk and 28% in South Norfolk.

Table 1: Current and projected population numbers for Norfolk Districts 2018 based. Source: ONS,

District	2018 (000's)	2041 (000's)	Population growth 2018- 2041 (%)41	2042 (000's)	Population growth 2018-2042
Breckland	139.3	162.8	17	163.6	17
Broadland	129.5	149.4	15	150.2	16
Great Yarmouth	99.4	106.1	7	106.5	7
King's Lynn And West Norfolk	151.8	159.4	5	159.8	5
North Norfolk	104.6	117.2	12	117.7	13
Norwich	141.1	151.7	8	152.0	8
South Norfolk	138	174.9	27	176.0	28
Norfolk	903.7	1,021.7	13	1,025.8	14

It should be noted that these projections do not take into account existing planned growth. This would suggest a somewhat different distribution of population growth between the Greater Norwich authorities.

The population projections also contain considerable information of the age profile of the population. This is potentially of considerable strategic significance for Norfolk which will have major implications for Local Authority services and will need to be considered in Local Plans. The projected age profiles are set out in the Table 2 and 3 over the page.

³⁰Available at [ONS population projections - https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2](https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2)

Table 2: Existing population numbers (000s) and % by age quartiles (2018) and projected population numbers and % by age quartiles (2041) of Norfolk Districts. *Source: ONS*

District	2018				2041			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	139.3	29.5 (21.2)	75.3 (54.1)	33.5 (24)	162.8	31.1 (19.1)	79.9 (49.1)	51.7 (31.8)
Broadland	129.5	26.4 (20.4)	69.9 (54)	33.2 (25.6)	149.4	28.5 (19.1)	74.8 (50.1)	46.1 (30.9)
Great Yarmouth	99.4	22 (22)	53.4 (53.7)	24 (24.1)	106.1	20.5 (19.3)	52.2 (49.2)	33.5 (31.6)
King's Lynn And West Norfolk	151.8	32.2 (21.2)	80.4 (53)	39.1 (25.8)	159.4	30.5 (19.1)	76.5 (48.0)	52.4 (32.9)
North Norfolk	104.6	18.1 (17.3)	52.2 (49.9)	34.3 (32.8)	117.2	17.4 (14.8)	52.4 (44.7)	47.4 (40.4)
Norwich	141.1	31.7 (22.5)	88.5 (62.7)	21 (14.9)	151.7	31.0 (20.4)	92.8 (61.2)	27.9 (18.4)
South Norfolk	138	30.6 (22.2)	74.3 (53.8)	33.1 (24)	174.9	35.9 (20.5)	88.7 (50.7)	50.3 (28.8)
Norfolk	903.7	190.5 (21.1)	494 (54.7)	219.3 (24.3)	1,021.7	195.1 (19.1)	517.3 (50.6)	309.4 (30.3)

Table 3a: Existing population numbers (000s) and % by age quartiles (2018) and projected population numbers and % by age quartiles (2042) of Norfolk Districts. *Source: ONS*

District	2018				2042			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	139.3	29.5 (21.2)	75.3 (54.1)	33.5 (24)	163.6	31.4 (19.2)	80.3 (49.1)	51.9 (31.7)
Broadland	129.5	26.4 (20.4)	69.9 (54)	33.2 (25.6)	150.2	28.7 (19.1)	75.2 (50.1)	46.2 (30.8)
Great Yarmouth	99.4	22 (22)	53.4 (53.7)	24 (24.1)	106.5	20.5 (19.2)	52.3 (49.1)	33.6 (31.5)
King's Lynn And West Norfolk	151.8	32.2 (21.2)	80.4 (53)	39.1 (25.8)	159.8	30.6 (19.1)	76.7 (48.0)	52.5 (32.9)
North Norfolk	104.6	18.1 (17.3)	52.2 (49.9)	34.3 (32.8)	117.7	17.5 (14.9)	52.6 (44.7)	47.6 (40.4)
Norwich	141.1	31.7 (22.5)	88.5 (62.7)	21 (14.9)	152.0	31.2 (20.5)	92.9 (61.1)	27.9 (18.4)
South Norfolk	138	30.6 (22.2)	74.3 (53.8)	33.1 (24)	176.0	36.2 (20.6)	89.3 (50.7)	50.5 (28.7)
Norfolk	903.7	190.5 (21.1)	494 (54.7)	219.3 (24.3)	1,025.8	196.1 (19.1)	519.5 (50.6)	310.3 (30.2)

Table 4: Change in 000s between 2018 and 2041. Difference between 'All People' for each district between 2018 and 2041 in %. Source: ONS

District	Difference between 2018 and 2041			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	23.5	1.6 (-2.1)	4.6 (-5)	18.2 (7.8)
Broadland	19.9	2.1 (-1.3)	4.9 (-3.9)	12.9 (5.3)
Great Yarmouth	6.7	-1.5 (-2.7)	-1.2 (-4.5)	9.5 (7.5)
King's Lynn And West Norfolk	7.6	-1.7 (-2.1)	-3.9 (-5)	13.3 (7.1)
North Norfolk	12.6	-0.7 (-2.5)	0.2 (-5.2)	13.1 (7.6)
Norwich	10.6	-0.7 (-2.1)	4.3 (-1.5)	6.9 (3.5)
South Norfolk	36.9	5.3 (-1.7)	14.4 (-3.1)	17.2 (4.8)
Norfolk	118	4.6 (-2)	23.3 (-4.1)	90.1 (6)

Table 5a: Change in 000s between 2018 and 2042. Difference between 'All People' for each district between 2018 and 2042 in %. Source: ONS

District	Difference between 2018 and 2042			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	24.3	1.9 (-2)	5 (-5)	18.4 (7.7)
Broadland	20.7	2.3 (-1.3)	5.3 (3.9)	13 (5.2)
Great Yarmouth	7.1	-1.5 (-2.8)	-1.1 (4.6)	9.6 (7.4)
King's Lynn And West Norfolk	8	-1.6 (2.1)	-3.7 (-5)	13.4 (7.1)
North Norfolk	13.1	-0.6 (2.4)	0.4 (5.2)	13.3 (7.6)
Norwich	10.9	-0.5 (2)	4.4 (1.6)	6.9 (3.5)
South Norfolk	38	5.6 (1.6)	15 (3.1)	17.4 (4.7)
Norfolk	122.1	5.6 (-2)	25.5 (4.1)	91 (5.9)

These tables show that whilst the overall population of the County is projected to grow steadily at a relatively modest rate, the change in the age profile is more significant with nearly 80% of the total increase being accounted for by growth in the over 65s³¹. Between the ages of 20 and 64 population growth is projected to be slow, with only a 4.7% growth rate over the 23 year period, whilst the numbers of 0-19 years olds are projected to grow very slowly by just 2.4%. These numbers do vary

³¹ Total growth in population age 65 plus is 78,200

somewhat between individual districts (with Norwich being notably less affected by an ageing population) but the growth in the elderly population is projected to affect most parts of the County and will create significant issues given current models for funding social care and education provision. These issues are not considered further in the framework but the issues relating to housing are considered further in the housing section.

The 2021 Health profile for England³² suggests:

- In the decade prior to the pandemic in England, improvements in life expectancy had slowed down. The very high level of excess deaths due to the pandemic caused life expectancy in England to fall in 2020, by 1.3 years for males and 0.9 years for females..
 - The number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions
- Deprivation and inequality continue to be key and enduring factors in poor health outcomes and so need addressing. Consequently, access to housing and employment and the impact of spatial and economic planning on these factors needs consideration.

4.2 Household Projections

The most recent set of household projections were published in June 2020³³. Similar patterns of growth are shown as for population, but it should be noted that these projections do not take into account growth planned in existing Local Plans which may influence the scale and distribution of the growth in households. The new household projections also show greater growth in the more rural districts compared to previous versions of the projections.

Table 6: ONS 2018 household projections. Source: ONS

District	2011	2018	2041	Household growth 2018-2041 (%)	2042	Household growth 2018-2042 (%)
Breckland	54,522	58,612	72,054	23	72,551	24
Broadland	53,343	55,676	66,619	20	67,041	20
Great Yarmouth	41,988	43,350	49,339	14	49,576	14
King's Lynn and West Norfolk	62,928	64,461	71,019	10	71,313	11
North Norfolk	46,033	48,049	57,111	19	57,448	20
Norwich	59,587	62,616	69,419	11	69,612	11
South Norfolk	52,825	58,973	78,565	33	79,213	34
Norfolk	371,225	391,737	464,126	18	466,813	19

³² [Health Profile for England 2021 \(phe.org.uk\)](https://fingertips.phe.org.uk/static-reports/health-profile-for-england/hpfe_report.html) https://fingertips.phe.org.uk/static-reports/health-profile-for-england/hpfe_report.html

³³ See [Household projections for England - Office for National Statistics-
https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland](https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland)

4.3 Employment Projections

Until recently East of England Local Authorities have used the East of England Forecasting Model (EEFM) to better understand the development needs of their area. The last run of this model was completed in 2017 and since then individual Local Authorities have commissioned data as it has been required for local Plans. But to help aid planning going forward Norfolk authorities agreed to commission a county wide set of economic data projections through Oxford Economics. These projections provide a set of baseline forecasts designed to facilitate the setting of consistent housing and jobs targets.

Table 5 sets out the headline results for Norfolk Districts from the data projections produced in 2024. As with any projections, these results need to be treated with a degree of caution. They are “policy neutral” and assume that policy context in the future remains broadly as it has in the past. They cannot reflect the impact of any recent or future interventions that may be made through infrastructure investment, Economic Strategies or Local Plans. In addition, the reliability of a number of the underlying datasets decreases at smaller scales, and economic activity is not limited by council boundaries, so individual sector and District forecasts should be treated as being broadly indicative.

Overall, the model shows that without additional intervention total job levels in the Norfolk economy are projected to grow at relatively modest rates over the next 25 years with most of the growth projected taking place within Greater Norwich.

Table 7: Total Job based employment by district. Source: Oxford Economics 2024

Districts	Total employment (000's)				2016-2041 growth (000's)	2016-2042 growth (000's)
	2011	2016	2041	2042		
Breckland	50.7	58.6	63.6	63.6	5	5
Broadland	55.1	55.4	68.7	68.9	13.3	13.5
Great Yarmouth	42.6	43.9	44	44	0.1	0.1
King's Lynn & West Norfolk	63.1	68.7	78.2	78.3	9.5	9.6
North Norfolk	39.6	42.8	46.3	46.3	3.5	3.5
Norwich	91.6	99.3	110.2	110.7	10.9	11.4
South Norfolk	56.5	60.9	87	87.7	26.1	26.8
Greater Norwich*	203.7	215.7	265.9	267.3	50.2	51.6
Norfolk	399.2	429.6	498	499.4	68.4	69.8

*Broadland, Norwich & South Norfolk

Note: The Broads does not have its own jobs figures but any jobs delivered contribute to district target.

Section 5 – The Economy

Strategic Economic Objectives

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment;
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure;
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities;
- recognising the role of our city centre and the need to re-examine and revitalise the role of town centres as a focus for investment and enhancing the quality of life for residents;
- recognising that the long term conservation, investment in and enhancement of Norfolk's natural environment and heritage is a key element of the county's competitiveness and contributor to the Norfolk economy;
- ensuring a healthy workforce through well planned sustainable communities where people can walk and cycle to work or use public transport or work effectively from home;
- recognise that high quality housing underpins economic growth;
- Maximising opportunities that a clean/green economic recovery presents for the region and the new jobs which will be required to achieve the Governments net zero target

5.1 Strategic Priority Areas

It is clear that Local Authorities will need to continue to work collaboratively with one another and businesses in order to deliver the step change in economic performance that is necessary to deliver the shared objectives. The Norfolk Economic Strategy is an overarching document outlining the county's approach to economic growth over the next period of 2024-2029. The strategy has been developed based on a comprehensive evidence base and through 17 engagement sessions across the county, with over 500 organisations engaged. The strategy aligns with district council local plans, which are included in the evidence base. As part of the process, Norfolk district councils reviewed the draft document, to feedback and request amendments/additions to the document, which were then incorporated. The Norfolk Economic Strategy provides an overview of Norfolk's economy and key priority areas of focus to address economic growth, which is also inclusive and sustainable growth, aligned to the needs of urban, rural and coastal areas of Norfolk. Strengths, opportunities and challenges for growth are listed against the main pillars of the strategy; key priorities are highlighted with actions listed under each priority and measures of impact. The headline key priority areas within the strategy, are as follows:

Priorities for local businesses

- Support businesses in high-value clusters to grow, innovate and generate more local value
- Grow, strengthen and future proof our business base, targeting needs of SMEs
- Ensure businesses in all places across Norfolk can succeed, prioritising growth in strategic sites and areas
- Support businesses to provide quality jobs, wages and conditions

Priorities for People and Skills

- Inspire life-long learning and workforce training
- Build the talent and supply of appropriately skilled new entrants to the workforce
- Equip and future-proof the Norfolk workforce to take advantage of digital and emerging green technologies
- Supporting collaboration, efficiency and skills system leadership

Priorities for Infrastructure

- Ensuring the enabling infrastructure is in place to support growth across Norfolk
- Improving transport connectivity
- Sustainable development, decarbonisation and climate change adaptation

Priorities for Placemaking and Communities

- Support all places across Norfolk to provide a high quality of life
- Strengthen communities and social infrastructure, support resident wellbeing and increase pride of place
- Promote Norfolk as a place to live, work, visit and invest
- Protect and enhance Norfolk's environment, heritage and cultural assets

5.2 Context

Norfolk is a £20bn economy with globally important research strengths. Employment and levels of trade are both higher than the East of England average. Norwich, a fast growing city with two universities, combines its rich cultural, social and architectural heritage with a dynamic, modern and creative business base which is accompanied by world class education and research centres. King's Lynn plays an anchor role as a major employment and education centre for the west of the county. Market towns are important centres of innovation, employment and culture, including the expansion of the market towns of Attleborough and Thetford, benefiting from the A11 tech corridor. On the coast, Great Yarmouth is at the forefront of both social and physical regeneration and the UK's offshore energy sector.

There is still work to do though. Earnings and skills levels in Norfolk are lower than in the country as a whole. Norfolk also has communities, both rural and urban, facing barriers to employment and experiencing health inequalities.

Norfolk's communities and businesses have proved resilient in the face of recent economic pressures, sustaining relatively high levels of employment and a high quality of life. But the cumulative pressures of increasing costs and uncertainty in the wider economic and investment outlook have created real difficulties for local people. This has exacerbated long term inequalities within Norfolk in wages, healthy life expectancy and business' ability to grow and succeed.

Overall, Norfolk's economic growth rate and productivity has remained below that of the UK. This increases pressure on wages, limits business' ability to invest and reduces opportunities for our communities. While this Strategic Framework addresses development matters (broadly speaking, building and changes in the use of land), it is recognised that to be fully effective this needs to be

complementary to other programmes and measures at the district, county, regional and national levels. In the light of the factors mentioned above, endeavours to promote 'inclusive growth' are especially relevant such as developing skills, community aspiration and capacity; recognising and nurturing the contributions of voluntary and community sectors; the quality of job opportunities, etc.

Whilst many districts have their own economic development strategies, the importance of working collaboratively across district boundaries is recognised. This Norfolk Strategic Planning Framework provides one of the foundations for cooperation as does the Norfolk Economic Strategy.

The Government published Invest 2035: the UK's modern industrial strategy in October 2024 for consultation. The industrial strategy is the UK government's proposed 10-year plan for the economy. It aims to deliver the certainty and stability businesses need to invest in the high-growth sectors and drive long-term economic growth.

This will underpin how Norfolk can target local needs and priorities whilst aligning with government strategy which is prioritising growth in certain sectors with high potential. The ambition is for Norfolk to become a national example of how to develop a new model for growth, that builds on the important work of the former Local Enterprise Partnership, in supporting and developing key sectors and maintaining a powerful business voice. Combined with a wider focus on place, skills and regeneration, it can take an integrated approach, driving new investment in businesses and communities. Norfolk partners are committed to addressing and mitigating the impact of climate change, led by the Norfolk Climate Change Partnership. All of the Norfolk Districts have formally endorsed the Norfolk Economic Strategy and there is a good record of collaboration on specific economic development projects.

The Norfolk Local Authorities are committed to strengthened collaboration and focus on new initiatives and interventions to help nurture economic growth in higher value, knowledge based sectors across Norfolk.

5.2.1 Climate Change

In November 2020 the government set out ambitions for investment in clean energy, transport and energy efficiency, designed to support the country's 2050 net zero emissions target and to support up to 250,000 new jobs. The 10-point plan³⁴ includes commitments on offshore wind, low carbon hydrogen production, electric vehicles and nuclear. Ten Point Plan are:

1. Advancing Offshore Wind
2. Driving the Growth of Low Carbon Hydrogen
3. Delivering New and Advanced Nuclear Power
4. Accelerating the Shift to Zero Emission Vehicles
5. Green Public Transport, Cycling and Walking
6. Jet Zero and Green Ships
7. Greener Buildings
8. Investing in Carbon Capture, Usage and Storage
9. Protecting Our Natural Environment
10. Green Finance and Innovation

³⁴ See [The Ten Point Plan for a Green Industrial Revolution - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf)

5.2.2 Norfolk's Key Economic Sectors

There are significant geographic clusters of existing business activity that anchor the Norfolk economy, with a number of these offering significant potential for growth. The Norfolk Economic Strategy identifies 6 key high growth and emerging sectors:

- Clean Energy
- Agri-Tech and Food Tech
- Life Sciences
- Financial Services and Insurance
- Digital Tech
- Advanced Manufacturing and Engineering

Clean Energy

Norfolk is a global leader for offshore wind with £39bn of clean energy investment forecasted over the next 20 years. The Southern North Sea offshore wind market is poised to increase significantly in both pace and scale to meet expectations around Net Zero. The Norfolk Offshore Wind Zone will produce clean power for over four million homes across the UK. Norfolk's energy sector has a GVA per head of £153.9k, which is the highest of all sectors and will help to raise average wage levels in Norfolk.

With some of the world's biggest wind farms and a major Operations and Maintenance Campus, Great Yarmouth generates over £1.8bn GV. Bacton Gas Terminal in North Norfolk manages around 30% of UK gas supplies and offers significant opportunities to deliver carbon capture, utilisation and storage.

The key challenge is to ensure that local people in severely deprived communities benefit from jobs and new skills, so that it can maintain a lasting legacy for the local economy from these key nationally significant infrastructure projects.

Life Sciences

Norwich Research Park (NRP) is a world-leading research base, at the forefront of global food and health research. It is Europe's largest single site hub of research, training, education, and enterprise in food and health. It has four research institutes, a University Hospital and over 30 companies. The growing site has approximately 30,000 talented people - 12,000 of whom are scientists (including 3,000 researchers and clinicians) and continues to grow.

The Research Park is set to be a key centre for Life Sciences, a sector which the government has decided to prioritise in their Modern Industrial Strategy. This exciting industry is leading to spin outs and commercialisation of research, significantly enhancing Norfolk's innovation ecosystem.

Agri-Tech and Food Tech

Norfolk's Agri-Food and Agri-Tech cluster is a major asset in both expertise and scale. It is central to the nation's challenges around food security and climate change, home to globally leading research and innovation at Norwich Research Park (NRP) that is supporting Agri-Tech, agribiotech and food tech, as recognised by the £7.5m Innovate UK Launchpad.

Norfolk also has a growing environmental services sector spearheaded by projects at Gressenhall and Shropham providing nature-based solutions to environmental challenges which work alongside agriculture and food production, whilst supporting development across the County.

Financial Services and Insurance

Financial Services is a significant sector for Norfolk, with specialisms in insurance and Insurtech. Financial services and insurance represent Norfolk's second highest sector in terms of GVA per head at a value of £136.8k.

Financial services, one of the eight growth-driving sectors listed in the government's Modern Industrial Strategy, and insurance generate 20% of Norwich's total GVA. If current momentum is built on, and Norfolk's GVA per capita approaches the average for England, this sector could generate a net additional £5bn per year (a 25% increase). This requires a multi-pronged effort to create and expand new businesses and jobs, attract more large companies to Norfolk and smartly leverage major investments like offshore wind. In addition to Norwich, Broadland Gate Business Park presents another growth opportunity for financial and professional services. Its key location gives businesses access to the city and to major transport routes and is a catalyst for inward investment into the region. It has played a significant role in the high levels of growth seen in Broadland in recent years: in 2021 it had the highest GVA of £3.9bn across all industries, including a peak for financial and insurance activities of £1.7bn.

Digital Tech

Norfolk is home to a fast-growing digital tech economy with a current GVA of £450m and around 9,000 employees and is increasingly important across a range of sectors and in its own right. Digital Tech, a priority sector in the government's Modern Industrial Strategy, is a nationally important industry. There are a number of locations in Norfolk that are supporting the incubation of early-stage tech companies and providing access to much needed early-stage support.

Advanced Manufacturing and engineering

Norfolk is home to 2150 advanced manufacturing and engineering companies, with an even distribution across the

county, generating GVA of £2bn (10% of Norfolk's total GVA). There are multiple specialisms within Norfolk - including food and drink, automotive, aerospace, pharmaceutical, safety equipment and civil engineering -benefiting from the A11 tech corridor between Norwich and Cambridge incorporating Snetterton Commercial Hub and the two urban extensions at Attleborough and Thetford. This makes the county an important centre in this sector identified by the government as a priority. Opportunities also exist across the clean energy supply chain.

5.2.3 Norfolk's Foundational Economic Sectors

The Norfolk Economic strategy also sets out the Foundational economy which provides a high number of jobs, contributes to GVA and supports Norfolk's residents:

- Culture, Heritage and Visitor Economy
- Construction
- Health and Social Care

Culture, Heritage and Visitor Economy

The Economic Strategy looks to build on Norfolk's rich heritage and culture, while enhancing tourism opportunities and bringing our local communities together. Culture, heritage and visitor economy is a place-centered concept which describes the assets, infrastructure and services - including hospitality, retail, attractions and events - which support visitors and tourists. It is one of Norfolk's largest economic sectors and makes up close to 20 per cent of all jobs in the county – many of them in the most deprived coastal areas. In 2022, tourism trips alone provided the Norfolk economy with a total value of £3.4bn. Norfolk has a wealth of visitor amenities and tourist attractions. Norwich is a Medieval city, boasting a Norman cathedral and refurbished castle, with an internationally significant art gallery and historic market place. Coastal locations from Great Yarmouth, through Cromer and Holt, round to Hunstanton are long-established and much-loved holiday destinations, with stunning beaches such as Gorleston on- Sea. Equally well loved are Norfolk's distinctive market towns, with their rich heritage and thriving centres.

The natural environment boasts a range of amenities including the Broads which has a status equivalent to a National Park, the Brecks and the Norfolk Coast Protected Landscape. Collaboration with partner organisations, including Visit East of England, will be essential for the continued success of the sector. All these organisations have important local knowledge and networks and are already delivering so much for the county in this sector. There is also the opportunity for further investment around under-utilised heritage assets (such as the Guildhall in King's Lynn) and in the upkeep of existing assets like the Winter Gardens in Great Yarmouth or Cromer Clifftop Gardens.

Construction

The Construction sector is a key part of the Norfolk economy and is a regional specialism for the East of England. It is currently responsible for £1.36bn of Norfolk GVA and employs a workforce of 25,361. Jobs growth in the sector is forecasted to be 12.7% between 2022 and 2033, the highest of any foundational sector.

Health and Social Care

Health and Social care is a significant sector for Norfolk, employing over 60,710 people and contributing £2.1bn in GVA. It is important to future proof this sector, with an ageing population there will be a high demand for Health and Social care provision. Norfolk currently has a market of over 500 providers of care services but needs to do more to keep up with the increasing demands for the sector. To meet government targets of reducing waiting times for appointments and to create further appointments in the NHS, further investment is required in the training and development of healthcare professionals. The UEA Dentistry School and the College of West Anglia Nursing School will enhance skills and development in their respective areas and help to attract healthcare professionals to Norfolk.

5.3 Strategic Employment Sites

Strategic employment sites have been agreed through joint activity on economic development and inward investment. They are all located in the growth locations identified in the Norfolk Economic Strategy and are targeted at the Norfolk Economic Strategy's key sectors.

Table 8: Tier one employment sites, sector, location and size. 2024

Site	Supports N&S Economic Strategy's Key Sector(s)	N&S Economic Strategy's Growth Location	Land available (approx.)
Attleborough	Advanced Manufacturing and Engineering	Tech Corridor	10 ha
Broadland Business Park area			
- plots on existing BBP			
- BBP Laurel Farm	Financial services	Greater Norwich	55ha
- St Andrews northside,	ICT & Digital Creative		
- Broadland Gate			
Browick Interchange (Wymondham)	Advanced Manufacturing & Engineering. ICT and Digital	Tech Corridor	20 ha
Food Enterprise Zone Honingham/Easton	Food, Drink & Agriculture	Greater Norwich / Tech-corridor	10 ha
Great Yarmouth Enterprise Zone and Energy Park sites:			
- Beacon Park (EZ)	Energy	Great Yarmouth and Lowestoft	13.5ha
- South Denes (EZ & EP)			25ha
Hardwick extension (King's Lynn)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10)	27 ha
Hethel Engineering Centre and Technology Park	Advanced Manufacturing & Engineering	Greater Norwich Tech Corridor	20ha
King's Lynn Enterprise Park (part EZ)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10 corridor)	17 ha (EZ)
Norwich City Centre	ICT and Digital Creative Financial Services Tourism and Culture	Greater Norwich	Multiple Sites
Norwich Airport			
- Aeropark			
- Southern area (around Hurricane Way)	Advanced Manufacturing & Engineering	Greater Norwich	75ha+
- Airport business park			
Norwich Research Park (part Enterprise Zone)	Life Sciences Food, Drink & Agriculture	Greater Norwich Tech Corridor	40ha (EZ 25ha)
Rackheath	Advanced Manufacturing and Engineering	Greater Norwich	25 ha
Scottow Enterprise Park	Logistics Energy	Greater Norwich/ North Norfolk	26 ha
Snetterton	Advanced Manufacturing & Engineering	Tech corridor	68ha
Thetford Enterprise Park	Advanced Manufacturing & Engineering Food, Drink & Agriculture	Tech corridor	18ha

Agreement 7 - The above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors and protected from loss to other uses.

This list will need to be kept under review in the light of emerging Economic Strategy priorities and the progress on Local Plans.

5.4 Key Cross-Boundary Economic Issues and Interventions

This section identifies the principal strategic economic matters and other matters which can only be fully addressed through development plans in (or across) more than one local planning authority area. It therefore does not include a wide range of matters which whilst they are recognised as very important, but which do not meet the specific definition of strategic development 'Duty to Cooperate' matters laid down by the Localism Act. These include the generality of

- rural economy (including agriculture);
- tourism and recreation;
- development of market towns;
- Coastal Change.

Development associated with and supporting these is addressed through individual local plans and informal joint working between local planning authorities, and these issues are addressed more widely through economic and other strategies. Neither is this section intended to include every economic issue that requires cross-boundary working, but just those of an extensive or special significance from a Norfolk wide perspective.

5.4.1 The role of Greater Norwich

Norwich and its immediate hinterland is the prime economic generator in the County. Its influence, and the policy measures required to make the most of this extend well beyond both the City Council's boundaries and the existing urban area.

A large part of the county depends upon the vibrancy of the city for employment, services, higher order retail, culture and leisure. It also has an economic importance as a public transport hub. The vibrancy and focus of activity in the city centre also attracts significant numbers of visitors and helps make the wider area an appealing place to live, work, invest and locate businesses. The economy of this wide area of influence will benefit from ensuring that the city is accessible; the centre continues to thrive and is attractive to inward investment; and out of centre development complements the overall offer.

The Broadland Northway supports the delivery of planned housing and jobs to the north and north-east of Norwich and has improved strategic access to a wide area of Broadland and North Norfolk. Realising the full range of economic opportunities will benefit from cooperation. The Airport supports the economy of the area including the off shore energy sector.

Broadland, Norwich, and South Norfolk, with Norfolk and the Broads Authority are working through the Greater Norwich Development Partnership (GNDP) on the planning of the area.

The Five Year Infrastructure Investment Plan³⁶ identifies the projects from the Greater Norwich Infrastructure Plan³⁷ the delivery of which is considered to be a priority for achieving the economic growth targets, as set out in the Joint Core Strategy and the Greater Norwich City Deal. The Greater Norwich Growth Programme identifies infrastructure schemes to be prioritised for delivery and development within each financial year, using pooled CIL funding.

Transport for Norwich Strategy³⁸ The Transport for Norwich strategy sets out transport policy focussed on Norwich, covering the full extent of the Strategic Growth Area as expressed through the Greater Norwich Local Plan (GNLP) together with consideration of the longer distance trips from the county and beyond. This is an ambitious strategy, putting carbon reduction and better air quality at the heart of the aim to support a growing economy, strengthen communities and reducing impact on the environment. East Norwich, which sits across a number of sites, including the former Carrow Works site, represents one of the most significant opportunities for the regeneration of this area

and the wider city. It is an ambitious project to create a sustainable new urban quarter for the city, supported by the preparation of a masterplan for East Norwich and a commitment to substantial future investment. The masterplan shows a mixed use for commercial, housing, tourism and environmental activities. In addition to housing and industrial opportunities, the site will specifically capitalise on the beautiful waterfront and presents a significant opportunity for recreational, tourism and heritage activities. The site will generate significant jobs and investment for the city.

5.4.2 Cambridge Norwich Tech Corridor

Cambridge Norwich Tech Corridor (CNTC) is home to world-leading universities, research institutes and science parks, complemented by an ecosystem of knowledge-intensive businesses and networks to support innovation through to commercialisation and manufacturing. There is significant opportunity for site development, attracting inward investment into the county. The corridor from Norwich to Cambridge includes a number of important existing and emerging clusters and strategic employment sites. It provides the potential for significant economic development, particularly as connectivity has improved with full dualling of the A11 between Norwich and Cambridge. The corridor also benefits from the Norwich to Cambridge railway line, direct trains between Norwich to Stansted airport and an increased number of internal (UK) and external routes from Norwich Airport. These opportunities need to be supported and exploited to maximise economic benefits.

In Norfolk the tech corridor extends through Norwich, South Norfolk and Breckland, and then into Suffolk and Cambridgeshire.

5.4.3 A47 Growth Corridor

The A47 crosses the county and, directly or indirectly, affects all Norfolk's districts, and parts of Suffolk and Cambridgeshire. The current limitations of the A47 act as a brake on economic growth, hindering investment, adding business and commuter costs, cause disproportionate accident and safety issues and contribute to the 'peripheral' image of Norfolk. Improvements to the road will unlock jobs, increase GVA and attract additional private investment all along its length. The A47 Alliance comprises

³⁶ <https://www.greaternorwichgrowth.org.uk/dmsdocument/2920>

³⁷ [Greater Norwich Infrastructure Plan 2024](https://storymaps.arcgis.com/collections/ccd0719bafb44d5eb29f01435bfe496b) -

<https://storymaps.arcgis.com/collections/ccd0719bafb44d5eb29f01435bfe496b>

³⁸ [Transport for Norwich Strategy - Norfolk County Council](https://www.norfolk.gov.uk/39828) - <https://www.norfolk.gov.uk/39828>

representatives from all Local Authorities, the business community, MPs and stakeholders along the whole of the trunk road route between Peterborough and Lowestoft. The Alliance is working to make the case for improvements and to secure the necessary investment to implement these. Partners will need to consider how best to cooperate to realise the economic potential of improvements.

Currently there are two A47 road improvement schemes under construction by National Highways:

- Dualling the A47 North Tuddenham to Easton
- Dualling the A47 Blofield to North Burlingham

Another scheme, to improve the A47/A11 Thickthorn Junction, is currently subject to the government's infrastructure spending review. These A47 road improvements have the potential to support growing the corridor's economy.

5.4.4 Clean Growth Coast / Ports of Great Yarmouth & Lowestoft

The ports of Great Yarmouth and Lowestoft are successfully developing their role in the huge growth in offshore wind generation and major planned gas field decommissioning in the southern North Sea, building on 50 years' experience in offshore energy. These ports also serve trade, fisheries and transportation sectors of the economy.

These two ports, in close proximity, together form a strategically significant economic (and infrastructure) resource, generating employment and supply chains of regional significance. The sector is also supported by businesses and facilities, such as Norwich Airport, in Greater Norwich. The critical mass of facilities, infrastructure and businesses helps the area compete with areas elsewhere, including on the other side of the North Sea.

There is a long and continuing history of collaboration between Great Yarmouth, East Suffolk, Norfolk and Suffolk Councils to make the most of these opportunities.

Through close cooperation, these bodies were successful in bidding for an Enterprise Zone (EZ) covering six sites in Great Yarmouth and East Suffolk to strengthen and build the offshore energy sector in the area. This EZ is one of the most successful in the country, the only zone to have exceeded the original EZ targets. The two Norfolk sites in Great Yarmouth are South Denes and Beacon Park.

Great Yarmouth Borough Council, Norfolk County Council and National Highways have cooperated closely on developing the road transport infrastructure to support the growth of the offshore energy sector in Great Yarmouth. The third river crossing has now been completed and provides direct access to the Port from the trunk road network, rather than through the heart of the town, and improving the A47 link to the rest of the country.

Meanwhile Norfolk County Council with Great Yarmouth Borough Council, are looking at a range of new infrastructure projects associated with the port and the Great Yarmouth Energy Park in order to enhance the value of Yarmouth to the offshore renewables sector.

5.4.5 Norfolk Coast, the Broads and the Brecks

The Norfolk Coast, the Broads and the Brecks are the 3 key cross boundary areas of the county where economic benefits include not only their attraction for tourism and recreation, but also their contribution to quality of life, and hence the attractiveness of Norfolk as an area to live, work and to locate a business. The economies of these areas are dependent on businesses, infrastructure and environmental protection in surrounding areas. This is particularly the case for the Broads Authority Executive Area, where the Broads Authority boundary is very tightly drawn.

In order to maximise the economic benefits a number of issues require coordination across planning authority boundaries, including coastal change, erosion and flooding; environment, landscape and habitats; as well as tourism and recreation itself. By working together the relevant authorities can ensure complementary measures, and maximise potential economic benefits.

All the Norfolk coastal districts, together with the Broads Authority (part of which is on the coast), East Suffolk District Council in Suffolk, and the Environment Agency have worked together on one or more of the three Shoreline Management Plans covering the Norfolk Coast, developing understanding of the technical and political challenges involved, and coordination of efforts to address these.

The quality, importance and diversity of the natural environment, including the Coast, the Broads and the Brecks, is reflected in the numerous national and international designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, and Sites of Special Scientific Interest (SSSIs), and protected landscapes (Norfolk Coast National Landscape and the Broads). The planning authorities have a role in helping to protect and manage these assets, along with Natural England, the Environment Agency and a wide range of non-statutory environmental and community organisations. Ensuring that new development can proceed sustainably without harm to protected sites or species, or to biodiversity or geodiversity in the wider environment, is a particular challenge. Through joint working and cooperation across planning authority boundaries, a better understanding of the potential impacts from development (especially relating to housing and recreation) is being developed, and new ideas and best practice for monitoring and mitigating any impacts are being shared.

It is important that all of this care and concern about the natural environment continues to be captured within a Green Infrastructure approach, so that protecting and enhancing nature and natural processes are consciously integrated into spatial planning and area development.

5.4.6 King's Lynn to Cambridge Corridor

The A10, and parallel rail line from King's Lynn to London, via Cambridge (passenger and freight), provides a strategic transport corridor. The section from King's Lynn to Downham Market is identified as a growth location in the Norfolk Economic Strategy. To realise the growth potential of the A10 Corridor there is a need to improve journey times, reliability of services and enhancement of operational capacity. The Ely area capacity enhancement Programme is looking to improve rail infrastructure to allow more trains to pass through the Ely area where several rail lines converge. This would enable more frequent passenger and freight rail services to operate in future; while works have been completed to enable longer trains to run from King's Lynn from December 2020. A new Cambridge North railway station has enabled improved access to jobs in the businesses on the north side of Cambridge for Norfolk residents. There is potential for large-scale job growth in the corridor at Downham Market, while the largest housing allocation in the West Winch Growth Area requires the completion of the West Winch Housing Access Road.

Agreement 8 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

Section 6 – Housing

Strategic Housing Objectives

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes in line with the Norfolk Economic Strategy;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, Health Services, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

6.1 Introduction

The overall objective of national policy is to ensure that sufficient homes of the right type, are built in the right locations, and at the right time to address all existing and newly arising needs for homes. This means meeting both the market *demand* for new housing and addressing the *need* for homes including the needs of those who are currently unable to afford to buy or rent a suitable home locally. Homes built should be of the right type having regard to needs of the existing and future population and should address the specific needs of groups such as the elderly, those with disabilities, students and the gypsy and traveller community. Local Plans should include measures to address the need for appropriate specific types of dwellings, those wishing to build their own home, live on boats, low-cost home ownership products to purchase and other tenures of affordable housing. Whilst this document considers the likely scale of growth in the different parts of the County, it is not its purpose to determine how many new homes are required or where precisely these should be located. These will be decisions for individual Local Plans or any County wide development plans which may be prepared. Instead the focus is on cross boundary strategic considerations concerning, for example, the capacity of each authority to accommodate the required growth, considering how growth in one area may have impacts elsewhere, the need or otherwise to redistribute growth beyond the administrative boundaries of individual authorities and the implications of this, or the need to take collective measures to improve the rates of housing delivery in the County.

Since taking office in July 2024 the Labour government has made it clear that sustained economic growth is the only route to improving the prosperity of the country and the living standards of working people. Their approach to delivering this growth has focused on three pillars: stability, investment and reform.

One of the government's key priorities has been reform to the planning system and on the 12th December 2024 the National Planning Policy Framework (NPPF) update was published, alongside the Government's response to the consultation which launched in July 2024 and updates to the NPPG.

Some of the key changes to the NPPF include:

- Reintroduction of Mandatory Housing Targets
- Restoration of Five-Year Housing Land Supply Rules
- A new standard method for calculating local housing need that uses housing stock to set a baseline figure

Based on the government's new standard methodology³⁹ Norfolk Authorities will need to collectively plan for at least an additional 5,939 homes per annum. This is a significant increase over the previous standard method representing a 48% increase and significantly above average annual delivery in the last 3 years which is 3,812.

As part of the duty to co-operate, and as reflected in the remainder of this section the Norfolk Authorities have reached a number of key agreements both about the geographical area over which it is most appropriate to prepare Local Plans, the period to be planned for, and how each plan will provide at least the minimum number of dwellings required over the agreed period. In reaching these Agreements the authorities have had regard to the needs which may arise from outside of the County and have collectively agreed a process for establishing each areas capacity to accommodate growth. Given the significant raise in the housing numbers required under the new standard method for calculating housing need there may be a need to review these agreements for future versions of this document or any subsequent replacement.

6.2 Existing targets, supply, and delivery rates

The number of dwellings built in the County since 2007 have generally fallen behind published Local Plan targets due to various impacts including covid-19 and recessions. Some areas of the county have also seen significant impacts to the granting of planning permissions because of Nutrient Neutrality since March 2022 and it's likely that this reduced level of new land supply will have impacts on future housing delivery particularly until such time that the supply of Nutrient Neutrality mitigation allows the backlog of planning permissions to be fully unblocked. The required annual rate of housebuilding needs to meet national policy⁴⁰ further details of the consequences of under delivery are covered in more detail in section 6.6.

In practice, delivery rates of housing development will vary considerably from one year to the next, with significant periods of under-delivery in some years and over-delivery in others, depending on a wide range of factors including site availability, economic conditions, and the capacity of the local building industry. For this reason, annualised targets represent a blunt instrument against which to assess delivery. Individual authorities will continue to consider carefully how new housing needs evidence might be taken into account appropriately in plan-making and the determination of planning applications.

Detailed information on the availability and deliverability of new housing is published annually by each authority in their Five Year Land Supply Statements.

³⁹ [Housing and economic needs assessment - GOV.UK](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments) - <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

⁴⁰ National Housing Delivery Test – Results of this test are published by government in November of each year and compare the number of dwellings built over a three year period with the number required.

6.3 Future Housing Demand and Need

The National Planning Policy Framework requires that the need for homes in terms of quantity, size, type and tenure within an area is addressed by planning authorities when preparing Local Plans, unless the consequences of doing so would result in unsustainable development. Where planning authorities conclude that it is not desirable to address identified needs within an individual authority area, they should reach agreement with others to ensure that needs are met.

Following the publication of the revised NPPF in December 2024 the quantity of homes needed should be calculated in accordance with the new standard method in national guidance. The method uses 0.8% of existing stock as the baseline. Over the last 10 years housing stock has grown nationally by around 0.89%. The baseline figure is then increased to reflect housing affordability pressures. The NPPF sets out transitional arrangements that may apply to local plans.

Table 9: Local Housing Need showing change between current and previous standard methodologies (correct as at December 2024)

Area	Previous Method	New Method	Change	% Change
Breckland	625	903	278	44%
Great Yarmouth	354	380*	*	*
KLWN	554	989	435	79%
North Norfolk	556	932	376	68%
Greater Norwich	1,929	2,590	661	34%
Norfolk	4,017	5,939	1,922	48%

*The Great Yarmouth figures under the new method is 525 however 380 is being used under the transitional arrangements

To ensure better alignment of Local Plans all Norfolk Authorities have agreed to prepare new Local Plans which address the level of housing need for the period until at least 2041 have formally commenced the process of plan review. Broadland, Norwich and South Norfolk have adopted a single Greater Norwich Local Plan allowing for consideration of how needs might be addressed across the larger plan area. Information on progress of local plans for Norfolk LPAs can be found on the NSPF website www.norfolk.gov.uk/nsf under summary of local plans.

Agreement 9 - When determining their respective Local Plan housing targets for plan making each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2041.

The Broads

Following the publication of the NPPF in December 2024 and updated National Planning Policy Guidance the Broads Authority has looked to reconsider its housing need based on housing stock to align to the new standard methodology. Because of this change in methodology, the housing need for

the Broads has tripled. Based on the commissioned housing needs analysis⁴¹, the total need in the Broads Authority Executive Area between 2021 and 2042 is 1077 dwellings (approx. 51 per year). These figures for the broads' part of the 6 district council areas are as follows:

Table 10: Projected dwelling need within the Broads Authority area 2021-2042

	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
Total OAN	316	298	17	204	177	70

It should be noted that this need is part of the need of the overlapping District Councils and not in addition to it. In view of the special qualities of the Broads there has been a long-standing agreement between the BA and their overlapping District Councils about the other areas planning to meet any housing needs arising in the BA area⁴². It would clearly not be in the best interests of good planning in Norfolk for planning in the Broads area to be driven by a need to meet statistically derived housing targets where this would be incompatible with the protection of the special qualities of the Broads. Agreements 11 and 12 below addresses this matter. There is also a residential moorings need that is identified in the Local Plan of 48 residential moorings⁴³ which the Broads Authority will seek to meet.

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

Agreement 11 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

East Suffolk Council (not signatories to this framework) have also agreed to do the same.

Implications of the City Deal for Housing

In December 2013 the Greater Norwich City Deal was signed⁴⁴. The City Deal was expected to see 300 new businesses supported and secure an additional £100 million of private investment. The deal was also expected to create more than 19,000 jobs, including 3,000 high value jobs at Norwich Research Park, 2,000 jobs around Norwich Airport, 1,000 jobs based around Norwich University of the Arts and 6,000 construction jobs.

⁴¹ [Local Housing Needs Assessment Addendum \(March 2025\)](https://www.broads-authority.gov.uk/__data/assets/pdf_file/0034/569329/Local-Housing-Needs-Assessment-Addendum-March-2025.pdf) - https://www.broads-authority.gov.uk/__data/assets/pdf_file/0034/569329/Local-Housing-Needs-Assessment-Addendum-March-2025.pdf

⁴² See [Planning for Housing and Employment in and Around the Broads Memorandum of Understanding - http://www.broads-authority.gov.uk/__data/assets/pdf_file/0008/432998/Duty-to-Cooperate-Planning-For-Housing-and-Employment-in-and-Around-the-Broads-Proposed-Memorandum-of-Understanding-040113.pdf](http://www.broads-authority.gov.uk/__data/assets/pdf_file/0008/432998/Duty-to-Cooperate-Planning-For-Housing-and-Employment-in-and-Around-the-Broads-Proposed-Memorandum-of-Understanding-040113.pdf)

⁴³ [Residential Moorings Need Assessment](#) 2022

⁴⁴ See [Norwich City Deal](https://www.gov.uk/government/publications/city-deal-greater-norwich) - <https://www.gov.uk/government/publications/city-deal-greater-norwich>

The housing implications of the City Deal were assessed thoroughly as part of the Greater Norwich local plan. The plan includes a buffer which help builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal.

6.4 Type of Homes

It is critically important to ensure that sufficient homes are provided but it is equally important that the homes that are built are the right type in terms of size, affordability and tenure. In this regard key issues affecting the County are providing suitable homes for:

- Those on lower household incomes who are unable to afford market prices and rents
- A rapidly aging population
- A growing student population in and around Norwich
- Gypsy and Traveller communities

Collectively, the Authorities are committed to the delivery of energy efficient homes which minimise the inefficient use of scarce resources and each Local Plan will consider the desirability of requiring enhanced construction standards which go beyond the requirements of the current National Building Regulations. For example, all authorities in the County have committed to introducing lower water consumption targets for new dwellings and most are likely to introduce enhanced accessibility requirements. Further consideration is also given to this area in the section on climate change.

Unless there is a significant increase in earnings or a slowing rate of house price increases the evidence concludes that dwelling affordability will continue to be a major issue in most parts of the County. Delivery of affordable homes, as with other types of housing, has failed to keep pace with existing and newly arising needs. Forecasts indicate that across the County as a whole some 26% of the total future housing requirement will need to be provided as affordable homes but this masks significant local variations.

The significance of this issue for Norfolk should not be underestimated. There would be particularly severe impacts on a number of key economic sectors if housing affordability worsens and there is not considerable increase in the availability of forms of housing that meet the needs of people who are employed in low wage sectors across the county. The situation will vary from one council area to another so is best addressed through local plans rather than through collective agreement.

Inward migration from the rest of the UK, mainly due to retirement to the area, is forecast to be the major driver of population growth in the County over the next 20 years and a rapidly aging population, particularly outside of the three main urban centres will continue to increase the need for homes. By 2042 over 16% (171,049 people) of Norfolk's population is forecast to be over 75 years of age and if current trends continue this will increase the need for specialist forms of accommodation such as care, nursing and assisted living schemes. These specialist accommodation needs are not included within household projections and authorities should carefully consider the latest available evidence and develop strategies to ensure these needs are met. If current trends continue an increasing proportion of elderly people will remain in their homes for longer periods.

Specialist types of accommodation

Local Housing Needs Assessments are prepared to establish the likely total need for new dwellings over a given period. These assessments quantify the needs of those residing in households including gypsy and travellers and those living in caravans and houseboats but they do not account for those living in other types of communal accommodation such as care and nursing homes and purpose-built

student accommodation (PBSA). Therefore, in addition to the target for new dwellings Local Plans will need to separately quantify and provide for other specialist types of accommodation and fully understand the relationship between the need for new dwellings and the need for different types of non-household accommodation.

Elderly People

The identified Objectively Assessed Need across Norfolk includes the conventional housing needs of elderly people but does not include people residing in care and nursing homes. On this basis, all self-contained elderly person housing is counted within the housing supply; but the supply of bed spaces in residential institutions (Use Class C2) is not. If sufficient Class C2 bed spaces are not provided, then these people will not vacate existing dwellings and therefore more dwellings may be required.

As section 4 highlights, latest population projections estimate an increase in 65's of over 91,000 between 2018 and 2042 in the county. Local planning authorities were clear that further research was required into their housing needs. As part of the work to update this document previously a study was commissioned to identify the need and types of accommodation which are required to support the increase in the elderly population going forward.

The study highlights that a range of housing types are required to meet the needs of the elderly. It should be noted the many residents will be able to remain in conventional type of housing for many years but may choose to downsize or move to more suitable types of home like bungalows. Therefore, housing types range from conventional housing (either modified or unmodified), age exclusive housing, sheltered housing with low level support to higher level support housing with on-site support or residential/nursing care homes. In 2020 there were 8,612 units of specialist independent retirement housing in Norfolk, 78% of these units are sheltered⁴⁵ housing with low level support and only 22% are extra care with higher level support⁴⁶. Across the whole of Norfolk in 2020 there is unmet need for 2,826 units of extra care housing and 4,034 units of sheltered housing. By 2041 these figures will have risen to 5,149 and 10,384 respectively. The report also highlights that care homes will also need to accommodate an additional 5,239 people and better provision should also be made for elderly with various levels of dementia with Norfolk likely to see an increase in residents with dementia by nearly 10,000 to 2041. Full details can be found in the report accompanying this study⁴⁷ Norfolk Local Planning Authorities will work with registered providers and housing associations to support the delivery of specialist housing to meet the needs of an increasingly the elderly and retired population.

⁴⁵ Sheltered housing is age restricted housing normally with either an onsite or visiting scheme manager or access to a bespoke helpline. There will normally be communal facilities which may include a café or shop but there is no bespoke site specific care package. Scheme residents are typically 75 or over, but the scheme may include some residents aged 65-74

⁴⁶ Extra Care housing is age restricted housing with an onsite scheme manager and provide a range of communal facilities. However residents will also have access to a site specific bespoke care package, usually including paying for a specified minimum number of hours of care a week with the option to increase usage if required. The care provider is CQC registered with specific carers allocated to the scheme. Scheme residents are typically 75 or over. Extra care housing can also be known as very sheltered housing, assisted living, enhanced sheltered or as housing with care.

⁴⁷ [D2 - Study of Retirement Housing Norfolk Report v1 March 2021](#)

Student Housing and the OAN

Planning Policy Guidance requires that local planning authorities should plan for sufficient student accommodation whether it consists of PBSA (both on and off-campus), or private sector housing (in particular Houses in Multiple Occupation (HMOs)).

The largest higher education provider in Norfolk is the University of East Anglia (UEA). The UEA has a campus on the edge of Norwich with a total of 15,775 full time students in the academic year 2022/23. The city also contains the Norwich University of the Arts (NUA) which has 2,765 full-time students, with most of its buildings in the city centre. These institutions greatly contribute to the city's and county's economic prospects.

In recent years there has been an increase in student accommodation both at the UEA campus and in privately owned and managed purpose-built student accommodation, which is mainly in the city centre. In October 2023 there were 6,349 PBSA bedspaces in Norwich. This figure excludes 663 bedspaces at the Ziggurats, UEA as they were closed due to Government guidance on Reinforced Autoclave Aerated Concrete (RAAC).

The AECOM Norwich Purpose Built Student Accommodation (PBSA) Study, November 2024, concludes that based on historical trends the student population in and around Norwich is likely to grow by around 383 students per year (or 328 full-time undergraduate students). The AECOM study sets out that the existing PBSA stock and expected pipeline is more than sufficient to meet future demand at least up to 2038/39.

Where accommodation is provided in the form of PBSA, when monitoring housing delivery, the ratio of 1:2.5 can be used for communal/cluster accommodation (i.e. 2.5 net PBSA bedrooms equates to 1 net new mainstream dwelling). However, for PBSA which takes the form of studio flats, each net student bedroom is counted as 1 net new dwelling.

The Greater Norwich Local Plan contains a policy to support growth of PBSA where the need is justified as part of policy 5 (Homes). To better inform planning decision making, in consultation with the two universities, Norwich City Council will use the evidence above to consider updates to its existing Purpose-Built Student Accommodation Evidence and Best Practice Advice Note⁴⁸ which was adopted in 2019.

Accommodation needs of Gypsies, Travellers, and other types of accommodation

The accommodation needs of Gypsies and Travellers, including Travelling Show people, and those residing in boats and mobile/park homes are included within the overall assessments of housing need and comprise part of that need rather than an additional requirement. These types of accommodation which are provided can therefore count towards addressing locally set housing targets. In December 2023 the Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022) determined that the 2015 PPTS was discriminatory by excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers. In response, the government

⁴⁸ [Purpose Built Student Accommodation \(PBSA\) Evidence and Best Practice Advice Note -
https://www.norwich.gov.uk/downloads/file/5448/pbsa_best_practice_and_advice_note -
adopted november 2019](https://www.norwich.gov.uk/downloads/file/5448/pbsa_best_practice_and_advice_note_-_adopted_november_2019)

amended the definition by re-inserting the word 'permanent'. As now set out in the subsequently updated PPTS, December 2023 for the purposes of planning policy, gypsies and travellers means:

'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.'

Locally authorities have prepared specific evidence to quantify the levels of need for such accommodation and use this evidence to inform Local Plan preparation. Great Yarmouth and the Broads Authority commissioned a study in 2022⁴⁹ as did Greater Norwich (Broadland, Norwich and South Norfolk)⁵⁰. North Norfolk commissioned an updated study in 2024 in order to identify its Gypsy, Traveller and Travelling Show people accommodation needs for the emerging Local Plan based on the updated definition issued by the government in December 2023⁵¹. Breckland DC published its own study in 2024⁵². In addition, a separate study was also commissioned and published by the Borough Council of King's Lynn and West Norfolk in 2023⁵³ to identify its Gypsy, Traveller and Travelling Showpeople accommodation needs for the emerging Local Plan.

Agreement 12 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Other forms of specialist accommodation such as self-build and accommodation for military personnel will be addressed by individual authorities but the Norfolk Strategic Planning Member Forum will keep this position under review.

6.5 Capacity and Distribution

Some parts of the County are more constrained than others and their capacity to accommodate new growth is similarly variable.

Each Authority has prepared Housing and Economic Land Availability Assessments (HELAAs) using a standardised methodology which has been agreed by all Authorities. These are assessments of unconstrained capacity and take no account of the policy choices that each authority may make when

⁴⁹ See https://www.broads-authority.gov.uk/__data/assets/pdf_file/0025/432475/Great-Yarmouth-and-Broads-Authority-GTRCAA-Report-June-2022.pdf

⁵⁰ See [Greater Norwich GTAA June 2022 \(gnlp.org.uk\)](https://www.gnlp.org.uk/sites/gnlp/files/2022-06/Greater%20Norwich%20GTAA%20Final%20Report%20June%202022.pdf) [Greater Norwich GTAA June 2022 \(gnlp.org.uk\)](https://www.gnlp.org.uk/sites/gnlp/files/2022-06/Greater%20Norwich%20GTAA%20Final%20Report%20June%202022.pdf) - <https://www.gnlp.org.uk/sites/gnlp/files/2022-06/Greater%20Norwich%20GTAA%20Final%20Report%20June%202022.pdf>

⁵¹ See [North Norfolk Gypsy & Traveller Accommodation Needs Assessment \(September 2024\)](https://url.uk.m.mimecastprotect.com/s/DfKxCgxvqTIPMrYUNfNf4J6rt?domain=north-norfolk.gov.uk) - <https://url.uk.m.mimecastprotect.com/s/DfKxCgxvqTIPMrYUNfNf4J6rt?domain=north-norfolk.gov.uk>

⁵² See [Breckland Gypsy Traveller and Travelling Showpeople Accommodation Needs Assessment April 2024](https://www.breckland.gov.uk/media/21598/Breckland-Gypsy-Traveller-and-Travelling-Showpeople-Accommodation-Needs-Assessment-April-2024/pdf/Breckland_Gypsy_Traveller_and_Travelling_Showpeople_Accommodation_Needs_Assessment_April_2024.pdf?m=1716560901907) - https://www.breckland.gov.uk/media/21598/Breckland-Gypsy-Traveller-and-Travelling-Showpeople-Accommodation-Needs-Assessment-April-2024/pdf/Breckland_Gypsy_Traveller_and_Travelling_Showpeople_Accommodation_Needs_Assessment_April_2024.pdf?m=1716560901907

⁵³ See https://www.west-norfolk.gov.uk/download/downloads/id/7907/klwn_final_gtaa_report_-_june_2023.pdf

preparing their Local Plan. Norwich City, Broadland and South Norfolk have worked jointly to address their shared housing need through the Greater Norwich Local Plan with other District Authorities having the capacity to address its own housing need at present.

Agreement 13 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

6.6 Delivering Housing Growth

Over the past decade the quantity of new homes delivered in the County has not kept pace with published targets notwithstanding that the number of planning permissions granted typically exceeds the required quantity of development. This is likely to have been compounded by economic recession and poorer housing market conditions in some areas which may have reduced developer confidence and other factors including Nutrient Neutrality.

Slower than required delivery rates have resulted in inadequate or marginal five-year land supply positions resulting in the need to release unplanned development sites in some parts of the County. Recognising this, Norfolk Authorities have agreed to take a range of actions to improve future housing delivery.

Agreement 14 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:

- **Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.**
- **Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.**

However, such is the scale of delivery challenge facing the County there may well be the need for further actions to be taken to ensure housing targets can be met. Norfolk Local Planning Authorities jointly commissioned a study to look further into the issues impacting delivery within the county. The report highlighted 10 measures to be considered which will be further addressed by Local Authorities in bringing forward their Local Plans:

- Allocating a balanced range of sites and scales of development
- Enable early-stage engagement with high profile councillors and leader of the Council to facilitate stakeholder buy-in and community liaison at the site allocation stage.
- Support and encourage allocation and development of retirement developments, single storey dwellings, lifetime homes and extra care facilities for independent elderly living in suitable environments
- Use Planning Performance Agreements where appropriate for larger scale and more complex housing sites
- Employ or nominate strategic development officers to focus on larger scale growth allocations and assist developers through the planning process. These staff may be a shared resource between neighbouring authorities.
- Seek to invoke Service Level Agreements for Utilities and Network Rail related infrastructure where large scale sites are reliant on strategic interventions.

- Review the s106 approach for larger scale sites and consider a hybrid approach with early phases considered in more detail than later phases to enable flexibility for sites which have longer timeframes.
- Facilitate the creation of a county-wide developer forum
- Consider whether statutory powers can be used to assist with unlocking difficult sites
- Work up a funding strategy with the local highway and flood authorities to support sites where major infrastructure is required and this is not covered by CIL.

Alongside these possibilities there may also be other measures taken which would complement these actions:

- Greater support with infrastructure planning in relation to large scale plans for urban expansion to increase confidence and reduce risks for the industry and make them more attractive for housebuilders to build out at quicker rates than in the past. Increasing the number of housebuilders active in the Norfolk market and increased use of modular (off-site) building techniques will also assist here;
- Action to stimulate the SMEs in the construction sector to increase the number of firms capable of building on the scale of sites that typically result in 5-50 dwellings being provided;
- Action to stimulate the self and custom build sector considerably.
- Further joint working to improve the speed, customer focus, predictability and efficiency of the planning system; and
- A considerable drive to increase the number of people entering the construction sector across the board, particularly in the light of the probable impact of Sizewell C construction on the market of skilled construction labour in Norfolk.

It should be noted that authorities housing delivery is measured against the Housing Delivery Test (HDT)⁵⁴ and where this indicates that delivery has fallen below the local planning authority's housing requirement over the previous three years, a number of policy consequences will apply:

1. where delivery falls below 95% of the requirement, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years;
2. where delivery falls below 85% of the requirement, the authority should include a buffer of 20% to their identified supply of specific deliverable sites, in addition to the requirement for an action plan.
3. where delivery falls below 75% of the requirement, the presumption in favour of sustainable development applies, as set out in the National Planning Policy Framework, in addition to the requirements for an action plan and 20% buffer.

⁵⁴ The Housing Delivery Test does not apply to the Broads Authority

Section 7 – Health

7.1 Introduction

The origins of the planning system are closely associated with wider health improvements and recognise that where people live, work, study and relax play a greater role in health and well-being at a population level than just access to health care. Equally we know that as population size and structure change, for example an aging population, so do the demands upon health care facilities increase alongside the ever increasing need to prevent ill health in the first place. These matters are not influenced solely on an individual planning authority basis. Services are arranged and delivered across multiple boundaries. People move between areas to do different things and across their lifetime. Transport routes and methods inevitably impact wide geographic areas.

Health services in Norfolk are provided at geographies which extend beyond district and borough boundaries. The Norfolk and Waveney Integrated Care System (ICS) covers the whole of Norfolk and the former district council area of Waveney (in north-east Suffolk). Public Health provision is provided at the national, regional and local level.

Given that the various healthcare organisations operate across district and borough boundaries it is considered that there is merit in looking at consistent approaches to planning for health and well-being across the Norfolk local planning authorities.

Consequently, the need to co-operate between agencies and across geographies is important.

7.2 Principles

The National Planning Policy Framework (NPPF) requires that ‘planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles’. The health and wellbeing of the population, and health infrastructure should be considered in both plan and decision making.

The Planning White Paper (2020 paragraph 1.7) recognises that: “Where we live has a measurable effect on our physical and mental health, on how much we walk, on how many neighbours we know or how tense we feel on the daily journey to work or school. Places affect us from the air that we breathe to our ultimate sense of purpose and wellbeing.”

The TCPA has advocated the impact of good planning decisions through its Reuniting Health with Planning workstream since 2010 and has worked in partnership with NHS England, Public Health England and Sport England.

The review of Health Equity in England by Sir Michael Marmot⁵⁵ highlights the need to build healthy and sustainable communities as one of 6 core recommendations to address the widening health inequalities. It states that ‘since 2010 life expectancy in England has stalled; this has not happened since at least 1900’ health is closely linked to the conditions in which people are born, grow, live, work and age’. There are clear links made to the quality, cost and condition of housing in the report, ‘The costs of housing have increased significantly, including social housing, impacting on all the other social determinants of health and pushing many people into poverty, homelessness and ill health.’

⁵⁵See [Health Equity in England - https://www.health.org.uk/funding-and-partnerships/our-partnerships/health-equity-in-england-the-marmot-review-10-years-on](https://www.health.org.uk/funding-and-partnerships/our-partnerships/health-equity-in-england-the-marmot-review-10-years-on)

The need for health infrastructure provision takes place in the context of:

- Stalling of life and healthy life expectancy rates (in the last decade 2011 onwards)
- Widening health inequalities and likely aggravation of this arising from impacts of Covid-19
- An increasingly ageing population, with impacts on health and social care provision and costs⁵⁶
- The number of premature deaths increasing, caused by smoking, lack of physical activity, obesity and alcohol misuse.⁵⁷ The UK wide NHS costs attributable to overweight and obesity are projected to be £9.7 billion a year by 2050 with wider costs to society estimated to reach £49.9 billion per year⁵⁸
- Increase in demand for mental health and wellbeing services
- Changing approaches to healthcare delivery.

7.3 Healthy living and Wellbeing – through better design

It is clear that health issues are increasingly important considerations in future planning activities. Therefore, development should facilitate a healthy lifestyle and provide opportunities for a high quality of life through a healthy environment where pollution is controlled and there is adequate access to open spaces and green and blue infrastructure. Availability of suitable and affordable housing and employment opportunities are also critical factors, as is access to active travel opportunities and affordable and practical public transport. It is also likely that active consideration will need to be given to increased home working, space standards and overcrowding in homes and internal ventilation, especially with many organisations having home working as an established new way of working whether this be full time home working or a hybrid model of office and home.

New developments present an opportunity to build homes, streets and neighbourhoods that support and enable healthy lifestyles through high quality provision of walking, cycling and accessible public transport. Good quality public spaces promote a sense of community and increase the variety of options to interact with the local environment and improve physical and mental health outcomes.

Both new and redesign of existing developments should consider a variety of needs of the Norfolk population. These could include:

- Recognising that the greatest health benefits across the population are to be had by encouraging the inactive to be moderately active so build short active journeys in everyday life such as shopping, schooling, catching a bus and work
- Considering the particular needs of an ageing population when designing open space, access to public transport and physically active means of getting about. For example, siting of benches and shelters, availability of toilets, safety when sharing pathways, level terrain and the provision of adult outdoor exercise equipment.
- It is important when designing built environments and making blue and green space more widely available that signage, navigation, and layout actively consider needs of those, for example, with dementia or learning disabilities who may otherwise find some designs less accessible
- A number of these considerations may also support their use by, for example, adults with younger children, the less mobile across all age groups and those with a sensory disability

⁵⁶ The King's Fund: Future Trends, Demography, Ageing Populations

⁵⁷ British Heart Foundation, 2013: Economic costs of physical inactivity.

⁵⁸Source: Guidance Health Matters: obesity and the food environment March 2017 (Public Health England)

- Signage to facilities could be expressed in time taken to walk, for example, instead of distance and routes designed to break up longer journeys into manageable sizes
- Location of housing, employment, education and retail facilities to minimise journeys by non-private vehicle methods
- Where possible cycle lanes and footpaths should be situated away from busy roads, publicised and well sign posted to encourage use. They can provide opportunities for biodiversity enhancement by planting appropriate tree species, hedgerows and pollen and nectar rich flora, facilitating species movement and habitat connectivity.
- Acknowledge that built environments deemed healthy now might not be so in the future, and that when designing built environments the anticipated impacts of climate change are accounted for. This could include adaptations for hotter summers, such as adequate shade and ventilation, but also preparations for wetter winters.

The RTPI published Enabling Healthy Placemaking⁵⁹ which highlights the barriers to building healthy places⁶⁰ called for 'greater ...collaboration between health, social care, and planning professionals to ensure people's health needs are integrated into the conceptualisation, design and planning stages of new developments in the future'. It highlights 7 ways planners can take the lead:



Norfolk authorities should consider skills development and greater understanding around healthy placemaking. Empowering Healthy Places recommends councils:

- Deliver education and training across the workforce and at all levels of seniority to outline health impacts and what can be achieved through existing powers and practices. This should include building an understanding of the different teams and roles across a council to improve shared knowledge and competencies. Signpost the wealth of research knowledge and good practice available to practitioners to guide work further and support local action.
- Update planning roles and associated job descriptions to develop the capacity of planning teams. This includes building skills to be able to work across different health-related disciplines and drive forward coordination between teams to deliver policy synergy that adequately reflects modern crises including health and climate. Incorporate public health, sustainability and resilience principles into core competencies.

⁵⁹ [Enabling Healthy Placemaking - https://www.rtpi.org.uk/media/5777/enabling-healthy-placemaking.pdf](https://www.rtpi.org.uk/media/5777/enabling-healthy-placemaking.pdf) published July 2020

⁶⁰ Such as lack of funding; different requirements from developers; conflicting policy priorities.

- Invest in skills and capability around the use of data and evidence and the infrastructure required to support this. This may involve exploring how this can be achieved through partnership, such as with academia or a higher-level authority, to drive consistency and reduce costs. This may include developing a platform that brings data and evidence sources together and visualises them spatially, which would increase access, transparency and ease of analysis

7.4 Implementing Healthy Design

The NPPF states that local planning authorities should make use of tools and processes for assessing and improving the design of development, specifically recommending assessment frameworks such as Building for Life 12 (recently updated to Building for a Healthy Life⁶¹).

[Building for a Healthy Life](#) replaced Building for Life 12 in July 2020; published in collaboration with NHS England, NHS Improvement and Homes England. 'Building for a Healthy life' is a Design Code to help people to improve the design of new and growing neighbourhoods and has been created for community, developer and local authority use. The 12 considerations capture areas of design and placemaking that need most attention but are often the most overlooked⁶². It provides visual prompts to good practice rather than the previous 12 question approach.

The [Healthy Streets Approach](#) is a framework that emphasises a street that works for people and is a street that is good for health. It provides an evidence-based approach for creating fairer, sustainable attractive urban spaces. The Department for Transport has funded Healthy Streets Approach training for Local Authorities (including Norfolk) using Local Cycling and Walking Infrastructure Plans. The 10 indicators focus on the experience of people using streets and complements the use of the Building for a Healthy Life design code.

10 Healthy Street Indicators™



Source: Lucy Saunders

Agreement 15 - Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrate these into local design codes (which will inform planning application decisions, local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthy Life and Active Design.

⁶¹ NPPF revised Feb 2019, para 129.

⁶² Building for a Healthy Life, pg 5.

7.5 Health Infrastructure Protocol

To help ensure these issues are addressed a protocol for joint working between planning, public health and health sector organisations was agreed in 2017 and has recently been updated to ensure it is working effectively and to take account of the organisational changes within the health system. Throughout this revision support has come from several quarters, including the Norfolk and Waveney ICB, Public Health and the local planning authorities. It was endorsed by the Norfolk Strategic Members Planning Forum in October 2024. The Protocol seeks to explain the relationship of land-use planning to public health, giving an overview of the planning system to health professionals and an overview of health service commissioning structures to land-use planners. There are mutual commitments to discuss development-related pressures on healthcare services and opportunities for high-quality place-making to enable people to make healthier lifestyle choices. The protocol also provides a single point of contact for local planning authorities within the healthcare system for feedback on planning applications and general advice. Working with Norfolk & Waveney ICS Estates and health colleagues affords an opportunity for long term planning and growth to be considered alongside health infrastructure needs.

The Protocol seeks for health professionals and town planners to work together to secure new healthcare facilities required as a result of development and population growth. To assist with such negotiations modelling data has been used to give an indication of future healthcare requirements throughout Norfolk. Projections are given on future demand for acute hospital beds, intermediate care beds, mental health capacity and the additional square metres of floorspace required for Primary care services infrastructure. The modelling also provides an indication of the cost associated to deliver the infrastructure required for the future demand. The population increases are modelled on low, medium and high scenarios for house-building rates, reflecting the uncertainty as to how economic conditions might affect the house-building industry in coming years. The Protocol also includes a *Health Planning Checklist* that consists of six place-making themes. Whilst use of the Checklist is not mandatory; it is made available to all practitioners as a convenient method to appraise development schemes in advance of, or at the point of, making a planning application. Additionally, there is agreement that within the GNLP area all developments in excess of 500 homes should use a Health Impact assessment. HIA use is to be actively encouraged to tackle health inequalities and the promotion of good health across all areas alongside wider use of both HIAs and the checklist to actively consider designing in health benefits. The Broads Authority Local Plan includes a healthy living checklist as their sites are typically smaller than other local authorities.

Agreement 16 - Norfolk authorities agree to endorse the updated Planning in Health: An Engagement Protocol between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments.

Section 8 – Climate Change

8.1 Introduction

In Summer 2019 the Norfolk Strategic Planning Member Forum requested that a Climate Change sub group should be set up as part of the update process to the Norfolk Strategic Planning Framework. The group reviewed information in relation to Climate Change with a specific focus on the role and impact on Local Plans and the planning system generally. It also explored some of the emerging policy work around climate change and looked at best practice where applicable.

8.2 Background

Climate change has been embedded into Land Use Planning and Marine Planning for many years; significant emphasis is placed on planners to address climate change through achieving sustainable development, and marine planning can make a contribution to climate change mitigation and adaptation in line with national policies. It is recognised that considerable national, international and local research in relation to climate change has been completed in recent years. This includes reports by the Intergovernmental Panel on Climate Change, and there continues to be emerging changes in relation to Government policy on the matter.

In June 2019 the government amended the Climate Change Act 2008 to extend the national carbon reduction target within it with the aim to reduce carbon levels to net zero by 2050. In December 2020 the government also announced a new plan which aims for at least a 68% reduction in greenhouse gas emissions by the end of the decade, compared to 1990 levels⁶³. Many local authorities were galvanised to either declare climate emergencies, and/or set their own locally applicable targets, either replicating the governments or extending it further as well as enshrining the concept into corporate objectives and Plans.

Within Planning, Local Plans can play a central role in helping to facilitate this key national environmental objective. Effective strategic plan making can deliver sustainable development and help address the challenges that climate change brings, complementing measures outside of the planning sphere but not resolving climate change challenges on its own. Clearly the County is vulnerable to the impacts of climate change through flooding, drought, storm surges, sea rise etc. The costs of climate change are projected nationally to be high and it is emphasised that not taking action could cost more than taking steps to reducing emissions now to avoid the worst impacts of climate change. Sustainable development through land use policies is regarded as a key means of addressing climate change and as such the planning system has a duty to ensure that action is taken to encourage and deliver more sustainable development.

8.3 Norfolk Climate Change Partnership

The Norfolk Climate Change Partnership (NCCP) was established in early 2020.

It aims to:

- Effectively tackle climate change, ensuring prosperity for the future generations of Norfolk by building healthy, resilient, sustainable communities and environments.
- Share knowledge and practices regarding how public bodies can respond to and influence climate change in Norfolk as a whole.

⁶³ See [Press Release - https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit](https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit)

- Support and deliver projects that support Norfolk's public bodies, communities, public, voluntary and community organisations, businesses and residents to reduce their carbon emissions, realise economic benefits, and adapt to and mitigate against the immediate and future impacts of climate change.

-

The NCCP has three strategic priorities:

- Develop a sustainable energy plan to decarbonise energy supply for Norfolk and improve distribution of energy to citizens.
- Reduce and conserve energy demand on the system through retrofitting of buildings through behaviour change, enabling fabric first and heating.
- Enable greener sustainable transport solutions including a focus on behaviour change and using statutory powers where appropriate.

Norfolk LPAs will continue to support the work of the NCCP, further details of the NCCP work plan can be found on its website - <https://www.norfolkclimatechange.co.uk/>

8.3 Climate Change Research Paper

Working collaboratively through the Norfolk Strategic Planning Member Forum, Local Planning Authority planning officers, along with colleagues from the Environment Agency, Local Enterprise Partnership and Norfolk County Council, worked together to develop ideas which could help local plans address climate change through land use policies at a strategic level. The group have produced a Climate Change Research Paper and sub topic reports which set out a number of approaches for local authorities to consider when drafting local plans. In the light of this work the following agreement has been reached.

Agreement 17 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to consider the approaches contained in the NSPF Climate Change research paper when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Section 9 – Infrastructure and Environment

Strategic Infrastructure and Environmental Objectives

To realise the economic potential of Norfolk and its people by:

- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure; and
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements to strengthen inward investment.
- strengthening Norfolk's place competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact on, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- reducing unnecessary car use and supporting the roll out of new technologies (such as Electric Vehicles and alternative fuels e.g. hydrogen) and Sustainable and active modes of travel including public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

Together these measures will help create healthier more sustainable communities.

To improve the quality of life and health for all the population of Norfolk by:

- promoting development and design which seeks to actively improve health, prevent ill health and tackle widespread health inequalities
- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at the local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- meeting environmental challenges including those set out in new legislation such as the 2021 Environment Act; e.g. habitat mitigation, achieving Biodiversity Net Gain (BNG) and addressing issues of Nutrient Neutrality affecting the River Wensum and Broads Special Area of Conservation/ Ramsar sites
- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the Coast;
- protecting the landscape setting of our existing settlements and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop greenfield land;
- avoiding, where possible, development on the best and most versatile agricultural land;
- maximising the environmental benefits where the development of greenfield sites is needed;
- protecting, maintaining and, enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources; and
- Protecting and enhancing water, air, soil and other natural resource quality where possible.

9.1 Introduction

Infrastructure and Environmental objectives have been considered together in the context of the Norfolk Strategic Planning Framework. The issues addressed are complex and multi-faceted and much of the work that has been completed on this subject by working closely with appropriate expert groups.

As is reflected in the introductory text in this framework and as recognised in the agreed vision and objectives, the future economic and social prospects for the County cannot be divorced from issues of environmental protection and infrastructure provision. The quality of Norfolk's environment, both in terms of the countryside, its historic City and the wide range of distinctive towns and villages it includes, give access to a quality of life which is one of the key selling points of the County and the retention and enhancement of which will be crucial to attracting the growth in highly productive economic sectors that is sought. Yet, as is also noted, Norfolk's infrastructure is comparatively under developed compared to many other parts of the wider South and East of England and will need significant enhancement if growth is to be delivered at the scale envisaged without compromising the quality of life and environment on offer.

The Norfolk Strategic Infrastructure Delivery Plan⁶⁴ (NSIDP) has been produced by the County Council working with all the local planning authorities and utility providers. It lists strategic infrastructure requirements and provides an update on the delivery of a range of projects. The projects in the NSIDP reflect the key infrastructure needed to deliver the scale of growth ambitions outlined in the NSPF. The NSIDP is a working document that will be regularly updated as information

⁶⁴See [Norfolk Strategic Infrastructure Delivery Plan](https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies) - <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies>

becomes available. A new version of the NSIDP was released in 2024. The NSIDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development. The Norfolk Strategic Infrastructure Delivery Plan highlights that the following projects have successfully been funded since 2013

Completed:

- Broadland Northway (Norwich Northern Distributor Road (inc Postwick)) - £205m
- Norwich Pedal ways - £14m
- Great Yarmouth sustainable transport package (Part 2) - £3.5m
- Great Yarmouth Beacon Park Link (A47/143 Link) - £6.8m
- A11 dualling Barton Mills to Thetford- £105m
- Great Yarmouth Right Turn at the rail station - £400,000
- Great Yarmouth Rail Station to the Market Place improvement- £2m
- Great Yarmouth sustainable transport package (Part 1) - £2.5m
- Thetford Enterprise Park Roundabout- £1.5m
- King's Lynn Lynnsport Link Road- £3.5m
- Bacton Walcott Landscaping - £19.3m
- A140 Hempsall Roundabout - £4m
- A11/Outer Ring Road Daniels Road junction improvement- £2m
- Great Yarmouth congestion relief projects- £3.3m
- Attleborough Town Centre Improvements - £4.5m
- Norwich (Growth Deal projects in Norwich City Centre and on the A11 corridor to Wymondham) - £11.2m
- Norwich (various projects through the Transforming Cities Fund programme) - £23.6m
- Active Travel Fund - £5.6m
- Wroxham road to Salhouse road section of the Broadland Growth Triangle Link Road
- Marriott's Way and Bure Valley Path sections of the Green Loop - £1.4m
- North Walsham, Honing and Stalham resurfacing section of the Weavers Way - £650,000
- Great Yarmouth Flood Defences 2017 onwards (Epoch 2)
- Great Yarmouth sustainable transport package (Part 2) - £3.5m
- Snetterton Heath Energy Supply Phase I – New primary substation and 6MVA transformer commencing Jan 2022 – £3.6m (Prior to Snetterton Heath Distribution Phase 1)
- Great Yarmouth Covered Market
- Great Yarmouth Harfreys Roundabout
- Great Yarmouth Third River Crossing - £120m
- Great Yarmouth Flood Defences 2017(Epoch 2) - £42.9m

Under construction or part-completed:

- Thetford Water Supply – £9.8m
- Thetford Sewerage Scheme - £2m
- Easton, Hethersett and Cringleford sewerage upgrade - £11m
- Local Full Fibre Network (LFFN) - £12m
- Internet of Things Innovation Network - £735,000
- Great Yarmouth Operations and Maintenance Campus
- Wymondham Water Supply Connections
- Great Yarmouth Learning Centre and University Campus

- Hethel Sustainable Energy Provision (Feasibility study phase)
- A47 improvements (incl dualling Blofield to North Burlingham, and Easton to North Tuddenham)

Planned, not yet started:

- A47 improvements (incl Thickthorn A47 Wisbech Junctions (Broadend Road))
- Increased Surface Water Capacity North Lynn
- Great Yarmouth Winter Garden
- Great Yarmouth Public Realms Improvements

9.2 Utilities

To deliver the rate of growth that is planned across Norfolk in the coming years considerable further investment will be needed in utilities infrastructure. A list of the main schemes that are thought to be necessary is outlined below.

Table 11: Priority Utilities Projects for Promotion⁶⁵

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Attleborough Energy Supply	Not Known	£22m	BRP, Private Sector
Snetterton Heath Distribution Phase 1	Not Known	£1.5m	Developer Finance
Snetterton Heath Mains Sewer Connection	TBC	£3.8m	Private Sector, Public Sector, Anglian Water.
Hethel Sustainable Energy Provision	2024	£5.2-£5.9m	Private sector investment

9.3 Electricity

Provision of energy, particularly electricity is fundamental to housing and economic growth as energy consumers require access to reliable energy supplies. Since 2004, the UK has been a net importer of energy, and this has changed the way we view our energy security (Annual Energy Statement 2014). Housing and employment growth will put a greater strain on the electricity network with many of the primary substations in Norfolk already reaching capacity.

The 33kV main transmission network in Norfolk is the main network for new on-shore electricity providers and major users such as employment sites and large scale residential development. It is essentially three networks with one in the west serving King's Lynn and West Norfolk and extending in a limited way into the western side of North Norfolk and Breckland; one centred in Norwich and extending to Attleborough and the central and eastern parts of North Norfolk; and one serving the towns along the southern border and extending round to Great Yarmouth. This leaves significant, largely rural, parts of the county some distance from potential connections to this network. This particularly applies to a central swathe running north south, and a southern swathe running east west.

⁶⁵ Anglian Water's Long Term Recycling Plan was published in the summer of 2018. Building on this version work has commenced on the drainage and wastewater managements plans, using a nationally agreed methodology, this will be published in 2022.

The electricity network is subject to a number of operational constraints which challenge the ability to predict the future capacity of substations over the time periods that are typical for Local Plans. UK Power Networks (UKPN) will not normally invest to provide additional unassigned capacity and the costs of capacity upgrades falling on developers can be significant. The ability of developers to reserve supply, and unexpected windfall development adds further uncertainty to the forward planning process. In addition, the power requirements of end users of employment sites can vary significantly and are unknown at the time the land is allocated in a Local Plan.

In developing Local Plans, it is clear that Local Authorities will need to work closely with UKPN to ensure that identified locations where housing and employment growth will require strategic enhancement of the electricity supply networks to support new developments can be delivered without delaying the delivery of development or rendering it unviable. Partners continue to work with UKPN to overcome current constraints and prevent future issues, and to explore mechanisms to ensure the cost of electricity infrastructure is shared proportionately between planned developments. To support this, partners are working with UKPN to ensure there is more detailed information available to authorities providing an understanding of potential constraints and where development will require strategic enhancement of the electricity supply networks. Some Norfolk Planning authorities have also completed electricity infrastructure studies to investigate power supply issues and assess local constraints in more detail, these include the Greater Norwich Energy Infrastructure Study⁶⁶ and the North Norfolk Power Study⁶⁷. Norfolk and Suffolk County Councils are collaborating to bring forward an Energy Plan for the sub-region, the plan will enable local authorities across Norfolk and Suffolk to identify the actions they need to take to ensure the counties are able to meet the rising demand for energy and unlock housing and economic growth in a way that respects environmental sensitivities and is consistent with a clear, and identifiable pathway to net zero.

Additionally, all Local Plans across Norfolk will need to promote new developments which minimises energy use; minimise reliance on non-renewable or high-carbon energy sources and promote and encourage the use of decentralised and renewable or low-carbon energy sources (including heat networks) and sustainable construction technologies ensure that investment decisions help promote growth and overcome constraints and there are forward looking decision on energy investment.

9.4 Water

Norfolk lies within one of the driest parts of the UK. Planned growth in housing and employment will significantly increase water demand. The area's large agricultural sector is also dependent on water availability in the summer. Water quality is crucial, due to the number of protected sites relying on high water quality, including the Broads.

Water Resources East (WRE) is one of five regional planning groups in England operating under the National Framework for Water Resources⁶⁸. Their region encompasses Norfolk, Suffolk, Essex, Cambridgeshire, Northamptonshire and Lincolnshire. WRE works with the four water companies in

⁶⁶ See [Greater Norwich Energy Infrastructure Study - https://gnlp.oc2.uk/docfiles/46/P3723%20Greater%20Norwich%20Energy%20Infrastructure%20Study%20with%20Appendices.pdf](https://gnlp.oc2.uk/docfiles/46/P3723%20Greater%20Norwich%20Energy%20Infrastructure%20Study%20with%20Appendices.pdf)

⁶⁷ See [North Norfolk Power Study - https://www.north-norfolk.gov.uk/media/5583/north-norfolk-power-study-report-march-2019.pdf](https://www.north-norfolk.gov.uk/media/5583/north-norfolk-power-study-report-march-2019.pdf)

⁶⁸ See <https://www.gov.uk/government/publications/meeting-our-future-water-needs-a-national-framework-for-water-resources>

the region together with local authorities and representatives of the farming, energy and housing development sectors to create a regional water resources plan that meets the long terms needs of all sectors and the environment. WRE's first Regional Water Resources Plan for Eastern England was finalised and published in December 2023⁶⁹.

Anglian Water supplies water to the majority of Norfolk with parts of Great Yarmouth and the Broads Authority being served by Essex and Suffolk Water. Water companies have a statutory obligation to prepare and review Water Resource Management Plans (WRMP) once every 5 years setting how they will maintain a sustainable balance between water supplies and demand.

Anglian Water's current 2024 Water Resources Management Plan (WRMP24) was approved by the Secretary of State and published in September 2024, it describes the action needed over the period from 2025 to 2050⁷⁰. This considers the challenges the region faces, allowing Anglian Water (AW) to implement an affordable, sustainable pathway that can provide benefit to their customers, society, and the environment. The WRMP24 process has identified significant challenges for the East of England between 2025 and 2050; some of which were not present for WRMP19. Anglian Water will continue to prioritise demand management through smart metering, leakage control and water efficiency campaigns. But with almost no surplus water available to meet the new water needs of our region, WRMP24 has to identify new supply options for ensuring customers in Norfolk continue to have a safe, resilient water supply whilst providing best value to the region. New strategic resource options (SROs) include the Fens and Lincolnshire reservoirs, that will meet 36% of new water needs. The region's first proposed desalination plant at Bacton has joined the list of strategic resource options to be accelerated under national oversight by regulators. Anglian Water has planned for adaptive future resources, which allows flexibility to respond to changing circumstances.

Anglian Water has a statutory duty to supply water for domestic purposes e.g. to all household properties as well as any domestic requirements (e.g., drinking water, hand-basins, toilets and showers) of non-household properties. There is no legal requirement for water companies to supply water for non-domestic water demands (i.e. water use for industrial processes such as agri-food production or car washes), where it might put at risk the ability to supply water for domestic purposes.

Anglian Water has advised that they can no longer guarantee to supply new non-domestic water requirements for intensive/high water consumptive uses such as manufacturing/ food processing and production, due to water supplies being squeezed by abstraction reduction, climate change and a fast-growing population⁷¹.

As a result of limited water availability, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 MI/d) (this may be less dependent on the availability of water in that area) Anglian Water will be declining requests. Where the development is progressing through the Nationally Significant Infrastructure Project planning regime or Special Development Order Anglian Water will ask businesses to submit a Water Resource Assessment as part of their planning process, and, where feasible, will work with them to explore innovative solutions to meet their requests - such as more water efficient manufacturing and cooling processes, water reuse,

⁶⁹ See <https://wre.org.uk/the-regional-plan/>

⁷⁰ See [V3 WRMP24 main report - V3 WRMP24 main report](#)

⁷¹ [Anglian Water's Non-Domestic Water Requests Policy July 2024](#)

or alternative non-potable water resources. This position will be reviewed annually, and this non-domestic water request cap may change.

Essex and Suffolk Water have also finalised their 2024 WRMP⁷² for the 2025-2050 period covering the areas of Norfolk they supply.

Norfolk Authorities will work with Water Resources East (WRE) and its members, including both water companies, to help safeguard a sustainable supply of water for Eastern England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential.

WRE's five-year business plan 2024-2028⁷³ sets out five strategic priorities to help increase their impact within the region, as they work with their members to deliver their flagship projects and develop the second iteration of their Regional Plan:

- Develop a more comprehensive, fully multi-sector, regional water resources plan for Eastern England
- Support catchment scale activity across the region to enable long-term planning and environmental improvement across sectors.
- Increase WRE membership, engagement and influence within the region.
- Be thought leaders and pioneers of collaborative approaches to integrated water management, helping to shape international best practice, national government policy and local delivery.
- Continue to strengthen WRE's governance and funding.

These will help to take forward action to help address the projected water shortages identified and deliver shared solutions that serve multiple sectors and help restore, protect and improve the environment.

One of WRE's flagship projects is the Norfolk Water Strategy Programme (NWSP) launched in February 2021 in collaboration with Norfolk County Council, Anglian Water and the international environment charity The Nature Conservancy. In February 2024, the partners launched the Business case for a Norfolk Water Fund⁷⁴; a £30 million investment in nature-based solutions and land use change with a benefit to cost ratio of 6.7. The aim is to establish the Water Fund as a partnership structure to facilitate delivery of nature-based solutions for water management in the medium and long term

Water Funds are governance and financing mechanisms allowing public and private sectors to work collectively to secure water for their communities. They are used successfully around the world to leverage blended finance streams to ensure coordinated delivery, funding and monitoring of nature-based solutions (NBS) for water security. In 40 locations, across North America, Latin America, Asia and Africa, TNC collaborates with partners to set up Water Funds based on science-based plans and innovative tools for representing water management challenges, strong monitoring and mobilisation of diverse funding streams. This programme will establish TNC's first Water Fund in Europe. Being part of the global Water Fund network will access collective experience, accelerating the project, and enable Norfolk to be featured as a global exemplar for water resource management, thereby facilitating access to further financial and human resources.

⁷² See [WRMP \(2025-2030\)](https://www.nwg.co.uk/responsibility/environment/wrmp/wrmp-2025-2030/) - <https://www.nwg.co.uk/responsibility/environment/wrmp/wrmp-2025-2030/>

⁷³ <https://wre.org.uk/wp-content/uploads/2023/12/WRE-5-Year-Business-Plan-2024-2028.pdf>

⁷⁴ See <https://wre.org.uk/wp-content/uploads/2024/02/Norfolk-Water-Fund-Business-Case-Report.pdf>

Agreement 18 – Norfolk Authorities will remain members of WRE and will work collaboratively with its other members in the development of the Norfolk Water Strategy Programme to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to support delivery of WRE's Regional Water Resources Plan and develop future iterations of the plan.

Other work is also ongoing across the county considering the wider impacts of water and associated infrastructure. Norwich City Council leads the River Wensum Strategy Partnership, working alongside the Environment Agency, Norfolk County Council, the Broads Authority and Norwich Society. The strategy has the overall vision of breathing new life into the river by enhancing it for the benefit of all and increasing access to, and making greater use of, this important asset. It will consider social, environmental and economic factors in achieving this vision. Some of the projects already delivered or planned as part of this strategy look to improve water quality and reduce flood risk on a catchment wide basis. In addition, the CATCH project, (Norfolk County Council along with Norwich City Council, Broadland District Council and Anglian Water) is working to find long-term solutions to the problem of surface water flooding in Norwich. The pilot project offers homes, businesses and schools the chance to have a slow-release water butts or rain water planters installed completely free of charge. The project is funded by Anglian Water and the Interreg European Union CATCH Climate Change and Flood Reduction Project. The EU are currently considering further phases of project work.

Local Plans can also contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/per person/per day).

Agreement 19 – 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) or lower for residential development.

Individual authorities may also wish to consider the inclusion of a specific water efficiency BREEAM standard for commercial development within their Local Plans. Improved water efficiency is not limited to measures within dwellings and commercial buildings and a collaborative approach to promote innovation in water efficiency/re-use is required working closely with water companies and site promoters/developers.

Anglian Water's aim is to see residential developers go beyond the optional higher water efficiency standard (110 litres/per person/per day) - this could include water re-use measures in new developments including stormwater and rainwater harvesting and grey water recycling forming part of an integrated approach to water management. Natural England, the Environment Agency and water companies in the WRE region (including Anglian Water and Essex & Suffolk Water) have developed Shared Standards for Water Efficiency in Local Plans (June 2025)⁷⁵. This recently published document promotes tighter water efficiency standards to be included in Local Plans – going further than the optional higher standard of 110 l/p/d towards 85 l/p/d, with a supporting evidence base to assist LPAs

⁷⁵ <https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf>

with policy-making. Norfolk Authorities will work with Anglian Water to establish these higher standards where viability allows.

The current and future management of compliant disposal of wastewater is assessed by Anglian Water's Drainage and Wastewater Management Plan 2025-2050 (DWMP23). This is a collaborative long-term strategic plan highlighting the known and expected future risks to drainage and identifying solution strategies to mitigate these. The plan considers risk from population and housing growth along with climate change impacts over time, ensuring assets are maintained and customer needs are met, while protecting the environment. It provides sustainable solutions for maintaining reliable and affordable levels of service and facilitates working in partnership to mitigate flood risk⁷⁶.

Anglian Water has also implemented new developer charging arrangements setting out a fixed, upfront schedule of fees that they charge for relevant activities, including laying mains and pipes that connect new buildings and housing developments to their network⁷⁷. These are circumscribed by limits and requirements that Ofwat sets, called charging rules ensuring that water companies provide an excellent service to developers of all sizes. Anglian Water's charging arrangements also cover a number of typical additional services that are offered in order to facilitate developments, including particular circumstances where additional costs are incurred. In addition to the Sewerage Environmental Incentive Scheme, which applies only to brownfield sites where surface water is currently discharged to a combined or foul sewer, developers can also apply for a Water Environmental Incentive where new residential properties are designed to meet 90 l/p/d or less.

It will be necessary to take a co-ordinated approach to water through water cycle studies or integrated water management strategies to address water supply, quality, waste water treatment and flood risk. Flood risk assessments should be used effectively to ensure development is located appropriately and addresses cumulative impacts in key growth areas. To help achieve this a Strategic Flood Risk Assessment (SFRA) has been produced jointly by most Norfolk authorities⁷⁸.

The release of land for development will be dependent on there being sufficient water supply and wastewater infrastructure to meet the additional requirements arising from the new development to ensure that water quality is protected or improved, with no detriment to areas of environmental importance. Growth in several parts of the county is dependent on investment at sewage treatment works (water recycling centres). The timing of these investments will have an important effect on the phasing of development. Such matters could be assessed through water cycle studies/integrated water management strategies and other supporting documents as appropriate to identify the infrastructure needs that are prepared to support Local Plans, and through Anglian Water's Business Plans that set out the growth investment schemes at water recycling centres for each 5-year Asset Management Period (AMP).

During the updating of this NSPF, Anglian Water announced capacity issues with some Water Recycling Centres (WRCs) within the county. Anglian Water have indicated that in some cases, growth schemes have been identified for AMP8 (2025-2030) and so development could come forward once

⁷⁶ [Drainage and wastewater management plan](#)

⁷⁷ See [DS charging arrangements - https://www.anglianwater.co.uk/siteassets/developers/development-services/ds-charging-arrangements-2019-2020.pdf](https://www.anglianwater.co.uk/siteassets/developers/development-services/ds-charging-arrangements-2019-2020.pdf)

⁷⁸ See [Strategic flood risk assessment - http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra](http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra)

improvements have been made. However, for other WRCs where no growth schemes have yet been identified this may impact the phasing of development. More information has been circulated to LPAs, and Norfolk LPAs will continue to work with Anglian Water to limit the impact of these capacity issues on new development.

Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure.

In considering the distribution of growth Local Planning Authorities will need to ensure that distribution avoids cumulative detrimental impact on the most sensitive water courses particularly, those in the Broads and on the Wensum which cross a number of Local Planning Authority boundaries. Each public body will have regard to River Basin Management Plan⁷⁹ to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites).

9.5 Digital Connectivity

Broadband

Having access to high-speed and reliable broadband is now regarded as essential by many residents and businesses. The picture regarding superfast broadband coverage is rapidly improving; 97.3% of the county's homes and businesses can now access superfast broadband, up from 42% in 2012⁸⁰.

The Better Broadband for Norfolk (BBfN) project was launched in 2012, with the aim of ensuring that by the end of 2015 more than 80% of Norfolk's premises could access superfast broadband (24 Mbps download, also known as Next Generation Access (NGA)). The third phase of the BBfN Programme started in 2019, a further £13 million is now being invested in Norfolk, but this time will deploy Ultrafast Fibre to the Premises broadband for circa 8,200 Norfolk properties that do not have access to Superfast broadband. Overall, this will allow the county to move towards its aim of achieving 100% coverage. As a result of The Future Telecoms Infrastructure Review, the Chancellor announced in 2019 a £5 billion commitment to fund gigabit capable broadband for the 20% of UK premises that would be unlikely to receive commercial access to gigabit capable broadband. In March 2021 the first live phase (Phase 1b) of Project Gigabit was launched. Norfolk has been included in the first wave, which will deliver gigabit- capable connections across Norfolk to premises that are unlikely to benefit from commercial investment.

The £114 million Norfolk Project Gigabit contract was awarded to Cityfibre and signed in June 2023. It will provide gigabit capable broadband to around 66,000 premises across Norfolk. As of Summer 2023,

⁷⁹ See [Anglian district river basin management plan - https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan](https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan)

⁸⁰ See [Local broadband Information Website - http://labs.thinkbroadband.com/local/index.php?area=E10000020](http://labs.thinkbroadband.com/local/index.php?area=E10000020)

Ultrafast (Gigabit capable) broadband coverage has reached over 56% across Norfolk, and increase from 10% from the previous year.

The availability of high-speed broadband is clearly of major strategic significance for Norfolk and Norfolk authorities welcome Openreach's offer to install Fibre to the Premises (FTTP) free of charge to all new housing developments of 20 or more homes and an improved pricing structure all the way down to two homes⁸¹. However, the further rollout of broadband to existing homes cannot be required through any current Local Plan, but the Norfolk authorities are working closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable.

Working with partners, Norfolk County Council secured circa. £8 million in 2019 via the Government's Local Full Fibre Network programme and a further £2m in 2020 from the Ministry of Housing, Communities and Local Government. The LFFN programme completed successfully in March 2022, delivering gigabit capable broadband to 394 rural public buildings, including schools, council offices, fire stations, libraries and village halls. A further circa. 2,200 nearby homes are also able to benefit from full fibre broadband.

In addition, a further 2,500 homes to date have benefitted from commercial operators exploiting the infrastructure installed under LFFN, by installing full fibre broadband deeper into poorly served communities. The revised NPPF (para 112) highlights the importance of reliable communications infrastructure in economic growth and social well-being and requires policies to set out how high quality digital infrastructure is expected to be delivered, authorities will engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans.

As part of the work to update the last version of this document a specialist group was set up to provide further guidance to local authorities on supporting broadband in local plans. Since this work was completed, the government has introduced regulations for gigabit broadband infrastructure and connectivity requirements for the construction of new homes in England⁸². The requirements are designed to ensure that during construction, new homes are installed with the fastest broadband connections available within a cost cap. Even where a gigabit-capable connection is not possible within this cost cap, the new homes will be future-proofed with physical infrastructure to support gigabit-capable connections when they become available. Local Planning authorities can also ensure they are able to support developers with information regarding the connection of Fibre to the Premises (FTTP) and discuss applications with the County Council to understand how their initiatives can help deliver high speed broadband provision to developments. Local planning authorities can implement Wayleave policies that only seek to cover costs and work with landowners to improve connectivity.

⁸¹ See [Fibre for developers rate card - https://www.openreach.com/content/dam/openreach/openreach-dam-files/images/fibre-broadband/fibre-for-developers/Rate%20card%20website.pdf](https://www.openreach.com/content/dam/openreach/openreach-dam-files/images/fibre-broadband/fibre-for-developers/Rate%20card%20website.pdf)

⁸² [The Building etc. \(Amendment\) \(England\) \(No. 2\) Regulations 2022](https://www.legislation.gov.uk/uksi/2022/984/contents/made) - <https://www.legislation.gov.uk/uksi/2022/984/contents/made>

Mobile Connectivity

Mobile telephone connectivity has, like broadband, become increasingly important. Significant change is now underway with the continued rollout of 5G services in the County.

Coverage in Norfolk

Interactive mapping (available from Consumer Group Which⁸³) shows the general coverage for 2G, 3G 4G and 5G data across Norfolk. The majority of areas across Norfolk receive a weak 2/3/4G signal, with the strongest signals in Norwich and market towns such as King's Lynn and Great Yarmouth.

Norfolk County Council is collaborating with mobile analysts Streetwave to map mobile coverage in the region using waste collection vehicles. In April 2024, Norfolk County Council installed monitoring devices in some waste collection vehicles across the seven district councils in Norfolk. These devices takes surveys of the quality of mobile networks from the four main providers in the UK: EE, O2, Three, and Vodafone. They collect data on speeds, signal strength, and network generation.

The results of this assessment can be found at [the Norfolk Mobile Coverage web page - www.norfolk.gov.uk/mobilemap](http://www.norfolk.gov.uk/mobilemap).

Many mobile “not-spots” remain in Norfolk (some rural areas and parts of the coast in particular), particularly for 4G data coverage, the most significant improvements in rural coverage will be delivered through the Shared Rural Network (SRN) programme. This Programme started in 2020 and will see the four main mobile operators and government jointly invest £1bn in improving mobile coverage in rural areas. The target is to deliver 4G coverage to 95% of the UK by 2025. Through shared and new infrastructure, the Shared Rural Network is planned to increase the parts of the UK that get 4G coverage from all operators from 66% to 84%, improving consumer choice. The mobile operators expect the Shared Rural Network will extend mobile coverage to an additional 280,000 premises and for people in cars on an additional 16,000km of the UK's roads, boosting productivity and investment in rural areas. Norfolk local authorities will continue to work proactively and collaboratively with the MNOs and their network build partners to improve mobile phone coverage including fast data services availability over 4G & 5G services.

5G

5G uses higher frequency radio bands which travel less well than 4G, and can be disturbed by buildings, trees, weather etc. Whilst more base stations will be required Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which will be rolled out on existing infrastructure where possible. Getting high quality 5G infrastructure rolled out across Norfolk will be important to delivering the vision of the NSPF. The main benefit of 5G is that it could, in theory, provide ultra-high speed broadband access to all, without the bandwidth capacity challenges of 4G. This should enable location to be much less of a barrier to receiving broadband than previously, with benefits for homeowners and businesses. It could remove a barrier to location of employment opportunities, particularly home-based and rural-based businesses.

5G is now available in the most dense urban parts of the County and some dispersed locations where masts have been more recently upgraded. In March 2022 the Government confirmed it's intention to

⁸³ [Which mobile phone coverage map - http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map](http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map)

reform planning legislation to support the deployment of 5G and extend mobile coverage. The changes have been made to the Permitted Development Rights to enable:

- the deployment of taller and wider masts;
- building-based masts located nearer to highways; and
- faster deployment of radio equipment housing, such as equipment cabinets.

At the same time the government published a new code of practice for wireless network development in England. This provides guidance to mobile infrastructure operators on their network deployment with a stronger focus on the siting and design of wireless infrastructure and the process for engaging with local authorities and communities.

The key conclusion is that some consistency of approach from all Norfolk Planning Authorities is clearly important for 5G if the very high degree of nationwide coverage required for 5G to be effective is to be secured. Broadly, it should be made as straightforward as possible for 5G base stations and transmitters to be approved where they fall outside of the remit of permitted development, and common development management policy text to facilitate this should be explored, taking into account material planning considerations. In particular, care will need to be taken to ensure that new telecommunications equipment is sited and located sensitively in respect of the public realm, street-scene, historic environment and wider landscapes.

As part of the work to update this document previously a specialist group was set up to provide further guidance to local authorities on supporting the roll out of 5G. The group have produced a supporting document of Shared Objectives for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk.

Agreement 21 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

9.6 Education

Education

Norfolk's pupil population has been in decline for some time, this was first noted by Norfolk County Council in 2019 when it was evident the birth rate was starting to fall. The previous peak in pupil population occurred in 2003 and these pupils entered the primary phase around 2007/2008. Since this period numbers have gradually been reducing

with some recovery but now continue to fall and reach an all-time low of approximately 7400 pupils. Previous higher cohorts of the primary phase sector have now transitioned through into the secondary phases. This will impact different areas and schools differently and will present a challenge as the effect is not sustained for

a long period in the secondary phase. School's Infrastructure colleagues have been working with Post 16 education colleagues to assess how these increased numbers may be accommodated across the existing Post 16 provision.

Based on the current trajectory of birth numbers the primary phase will continue to see reduced numbers entering the reception cohort in some areas of the county and as a result, overtime, the older cohorts reducing, this will have quite different and significant effects on settings in different

communities. The speed of delivering houses is key to the requirements of school places so careful monitoring of housing progress is undertaken between County Council/District/Borough Councils. The expected decline in pupils impacts the ability to deliver new schools in areas of significant development, based on the funding mechanism associated with pupil numbers. This could present significant challenge in certain areas ensuring sustainable travel for education provision and delay the anticipated schemes as a result. Costs of school delivery have increased significantly over the last few years in order to meet additional requirements within the planning system and in order to meet our sustainability targets.

At the same time costs have increased, the needs of Norfolk's pupil population has changed, with increased pupils with identified Special Education Needs and Disabilities, the type of establishment required to respond to this need in future will also have to adapt and change. This changed requirement also brings with it higher costs for more specialists provision to be introduced across the county.

Standards in Norfolk schools have continued to rise with 86% of schools being graded Good or better as of September 2024. The Local Authority retains responsibility for ensuring that there is a sufficient supply of school places and works with a range of partners, e.g. Governing Boards, Dioceses and Academy Trusts to develop local schemes.

Norfolk County Council's School Sufficiency Plan sets the strategic plan for the next ten years or more, published every year identifies a need for 24 new primary schools and 1 high school. It outlines the implications of key growth areas where more than one primary school is required, which includes Attleborough, Thetford, Beeston Park, Rackheath and West Winch. A new High School for north east Norwich is also being discussed and planned. Expansion to existing schools will also be required in areas of the County to respond to local needs dependant on the delivery of housing and impact on the pupil population.

Norfolk County Council works closely with Local Planning authorities as per agreement 26.

Agreement 22: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places. This includes making provision for those with Special Educational Needs (SEND), providing land for school expansion or new schools and/or where no suitable solution for sustainable access to schools exists, appropriate contributions for home to school transport. S106 and / or Community Infrastructure Levy funds will be used to deliver additional school places and/or contributions to home to school transport, where appropriate. The County Council's Planning Obligations Standards will be used to inform any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure. The authorities agree to support Norfolk County Council in securing contributions towards infrastructure where justified and, in the case of planning obligations, suitably evidenced as being in compliance with S122 of the Community Infrastructure Levy Regulations 2010.

9.7 Transportation

There will be a need for considerable further investment in transport infrastructure if this is not to constrain growth. A background paper was previously produced summarising the state of the County's transport network, providing much of the evidence base for the production of the first version of the

NSPF and subsequent Local Plans⁸⁴. The paper aims to identify: the current state of the transport system; the constraints (current and future); and opportunities and includes a review of transport constraints to identify issues that, without resolution, may prove a barrier to growth. The information is now being updated via the Norfolk Strategic Infrastructure Delivery Plan as mentioned in Section 9.1.

Current Network

Norfolk is served by two trunk roads: the A11 from London and Cambridge, and the A47 from the west. The A47 continues from Great Yarmouth to Lowestoft in the east and from King's Lynn to the A1 in the west. The A11 is fully dual carriageway and the corridor will see some of the largest scale growth planned in the county (at Thetford, Attleborough, Wymondham, Hethersett and the Norwich fringe at Colney/Cringelford). The A47 is a mix of single and dual carriageway, both within and beyond Norfolk.

Away from the strategic road network, Norfolk's road network is a largely rural, single carriageway network. Much of it has not seen significant improvement schemes and so journey times can be slow, particularly away from the higher standard A-class network.

Norfolk County Council, in partnership with Norwich City Council, Broadland District Council and South Norfolk Council, made successful bids to the Department for Transport (DfT) as part of the Transforming Cities Fund. The fund aims to make it easier for people to access jobs, training and retail, and also aims to respond to issues around air quality. The partnership was initially awarded £6.1m to deliver improvements to Norwich Bus Station, investment in the blue and green pedalway routes in Hethersett and Thorpe St Andrew and the introduction of the new bike share scheme for Greater Norwich, Beryl. A further £32m was awarded to deliver a 'core' package of improvements. All Tranche 1 and many Tranche 2 schemes have already been successfully delivered.

⁸⁴ See [NSPF SUpporting Transport Information - https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx](https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx)

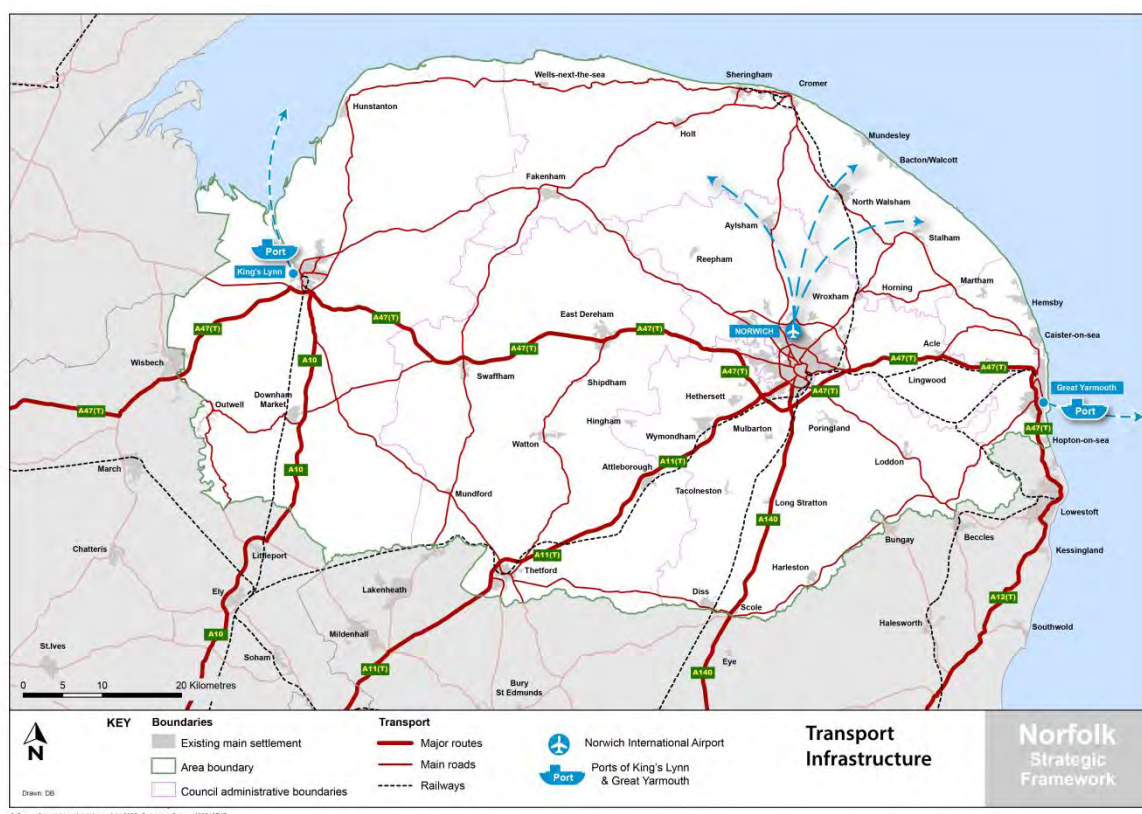


Figure 9: Norfolk Transport Infrastructure, 2021

Norwich Airport is situated some 5km north of Norwich city centre. It operates a number of scheduled and charter flights and provides servicing for the offshore energy industries via helicopter flights. The airport terminal has capacity for 700,000 passengers per year. Norwich airport has published a masterplan setting out a vision for the airport's continued growth over the next 30 years⁸⁶. The masterplan is endorsed by both Norwich City Council and Broadland District Council as a clear indicator of how the airport could grow in a sustainable way in the coming decades.

Great Yarmouth is the largest port in the county. It is a modern, multipurpose facility with 24/7 unrestricted operations, integrating a well-established river port with a fully operational deep water outer harbour with more than 1 km of quayside, accepting vessels up to 220 metres in length and up to 10.5 metres draught at all states of tide. The Port of King's Lynn specialises in agribulks and aggregates handled both in-dock and on Riverside Quay. The port also provides a range of terminal operations for cargo shippers and receivers and can handle specialist industrial project cargo, supporting the development of major UK infrastructure construction.

⁸⁵ [Improvement projects - Norfolk County Council](https://www.norfolk.gov.uk/article/39833/Improvement-projects) - <https://www.norfolk.gov.uk/article/39833/Improvement-projects>

⁸⁶ [Norwich Airport Masterplan - Norwich Airport](https://www.norwichairport.co.uk/masterplan/) - <https://www.norwichairport.co.uk/masterplan/>

Levels of both walking and cycling to work are relatively high in Norwich. In South Norfolk and Broadland Districts levels of walking are comparatively lower than elsewhere in the county, probably reflecting that many people from these districts work in Norwich and many parts of these districts are too far from Norwich to walk. A comprehensive cycle network has been identified in Norwich, and the city has also benefited from a large amount of funding that has been used to upgrade parts of the cycle network. There is still however a considerable amount of work required to upgrade the network in its entirety.

Accessibility by public transport to services and facilities is problematic in some more rural and isolated parts of Norfolk. Overall, accessibility tends to be poorest in the more rural districts of Breckland and West Norfolk, where there is a significant number of smaller villages, hamlets and isolated dwellings. Providing bus services within these smaller settlements is often unviable due to low population numbers.

Tables below lists some of the key road projects that the County Council in collaboration with partners is seeking to progress in the next 10 years.

Table 12: Key Infrastructure Road Projects in Local Authority Control

Project Name	Estimated Start date	Estimated Cost	Funding sources
Broadland Growth Triangle Link Road	Part Delivered	£38m	Developer funding, CIL, HIF
A140 Long Stratton Bypass	Started	£46.9m	Developer funding, CIL supported borrowing, DfT Major Road Network Funding
A10 West Winch Housing Access Road	2025	£85m	Developer funding, DfT Major Road Network Funding
A148 Fakenham Roundabout Enhancement	2025	£3.5m	NPIF, Developer funding
Attleborough Link Road	TBC	£18m	Developer finance, Homes England loan, HIF
Norwich Western Link (A47 to NDR)	2026	£274m	DfT Large Local Major transport scheme funding
A17/A47 Pullover Junction	2025	£33.7m	DfT, NCC
King's Lynn STARS	2025	£27m	Levelling Up Fund (LUF), Norfolk County Council, Borough Council of Kings Lynn and West Norfolk
North Walsham Western Link Road	TBC	TBC	Developer funding
Hethel Infrastructure to open up Employment Land	2025	£9.9m	CIL, South Norfolk Council, Norfolk County Council
North Walsham Western Link Road Lyngate/Folgate Industrial Estate Access	TBC	TBC	Developer Funding

Table 13: Priority Road Projects for delivery by other organisations

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
A11 Thetford bypass junctions	2025-2030	Not Known	NPIF, National Highways Roads Investment Strategy 3 (2025-2030), Major Road Network Funding

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
A47 Wisbech Bypass Junctions	TBC	£4.5m	NPIF, developer funding, National Highways Roads Investment Strategy 2 (2020-2025), CPCA Business Board Growth Deal Funding
A47 Acle Straight dualling	2025-2030	£144m	National Highways Roads Investment Strategy 3 (2025-2030)
A47 Tilney to East Winch Dualling	2025-2030	£203m	National Highways Roads Investment Strategy 3 (2025-2030)

Timely delivery of the above list of commitments will doubtless serve to stimulate the local economy and enhance the prospects of delivery of planned growth. Whilst the growing recognition of the need for further development of Norfolk's infrastructure is very welcome because of its contribution to the delivery of the objectives of the NSPF there remains a considerable need for further infrastructure investment in the County if the vision in this framework is to be realised.

Furthermore, the background paper previously produced identified three key strategic issues affecting the County including: the relatively poor transport connectivity between our main settlements and destinations outside Norfolk resulting in long journey times; the poor connectivity within the County particularly for east-west journeys, exacerbated by congestion and unreliable journey times on parts of the network (especially the A47) adding to business costs; and difficulties in delivering major enhancements to transport networks within our urban areas and market towns which tend to have historical street patterns where the scope for major improvements is limited.

It should also be noted that the area of transport is considered to be an area where new technology may have a particularly significant impact during the duration of this framework and this makes predicting the full range of enhancements to travel networks difficult at this stage.

It is clear that providing suitable transport provision to meet the needs of existing and future populations while reducing travel need and impact will be one of the greatest challenges faced by Norfolk in delivering the level of growth that is anticipated over the coming decades. Given the overall scale of growth that is planned across the County a key matter will be ensuring that transport is a significant consideration in locating this growth and development levels are maximised in areas that are best served by transport networks and have the greatest potential for promoting the use of non-car based modes.

Rail

Norfolk has a limited rail network, meaning that many of its towns are not served by rail. Also, the services offered provide a very limited range of destinations and frequencies. In particular, services to the Midlands and Home Counties are poor. Whilst rail generally provides faster journeys to other major centres compared to road, average rail speeds compare poorly with connections between major centres out of the County.

There are two lines from London: the Great Eastern Main Line from London Liverpool Street via Ipswich to Norwich; and the Fensline / Great Northern Route from London King's Cross via Cambridge to King's Lynn. Norwich is directly connected to Cambridge, Great Yarmouth, Lowestoft and Sheringham; and longer distance services to Liverpool via Peterborough.

The tables below set out some key shared priority schemes for rail improvement that the authorities will work together to promote for funding. Post-pandemic, the numbers and types of journeys made by rail is likely to have changed, and this needs to be factored into long-term planning of services and other improvements. The Great Eastern Main Line Task Force, formed to define how the ambition for a faster, more reliable, better quality service with more capacity could be delivered to serve the needs of Essex, Suffolk, and Norfolk, continues to make the case for improvements between Norwich and London. The Ely Task Force continues to make the case for government to release funding for Ely Area Capacity enhancements which could unlock a range of passenger and freight services. The East West Rail Partnership has made the case for east West Rail, a new railway that will provide direct rail services from Cambridge to – amongst other places – Milton Keynes, Bedford and Oxford, whilst the Eastern Section partners are making the case for direct train services on EWR to be extended to Norwich and Ipswich.

Table 14: Priority Rail Projects for promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Norwich to London rail (Norwich in 90)	2024-2029	TBC	Network Rail: Rail Network Enhancements Pipeline
Great Yarmouth Rail Station	2024-2029	TBC	Network Rail: Rail Network Enhancements Pipeline
Ely area enhancements	Mid 2020's	£500m	Network Rail: Rail Network Enhancements Pipeline
Broadland Business Park station	2025-2028	£22.5m	TBC
East West Rail (Cambridge to Oxford)	Late 2020s	TBC	Government via special purpose delivery vehicle

9.8 Coastal and Marine Planning

The Norfolk coast is of recreational, environmental, economic and cultural importance but it is also home to industry (energy, ports and logistics, digital, food and drink and creative sector), agriculture and tourism.

Shoreline Management Plans

The East Anglia Coastal Group's role is to influence and support members to manage the coast for the benefit of the Anglian Region, this role includes supporting the Shoreline Management Plans Process. Shoreline Management Plans (SMPs) set out a preferred, non-statutory, plan for long-term sustainable coastal flood and erosion risk management, which supports other coastal planning by providing information on coastal processes and expected changes to them. The plans were developed taking account of technical, environmental, social, and economic factors whilst being flexible enough to adapt to new information and changes in legislation, politics, and social attitudes.

The SMPs are led by Risk Management Authorities, either the Environment Agency or Coastal Protection Authorities. Although led by these organisations the SMPs were developed, and are

maintained, by a group of stakeholders – often referred to as SMP Working Groups. As well as Risk Management Authorities these groups tend to include other Defra bodies, wildlife charities, landowners and Regional Flood and Coastal Committee representatives for example. The aim of an SMP is to provide a strategy for managing flood and erosion risk for a particular stretch of coastline, and to help deliver the ambitions of the National Flood and Coastal Erosion Risk Management Strategy. They provide a large-scale assessment of the risks associated with coastal processes and helps reduce these risks to people and the developed, historic and natural environments.

The SMPs provide estimates of how the coast is likely to change over the next 100 years, taking into account the future implementation of coastal policies, geology, likely impacts of climate change and the existing condition of the coast including coastal defences.

Three Shoreline Management Plans are active along the Norfolk coastal frontage:

- SMP4 the Wash Shoreline Management Plan covers approximately 110 km of coast from Gibraltar Point to Old Hunstanton (also known as ‘The Wash’).
- SMP5 which incorporates the coast from Hunstanton to the west of Kelling Hard.
- SMP6 which incorporates the coast to the east of Kelling Hard to Lowestoft Ness.

Shoreline Management Plans exist around all of the coastline of England and Wales.

Marine Plans

The East Inshore and East Offshore Marine Plans have been prepared by the Marine Management Organisation (MMO) and were adopted in April 2014. 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. The Secretary of State for Environment, Food and Rural Affairs agreed with the MMOs recommendation made in 2022 to replace the East Inshore and East Offshore Marine Plans with a new ‘East Marine Plan’, which will be the first of a second generation of plans for English waters. The new document will be referred to as the ‘East Marine Plan’ and will include the same geographical areas as the East Inshore and East Offshore Marine Plans.

The aim of marine plans is to help ensure the sustainable development of the marine area. Marine plans will contribute to economic growth in a way that benefits society whilst respecting the needs of local communities and protecting the marine ecosystem. They will help to reduce the net regulatory burden on applicants and users by acting as an enabling mechanism for those seeking to undertake activities or development in the future and providing more certainty about where activities could best take place. The MMO is the marine planning authority for England and is responsible for preparing marine plans for the English inshore and offshore waters.

At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), meaning there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. For Norfolk The East Marine Plan area (previously the East Inshore Marine Plan area) extends up to Norwich on the River Yare, as well as to Wroxham on the River Bure, and to near Ellingham on the River Waveney and in West Norfolk the River Great Ouse and River Nene are tidal. The East Marine Plan (previously the East Inshore Marine Plan) area also extends beyond the Borough boundary almost to Peterborough on the Nene and just beyond Earith on the Great Ouse.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan. Therefore, the MMO are consulted as part of the local plan process for authorities with coastal borders or where tidal rivers are part of their area. The MMO are also involved with a range of local coastal groups and strategies.

It is also important to note that, due to the physical relationship of Local Planning Authorities (LPAs) and the MMO, LPAs should consider all areas of strategic planning and continue to engage with the MMO, including around the following policy areas in Agreement 23.

Agreement 23 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:

- Aquaculture
- Biodiversity
- Cabling
- Climate change
- Coastal erosion and coastal change management
- Coastal management, including defence, inundation, and Coastal Change Management Areas
- Co-existence
- Defence
- Displacement
- Dredging and disposal
- Energy – offshore wind and oil and gas
- Fishing
- Governance
- Heritage
- Historic environment
- Infrastructure
- Landscapes and seascapes
- Marine aggregates
- Marine and coastal employment
- Marine Litter
- Marine net gain
- Marine protected areas
- Marine related renewable energy
- Natural capital
- Non-native species
- Oil and Gas
- Port and marine infrastructure and employment
- Sustainable fisheries and aquaculture in small harbour towns
- Sustainable port development

- Tidal Energy
- Tourism and recreation
- Underwater noise
- Water quality/water supply and sewerage

9.9 Flood Management and Green Infrastructure

Flood Management

Flood risk is an important issue for Norfolk. Significant parts of the County are vulnerable to tidal, fluvial or surface water flooding from extreme weather events. Such events can pose a significant risk to life as well as property. The three main settlements in the County which all developed in their locations due in part to their access to tidal waters can all be impacted by flooding.

Much of the Norfolk coastline is reliant on flood defences to reduce flood risk to existing development. Considerable further information on the planned interventions that are necessary in order to protect our communities from coastal flooding are set out in the NSIDP. In addition to that an interactive Environment Agency Map can be accessed at [the EA web page - https://environment.data.gov.uk/asset-management/index.html](https://environment.data.gov.uk/asset-management/index.html) which details managed flood risk assets and planned capital schemes. UK Government studies have concluded that climate change over the next 100 years is likely to result in hotter, drier summers and warmer, wetter winters, with more extreme weather events including droughts, floods and sea level rise increasing the level of risk from flooding that is faced by communities in Norfolk.

To address these strategic issues, it will be necessary to take a co-ordinated and proportionate approach to managing flood risk including the opportunities not only for mitigation but also adaptation. Flood risk assessments are to be used effectively to ensure development is located appropriately and away from areas of flood risk wherever possible. Developers will need to work closely with the relevant risk management authorities in minimising flood risk from all sources through a combination of high quality urban design, natural flood risk management including green infrastructure, as well as use of Sustainable Drainage Systems (SUDs) which can provide multi-functional benefits not limited to flood risk and can form part of an integrated approach to water management with water re-use measures forming part of the overall design of developments. Early engagement with the relevant risk management authorities is required prior to the submission of some planning applications. Anglian Water's Water Smart Communities⁸⁷ combine different elements of water management together with town planning and design to deliver multiple benefits for communities and the environment. They use a more holistic and integrated approach to urban water management, with the aim to:

- Enhance liveability by contributing to green streetscapes and high quality open space
- Promote sustainable use of water resources and infrastructure to enable growth
- Build resilience against the potential impacts of climate change and extreme weather events
- Contribute to natural capital and biodiversity through multi-functional water features
- Deliver water efficient homes to reduce household bills and support affordability

⁸⁷ See [Water smart Communities - https://prod-swd.anglianwater.co.uk/siteassets/household/about-us/aws-water-smart-communities---flyer.pdf](https://prod-swd.anglianwater.co.uk/siteassets/household/about-us/aws-water-smart-communities---flyer.pdf)

Anglian Water together with the LLFAs (including Norfolk County Council) have also created a Water Management Checklist⁸⁸ for Local Plan policies.

Further guidance on how this will be done is available on the County Council website in its role as the Lead Local Flood Authority for the County⁸⁹. The Government has also set out the National Flood and Coastal Erosion Risk Management Strategy for England⁹⁰. This strategy's long-term vision is for a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100. It has 3 long-term ambitions, underpinned by evidence about future risk and investment needs. They are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action

The Local Flood Risk Management Strategy (LFRMS) for Norfolk must be consistent with the National FCERM Strategy. The LFRMS is in the process of being updated to include policies for zero emissions and environmental net gain in local flood risk activities and supporting communities to be more flood resilient.

⁸⁸ See [AW water management checklist - https://www.anglianwater.co.uk/siteassets/household/about-us/water-management-checklist-for-local-policies.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/water-management-checklist-for-local-policies.pdf)

⁸⁹ See in particular [Information for developers - Norfolk County Council - https://www.norfolk.gov.uk/38642](https://www.norfolk.gov.uk/38642)⁹⁰
See [National Flood and Coastal Erosion Risk Management Strategy for England - https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2](https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2)

⁹⁰ See [National Flood and Coastal Erosion Risk Management Strategy for England - https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2](https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2)

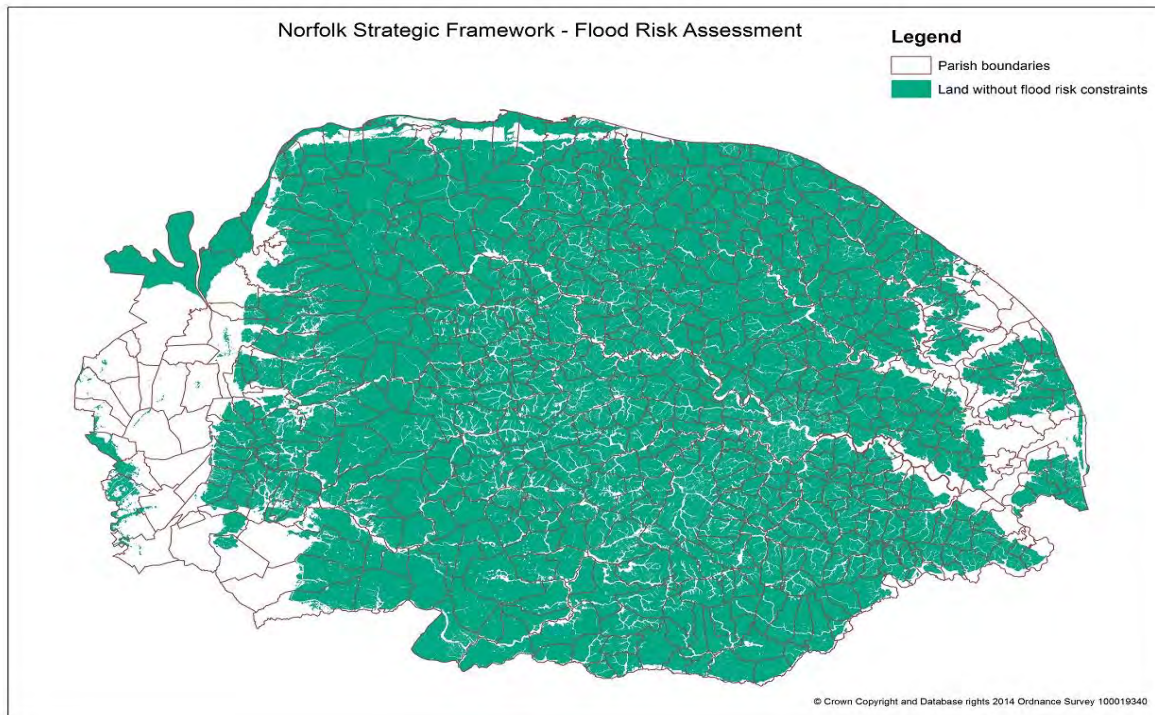


Figure 10: Norfolk Flood Risk Map.

Figure 10 provides an illustration, at a broad scale, of the extent of land with and without flood risk constraints from rivers and the sea in Norfolk. Whilst it is clear that significant areas of the County are free from flood risk constraint it should be noted that many of the currently developed urban areas are at some risk of flooding. It will be important to ensure that a pragmatic approach is taken to new development and consideration of on-site and off-site flood risk. If planned correctly and measures for betterment are agreed and implemented, new development can significantly reduce the flood risk faced by existing communities in these areas.

As flood waters do not respect administrative boundaries there will be a need for the Norfolk Planning Authorities to continue to work closely together on assessing and minimising flood risk as well as on responding to emergencies when they do occur. For example, the Broadland Futures Initiative is a strategic project to explore how best to manage flood risk in the inter-related areas of the Norfolk and Suffolk Broads, the coast between Eccles and Winterton (which protects the Northern Broads) and the entrance to the Broads system through Great Yarmouth. The project will guide decision making over the short, medium and long term.

A number of significant investments have recently been made or are planned in the near future to help alleviate flood risk, these are listed in section 9.1. Further projects are detailed in Local Plans, coastal management plans and strategic flood risk assessments and included in the county wide NSIDP.

Table 15: Priority Strategic Flood Defence Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Great Yarmouth Tidal Defences (Epoch 3)	mid 2023	£64 million	Central Government, Local Authorities and Private Sector
Future Fens – Flood Risk Management	2026	£10-15m	Central Government, Local Government, Internal Drainage Boards and other funding sources from beneficiaries.
Hunstanton Coastal Defences	2025	£16m	Central Government, Local Government

The Environment Agency (EA) has a duty to update our understanding of current and future flood and coastal erosion risk as part of the statutory 'strategic overview' role for all sources of flood and erosion risk. This is described in the 2010 Flood and Water Management Act.

EA has worked with inland and coastal local authorities across England to develop a new National Assessment of Flood Risk (NaFRA) and an updated National Coastal Erosion Risk Map (NCERM). They use the best available data, information and modelling from both the Environment Agency and local authorities.

The National assessment of flood and coastal erosion risk in England 2024 report was published in December 2024⁹¹. The report summarises the findings from the new NaFRA2 and the updated NCERM. The report identifies national and regional trends in terms of the source and characteristics of flood and coastal erosion risk and the potential for these to change in the future.

In January 2025 EA published the new data from NaFRA⁹² and NCERM⁹³. Norfolk Local Planning Authorities will work together to ensure the new data is used to update flood risk assessments for planning applications for new development proposals.

Green Infrastructure and the Environment

Green infrastructure (GI)⁹⁴ is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of economic, environmental and quality of life benefits for local communities. The provision of green infrastructure in and around urban areas helps create high quality places where people want to live and work. New GI can also mitigate impacts on existing sensitive sites and support heritage and conserve the historic environment. Access is an integral part of GI and PROW and 'Norfolk Trails' are an important asset.

⁹¹ [National assessment of flood and coastal erosion risk in England 2024 - GOV.UK](#) - [National assessment of flood and coastal erosion risk in England 2024 - GOV.UK](#)

⁹² See [Check the long term flood risk for an area in England - GOV.UK](#) - <https://www.gov.uk/check-long-term-flood-risk>

⁹³ See [Check coastal erosion risk for an area in England - GOV.UK](#) - <https://www.gov.uk/check-coastal-erosion-management-in-your-area> and [Home | Shoreline Management Plans](#) - <https://environment.data.gov.uk/shoreline-planning>

⁹⁴ [The definition of GI is set out in the Natural England document GI Guidance - http://publications.naturalengland.org.uk/file/94026](#), in terms of the NSPF it includes 'blue infrastructure' ie water environments - rivers, lakes, ponds etc.

The area has a wealth of environmental assets ranging from international and national status, to those of local importance. These must be safeguarded and enhanced for the benefit of current and future generations. Many of Norfolk's natural habitats have been lost and fragmented with once extensive areas of habitats reduced to small remnants isolated from each other and surrounded by relatively inhospitable land uses, reducing biodiversity and increasing vulnerability.

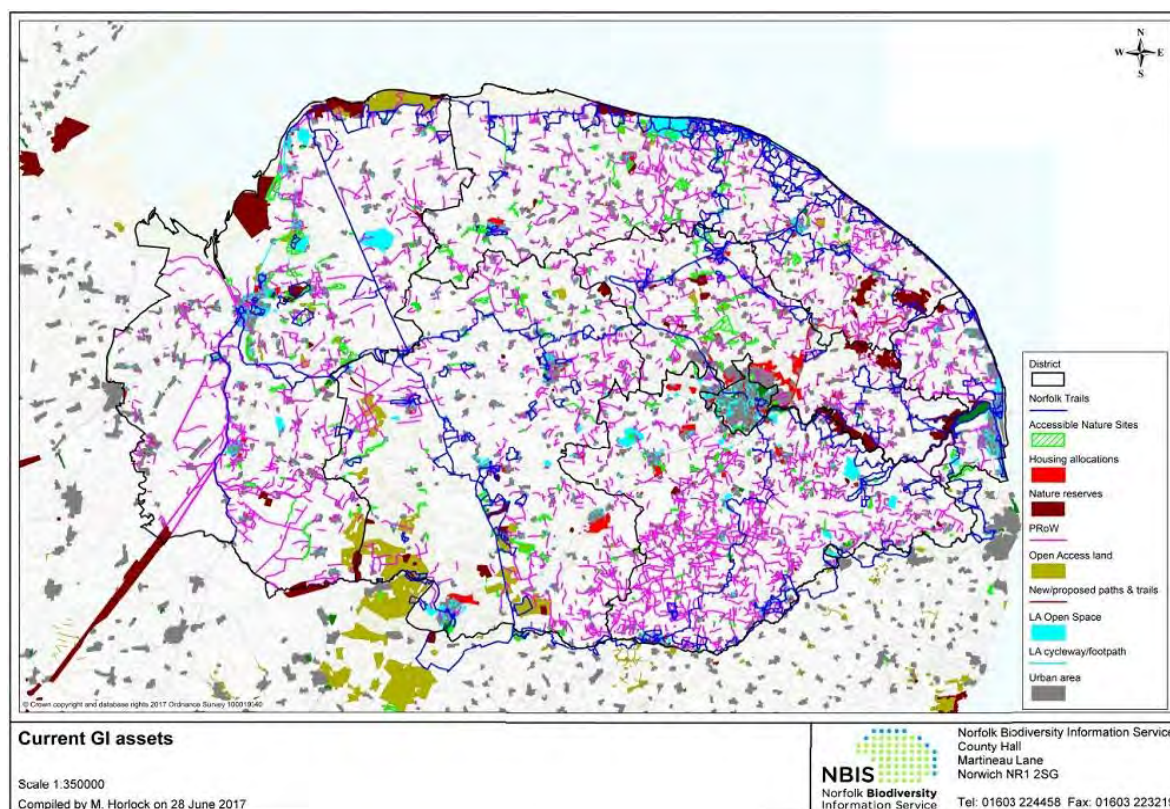


Figure 11: Norfolk's current GI assets.

Current GI assets are set out in Figure 11⁹⁵. Green infrastructure should be provided as an integral part of all new development, where appropriate, alongside other infrastructure such as utilities and transport networks.

Planning for green infrastructure should occur at the evidence gathering (survey and analysis) stage of the planning process, so that green infrastructure responds to character and place, and that standards are set for green infrastructure accessibility, quantity and quality. Early integration of green infrastructure can also ensure that it is properly planned in advance of development or delivered alongside development on a phased basis. In this way green infrastructure can be planned as an integral part of the community. (Natural England Green infrastructure guidance, P43)

The Environment Act has now been introduced which creates a new legal framework for environmental protection. In early 2024 Biodiversity Net Gain (BNG) became mandatory for relevant developments and a Local Nature Recovery Strategy (LNRS) is being finalised by the County Council. These will support the vision of the 25 year Environment Plan Norfolk Local Planning Authorities have

⁹⁵ Further more detailed maps are available from the NBIS website see <http://www.nbis.org.uk/sites/default/files/documents/Maps.zip>

worked together to support the introduction of BNG and continue to support Norfolk County Council in the production and implementation of the LNRS.

As Norfolk grows and changes in terms of its demographic profile considerable investment in the provision and maintenance of a GI network will be needed in order to facilitate and support growth whilst also:

- Minimising the contributions to climate change and addressing their impact;
- Protecting, managing and enhancing the natural, built and historical environment, including landscapes, natural resources and areas of natural habitat or nature conservation value;
- Creating more or restoring lost wildlife rich habitat outside protected site networks to reverse the loss of biodiversity
- Ensuring existing and new residents many of whom may be elderly receive the health and quality of life benefits of good green infrastructure and are able to access appropriate recreational opportunities;
- Maintaining the economic benefits of a high quality environment for tourism; and
- Protecting and maintaining the Wensum, Coast, Brecks and the Broads.

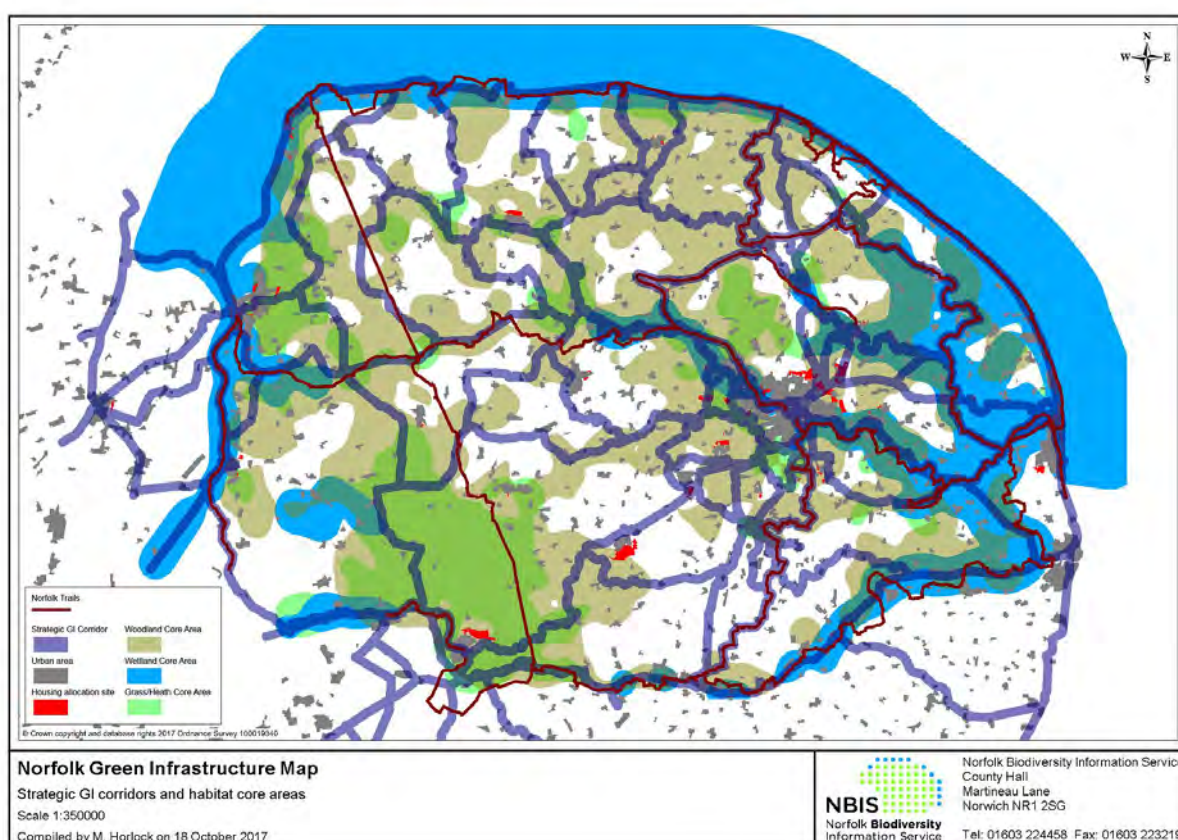


Figure 12: Norfolk's GI corridors. 2017

Figure 12 shows the identified potential Green Infrastructure Corridors. The intention is for this map to inform Local Plans, and also local GI Strategies. It should be noted that depending on the nature of corridor they may not constrain development, indeed in some circumstances promoting growth in these corridors may enhance their GI value.

One of the strategic aims for the Environment section is to not only 'protect, maintain and enhance biodiversity' but also to restore and create habitats which support biodiversity. New growth in Norfolk must respect this aim, but the use of green infrastructure either existing or new can greatly aid the assimilation of new development.

A commissioned report by Footprint Ecology on the impact of recreational pressures on Natura 2000 protected sites e.g. North Norfolk Coast, The Broads and the Brecks, likely to arise from new housing growth gave insights into the scale and location of that pressure. This is a complex area, many of the Natura 2000 sites attract large numbers of visitors, acting as green infrastructure, but are sensitive environments with specific legislative requirements.

Following on from the visitor pressures report Norfolk Local Planning Authorities, working in collaboration with the Environment Agency, Natural England, Forestry Commission and other local partners, commissioned Place Services to produce the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy. This looks to address the recreational pressures on Natura 2000 protected sites in a coordinated way and therefore helps address requirements arising from Habitat Regulations Assessments from respective Local Plans. The Strategy includes:

- A Recreational Impact Avoidance and Mitigation Strategy (RAMs) - a County Wide programme of mitigation measures to avoid adverse effects on protected habitat sites from the in-combination recreational impacts from new residential development. The cost of measures will be funded by a tariff on new residential development.
- Identification of GI opportunities which aims to divert visitors from sensitive habitat sites

In 2023 and 2024 Norfolk Planning Authorities have been working with Footprint Ecology to produce a detailed action plan. This lists specific projects that are require to mitigation the impacts of increase visitor pressures.

Agreement 24: In recognition of:

a) the importance the Brecks, the Broads and the National Landscapes, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;

b) the pressure that development in Norfolk could place on these assets; and

c) the importance of ecological connections between habitats

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

With regard to the emerging priority projects for short term effort to bring forward, the following feature within the NSIDP.

Table 16: Priority Green Infrastructure Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
The Green Loop (Walking/cycling route linking Norwich – Aylsham – Hoveton –NE Growth Triangle)	Not Known	£5.7m	S106, CIL, DfT, NALP, Interreg Experience-secured
Weavers Way	Ongoing	£3.1m	Norfolk County Council,HLF

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Broadland Country Park	Ongoing	£2m	Broadland DC, CIL, BRP
Burlingham Country Park	Ongoing	TBC	CIL, BRP, NCC, Developer Funding

9.10 Nutrient Neutrality

On the 16 March 2022 Natural England issued new guidance to all Local Planning Authorities in Norfolk concerning nutrient enrichment and the role local authorities must play in preventing further adverse impacts to protected wetland habitats. The importance of achieving nutrient neutrality stems from evidence that large quantities of nitrogen and phosphorous entering water systems cause excessive growth of algae, a process called ‘eutrophication.’ This reduces the oxygen content of water impacting aquatic species; subsequently removing a food source for protected species. The advice covered two catchments in Norfolk for the River Wensum SAC and the Broads SAC/Broadland Ramsar.

Natural England considers that the conservation status of the protected natural habitats of the River Wensum and the Broads SACs are unfavourable due to excessive phosphates in the Wensum SAC and nitrates and phosphates in the Broads SAC. Each of the Norfolk LPAs, as the “Competent Authority” for each local planning authority area under the Habitat Regulations 2017, is required to consider the implications of these matters on the River Wensum SAC and the Broads SAC before permitting any further development which has the potential to result in additional nutrient loads entering the catchments. Consequently, local plans and planning applications leading to new overnight stays in the affected areas can only now be progressed if further assessment provides each LPA with certainty that the resulting development will not have an adverse impact on the integrity of the protected habitats.

The initial effect was a total moratorium for new developments that provide overnight accommodation within the catchments of the River Wensum SAC and/or the Broads SAC. The impacts of Nutrient Neutrality vary considerably between districts in the county with Great Yarmouth and King’s Lynn and West Norfolk, the impacts are on relatively small areas which are mainly rural in nature, whereas the whole of administrative area of Norwich City Council is impacted.

However, Norfolk Authorities have worked together to help unlock planning permissions held up by this advice, in May 2022 Royal Haskoning were commissioned to provide an evidence base and bespoke Norfolk Calculator. In Spring 2023 Broadland District Council, South Norfolk Council, Breckland District Council and North Norfolk District Council set up Norfolk Environmental Credits (NEC) to help support the delivery of Nutrient Mitigation (which Norwich City Council have subsequently joined). While the initial focus has been on Nutrient Neutrality it is likely that NEC can support other nature markets including water, carbon offsetting, biodiversity and recreational impact. Broadland District Council, South Norfolk Council, Breckland District Council, Norwich City Council and North Norfolk District Council have successfully bid in 2 rounds of the government Local Nutrient Mitigation Fund, this will provide capital grants totalling £18.45m (£9.6m from round 1 and £8.85m from round 2) to help bring forward Nutrient Mitigation schemes in the county. To help manage this funding the five council that bid for this funding have set up the Norfolk Mitigation Fund which was launch in spring 2024.

Whilst the impacts of Nutrient Neutrality on housing delivery in the county are likely to be felt for many years to come Mitigation is increasingly becoming available. The Norfolk LPAs will continue to work together to unlock new development in the county and work with developers and environmental bodies to unlock solutions including increasing the availability of credits.

The area impacted by Nutrient Neutrality is shown in the map below.

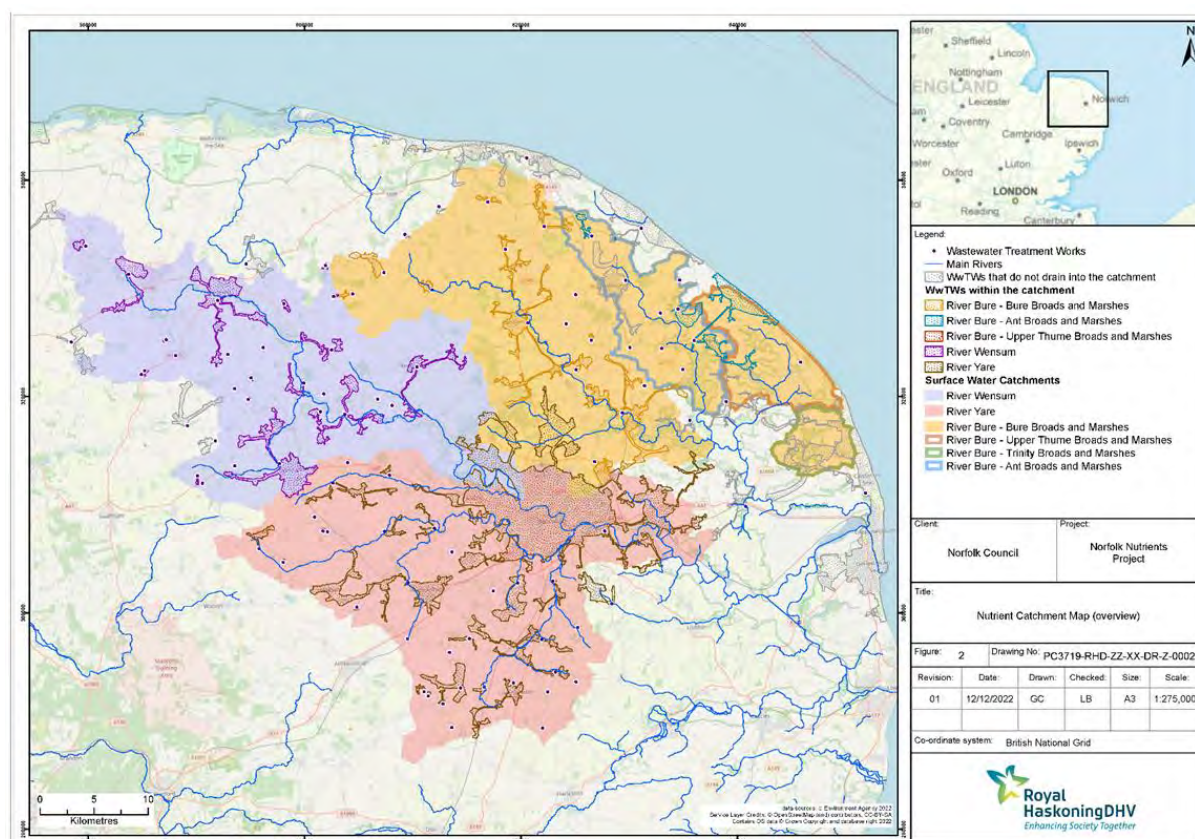


Figure 13: Map of Nutrient Neutrality Catchments in Norfolk, Source: Royal Haskoning

The government introduced changes to the Levelling up and Regeneration Act 2024 to require water companies in England to upgrade wastewater treatment works by 2030 in nutrient neutrality areas to the highest achievable technological levels. The treatment works to be identified would be ones serving a population equivalent of over 2000 people. In May 2024 the government published a list of 17 Waste Water Treatment Works which would be upgraded in Norfolk, these are in the following locations:

- Aylsham
- Belaugh
- Bylaugh
- Briston
- Dereham
- Fakenham
- Fornsett End
- Hempnall
- Long Stratton
- Mattishall
- Reepham
- Saxlingham
- Shipdham
- Stalham
- Swardeston
- Whitlingham

- Wymondham

9.11 Minerals and Waste

Minerals

Carstone is a type of sandstone that is quarried in west Norfolk. It has traditionally been used as a vernacular building material, although it is no longer used to any significant degree. Although it is classed as a 'hard rock' it is not used as a hard rock (e.g. road dressing), instead it is used primarily as fill (to raise the levels of land prior to construction) or in the formation of embankments. Therefore it is often used in the construction of roads.

Carstone deposits are located in very limited areas of west Norfolk. In 2023 there were two active carstone extraction sites in Norfolk, located at Middleton and Snettisham.

Carstone production in Norfolk was 0.1 million tonnes in 2022. The 10-year rolling average of carstone sales was 0.81 million tonnes in the period 2013-2022. The 3-year rolling average of carstone sales was 0.98 million tonnes in the period 2020-2022. The permitted reserves for carstone extraction sites in Norfolk were 1.423 million tonnes at the end of 2022. Based on the 10-year sales average, at the end of 2022 there was a carstone landbank of permitted reserves of over 17 years.

Silica sand deposits are located in very limited areas of west Norfolk, a relatively narrow band which runs north to south just to the east of King's Lynn. The northern extent of the silica sand resource is at Heacham, and the southern extent around Hilgay. In Norfolk the silica sand resource is split into two broad categories, the Mintlyn Beds and the Leziate Beds; historically the Leziate Beds have been used principally for glass sand and the Mintlyn Beds for the production of foundry sand. Processing of sand for foundry use has stopped at Leziate and those parts of the process plant dedicated to their production have been removed. This reflects a general decline in the demand for foundry sand in England.

The deposit which is being worked at Leziate is one of two in England where silica sand of sufficient purity and grade for the manufacture of colourless flint (container) and float (window) glass is extracted. The other extraction site of silica sand of comparable quality is in Surrey.

Silica sand which is to be used for glass manufacture requires a significant amount of processing prior to being suitable for onward shipment to the glass manufacturers. This processing requires large and capital intensive plant such as the one operated by Sibelco UK Ltd which is located at Leziate. Consistency of material is an important consideration and this requires blending of sand from different areas of the working. The processing plant site includes a rail head to export the processed mineral for use by glass manufactures elsewhere. Norfolk is one of the most important sources of silica sand in Great Britain, accounting for approximately 16 per cent of total silica sand production and 58 per cent of glass sand production in the UK between 2020 and 2022.

Due to the cost and largely fixed nature of the processing plant and railhead, silica sand working has historically taken place in close proximity to the Leziate processing plant. However, this now means that the most accessible areas have either been worked or are in the process of being worked.

The 10-year rolling average of silica sand sales in Norfolk was 0.83 million tonnes in the period 2013-2022. The 3-year rolling average of silica sand sales was 0.79 million tonnes in the period 2020-2022. The permitted reserves for silica sand extraction sites in Norfolk were 3.08 million tonnes at the end of 2022. Based on the 10-year sales average, at the end of 2022 there was a silica sand landbank of permitted reserves of less than 4 years.

Sand and gravel resources are located throughout the County (with the exception of the Fens area in the far west and south-west of Norfolk). Sand and gravel are used in the construction of roads and buildings and it is a key ingredient in the production of concrete and mortar, asphalt coating for roads, as a drainage medium and in the construction of embankments and foundations. The distribution of sand and gravel sites throughout Norfolk is widespread with a relatively large number of small operators. In 2022 there were 22 permitted sand and gravel extraction sites in Norfolk operated by 14 different companies. There are, however, particular clusters of sand and gravel workings near to King's Lynn, in the north of Breckland District and around Norwich.

Sand and gravel production in Norfolk was 1.367 million tonnes in 2022. The 10-year rolling average of sand and gravel sales was 1.413 million tonnes in the period 2013-2022. The 3-year rolling average of sand and gravel sales was 1.39 million tonnes in the period 2020-2022. The permitted reserves for sand and gravel extraction sites in Norfolk were 17.954 million tonnes at the end of 2022. Based on the 10-year sales average, at the end of 2022 there was a sand and gravel landbank of permitted reserves of over 12 years.

Secondary and recycled aggregates are also sourced within Norfolk. The annual average quantity of inert and construction/demolition waste recovered at waste management facilities over the ten years from 2013-2022 was 0.293 million tonnes, however, some parts of this waste stream are unsuitable for use as a recycled aggregate (such as soil or timber). The data is not comprehensive because many operations, such as on-site recovery, are not recorded.

Marine aggregate dredging is carried out by companies on behalf of the Crown Estate and the sites are licensed by The Crown Estate and the MMO. Aggregates from marine dredging are not currently received at any ports or wharves in Norfolk. No marine sourced aggregates were consumed in Norfolk in 2019 (the most recently available date), therefore no adjustments have been made to the mineral requirement figures in the Norfolk Minerals and Waste Local Plan based on marine sourced aggregates. Norfolk County Council does not determine planning applications for marine aggregates and they do not form part of the Minerals and Waste Local Plan.

Clay and chalk are also extracted in Norfolk. Clay is primarily used in the engineering of landfill sites and in flood protection schemes. Chalk is primarily used as a liming agent for farmland. In 2022 there was one active clay working at Middleton, and three active chalk workings located at Castle Acre, Caister St Edmund and Hillington. However, the resource for these minerals is considered to be abundant in Norfolk relative to the demand.

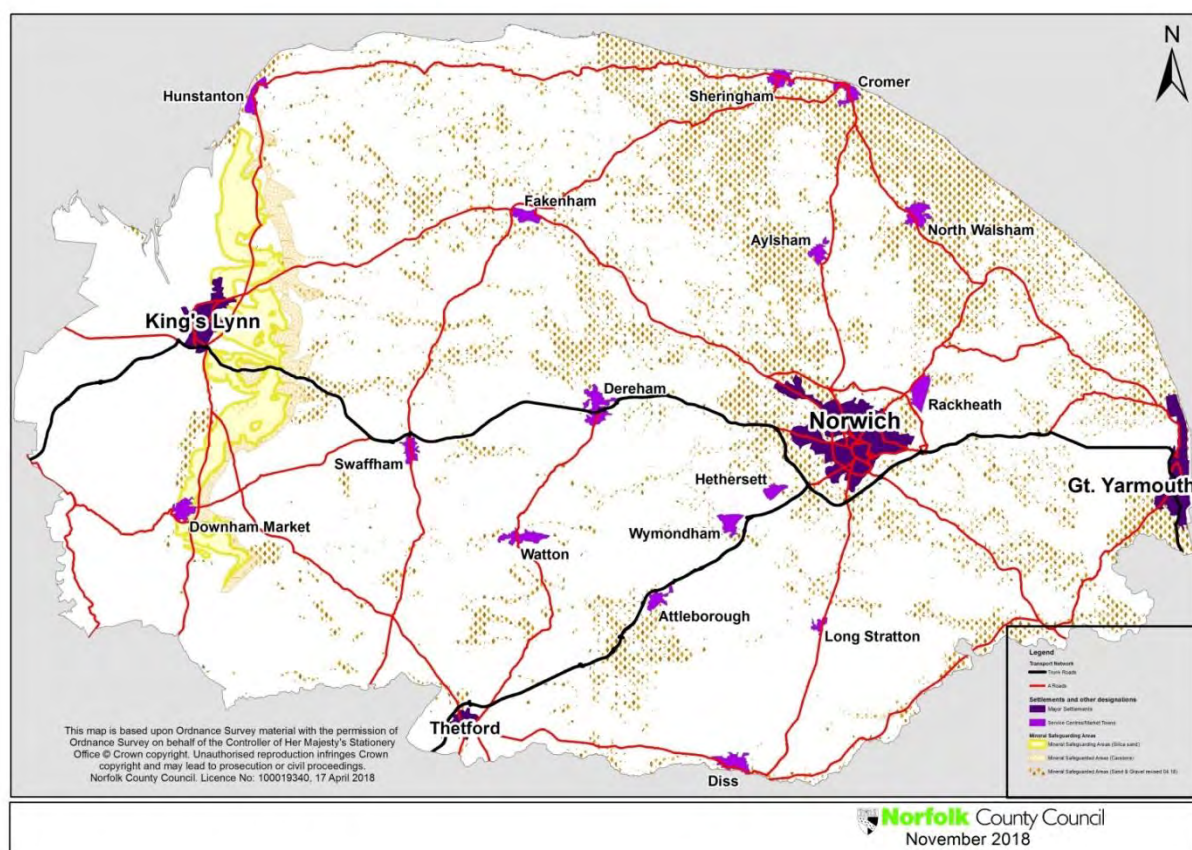


Figure 13: Mineral Resources within Norfolk

Waste

There are a number of waste management facilities within Norfolk. They include:

20 Household Waste Recycling Centres, provided by Norfolk County Council, which accepted over 62,000 tonnes of waste in 2022.

6 commercial composting facilities which received over 94,000 tonnes of waste in 2022;

There are large metal recycling facilities at Lenwade, Great Yarmouth and King's Lynn docks and a large number of small sites accepting scrap metal or end-of-life vehicles. The metal recycling facilities received over 216,000 tonnes of waste in 2022;

88 operational sites for the treatment and/or transfer of waste (including municipal, commercial and industrial, hazardous, clinical, construction and demolition), which received over 2.188 million tonnes of waste in 2022. Of this total, over 0.64 million tonnes was received at Anglian Water Services Ltd sewage sludge treatment facilities at King's Lynn, Thetford and Whitlingham.;

There are two non-hazardous landfill sites (Blackborough End and Feltwell) in Norfolk. Feltwell landfill site has not received any waste since 2012; it is required to be restored by 2041. Blackborough End landfill site received over 156,000 tonnes of waste in 2022 and is required to be restored by the end of 2026. These two sites have a permitted void capacity (remaining landfill space) for non-hazardous waste estimated to be 1.304 million cubic metres, plus capacity for 2.225 million m³ of inert waste disposal. In 2022 over 262,000 tonnes of inert waste were received at inert landfill sites or used in the restoration of mineral workings. There is an estimated void capacity at inert landfill sites and for quarry

restoration of at least 3.5 million m³ in Norfolk at the end of 2022 plus capacity within Blackborough End landfill site.

There is a renewable energy plant operated by Melton Renewable Energy at Thetford which received over 212,000 tonnes of waste in 2022. The waste received at this facility is poultry litter which is burned to produce energy.

There is a wastepaper reprocessing facility operated by Palm Paper at King's Lynn and received over 506,000 tonnes of wastepaper and cardboard in 2022 to produce newsprint.

Agreement 29 :

It is agreed that:

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.**
- 2) As the Mineral Planning Authority, Norfolk County Council will plan for a steady and adequate supply of minerals to support sustainable economic growth through allocating sufficient sites to meet the forecast need for sand and gravel, carstone, as well as allocating sites and providing a criteria-based policy to assess applications to meet the forecast need for silica sand in the Norfolk Minerals and Waste Local Plan.**
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.**
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.**
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period.**
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns using criteria-based policies. Priority for the location of new waste management facilities will be given to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.**

7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk and surrounding areas.

DRAFT

Section 10 – Conclusions and Next Steps

This Framework documents how the Norfolk Planning Authorities maintain effective cooperation between themselves, with the neighbouring district and county planning authorities, and with other key relevant agencies and utilities. In doing so it meets the relevant requirements of Section 3 of the National Planning Policy Framework (NPPF).

To date, since its first endorsement in October 2019 and through its subsequent updates, the NSPF has been successful in addressing the requirements of the duty to co-operate in local plan production for the Norfolk local planning authorities. This has been achieved through the framework providing cross-boundary approaches to strategic infrastructure, housing and jobs numbers and common policy approaches. The NSPF has had further benefits by creating efficiencies through shared evidence production, influencing high-level plans and maximising opportunities to secure external funding to deliver against agreed objectives. The effectiveness of the NSPF was recently reflected in the February 2024 Inspectors' Report on the Greater Norwich Local Plan. The report directly referenced the NSPF, along with the co-operative work of the Greater Norwich Development Partnership, concluding that "We are satisfied that where necessary the Partnership has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met".

This experience of co-operative work through the NSPF places the Norfolk local planning authorities in a positive position to address the likely forthcoming introduction of sub-regional Spatial Development Strategies as signalled by the English Devolution White Paper (December 2024).

The current NPPF highlights that Cooperation should be effective and ongoing, with this in mind the Norfolk Authorities have agreed to maintain the following agreement:

Agreement 26 In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

There remains significant value in continuing with a work programme into the next financial year to address strategic cross boundary issues going forward.

There also remains other significant benefits to continue with the current strategic planning activities completed under this remit, these included:

- Maintaining links to other neighbouring counties and their strategic planning work.
- Maintain links to public bodies and Utilities involved in the preparation of local plans eg Natural England, Environment Agency, Anglian Water, MMO, and UKPN.
- Maintain links to other key initiatives in the county eg Water Resources East, Transport East, Hydrogen East, Greater South East Energy Hub
- Support the county in the production of a county wide Infrastructure Delivery Plan and any potential economic or growth strategies
- Support of Local Plan processes across the county
- Maintain links to NHS estates and the ICS with regular meetings to share updates on key developments and progress of Local Plans
- Scope to continue to commission joint studies across the county to reduce costs

The current NPPF also sets out the requirement for local authorities to prepare and maintain one or more statements of common ground. This document is intended to meet this requirement in a single

document for all matters relevant to all Norfolk Local Authorities. Additionally individual local authorities may seek to enter into further statements of common ground with neighbouring or other authorities to address further strategic planning issues as part of the local plan preparation process.

Agreement 27: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.

DRAFT

Appendix 1 – NSPF Contacts:

Please direct all representations relating to the NSPF to the NSPF Programme Manager as detailed below. Use the Local Planning Authority contact details only if you have enquiries concerning a specific authority area.

Trevor Wiggett NSPF Programme Manager City Hall St Peter's Street Norwich NR2 1NH Email: trevorwiggett@norwich.gov.uk	
Breckland Council	Broadland and South Norfolk Councils
Gemma Manthorpe Planning Policy Manager Breckland Council Elizabeth House, Walpole Loke Dereham NR19 1EE Tel 01362 656337 Email : gemma.manthorpe@breckland.gov.uk	Adam Banham Place Shaping Manager Broadland and South Norfolk Councils The Horizon CentrePeachman WayBroadland Business Park Norwich NR7 0WF'Tel 01603 430505 Email : Adam.Banham@southnorfolkandbroadland.gov.uk
The Broads Authority	Great Yarmouth Borough Council
Natalie Beal Planning Policy Officer Broads Authority Yare House 62-64 Thorpe Road Norwich NR1 1RY Tel 01603 756050 Email : Natalie.Beal@broads-authority.gov.uk	Nick Fountain Strategic Planning Manager Great Yarmouth Borough Council Town Hall, Hall Plain Great Yarmouth Norfolk NR30 2QF Tel 01493846626 Email: nick.fountain@great-yarmouth.gov.uk
Borough Council of King's Lynn and West Norfolk	Norfolk County Council
Alex Fradley Planning Policy Manager Borough Council of King's Lynn and West Norfolk Kings Court, Chapel Street King's Lynn PE30 1EX Tel 01553 616237 Email : alex.fradley@west-norfolk.gov.uk	Paul Harris Strategic Planning Planner Norfolk County Council Martineau Ln Norwich NR1 2UA Tel 01603 679256 Email : paul.harris@norfolk.gov.uk
North Norfolk District Council	Norwich City Council
Iain Withington Acting Planning Policy Manager North Norfolk District Council Council Offices, Holt Road Cromer NR27 9EN Mail : Iain.Withington@north-norfolk.gov.uk Tel 0 1263 516034	Mike Burrell Planning Policy Team Leader City Hall St Peter's Street Norwich NR2 1NH Mail : mikeburrell@norwich.gov.uk Tel 01603 987964

Appendix 2 – Cross Border Cooperation Initiatives

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
Membership of Broads Authority	Broadland, Great Yarmouth, North Norfolk, Norwich, South Norfolk, East Suffolk, Norfolk and Suffolk.	Each provides members to govern the Broads Authority.	Ongoing		Membership of Broads Authority - http://www.broads-authority.gov.uk/about-us/who-we-are/members/meet-our-members
East Suffolk/Great Yarmouth sub regional meetings	East Suffolk, Great Yarmouth, Broads Authority.	Quarterly Periodic meetings between these three eastern authorities to discuss strategic cross boundary issues pertinent to the area.	Ongoing	East Suffolk Local Plan Duty to Cooperate Statement of Common Ground (2018) on Housing Market Area, Functional Economic Area and Objectively Assessed Need, between East Suffolk, Great Yarmouth, Broads Authority, South Norfolk, Suffolk Coastal, and Mid-Suffolk.	n/a
Norfolk Coast National Landscape	Great Yarmouth, North Norfolk, King's Lynn & West Norfolk, Norfolk, Broads Authority, Natural England	Management of the Norfolk Coast National Landscape	Ongoing	The Partnership also includes 2 community representatives.	Home - Norfolk Coast - https://norfolkcoast.org/
Memorandum of Understanding – Treatment of Housing and Employment Needs and Delivery in the Broads Authority Area	Broads Authority, Broadland, South Norfolk, Norwich, Great Yarmouth, East Suffolk, Norfolk, Suffolk.	Agreed mechanism for distribution of housing (and employment) development in relation to targets for overlapping district and Broads areas.	2014 (and previously)	Further Statement of Common Ground (2017) between Broads Authority and Great Yarmouth Borough Council updating and specifying this in relation to housing in Proposed Broads Local Plan	n/a
Wherry Line Community Rail Partnership	Norfolk, Suffolk, Norwich, Broadland, Great Yarmouth, East Suffolk.	To promote the railway and the surrounding area to develop economic and environmental benefits for residents, visitors and tourists.	Ongoing	Partnership also includes Abellio Greater Anglia, Network Rail, Railfuture, Norfolk Association of Local Councils, rail users, station adopters, RSPB, and local businesses.	Greater Anglia Community partnerships - https://www.greateranglia.co.uk/about-us/community-rail-partnerships
Great Yarmouth Transport and	Great Yarmouth, Norfolk, Environment	To promote and coordinate infrastructure improvements in,	Ongoing		Great Yarmouth Transport and Infrastructure Steering Group -

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
Infrastructure Steering Group	Agency, Highways England	around and benefitting Great Yarmouth Borough			https://great-yarmouth.cmis.uk.com/great-yarmouth/Committees/CommitteeSystemfromMay2016/tabid/142/ctl/ViewCMIS_CommitteeDetails/mid/562/id/170/Default.aspx
A47 Alliance	Norfolk, Great Yarmouth, Broadland, Norwich, Breckland, King's Lynn & West Norfolk, Broads Authority	Seeks to promote the dualling of the A47.		Alliance also includes Peterborough & Cambridgeshire local authorities, MPs, business groups, LEPs, etc.	A47 Alliance website - http://www.a47alliance.co.uk/
Greater Norwich Development Partnership	Norwich, Broadland, South Norfolk, Norfolk County Council and the Broads Authority	Partnership to produce Local Plan for Greater Norwich Area and address related planning policy issues such as housing land supply and monitoring. This involves a member level group and joint officer team.	Ongoing		Greater Norwich website - http://www.greaternorwichgrowth.org.uk/
Greater Norwich Growth Board	Norwich, Broadland, South Norfolk, Norfolk County Council and the Broads Authority	Member level Board and joint officer team for strategic investment planning and delivery across the Greater Norwich area. This includes pooling of CIL receipts and a joint CIL process.	Ongoing		Greater Norwich website - http://www.greaternorwichgrowth.org.uk/
Norfolk Strategic Planning Officers Group	All Norfolk Local Planning Authorities	Monthly meeting of Heads of Planning Policy teams to discuss cross boundary issues.	Ongoing		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf
Norfolk Member Forum	All Norfolk Local Planning Authorities	Over sees Duty to Cooperate requirements at a member level, in particular the production of the NSPF.	Ongoing		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf
Norfolk Strategic Planning Framework	All Norfolk Local Planning Authorities	Shows how the Authorities work together and forms the Statement of Common Ground	Reviewed for 2021.		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
		for the area. Addresses cross boundary issues.			
The Wash and North Norfolk Marine Partnership	East Linsey, Boston, Fenland, South Holland, Kings Lynn & West Norfolk, North Norfolk, Lincolnshire County Council and Norfolk County Council	Local Communities and Management Groups working together to protect marine heritage	On-going	Many other Agencies and local groups involved	The Wash & North Norfolk Marine Partnership - Norfolk Coast - https://norfolkcoast.org/about/wnnmp/
Norfolk/Suffolk Cross border Meeting	Babergh and Mid Suffolk, South Norfolk, Great Yarmouth, Broads Authority, Ipswich Borough, Suffolk County, West Suffolk, Breckland, Kings Lynn & West Norfolk, East Suffolk	Quarterly meetings of Planning Policy teams to discuss cross boundary issues.	Ongoing		
Norfolk Rail Group	Norfolk & Suffolk County Councils, all districts		Ongoing		
Joint SFRA Update	Kings Lynn & West Norfolk, North Norfolk DC, Greater Norwich, Broads Authority, Great Yarmouth	Team over was the production of a Joint SFRA across most of Norfolk	Completed		
East of England Aggregates Working Party	Norfolk, Suffolk, Essex, Hertfordshire and Cambridgeshire County Councils. Peterborough, Thurrock, Southend-	Quarterly meetings. Collect data relating to the supply and demand of aggregates, publish an annual monitoring report, provides technical advice to Mineral	Ongoing	The EoEAWP also includes representatives from the minerals industry, Marine Management Organisation, and MHCLG. Includes feedback and liaison with London AWP and South East AWP.	East of England Aggregates Working Party web page - http://www.centralbedfordshire.gov.uk/planning/minerals-waste/aggregate/overview.aspx

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
	on-Sea, Luton, Bedford, Central Bedfordshire Councils	Planning Authorities on their Local Aggregate Assessments. Line of communication between MPAs and MHCLG.			
East of England Waste Technical Advisory Body	Norfolk, Suffolk, Essex, Hertfordshire and Cambridgeshire County Councils. Peterborough, Thurrock, Southend-on-Sea, Luton, Bedford, Central Bedfordshire Councils	Quarterly meetings. Forum for discussion relating to waste planning including waste data, capacities and forecasting.	Ongoing	The EoEW TAB is also attended by the Environment Agency. Includes feedback and liaison with London WTAB and South East WTAB.	
Water Resources East	WRE has over 200 members from a diverse range of organisations including all district and county councils in the WRE area	WRE is the independent, not-for-profit membership organisation pioneering a collaborative, cross-sector approach to water resources and integrated water management planning in Eastern England.	Ongoing	For further details see the water section 9.4	https://wre.org.uk/

Planning Committee

18 July 2025

Agenda item number 13

Local Plan- Regulation 19 consultation

Report by Planning Policy Officer

Summary

The Local Infrastructure Study has been amended. The Local Plan, Sustainability Appraisal and Habitats Regulation Assessment are ready for consultation. This will be the final consultation before the Local Plan is submitted to the Planning Inspectorate for examination.

Recommendation

1. To endorse the updated Local Infrastructure Study.
2. To endorse, and recommend that Broads Authority do the same:
 - a) The Local Plan, Sustainability Appraisal and Habitats Regulation Assessment for consultation;
 - b) The proposed approach to consultation;
 - c) Any minor changes or amendments be delegated to the Head of Planning and Director of Delivery¹; and
 - d) The fallback position, if required, of delegating authority for submitting the Local Plan to the Planning Inspectorate.

1. Introduction

- 1.1. The Local Plan came to Planning Committee in November 2024. It did not go out for consultation because the new NPPF was released in December 2024. The Local Plan has been amended to reflect the NPPF changes, in particular a new housing need number based on the new methodology. It is ready for consultation. This will be the final consultation before the Local Plan is submitted to the Planning Inspectorate.
- 1.2. The Local Plan is being produced under the current Local Plan preparation system but is consistent with the new NPPF (December 2024). The Local Plan must be submitted for examination by the end of 2026 at the latest.

¹ This role replaces the Director of Strategic Services on 1 August 2025.

2. Updated Local Infrastructure Study

2.1. An updated Local Infrastructure Study is included at Appendix 1. Amendments to the previous version are highlighted in green. This has been updated for the following reasons:

- a) Updated references to the NPPF 2024.
- b) Updated to reflect the amended housing numbers.
- c) Some amendments from Anglian Water Services and Essex and Suffolk Water.

2.2. It is therefore recommended that Planning Committee endorse the updated Local Infrastructure Study.

3. Main changes since November 2024

3.1. The Local Plan is at Appendix 2. The main changes since November 2024 are shown in bright green and are as follows:

- a) Flood risk checked and updated – the EA released new flood risk data earlier in 2025 and we have checked reference to flood risk in the Local Plan as well as some evidence such as Sequential Test and Call for Sites.
- b) NPPF references checked and updated – the NPPF was updated in December 2024 and the Local Plan has been checked and references updated/amended.
- c) PUBSP5: Biodiversity - introduces protection for Biodiversity Net Gain (BNG) sites.
- d) PUBDM16: Biodiversity Net Gain - supporting text refers to some specific approaches to BNG such as monitoring and a more local take on defining significance.
- e) BRU2 and BRU4 updated to refer to taking opportunities for small craft to access the water as there is currently limited opportunity in this area.
- f) PUBDM28: Light pollution, dark skies and nocturnal character – changes made to clarify the policy.
- g) Quay heading parts – a photo and diagram have been added to explain the various parts of quay heading.
- h) Trajectories updated – these have been updated to reflect the plan is to 2042.
- i) New policies – the new policies that have been produced since November 2024 have been added to the Local Plan, SA, HRA, Sustainable Development Goals assessment, and monitoring section of the Local Plan. These have been discussed at Planning Committee. They are policies on safety by the water (PUBDM42A) and extensions (PUBDM52A).

- j) Housing section (section 30) has been updated to reflect recent monitoring data as well as the updated Gypsy and Traveller study findings and the amended local housing need.
 - k) Filby is added as a settlement with a development boundary rather than asking a question about it having a development boundary.
- 3.2. Members were sent a draft Regulation 19 version two months prior to this meeting to give good time and opportunity to raise any final comments. Responses have been received and changes since that version are highlighted in blue and discussed below.
- a) To highlight that there is a proposal by the Government to introduce a medium development threshold. This is an area that we will discuss with the Inspector through the Examination.
 - b) Changes to better refer to the Marine environment.
 - c) Changes to the shadow HRA approach to clarify that the Authority will ask for information to help inform the process.
 - d) Referring to the current consultation on BNG.
 - e) Removed the list of public houses from the policy and put into supporting text and made the policy refer to any and all pubs in the area, even if not listed.
 - f) Reference to considering the environmental impact of treated timber used for quay heading etc.
 - g) Amendments to PUBOUL2 to update the policy and add clarification on how we wish the site to be developed.
 - h) Reference to a recently released study in the Heat Resilient Design policy (PUBDM54) supporting text. This study concludes that the chance of exceeding 40°C in the UK is accelerating at pace.
 - i) PUBDM55 - reference to aiming to meet the full credits in the other water calculators in relation to BREEAM standard.
 - j) Reference to Essex & Suffolk Water not being able to guarantee non-domestic water supply in parts of their area. Updates to the similar text relating to Anglian Water.
 - k) PUBDM15 Natural Environment - clarification on some of the supporting text.
 - l) PUBDM31 - clarification relating to the location of new employment development.
- 3.3. Yellow highlights areas which need information added, but these are not central to the Local Plan.
- 3.4. A 'clean' version will go to Broads Authority on 25 July.

4. Habitats Regulation Assessment

- 4.1. The Habitats Regulation Assessment (HRA) was completed by Lepus Consulting and reflects the latest version of the Local Plan. All recommendations have been taken on board. See Appendix 3.

5. Sustainability Appraisal

- 5.1. The Sustainability Appraisal was completed in house and assesses all the policies in the Local Plan. See Appendix 4.

6. Approach to consultation

- 6.1. The dates for the public consultation are 28 July to 4pm on 26 September. The consultation runs over the school summer holidays, but to reflect that, it will be almost 9 weeks rather than the statutory 6 week minimum.
- 6.2. We will write to those on our consultation database to advertise the consultation. We will add a press advert into the EDP and do a press release. We will advertise the consultation on social media, at the start and throughout the consultation period.
- 6.3. We will hold three drop-in sessions in September in the north, centre and southern part of the Broads. These will be held outside of normal working hours:
- Saturday 6 September, 1pm to 4pm, Acle Recreation Centre.
 - Monday 8 September, 5pm to 8:30pm, Blyburgate Hall, Beccles.
 - Tuesday 9 September, 5pm to 8:30pm, New Victory Hall, Neatishead.
- 6.4. We will meet with young people; namely the South Norfolk and Norwich Youth Advisory Boards.
- 6.5. We will ask Parish Councils to put a poster on their notice boards and to advertise the consultation on their social media, in any magazines that they release.
- 6.6. We will add posters to our Tourist Information Centres.

7. Next steps

- 7.1. It should be noted that as the Broads Authority meeting is a week after this Planning Committee meeting, any comments made at this Planning Committee meeting will be reported to it verbally.
- 7.2. Following the public consultation, we will read and respond to the comments received. We will make a schedule of proposed changes that we will then submit with the Local Plan to the Planning Inspectorate; we cannot make changes to the plan prior to submission.
- 7.3. We intend to bring the result of the consultation on the Local Plan and seek authority to submit the Local Plan to Planning Committee on 7 November 2025 and Broads

Authority on 28 November 2025. However, in order to ensure the Local Plan is submitted in a timely manner, we are seeking delegation to the Chief Executive, in consultation with the Chair of Broads Authority, Chair of Planning Committee, the Director of Delivery² and Head of Planning, to submit the Local Plan if, for any reason, we are not able to meet the November Broads Authority meeting deadline. This will ensure that the Local Plan is submitted as near to the date that we set out in our Local Development Scheme as possible – this is a fallback position, and the aim is to come to both Planning Committee and Broads Authority in November.

Author: Natalie Beal

Date of report: 27 June 2025

Appendix 1 - [Amended Local Infrastructure Study](#)

The following appendices are available to view on [Planning Committee - 18 July 2025 \(broads-authority.gov.uk\)](#)

Appendix 2 - [Regulation 19 Local Plan](#)

Appendix 3 - [Habitats Regulation Assessment](#)

Appendix 4 - [Sustainability Appraisal](#)

² This role replaces the Director of Strategic Services on 1 August 2025.

Broads Local Plan

Local Infrastructure Report

July 2025

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1. Introduction

Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences. By its very nature, it underpins everything we do and is fundamental to our daily lives. Infrastructure supports new development and facilitates the growth of jobs and access to technology and services.

The NPPF, at paragraph 20, says:

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: Inter alia

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure)

This report seeks to summarise the needs and approaches to provision of local infrastructure. A draft version of this report was sent to some stakeholders for a three-week technical consultation. The responses received are at Appendix 1.

This version updates and replaces the June 2024 version.

2. The Authority's constituent districts and their infrastructure studies

To support their proposals in current Local Plans and to support future proposals in future Local Plans, our District Council's assess the infrastructure requirements. The Broads' housing need number is included within our district's total housing need and the infrastructure needs of that total number for the entire district will be assessed through these studies. The Authority works closely with its constituent districts as Local Plans are produced. Here are the most recent Infrastructure Studies. Please note that North Norfolk District Council do not appear to have such a study on the website.

- [Great Yarmouth Infrastructure Plan \(2020\)](#) - This document identifies the various forms of infrastructure that might be required to meet the level of growth planned in the Great Yarmouth Local Plan Part 2 to 2030. It presents an overview of growth patterns and their infrastructure projects needed to support such growth, their costs and the funding involved with this. This study has been prepared in consultation with infrastructure providers.
- This report is a review of the infrastructure requirements within the Greater Norwich Area: [Greater Norwich Infrastructure Needs Report](#) and [Greater Norwich Infrastructure Needs Report December 2020](#). There is also the [Five Year Infrastructure Investment Plan](#) which identifies the projects from the [Greater Norwich Infrastructure Plan](#) whose delivery is

considered to be a priority for achieving the economic growth targets, as set out in the [Joint Core Strategy](#) and the [Greater Norwich City Deal](#).

- [Waveney Infrastructure Study](#) - This document identifies what infrastructure might be required to support the growth ambitions in the Waveney Local Plan. Where possible it identifies the cost, the organisation responsible for delivery, and any potential funding sources. The study has been prepared in consultation with infrastructure providers.
- At the time of writing, North Norfolk District Council were at examination into their Local Plan. Their infrastructure related information can be found here: [Home | 4: Evidence base and supporting documents \(north-norfolk.gov.uk\)](#)

It should also be noted that LPAs are required to produce Infrastructure Funding Statements each year. The infrastructure funding statement (IFS) must set out the amount of future planning obligation expenditure where funds have been allocated. The BA's Statement is here: [Developer contributions \(broads-authority.gov.uk\)](#).

At the time of writing, the district councils have not asked the Broads Authority to include specific infrastructure in the emerging Local Plan. We will continue to work closely with the District Councils.

3. Norfolk Strategic Planning Framework

As part of the [Norfolk Strategic Planning Framework \(NSPF\)](#) (June 2024) work is ongoing at a Norfolk-wide level to address the same issues as listed in the NPPF, but from a more strategic view point. Whilst the NSPF looks at strategic infrastructure this report summarises infrastructure at a local level. The following are agreements from the NSPF:

Agreement 18– Norfolk Authorities will remain members of WRE and will work collaboratively with its other members in the development of the Norfolk Water Strategy Programme to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to support delivery of WRE's Regional Water Resources Plan and develop future iterations of the plan.

Agreement 19 – 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) or lower residential development.

Agreement 20 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure.

Agreement 21 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G

coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 22: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places. This includes making provision for those with Special Educational Needs (SEND), providing land for school expansion or new schools and/or where no suitable solution for sustainable access to schools exists, appropriate contributions for home to school transport. S106 and / or Community Infrastructure Levy funds will be used to deliver additional school places and/or contributions to home to school transport, where appropriate. The County Council's Planning Obligations Standards will be used to inform any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure. The authorities agree to support Norfolk County Council in securing contributions towards infrastructure where justified and, in the case of planning obligations, suitably evidenced as being in compliance with S122 of the Community Infrastructure Levy Regulations 2010.

Agreement 23 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:

• Aquaculture • Biodiversity • Cabling • Climate change • Coastal erosion and coastal change management • Coastal management, including defence, inundation, and Coastal Change Management Areas • Co-existence • Defence • Displacement • Dredging and disposal • Energy – offshore wind and oil and gas • Fishing • Governance • Heritage • Historic environment • Infrastructure • Landscapes and seascapes	• Marine aggregates • Marine and coastal employment • Marine Litter • Marine net gain • Marine protected areas • Marine related renewable energy • Natural capital • Non-native species • Oil and Gas • Port and marine infrastructure and employment • Sustainable fisheries and aquaculture in small harbour towns • Sustainable port development • Tidal Energy • Tourism and recreation • Underwater noise • Water quality/water supply and sewerage

Agreement 24: In recognition of:

a) the importance the Brecks, the Broads and the Norfolk Coast National Landscape, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;

b) the pressure that development in Norfolk could place on these assets; and

c) the importance of ecological connections between habitats.

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

As the Local Plan is produced, we will ensure it addresses the agreements set out in the NSPF.

4. Norfolk and Suffolk - Strategic Infrastructure

The [Norfolk Strategic Infrastructure Delivery Plan \(NSIDP\) \(2023\)](#) has been produced by Norfolk County Council working with all the local planning authorities and utility providers. It identifies strategic infrastructure requirements and provides an update on the delivery of a range of projects. The projects in the NSIDP reflect the key infrastructure needed to deliver the scale of growth ambitions outlined in the NSPF. The NSIDP is a working document that will be regularly updated as information becomes available. The IDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development.

In Suffolk, there is a public sector led partnership, working with councils and partners to promote countywide economic growth. [Suffolk Growth](#)

The Suffolk Local Planning Authorities, like Norfolk LPAs, have a track record of working together when planning growth and change. Until recently, Suffolk Growth worked at both a strategic and operational level, providing links across a multi-faceted growth agenda. Generally, the partnership worked to:

- Connect transport investment and the development of the local economy,
- Ensure public investment in infrastructure and business development support delivers best value (economic, social and environmental) for Suffolk's firms.
- Enable growth of the visitor economy and support the rethinking of local high streets to deliver for residents, businesses and tourists, including our ambition to become the UK's first green tourist destination.

The Suffolk LPAs are starting to work together as they start to produce the next round of Local plans.

The main infrastructure identified that is particularly relevant to the Broads, is the dualling of the Acle Straight. The current local plan has a policy on the Acle Straight and this will be rolled forward.

5. The housing and residential moorings need for the Broads

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

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

5.1 Residential dwellings

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

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

- 2019/20: 21 dwellings
- 2020/21: 7 dwellings
- 2021/22: 21 dwellings
- 2022/23: 3 dwellings
- 2023/24: 7 dwellings
- 2024/25: 2 dwellings

Most Local Planning Authorities now have their housing need calculated using the Standard Methodology. The NPPG says that the ‘standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under supply’.

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

Working with Great Yarmouth Borough Council, who were commissioning work on their housing need at the same time as us, we commissioned ORS Consultants to calculate the housing need for the entire Broads area. The [study](#) was completed in May 2022 and identifies a housing need for the Broads from 2021 to 2041 as follows: A new NPPF (and some changes to the NPPG) was released in December 2024. This changed how housing need is to be calculated, moving from population projections to housing stock. The housing need figure for the Broads was re-calculated: [Local Housing Needs Assessment Addendum \(March 2025\)](#). The May 2022 figure effective tripled. It is important to note that the need is part of the six constituent districts and not additional to.

Projected Dwellings needed for the Broads by Local Authority for the period 2041 to 2042.

Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
316	293	17	204	177	70

Overall, there is a need for 1,077 dwellings over the 21-year period, or 51.3 dwellings per annum

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

5.2 Residential moorings

The Housing and Planning Act 2016 sets out the requirement to understand the need for those living on boats.

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

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

We commissioned RRR Consultancy to calculate the housing need for the entire Broads area. The study¹ was completed in July 2022 and identifies a residential mooring need of 48, as follows.

The study and letter are here: [Residential Mooring needs assessment \(August 2022\)](#) and [clarification letter \(May 2025\)](#).

Table 10

Residential moorings need to 2042

Permanent residential moorings need	
2021-2026	45
2026-2031	1

¹ [Broads Authority Boat Dwellers Accommodation Assessment \(broads-authority.gov.uk\)](#)

2031-2036	1
2036-2041	1
Total	48

5.3 The Utilities Site

The Utilities Site is a brownfield site in Norwich. It is next to other brownfield sites which have the potential for regeneration. Working with Norwich City Council and Broadland and South Norfolk Councils, a partnership has formed to collectively look at sites in this area – the East Norwich Regeneration Area. Combined with the other four sites, it is fair to say that much infrastructure will be required. A [Masterplan](#) has been produced and at the time of writing, a Supplementary Planning Document (SPD) was being produced. The infrastructure needs of that wider scheme are considered in those two documents.

Development in the Broads may require local specific infrastructure. The Utilities Site will require significant infrastructure and that site is part of a wider regeneration area subject to a Masterplan and emerging SPD.

6. Transport

The NPPG Paragraph 104 says: *Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

The NPPF at paragraph 85 recognises the difference between rural and urban areas:

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

6.1 Acle Straight

An important transport consideration is the dualling of the Acle Straight. Whilst on one hand this is local to the Broads, it is also of strategic importance as the road is a Trunk Road. The A47 is the main strategic route linking Norfolk to the midlands and the north (westbound) and central/northern Europe (eastbound). The Authority has an adopted policy relating to this in the Local Plan (2019) which will be rolled forward to the new Local Plan.

6.2 Policies in the Local Plan

New allocations could have local highway network impacts of varying scales. The Authority will work with the relevant Local Highways Authority. Individual allocations will be considered by the Highways Authority. Indeed, the Highways Authority will still assess individual planning applications. Please note that those allocations rolled forward from the 2019 Local Plan that have planning permission (OUL2, STO1 and THU1) are deemed adequate in relation to transport. And all other sites that are to be included in the new Local Plan were assessed through the [Housing and Economic Land Availability Appraisal \(HELAA\)](#) and [HELAA part 2 \(February 2025\)](#) both Norfolk and Suffolk County Councils as Local Highways Authorities provided comments to consider and take on board when assessing the sites.

Development allocations and development boundaries are located in more sustainable locations where services and facilities can be accessed by modes other than single occupancy cars. The [Development Boundaries Topic Paper](#) is of relevance.

Some dis-used railways allocated in the Local Plan and safeguarded to enable them to be used as recreation routes.

6.3 Public transport, walking, wheeling and cycling.

Public transport is supported, although it should be noted that the scale of growth and the sites allocated in the Local Plan will not be of a scale to generate the need for viable changes to bus routes. In relation to rail, the Local Plan seeks to identify and allocate rail stations. For walking and cycling, please see the Green Infrastructure section. Norfolk County Council is currently consulting on a Walking, Wheeling and Cycling Strategy for Norfolk (December 2023).

6.4 Alternative fuels

Since June 2022, the Building Regulations have been changed so new homes and buildings such as supermarkets and workplaces, as well as those undergoing major renovation, are required to install electric vehicle charge points.

It is not proposed to set a standard for electric vehicle charging points in the new Local Plan for the Broads although there will be a policy relating to fire risk and the design and location of charging points.

6.5 Relevant district documents

Great Yarmouth Borough Council:

[Local Plan Part 2 Transport Modelling](#): The purpose of the study is to assess the impact on the A47 trunk road of three additional allocations that are part of the Great Yarmouth Draft Local Plan 2. The study demonstrates the impact on the A47 trunk road of the following allocations:

- Policy ADA1 – Land to the south of Links Road Gorleston-on-Sea – 500 dwellings;
- Policy ADA4 – Land to the north of the A143 Beccles Road, Bradwell – 600 dwellings; and
- Policy PDP6 – Beacon Park District Centre – (subject to a lapsed planning consent)

The impact of including the three additional allocations either constrained to NTEM growth levels or with unconstrained growth, is to increase the likelihood of traffic congestion around the junction of A47 / Links Road / Beaufort Way.

[Great Yarmouth Transport Strategy and Implementation Plan - 6 April 2020 \(norfolk.gov.uk\)](#): This document sets out the transport vision for Great Yarmouth, highlighting the challenges and opportunities along with the transport infrastructure that needs to be delivered within the short and medium-term to enable growth to come forward sustainably as well as supporting the existing local communities. The transport infrastructure presented in this strategy has been sifted from an initial long-list of options which have been subject to stakeholder engagement, appraisal and prioritised using a bespoke Strategic Assessment tool and the Department for Transport's (DfT) Early Assessment and Sifting Tool (EAST), which compares the Strategic, Economic, Managerial, Financial and Commercial case for each transport option. An Action Plan has then been produced to take forward the identified options along with a series of recommended next steps.

Norwich City Council

[About Transport for Norwich - Norfolk County Council](#): Transport for Norwich is a programme of work to improve accessibility by all forms of transport around the city. The aim is to encourage the use of more sustainable forms of transport, such as public transport, cycling and walking, while also improving the capacity of the road network. It is also designed to stabilise traffic levels and as a result improve air quality around the city. It is a partnership between Norfolk County Council and Norwich City Council, as well as local authorities within Greater Norwich on schemes in the wider area. Funding is from sources including the Department for Transport, developer contributions, New Anglia Local Enterprise Partnership and local growth funds.

East Suffolk Council

The following evidence was produced to support the Waveney Local Plan.

- [Traffic Modelling](#) (2018)
Assessing the impact upon the highway network of development planned in the Local Plan and identifying junctions that are likely to experience congestion in the future.
- [Suffolk County Transport Model Forecast Model Report](#) (2017)
Assessing the impact on the highway network from different growth scenarios.
- [Suffolk County Transport Model Forecast Model Report Addendum](#) (2017)
Examining the traffic impact from access options for growth to the south of Beccles.

- [Suffolk County Transport Model Preferred Option Traffic Forecasting Report](#) (2018)
Assessing the impact of the emerging preferred option. It includes updates to the model from the July 2017 reports.
- [Technical Note – Response on Beccles Transport Impact Assessment](#) (2018)
A response to issues raised within the Beccles Transport Impact Assessment, which was commissioned by Worlingham Parish Council.

6.6 Hoveton and Wroxham network improvement strategy

The [Hoveton and Wroxham network improvement strategy \(2020\)](#) identified potential measures to help address existing transport network constraints and transport improvements to facilitate the growth identified in the emerging Local Plans. This work produced some key findings:

- Through traffic is a significant proportion of the journeys.
- The highest quantities of traffic pass through Norwich Road / Stalham Road (A1151) with the majority travelling South towards Norwich.
- There is scope to encourage a greater use of sustainable transport.
- The A1151 Norwich Road / B1140 Salhouse Road mini-roundabout operates close to capacity with high delays in AM peak hour.
- The A1151 Norwich Road / Church Road / Station Road / A1151 Stalham Road junction is affected by high demand from the adjacent signal-controlled pedestrian crossing which creates queues.
- The A1151 Stalham Road / A1062 Horning Road / B1354 Horning Road West double mini-roundabout junction is close to capacity in both AM and PM peak hours and experiences congestion on all arms.

6.7 Transport East

[Transport Strategy 2023-2050](#): Through this strategy, we aim to overcome some of the transport challenges experienced, while also delivering a fit for purpose, high quality, inclusive and sustainable transport network that will be able to accommodate future growth in the area.

Strategic priorities and linked goals are as follows:

Decarbonisation to net-zero

Working to achieve net zero carbon emissions from transport, building on our status as the UK's premier renewable energy region. Our decarbonisation pathway underpins the other three pathways in the Strategy.

- **Goal 1**
Reduce demand for carbon intensive trips through local living; making it easier for people to access jobs and services locally or by digital means

- **Goal 2**
Shift modes by supporting people to switch from private car to active and passenger transport, and goods to more sustainable modes like rail
- **Goal 3**
Switch fuels with all private, passenger transport, fleet and freight vehicles switching to net zero carbon fuels at the earliest opportunity
- **Goal 4**
Zero carbon growth by supporting authorities and developers to plan, locate and design new development that reduces the need for people to make carbon-intensive trips

Connecting growing towns and cities

Providing enhanced links between our fastest growing places and business clusters. Improving access for people to jobs, suppliers, services, and learning; enabling the area to function as a coherent economy and improving productivity.

- **Goal 5**
Improve connections and access within our urban centres through better walking, cycling and passenger transport, supporting sustainable access to services, education, training, jobs and leisure
- **Goal 6**
Deliver faster and more reliable connections between our growing places and to the rest of the UK, to support business growth, skills development and employment
- **Goal 7**
Fully integrate transport networks, services and operations across the Transport East region, through a customer-focused approach, enabling seamless and safe end-to-end journeys by sustainable modes that are attractive to all

Energising coastal and rural communities

A reinvented sustainable coast for the 21st century which powers the UK through energy generation. Supporting our productive rural communities and attracting visitors all year round.

- **Goal 8**
Increase accessibility for rural communities to education, training, services and jobs through; better ways of taking people to places sustainably, supporting more local trips through closer provision of goods and services, supporting regional partners and the digital sector to provide alternative options to travel
- **Goal 9**
Improve connections along our 500miles of coastline, and connect our coastal communities to the rest of the region and the UK, supporting levelling-up and boosting our coastal industries

Unlocking international gateways

Better connected ports and airports to help UK businesses thrive, boosting the nation's economy through better access to international markets and facilitating foreign investment.

- **Goal 10**

Improve connectivity, journey time and reliability for freight, passengers and employees to ports and airports

- **Goal 11**

Move goods and people sustainably to ports and airports by shifting modes including to rail and water

- **Goal 12**

Increase the use of alternative fuels for both port and airports, and for the vehicles moving people and goods onwards from international gateways

[Strategic Investment Programme \(February 2023\)](#): This document sets out the proposed approach to a Strategic Investment Programme to enable delivery of the Transport Strategy. It is a supporting document for the Transport East Strategy, and the main document will be reviewed every three years or in response to emerging guidance and policy; the Appendices to this document will be updated annually.

The scale of growth proposed will not have strategic transport impacts. There may be some more local highway changes or improvements that could be needed as a result of schemes. We will contact the relevant Highways Authority regarding any allocations that are proposed. We will ensure we keep up to date with any relevant documents and strategies.

7. Telecommunications

NPPF paragraph 114 says: *Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*

7.1 Mobile coverage

In 2020, 87% of those over 16 had a smartphone². Whilst there remain many mobile “not-spots” in Norfolk and Suffolk (some rural areas and parts of the coast in particular), the use of smartphones to access the internet has increased hugely; in 2015, smartphones overtook the use of laptops as the number one device to access the internet in the UK³.

² [Share of adults who own a smartphone in the United Kingdom \(UK\) in 2008 and 2019 to 2022 \(statista.com\)](#)

³ [UK Communications Market Report, August 2015 \(ofcom.org.uk\)](#)

Norfolk County Council⁴ commissioned an independent study in 2018, where the mobile signal was tested with consumer devices around Norfolk to establish a true picture of mobile voice and data coverage. They are using this information to work with mobile providers to improve coverage and tackle ‘not spots’ across the county. The survey covered:

- More than 3,400 miles of Norfolk’s roads
- 30 railway stations
- Main railway lines
- Enterprise zones
- Popular tourist destinations

The survey showed that phone signals for voice calls in Norfolk were an issue, with only 82% of call attempts being successful. The call failures happened throughout the county, across a broad range of locations and for all operators. Norfolk County Council provided the information from the survey in [interactive maps](#), allowing residents to see which of the four major providers - EE, Telefonica/O2, Three and Vodafone – have the best coverage in the area for the needs.

Suffolk County Council do not seem to have equivalent information relating to mobile coverage.

7.2 Broadband

The use and demand for mobile and home fast internet connections will continue to grow exponentially - with increased dependency on technology in our everyday lives. Access to fast broadband is a vital component of infrastructure in today’s world. It is key to growing a sustainable local economy, vital for education and home working and an increasingly central part of community cohesion and resilience, particularly in the rural areas of the county. The availability, reliability and speed of mobile and fixed broadband provision is now a key consideration for most house buyers as well as tourists and many view it as essential as the traditional utilities. Similarly, it is also a key concern for the business sector. The services offered by Local Authorities, utility companies and banking services are increasingly reliant on digital infrastructure to provide services and interact with their customers. Planning policy can play an important role in helping to achieve the transformation in mobile and broadband provision. Local Planning Authorities have a pivotal role to play in encouraging and supporting developers to future-proof their developments and maximise their value by installing high-speed broadband and by working with mobile telecoms companies to ensure there is a comprehensive and reliable network that minimises the impact on the landscape.

Not all urban areas are well-connected; as an example, new residential development does not always have broadband connectivity installed up-front and rural areas are often less well-served by broadband, and the low speed of connectivity can be an issue in both urban and rural areas. Not all properties in a rural county – particularly isolated farmhouses and small hamlets - will be feasible financially to connect up to a broadband network, although there are some examples of

⁴ [Norfolk County Council study of mobile phone coverage in Norfolk \(norfolk.gov.uk\)](https://www.norfolk.gov.uk)

the residents of small villages working together to pool funding to secure and deliver fibre broadband⁵.

In Norfolk, [Better Broadband for Norfolk](#), [Local Full Fibre Network](#) and [Project Gigabit](#) have extended and will continue to extend the fibre broadband network to homes and businesses across the county where it wasn't economically viable for commercial companies to provide access. Funded through Norfolk County Council, BT and BDUK (Broadband delivery UK), the project is expected to have a huge positive impact on the economic and social development of Norfolk. The latest info taken from the [Think Broadband](#) data shows at October 2023, 96.7% of premises in Norfolk can now access superfast broadband. This map shows the upgraded postcodes to enable fast broadband and where it's planned for future delivery [Better Broadband for Norfolk coverage check \(arcgis.com\)](#).

In Suffolk, Suffolk's overarching aspiration is to deliver full coverage of better broadband services to all premises in Suffolk as soon as possible. The Better Broadband for Suffolk Programme⁶, run by Suffolk County Council, secured around £24m of public money (SCC and Central Government), which was been used to leverage further private sector investment from BT through a public procurement process. Here is the Programme history:

- In 2013, we achieved 50% superfast broadband coverage in Suffolk.
- In 2015, we reached 85% coverage.
- In 2020 the Better Broadband for Suffolk programme reached its 100,000th customer.
- In 2021, phase 3 of the Better Broadband for Suffolk programme started - this phase completed in early 2023 and extended coverage in the county past 98% (with speeds of 24Mbps or greater). To see the latest broadband coverage figures in the county, please go to the [Think Broadband website](#).

Project Gigabit is a £5 billion government infrastructure project aimed at delivering fast and reliable gigabit-capable broadband to homes and businesses in the hardest-to-reach parts of the UK. On 1 July 2023, it was announced that the contract for Suffolk, representing a £100 million investment in Suffolk, has been awarded by BDUK to CityFibre to provide new high speed Gigabit broadband capabilities. This will benefit around 80,000 properties across rural Suffolk.

7.3 Fibre to the premises

Traditionally the main challenge to installing high speed broadband in new developments, particularly smaller developments and/or those in rural areas, has been that of cost and the complexities of working with the providers. Although the cost to developers of installing high speed broadband at larger sites can be cost neutral, the cost per unit increases on smaller developments where economy of scale is reduced. In addition, installing fibre cabling for superfast broadband across private land can often double the per-kilometre cost. Fibre to the Premises (FTTP) uses fibre-optic cable direct from the exchange to a business or home. Unlike

⁵ More information can be found at [Fibre Community Partnership \(openreach.com\)](#)

⁶ [Better Broadband for Suffolk \(suffolk.gov.uk\)](#)

FTTC (fibre to the Cabinet), there is no use of the traditional copper wire from a street cabinet. While the copper wire from the cabinet to the premises makes for an economical alternative, it does not compare with the speeds that FTTP offers. While an FTTC connection offers up to 76Mbps, the full fibre option reaches up to 1000Mbps or 1Gbps. Not all homes or businesses need those speeds but the ultrafast option allows for future-proofing and growth. FTTP was designed to be easily expanded and improved upon so that bandwidth has more room for growth than the hybrid FTTC option. [Openreach](#) offer to install Fibre to the Premises (FTTP) free of charge to all new housing developments of 20 or more homes and an improved pricing structure all the way down to two homes.

A change to building regulations commenced from the 26th December 2022. These changes mandate the installation of a gigabit-ready telecoms infrastructure during the construction of new homes.

7.4 Fifth Generation Technology Standard

5G follows previous generations of mobile technology such as 3G, which led to the launch of smartphones, and 4G, which enabled faster browsing, allowing us to do things like watching videos on the move. All four major UK mobile networks have launched 5G services. Technology firms are also rolling out 5G-ready devices. 5G is much faster than previous generations of wireless technology. But it's not just about speed. 5G also offers greater capacity, allowing thousands of devices in a small area to be connected at the same time. The connectivity and capacity offered by 5G is opening up the potential for new, innovative services.

5G will use a wide range of frequency bands⁵, such as 700MHz, 3.4GHz and 30GHz.

The higher frequencies of 5G will have a shorter range. Achieving the levels of network capacity where there is a very high volume of network traffic will over time increasingly rely on smaller cells situated nearer to the ground on lampposts and other street furniture, in addition to rooftop and ground-based masts.

Whilst more base stations will be required, Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which can be rolled out on existing infrastructure where possible. The initial phase will be to strengthening the existing infrastructure or rebuilding the network where required, then densification for major areas using small high frequency cells which will be rolled out in areas with high demand.

7.5 Recent Government Consultations

In April 2021, the Government consulted on [changes to permitted development rights for electronic communications infrastructure: technical consultation](#). This consultation sought views on proposed planning reforms that will allow the deployment of telecoms equipment to be quicker whilst ensuring that there are appropriate environmental protections and safeguards in place.

In January 2021, the Government consulted on [changes to the Electronic Communications Code](#). Through this consultation, the Department for Digital, Culture, Media and Sport sought views on

whether changes to the Electronic Communications Code can help ensure that the UK has sufficiently robust electronic communications networks to deliver the coverage and connectivity consumers and businesses need.

Following these consultations, the [Product Security and Telecommunications Infrastructure Act 2022 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2022/26/contents) was produced and has received Royal Assent.

7.6 NSPF and telecommunications

The Norfolk Strategic Planning Framework has two relevant agreements:

- Agreement 24 - To support the high-speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.
- Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations

7.7 Codes of practice

[Cabinet Siting and Pole siting Code of Practice Issue 2](#) (2016): The purpose of this Code of Practice is to provide guidance to Code Operators, agents, contractors, planning and highway authorities and other persons entitled to be notified of the proposed deployment of electronic communications apparatus on the siting, keeping, maintenance and use of above the ground electronic communications apparatus, specifically cabinets and poles utilised by fixed line Code Operators, not including masts utilised by mobile Code Operators (which falls under a separate code of practice).

[Code of Best Practice on Mobile Network Development in England](#) (2016): The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code applies to all forms of wireless development, but very obviously is most relevant to proposals for new masts or base stations and significant additions, extensions or replacements of existing sites.

There is a policy that relates to telecommunications infrastructure emphasising the importance of addressing impacts on landscape in the Broads. The Local Plan will reflect the NSPF.

8. Security

Paragraph 97 of the NPPF says: *Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:*

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

At this stage, the Authority is not aware of any specific security related issues that the Local Plan needs to address. Norfolk and Suffolk Architectural Liaison Officers are consulted at all stages of producing the Local Plan and their responses will be considered and addressed as appropriate.

9. Waste

The [National Planning Policy for Waste](#) states ‘Positive planning plays a pivotal role in delivering this country’s waste ambitions’

The NPPG states: *While such authorities may not have the planning functions in respect of the preparation of Local Plans covering waste, or dealing directly with waste planning applications, they must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy. This might include:*

- working constructively with waste planning authorities to identify and protect those sites needed for waste management facilities. Local planning authorities should consider the need for waste management alongside other spatial planning objectives
- integrating local waste management opportunities in proposed new development
- considering, where relevant, the likely impact of proposed, non-waste related development on existing waste management sites and on sites and areas allocated for waste management
- promoting sound management of waste from any proposed development, such as encouraging on-site management of waste where this is appropriate, or including a planning

condition to encourage or require the developer to set out how waste arising from the development is to be dealt with

- including a planning condition promoting sustainable design of any proposed development through the use of recycled products, recovery of on-site material and the provision of facilities for the storage and regular collection of waste
- ensuring that their collections of household and similar waste are organised so as to help towards achieving the higher levels of the waste hierarchy.

The Broads Authority is not the minerals and waste authority. The Authority's constituent districts are responsible for collecting waste from domestic properties while Norfolk and Suffolk County Council are the Waste Disposal Authorities and are therefore responsible for disposing of refuse as well as being the Minerals and Waste Local Planning Authority, producing Minerals and Waste Local Plans.

The County Councils are consulted at each stage of the Local Plan production and their responses will be considered and addressed as appropriate. There are some waste consultation areas that are in the Broads, which the Broads Authority are aware of and will act upon as required.

9.1 Norfolk County Council

The [Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD 2010-2026](#) (the 'Core Strategy') was adopted in September 2011. The [Norfolk Minerals Site Specific Allocations DPD](#) and the [Norfolk Waste Site Specific Allocations DPD](#) were both adopted in October 2013. The County Council are in the process of reviewing the three documents and bringing them together into one local plan. The Broads Authority will monitor progress and address any relevant policies or requirements as we produce our Local Plan. The [Norfolk Minerals and Waste Local Plan](#) was adopted in 2025. There is an interactive map available for use.

The following table identifies the safeguarded waste management sites (see section 10.4 for safeguarded wastewater sites) where either the site itself or the consultation area for the site falls within the Broads Authority Executive Area.

SITE NAME	OPERATOR	TYPE
Caister on Sea (Household Waste Recycling Centre)	Norse LTD	Waste management site Consultation Area
Great Yarmouth-MT Skips	M T Skips	Waste management site
West Caister (Materials Recycling)	Norfolk County Council	Waste management site Consultation Area
Cantley (inert landfill)	British Sugar PLC	Waste management site and 250m consultation Area

9.2 Suffolk County Council

The [Suffolk Minerals and Waste Local Plan](#) was adopted in 2020. This does not propose any minerals or waste sites in the Broads area. In addition, there are no existing waste or minerals management facilities in the Broads. There seems to be some wastewater treatment plants safeguarding areas that could be of relevance to the Local Plan.

9.3 The Local Plan and waste

Generally, the Local Plan supports the waste hierarchy. In terms of construction waste, as it accounts for a high proportion of waste that ends in landfill, it seems prudent to improve how that is considered in the Local Plan.

The Local Plan will roll forward the current general support of the waste hierarchy as well as ensure any waste allocations in the Local Plans are considered. There is potential to improve reference to construction waste.

10. Water

Adequate water and wastewater infrastructure are needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

The NPPG says:

What are the water supply, wastewater and water quality concerns that plans need to address?

These will vary depending on the character of the local area, the [type of issues the plan covers](#) and the contribution that can be made to a [‘catchment-based approach’](#) to water. Wastewater treatment plants are waste developments and handled by the waste planning authority. In plan-making, there are a number of broad considerations relevant to water supply and water quality:

- [infrastructure](#) (water supply and wastewater)
- [water quality](#)
- [wastewater](#)
- [cross-boundary concerns](#)
- [strategic environmental assessment and sustainability appraisal](#)
- habitats regulations assessments.

Early discussions between strategic policy-making authorities and water and sewerage companies can help to ensure that proposed growth and environmental objectives are reflected in company business plans. Growth that requires new water supply should also be reflected in companies’ long-term water resources management plans. This will help ensure that the necessary infrastructure is funded through the [water industry’s price review](#).

Strategic policy-making authorities will also need to consider the objectives in the government's [25 Year Environment Plan](#) to reduce the damaging abstraction of water from rivers and groundwater, and to reach or exceed objectives for rivers, lakes, coastal and ground waters that are specially protected.

Paragraph: 002 Reference ID: 34-002-20140306

Revision date: 22 07 2019

Water is a particularly important consideration in the Broads. Abstraction to serve development and wastewater can potentially have a profound impact on the quality of the system. Development and activities within the catchment can impact on the Broads, for example agricultural practices, even if located some way from the Broads, can lead to sediment and chemicals washing downstream to the Broads which can lead to reduced water depth, turbidity and impact on the aquatic system through excess nutrients. These are all matters which planning can influence potentially with close cooperation with neighbouring Local Planning Authorities.

10.1 Water supply

10.1.1 Water supply in the Broads

The following table summarises water supply in the Broads Authority Executive Area:

Document	Description	What it says about the Broads Executive Area
The Water Stressed Areas - 2021 Classification (Environment Agency, 2021).	This identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.	The companies determined to be in areas of serious water stress are: • Anglian Water – East Anglia • Essex and Suffolk Water
Abstraction Licensing Strategy Environment Agency 2017	This strategy sets out EA's approach to managing new and existing abstraction and impoundment within the Broadland catchment in the Anglian river basin district.	The Broadland Rivers catchment area is extensive and covers 3188 km² of relatively flat land predominantly in the county of Norfolk with a small proportion of the area (16%) lying in Suffolk. The catchment area extends from Felbrigg and Briston in the north to Thorndon in the south. The most westerly extent is Great Massingham with Lowestoft being the most easterly extent. Many parts of the Broadland Rivers CAMS area are designated for their variety of habitats and species. These include Broadland Special Protection Area (SPA), The Broads Special Area of Conservation (SAC), Norfolk Valley Fens SAC, River Wensum SAC, and The Broads Environmentally Sensitive Area. The approach ensures that River Basin Management Plan objectives for water resources activities are met and we avoid deterioration within this catchment. Many assessment points in the Broadland catchment show limited or no water availability, especially during low-flow periods. New abstraction licences are unlikely to be granted where flows are already below environmental thresholds.

Document	Description	What it says about the Broads Executive Area
Essex and Suffolk Water Resource Management plan (2024)	Essex and Suffolk Water and Anglian Water Services have a statutory duty to prepare and maintain a Water Resources Management Plan (WRMP) under the Water Resources Management Plan Regulations 2007. These set out how the companies plan to maintain the balance between supply and demand over the next 25 years.	East Anglia is one of the driest parts of the country and has been confirmed by the Environment Agency as being a Serious Water Stressed Area. We are forecasting that there will not be enough water supplies to meet forecasted demand over the next 25 years and beyond. We need to prepare for worsening droughts. To do this we are taking a twin track approach to address this by working hard to reduce demand and putting plans in place to increase supply. Northern Central WRZ: The majority of the water supply here comes from the River Waveney, the River Bure, and groundwater fed lakes at Ormesby, Lound and Fritton. The rest comes from the Chalk aquifer in the far north and south of the WRZ. We are predicting that without our intervention, demand for water could significantly exceed supply in our Essex and Suffolk supply areas and so we need to put plans in place now to make sure we have enough water in the future. We forecast an increase in the amount of water used by businesses and industry over this period because of a growth of new businesses in the area, such as new food processing and cosmetic factories, and a nuclear power station in Suffolk. Until we develop new resources (2030), we are currently unable to agree to new requests for water in our Hartismere Water Resource Zone where it will be used for non-domestic purposes’. Households: We will fit a smart meter on all households and non-households by 2035 and, supported by a water efficiency programme, we aim to have an average per capita consumption of 122 litres per head per day by 2038 and 110 litres per head per day by 2050. For non-household demand we are aiming for a reduction of 9% by 2038. Leakage will be reduced by 40% from our 2017/18 level by 2025.

Document	Description	What it says about the Broads Executive Area
		Increasing supply in Suffolk: Linking our Water Resource Zones: Our plan is to build new pipelines that will allow us to move water around our network from places with extra water to areas with a water shortage. These new pipelines will connect our Blyth, Hartismere, and Northern Central WRZs. Northern Central WRZ has a small surplus initially so once the new pipeline is built, it can share water with Blyth and Hartismere WRZ. New treated water storage reservoirs: We will build new treated water storage reservoirs in Hartismere and Northern Central. New pipeline: We will install a new pipeline from an existing well near Bungay to a nearby water treatment works by 2030 to increase capacity in the area. River Waveney Nitrate Removal Scheme: We are going to build a new nitrate removal process at our River Waveney WTWs near Beccles in Suffolk. This is because the nitrate concentrations in river water during the autumn and winter are staying elevated for longer Lowestoft and Caister water reuse schemes: The water recycling scheme at Lowestoft would be ready by 2030. It is likely that we could build this quicker than we could build a new reservoir. The scheme at Caister is not needed until 2045. Suffolk adaptive plan We have tested our plans and where there is a risk of our supply and demand forecasts out turning differently, we have identified alternative investment programmes which may require supply schemes to be built earlier or may require different supply schemes to those in our preferred plan. Our best value plan is to complete Lowestoft Water Reuse scheme first because we think we can deliver it more quickly. However, we are going to complete further work to see if

Document	Description	What it says about the Broads Executive Area
		we can build the North Suffolk winter storage reservoir more quickly and instead of the Lowestoft Water Reuse scheme. In the long term, a reservoir is a better and more environmentally friendly option. We will complete further detailed designs by 2026 and will then decide whether we construct the North Suffolk Winter Storage Reservoir or the Lowestoft Water Reuse Scheme.
Anglian Water Services Water Resource Management Plan (2024)		This shows the scale of our region's new water needs by 2050. Without any action, we will experience a shortfall of 593 megalitres of water a day by 2050. That's equivalent to approximately half the amount of water we put into our network currently.

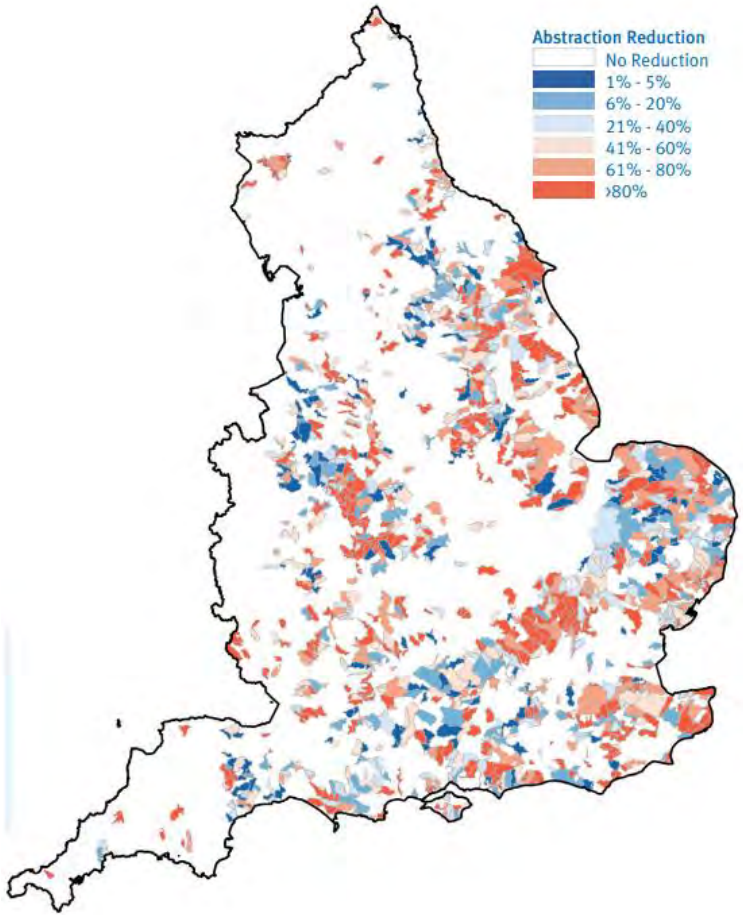
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		Supply demand balance (ML/d) < -90 -40 - -90 -15 - -40 0 - -15 0 > 0 WRZ <table><tr><th></th><th>1</th><th>2</th><th>3</th><th>4</th><th>5</th></tr><tr><td>1</td><td>Essex Central</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>2</td><td>Essex South</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>3</td><td>Fenland</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>4</td><td>Hartlepool</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>5</td><td>Lincolnshire Bourne</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>6</td><td>Lincolnshire Central</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>7</td><td>Lincolnshire East</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>8</td><td>Lincolnshire Retford and Gainsborough</td><td></td><td></td><td>✓</td><td></td></tr><tr><td>9</td><td>Norfolk Aylsham</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>10</td><td>Norfolk Bradenham</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>11</td><td>Norfolk East Dereham</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>12</td><td>Norfolk East Harling</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>13</td><td>Norfolk Happisburgh</td><td>✓</td><td></td><td></td><td></td></tr><tr><td>14</td><td>Norfolk Horleston</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>15</td><td>Norfolk North Coast</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>16</td><td>Norfolk Norwich-Broads</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>17</td><td>Norfolk Wymondham</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>18</td><td>Ruthamford Central</td><td>✓</td><td></td><td></td><td></td></tr><tr><td>19</td><td>Ruthamford North</td><td>✓</td><td>✓</td><td>✓</td><td></td></tr><tr><td>20</td><td>Ruthamford South</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>21</td><td>Ruthamford West</td><td>✓</td><td></td><td></td><td></td></tr><tr><td>22</td><td>SouthHumber Bank</td><td>✓</td><td></td><td></td><td></td></tr><tr><td>23</td><td>Suffolk East</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>24</td><td>Suffolk Iwerth</td><td>✓</td><td></td><td></td><td>✓</td></tr><tr><td>25</td><td>Suffolk Sudbury</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>26</td><td>Suffolk Thetford</td><td>✓</td><td></td><td>✓</td><td>✓</td></tr><tr><td>27</td><td>Suffolk West Cambs</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr></table> 1 Growth 2 Climate change 3 1 in 500 year drought 4 Licence reductions 5 Environmental destination These WRZs do not contain their own water resources so challenges 2-5 are not relevant Through our decision making processes, guided by the new water needs of our region, the best value plan framework and our customers' and stakeholders' views, we have developed a three-tiered strategy: 1. We will make the best use of our existing resources, building on our industry leading demand management and using any surplus water available.		1	2	3	4	5	1	Essex Central	✓		✓	✓	2	Essex South	✓	✓	✓	✓	3	Fenland	✓	✓	✓	✓	4	Hartlepool			✓	✓	5	Lincolnshire Bourne	✓		✓	✓	6	Lincolnshire Central	✓	✓	✓	✓	7	Lincolnshire East	✓		✓	✓	8	Lincolnshire Retford and Gainsborough			✓		9	Norfolk Aylsham	✓		✓	✓	10	Norfolk Bradenham	✓		✓	✓	11	Norfolk East Dereham	✓		✓	✓	12	Norfolk East Harling	✓		✓	✓	13	Norfolk Happisburgh	✓				14	Norfolk Horleston			✓	✓	15	Norfolk North Coast	✓		✓	✓	16	Norfolk Norwich-Broads	✓		✓	✓	17	Norfolk Wymondham	✓		✓	✓	18	Ruthamford Central	✓				19	Ruthamford North	✓	✓	✓		20	Ruthamford South	✓	✓	✓	✓	21	Ruthamford West	✓				22	SouthHumber Bank	✓				23	Suffolk East	✓	✓	✓	✓	24	Suffolk Iwerth	✓			✓	25	Suffolk Sudbury	✓		✓	✓	26	Suffolk Thetford	✓		✓	✓	27	Suffolk West Cambs	✓	✓	✓	✓
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Document	Description	What it says about the Broads Executive Area
		2. The progression of the strategic resource options (SROs): the Fens and Lincolnshire reservoirs, that will meet 36% of our new water needs, and provide the opportunity for many benefits identified in our best value plan framework. 3. We have planned for adaptive future resources, which allows us to remain flexible to changing circumstances, whilst ensuring we limit bill impacts to our customers by only investing in low regret solutions. Figure 5 Our three pillars of demand management <pre> graph TD SM[Smart metering] --> WS[Water Savings] LE[Leakage efficiencies] --> WS WE[Water efficiency] --> WS SM --> SM_Note[Smart meter data will help identify customer and distribution loss leakage] SM --> SM_Note2[Smart meter data will help us engage with our customers enabling water efficiency programmes] LE --> LE_Note[Customer leakage reduction will form part of the water efficiency programmes] WE --> WE_Note[Customer leakage reduction will form part of the water efficiency programmes] </pre> Making best use of existing resource through supply-side options • Upgrading treatment works • Transfers • Colchester water reuse

Document	Description	What it says about the Broads Executive Area
		Progressing strategic resource options- the Fens and Lincolnshire reservoirs - The regional need for reservoirs - Promoting reservoirs in WRMP24 Supply demand balance (Ml/d) ■ < -90 ■ -40 - -90 ■ -15 - -40 ■ 0 - -15 ■ 0 ■ > 0 ● Population growth ● Drought resilience ● Licence caps ● Climate change ● Environmental destination 2025 2030 2036 2040 2049 Baseline deficits Hartlepool 2025-2049 > 0 Demand management Hartlepool 2025-2049 > 0 Supply-side options 1 Executive summary Anglian Water WRMP24 main report 10

Document	Description	What it says about the Broads Executive Area																																								
		Figure 22 Summary of WRMP24 problem characterisation <table><tr><th>Area</th><th>Water Resource Zones</th><th>Total Needs Score</th><th>Total Complexity Score</th><th>Level of Concern</th></tr><tr><td>1</td><td>Lincolnshire WRZs</td><td>4</td><td>12</td><td>H</td></tr><tr><td>2</td><td>Ruthamford WRZs</td><td>6</td><td>20</td><td>H</td></tr><tr><td>3</td><td>Fenland WRZ</td><td>3</td><td>14</td><td>M</td></tr><tr><td>4</td><td>Norfolk WRZs</td><td>5</td><td>16</td><td>H</td></tr><tr><td>5</td><td>Essex and Suffolk East WRZs</td><td>6</td><td>17</td><td>H</td></tr><tr><td>6</td><td>Suffolk and West Cambridgeshire WRZs</td><td>4</td><td>16</td><td>H</td></tr><tr><td>7</td><td>Hartlepool</td><td>0</td><td>1</td><td>L</td></tr></table>	Area	Water Resource Zones	Total Needs Score	Total Complexity Score	Level of Concern	1	Lincolnshire WRZs	4	12	H	2	Ruthamford WRZs	6	20	H	3	Fenland WRZ	3	14	M	4	Norfolk WRZs	5	16	H	5	Essex and Suffolk East WRZs	6	17	H	6	Suffolk and West Cambridgeshire WRZs	4	16	H	7	Hartlepool	0	1	L
Area	Water Resource Zones	Total Needs Score	Total Complexity Score	Level of Concern																																						
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3	Fenland WRZ	3	14	M																																						
4	Norfolk WRZs	5	16	H																																						
5	Essex and Suffolk East WRZs	6	17	H																																						
6	Suffolk and West Cambridgeshire WRZs	4	16	H																																						
7	Hartlepool	0	1	L																																						
Anglia District River Basin Management Plan (2022).	The Anglian river basin district (RBD) river basin management plan describes the challenges that threaten the water environment and how these challenges can be managed.	Significant water management issues are listed as: • Physical modifications • Pollution from waste water • Pollution from towns, cities and transport • Changes to the natural flow and level of water • Negative effects of invasive non-native species • Pollution from rural areas The need for water efficiency measures features strongly in the document.																																								
National Framework for Water Resources (2025)	The National Framework explores the long-term needs of all sectors that depend on a	The National Framework provides a picture of England’s future water needs across each of the regional groups by 2055. For public water supply, the estimated additional water need between 2030 and 2055																																								

Document	Description	What it says about the Broads Executive Area
	secure supply of water. This includes public water supplies provided by water companies to customers' homes and businesses; direct abstraction for agriculture, electricity generation and industry; and the water needs of the environment.	For East Anglia additional public water supply needs between 2030 and 2055 are 679 MI/d. Potential abstraction reductions by 2050 (without consideration of water company actions to reduce pressure) are highlighted below.

Document	Description	What it says about the Broads Executive Area
		 The map displays the geographical area of the Broads in East Angles, with various regions color-coded to represent different levels of abstraction reduction. A legend titled 'Abstraction Reduction' is located in the top right corner of the map area, providing the following scale: - No Reduction (White) 1% - 5% (Dark Blue) 6% - 20% (Medium Blue) 21% - 40% (Light Blue) 41% - 60% (Light Orange) 61% - 80% (Medium Orange) >80% (Dark Orange/Red) The map shows a high concentration of areas with 61% to 80% reduction (medium orange) and areas with no reduction (white) across the central and eastern parts of the Broads. There are also scattered patches of 1% to 5% reduction (dark blue) and 41% to 60% reduction (light orange).

Document	Description	What it says about the Broads Executive Area

10.1.2 Water Cycle Studies of our districts

Another source of information is existing water cycle studies completed by our districts. However, these have all been produced prior to the publication of the Water Resources East Regional Water Resources Plan, the water companies' Water Resource Management Plans for the period 2025-2050 published since September 2025, and the Anglian Water Drainage and Wastewater Management Plan 2025-2050 (published May 2023). As a result, these water cycle studies would be considered to be out of date and would need to be reviewed as part of any new Local Plan for the Broads constituent districts.

District	Evidence	Information/policy
Broadland	Water Cycle Study (2021) was produced for Norwich, SN, BDC, Norfolk County Council and the Broads Authority.	The water efficiency assessment can be used by GNA to develop a water use policy that requires developers to build new homes to meet the higher Building Regulation standards of 110l/h/d as a minimum, improving on it where possible and to consider working with AWS and other stakeholders to develop further options for retrofitting existing properties with efficiency fixtures and fittings. The Emerging Local Plan says this in policy 2: Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher optional standard.
Norwich		
South Norfolk		
North Norfolk	Not aware of any evidence.	Core Strategy and Development Management DPD policy relates to Code for Sustainable Homes. There is an emerging Local Plan under production which seeks 110l/h/d.

District	Evidence	Information/policy
GYBC	The Water Cycle Scoping Study was a stage 1 report and was completed in 2009. This was not taken any further as the issues raised in the Scoping study were not significant to development plans at the time. This did include the Broads Authority Executive Area.	The emerging Local Plan (in examination) includes policy E7: Water conservation in new dwellings and holiday accommodation which says that new residential development, and holiday accommodation in buildings, will be supported only where it meets the higher water efficiency standard of requirement of 110 litres per person per day.
Waveney (now East Suffolk council)	Water Cycle Study 2017	The study concludes that a policy could be developed that ensures all housing is as water efficient as possible, and that new housing development should go beyond mandatory Building Regulations requirements, ideally to 110 l/h/d optional Building Regulations requirements where possible. Policy WLP8.28 – Sustainable Construction says that all new residential development in the District should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day unless it can be demonstrated that it is not viable or feasible to do so.

10.1.3 Norfolk Strategic Planning Framework 2021

There is an agreement in the [Norfolk Strategic Planning Framework \(2021\)](#) that relates to water use.

Agreement 19 – 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) or lower residential development.

According to The Housing Standards Review: Cost Impacts report that was produced for the Department for Communities and Local Government in 2014, the uplift in cost between 125 and 110 litres per person per day is just £9 per dwelling. It is noted that was in 2014 and the cost could be less now. The Government's Environmental Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress.

Please note that at the time of writing, an updated NSPF was being finalised, but the agreement remains.

10.1.4 Water Resource East

Water Resource East's (WRE's) [updated position statement \(February 2021\)](#) promotes a vision for Eastern England to have sufficient water resources to support a flourishing economy, a thriving environment and the needs of its population, and for the region to be seen as an international exemplar for collaborative integrated water resource management.

On an average day, in a dry year, the total consumptive demand for water in the WRE region is equivalent to 2,311 million litres (megalitres) per day. Most of this water (85%) is used for public water supply (PWS). Most of the rest is used for spray irrigation (8%), power generation (3%) and in the manufacturing, food and drink sectors (2%).

FUTURE WATER CHALLENGES FOR EASTERN ENGLAND

- Housing growth
- Agricultural growth
- Energy sector
- Systematic conservation planning
- Climate change

OPTIONS FOR MEETING FUTURE DEMAND FOR WATER IN EASTERN ENGLAND

- Water company leakage
- Water efficiency measures
- Supply options

Looking forward to the 2050s and beyond, our Initial Resource Position Statement estimated that up to an additional 1,656 megalitres of water could be needed per day. The largest drivers of this were abstraction reductions to drive environmental restoration and enhancement (500

megalitres per day), housing growth (408 megalitres per day) and additional water for irrigation (288 megalitres per day).

[WRE Regional Water Resources Plan 2023](#) says that Eastern England faces projected water shortages of 800 million litres of water per day by 2050 – the equivalent of a third of current water use in the region.

The demand for water is rising with one of the highest rates of new housing development in the country. Climate change is making existing seasonal patterns of rainfall less dependable, adding further pressures to the region's already scarce water resources and natural environment. Only 8% of rivers and streams in the WRE region are in 'Good' ecological status, and these environmental pressures signify the need to dramatically reduce the rate of abstraction from waterbodies at risk of further deterioration.

This first regional plan, covering the period 2025 to 2050, finalised and published in December 2023:

- Outlines the needs of different sectors for water in the region, now and in the future, taking into account projections of housing and economic growth.
- Forecasts the amount of water available for supply, resulting from factors such as climate change, improving resilience to drought, and the need to reduce abstraction from current water sources to improve the environment.
- Identifies the 'best value' plan for meeting the projected supply-demand deficits for the public water supply in a way that maximises co-benefits for other sectors and the environment.
- Describes the work that has started and is proposed at a catchment scale to identify the water needs and solutions to meet the supply-demand deficits for other sectors such as agriculture, power generation and navigation.

The Authority will continue with the 110l/h/d water usage requirement for new development. We will explore the potential to go lower than 110l/h/d. The Authority will introduce requirements relating to water usage of non-residential development.

10.1.5 Reservoirs

On occasion, reservoirs may be proposed. These are usually proposed by farms and enable landowners to have their own water supply needed for crops, meaning less reliance on external water supplies. With the increase in long, dry summers with low rainfall, having a reservoir to store water from the wetter months can ensure there is enough water all year-round. Other benefits of reservoirs is that they can help with diversifying landowners crops and therefore becoming more resilient to problems they may encounter. Any reservoir 25,000 cubic meters above ground level will need to be registered with the Environment Agency (England). If more than 20 cubic meters are taken per day from groundwater or rivers to fill the reservoir, a water abstraction licence is needed. More information can be found here: [5187 - Water Reservoir Brochure \(publishing.service.gov.uk\)](#). Proposals for reservoirs in the Broads will be determined

using the topic-based policies in the Local Plan. Considerations would include landscape impact, soil and biodiversity.

10.2 Water Quality

10.2.1 Wastewater and treatment

Water quality is a key consideration in the Broads and the Local Plan will look into drainage. With regards to how wastewater is transferred from a property, due to the low-lying nature of the area and remoteness of some settlements connection to a public sewer is not always possible in the Broads. The alternative disposal methods employed can have a significant local impact on water quality.

Anglian Water is implementing a series of first-time sewerage projects of some villages in the Broads Area. Stokesby for example is one area that has benefitted from this project.

Through discussions with North Norfolk District Council, Anglian Water Services and the Environment Agency, it is apparent that there are capacity issues at the Horning Knackers Wood Water Recycling Centre. This Water Recycling Centre discharges to the River Bure and contributes nutrient loads to the downstream watercourses as well as the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA). Both Anglian Water and the Environment Agency agree that the Horning Knackers Wood Water Recycling Centre (WRC) does not currently have capacity to accommodate further foul flows. Horning Knackers Wood WRC is in protracted exceedance of the volumetric permit due to the continued ingress of surface and groundwater. This means that development that will increase the foul water load in the Horning area cannot come forward and cannot be permitted. The Joint Position Statement and Statement of Fact can be found here:

- [Joint Position Statement on Development in the Horning Knackers Wood Water \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/joint-position-statement-on-development-in-the-horning-knackers-wood-water/)
- [Horning Statement of Fact - Revised August 2023 \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/horning-statement-of-fact-revised-august-2023/)

There are also other treatment works, identified in the Norfolk⁷ and Suffolk⁸ Minerals and Waste planning documents that are of relevance to the Broads. The list of safeguarded wastewater sites and consultation areas in Norfolk relevant to the Broads Authority Executive Area is below. There are no wastewater sites or wastewater consultation areas in the Broads part of Suffolk.

SITE NAME	OPERATOR	TYPE
Acle (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
Belaugh (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area

⁷ [Norfolk County Council Minerals and waste planning policies \(norfolk.gov.uk\)](https://norfolk.gov.uk/minerals-and-waste-planning-policies/)

⁸ [Suffolk County Council Minerals and Waste Plan \(suffolk.gov.uk\)](https://suffolk.gov.uk/minerals-and-waste-plan/)

SITE NAME	OPERATOR	TYPE
Horning (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
Stalham (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
West Caister (water recycling centre)	Anglian Water Services Ltd	Wastewater Consultation Area
Whitlingham (water recycling centre)	Anglian Water Services Ltd	Wastewater Consultation Area

10.2.2 Nutrient neutrality

Alongside all other local planning authorities in Norfolk, the Broads Authority received a letter in 2022 from Natural England concerning nutrient pollution in the protected habitats of the Broads Special Area of Conservation and Ramsar site.

The letter advised that new development within the catchment of these habitats comprising overnight accommodation has the potential to cause adverse impacts with regard to nutrient pollution. Such development includes, but is not limited to:

- new homes,
- student accommodation,
- care homes,
- tourism attractions,
- tourist accommodation,
- permitted development (which gives rise to new overnight accommodation) under the Town and Country Planning (General Permitted Development) (England) Order 2015, and
- Any development not involving overnight accommodation, but which may have non-sewerage water quality implications.

The Conservation of Species and Habitats Regulations 2017 require local planning authorities to ensure that new development does not cause adverse impacts to the integrity of protected habitats such as the Broads prior to granting planning permission. At present there are no identified mitigation solutions available locally to resolve these impacts.

Whilst the Authority assesses the implications of these matters, it cannot lawfully conclude that development within the catchment of the Broads Special Area of Conservation and Ramsar site will not have an adverse effect. Therefore, until these matters are resolved the Authority will not be able to grant planning permission for developments comprising overnight accommodation within the affected catchments.

The fundamental issue being phosphorous and nitrogen in the water causing eutrophication. Water Recycling Centres have been identified as one of the causes of nutrient enrichment.

Mitigation schemes are being worked up, both locally and nationally which may involve nature-based solutions as well as other solutions that involve infrastructure.

10.2.3 Water Recycling Centre capacity constraints

In 2025, Anglian Water Services released documents and mapping to explain a change in how they will respond to planning applications for certain development types wishing to dispose of foul water through Water Recycling Centres (WRCs). The issue being the the potential for environmental harm and risk to existing customers where there is insufficient capacity to accommodate wastewater flows at the WRC from new development. Anglian Water Services have indicated that for some applications in the catchment of some WRCs, they will object. Some WRCs have growth plans identified for 2025-2030, which are designed to address dry weather flow capacity, but not all WRCs in the Broads do.

The Authority will address water quality in the Local Plan. The Authority will keep updated regarding Horning Knackers Wood Water Recycling Centre. The Local Plan will reflect Nutrient Neutrality. The Local Plan and Planning Team will use the information provided by Anglian Water Services in relation to Water Recycling Centres.

11. Flood Risk

11.1 Flood Risk

Approximately 82.46% of the Broads Authority Executive Area is covered by flood zone 3 (3, 3a & 3b). This equates to 24,894.6 hectares. The Broads Authority boundary is tightly drawn around the edge of the functional floodplain⁹. The extent and nature of flood risk, with significant areas of 'functional floodplain', means that flood risk is a major constraint on development in the Broads. Flood risk includes all type of flood risk, so in addition to tidal and fluvial sources of flood risk, there is also surface water, reservoir and groundwater sources of flood risk.

The flood risk in the Broads is predominately from fluvial and tidal sources which are interlinked. However, other sources of flood risk include groundwater and surface water. The whole character and development in the Broads over many hundreds of years has been closely associated with the water environment and flood risk. Much of the Broads area is defended by flood defence embankments, which are maintained by the Environment Agency to reduce flooding. The flood defences, where they exist, only reduce the risk of flooding through containing some water to a given area and will never eliminate the flood risk; this has been the case historically within the Broads.

⁹ The NPPG defines Zone 3b The Functional Floodplain as: This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise:

- land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
- land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).

Working, living and visiting the Broads have been, and will continue to be, activities that have co-existed with the risk of flooding. However, any new development (which includes change of use, etc) must be in line with government policy and minimise flood risk by avoidance where inappropriate development is directed away from areas of highest risk. In the Broads area, this means identifying the risks from flooding and ensuring appropriate development is at a low a risk level as possible while being compatible with the wetland and water-based environment.

The Broads is not subject to open sea conditions (relating to tidal range and wave action) but much of the Broads are tidally influenced fluvial waterbodies.

The flood probability mapping carried out within the SFRA does not signify the degree of hazard likely to be experienced in the Broads Authority area, especially in the more upstream catchment areas and those areas not at risk of breaching of coastal defences, because it does not quantify depth or water velocity. Hazard, or “danger to people”, is a function of depth and velocity. Hazard is very site specific and could vary greatly over a relatively small area due to the presence of drains, dykes, quay-headings, flood banks, etc. Hazards can be hidden by floodwaters and a site-specific Flood Risk Assessment will need to measure this.

The typical Broads river has a permeable catchment¹⁰, is groundwater dominated¹¹, and is a slow responding watercourse with a slow increase and decrease of flow in response to rainfall. Although tidal surges can develop rapidly within 6-12 hours because of the movements of weather systems in the North Sea, the Environment Agency Flood Warning System covers the whole of the Broads area which could provide early warning (for fluvial and tidal flooding). Signing up to this service is voluntary or it may be a requirement of planning permission.

The nature of flooding in the Broads is such that flood water is likely to have a slow velocity, may be shallow in depth and may be low hazard (depending on topography), unless it is in or beside a breach in defences where the flow will be greater and the risk would subsequently be higher.

Some people living and working within the Broads are historically familiar with the water environment and are unlikely to be surprised or alarmed by the possibility of floods or rising water levels or may be more prepared. That being said, others may not have had any experience of flooding and historic knowledge and historic connections does not necessarily lower people's vulnerability, it can also lead to complacency which increases vulnerability. Measures will need to be in place to ensure effective communication with visitors - an issue which is already addressed on many sites locally. The measures to take before, during and after a flood should be detailed within a Flood Response Plan for each development site.

Any development encroaching within any of the plotted Flood Zones may increase flood risk to adjacent areas. The effect on flood risk of several small encroachments is cumulative. If the requirements of the NPPF and NPPG are met in full, then additional development should not increase flood risk elsewhere.

¹⁰ A river catchment is the area of land whose water drains into that river. A permeable catchment lies on porous rock, such as chalk or sandstone.

¹¹ Where groundwater accounts for much of the inflow and outflow of the watercourse.

11.2 The Broads Flood Risk Alleviation Project and Broadland Futures Initiative

The Broadland Flood Alleviation Project (BFAP) was a long-term project, led by the Environment Agency, to provide a range of flood defence improvements, maintenance and emergency response services within the tidal areas of the Rivers Yare, Bure, Waveney and their tributaries.

The main aim of project work was to strengthen existing flood defences and restore them to a height that existed in 1995 (a level defined by the Environment Agency) and make additional allowances for sea level rise and future settlement of the flood banks.

This aim has largely been achieved, through a phased programme of improvement works comprising:

- Strengthening the existing flood banks, restoring them to agreed levels where excessive settlement has occurred
- Replacing existing erosion protection that is in a poor condition using more environmentally acceptable methods wherever possible
- Providing new protection where erosion is currently threatening the integrity of the flood defences
- Carrying out works at undefended communities

The Broadland Futures Initiative (BFI)¹² is a partnership for future flood risk management in the Broadland area. The main goal is to agree a framework for future flood risk management that better copes with our changing climate and rising sea level. The focus will be on what happens from the mid-2020s onwards. Planning is needed now to secure support and make well-informed decisions.

The Initiative has been set up by organisations responsible for managing coastal and inland flood risk. The Environment Agency have the lead responsibility and will be working with Natural England, County Councils, Internal Drainage Boards, Broads Authority and National Farmers Union. The Broads Authority will support the Initiative Project Team and governance arrangements.

The BFI will also work in partnership with local communities and other stakeholders to identify the way forward. This will be a democratic process, with local politicians making the core decisions to agree a framework for future flood risk management that better copes with our changing climate.

It is also worth noting the [Lowestoft Tidal Flood Barrier project](#) whose impacts will stretch into Oulton Broad and close to the BA boundary.

The NPPF, current and new Local Plan policies and current Flood Risk SPD will enable flooding and flood risk to be addressed.

¹² [Broadland Futures Initiative \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)

12. Local Coastal Changes

The Broads Authority has a small stretch of coast in the Executive Area (Winterton/Horsey area). The Kelling to Lowestoft Ness Shoreline Management Plan unit 6.13 covers Eccles to Winterton Beach Road. Coastal erosion is a sensitive issue and the detail of the approach for this area is included in the Management Plan. As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. In relation to the present day, the Plan says: *‘Due to the considerable assets at risk and the uncertainty of how the coastline could evolve, the policy option from the present day is to continue to hold the line of the existing defence. This policy option is likely to involve maintenance of existing seawalls and reef structures, replacing groynes as necessary and continuing to re-nourish beaches with dredged sand. This policy option will provide an appropriate standard of protection to all assets behind the present defence line, and, with the recharge, a beach will be maintained as well as a supply of sediment to downdrift areas.’*

Some Norfolk and Suffolk coastal Local Planning Authorities have produced a joint [SPD](#) to guide and inform development on the coast and elaborate on Local Plan policies.

There is a policy relating to the coast which generally supports the Shoreline Management Plan’s approach. A Coast SPD has been produced.

13. Minerals

See section 8 of this document for references and information about the Suffolk and Norfolk Minerals and Waste documents.

The NPPF states ‘It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.’

The NPPF states ‘Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.’

~~Whilst the Broads Authority is not a district council, it is not a mineral planning authority, therefore the below wording is relevant.~~

The NPPG states ‘Whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in 3 ways:

- 1) Having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps;
- 2) In those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan

before determining a planning application on any proposal for non-minerals development within it; and

- 3) When determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.

The following table identifies the safeguarded mineral extraction and mineral infrastructure sites where either the site itself or the consultation area for the site falls within the Broads Authority Executive Area.

Site Name	Operator	Type
Norton Subcourse Quarry	Breedon Group	Mineral Extraction Site Consultation Area Safeguarded mineral extraction
Earsham Quarry	Earsham Gravels Ltd	Mineral Extraction Site and 250m Consultation Area
Trowse Railhead	Tarmac	Mineral Infrastructure Consultation Area

Many current allocations in the Local Plan are partially on safeguarded minerals (sand and gravel) resource and this is identified. This approach is intended to be continued.

14. Energy

The NPPG says that:

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

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

Paragraph: 003 Reference ID: 5-003-20140306

Revision date: 06 03 2014

See separate Renewable Energy Topic Paper.

15. Utilities

In relation to gas and electricity, no providers who were consulted raised any concerns with regards to the Objectively Assessed Housing Need for the Broads during the Issues and Options Consultation, December 2022 **or the Preferred Options consultation in 2024.**

15.1 Gas

National Gas Transmission owns and operates the national transmission system throughout Great Britain which connects to eight regional networks. In the borough, National Grid also own and operate the local gas distribution network and are therefore also responsible for distributing gas to the borough. National Grid has a duty to develop and maintain an efficient, co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. Bacton Gas terminal is a large gas terminal located on the north Norfolk coast with an underground pipeline connecting the terminal with the gas power station in South Denes in Great Yarmouth. There are likely to be no future supply issues with gas provision. Improvements to the gas distribution network are generally carried out as a result of significant growth in overall regional demand rather than site specific requirements.

15.2 Electricity

The electricity distributor for the area is UK Power Networks, which is known as a Distribution Network Operator (DNO), covering 29,000sq km of London, the south east and the east of England. Their role is to take electricity at high voltages from the National Grid and transform it down to voltages suitable for commercial and domestic use. UK Power Networks are responsible for ensuring that the infrastructure that brings power to homes, businesses, hospitals, schools and other public services continues to deliver reliable, safe and sustainable electricity at all times.

15.3 Relevant district documents

Some of our constituent districts have produced energy studies and these may be relevant to the Broads. The ones in place (or being produced) at the time of writing are included below.

[North Norfolk Power Study \(2019\)](#) – the aim of this study is to review current energy infrastructure and identify areas where there may be constraints on energy supplies now and in the future. The areas of planned development are shown in relation to the local substation, which is also colour coded in a traffic light system according to the available capacity. The substations in green have no capacity issues, while those in red have under 5 MW of spare capacity and will struggle to serve major additional development without further reinforcement.

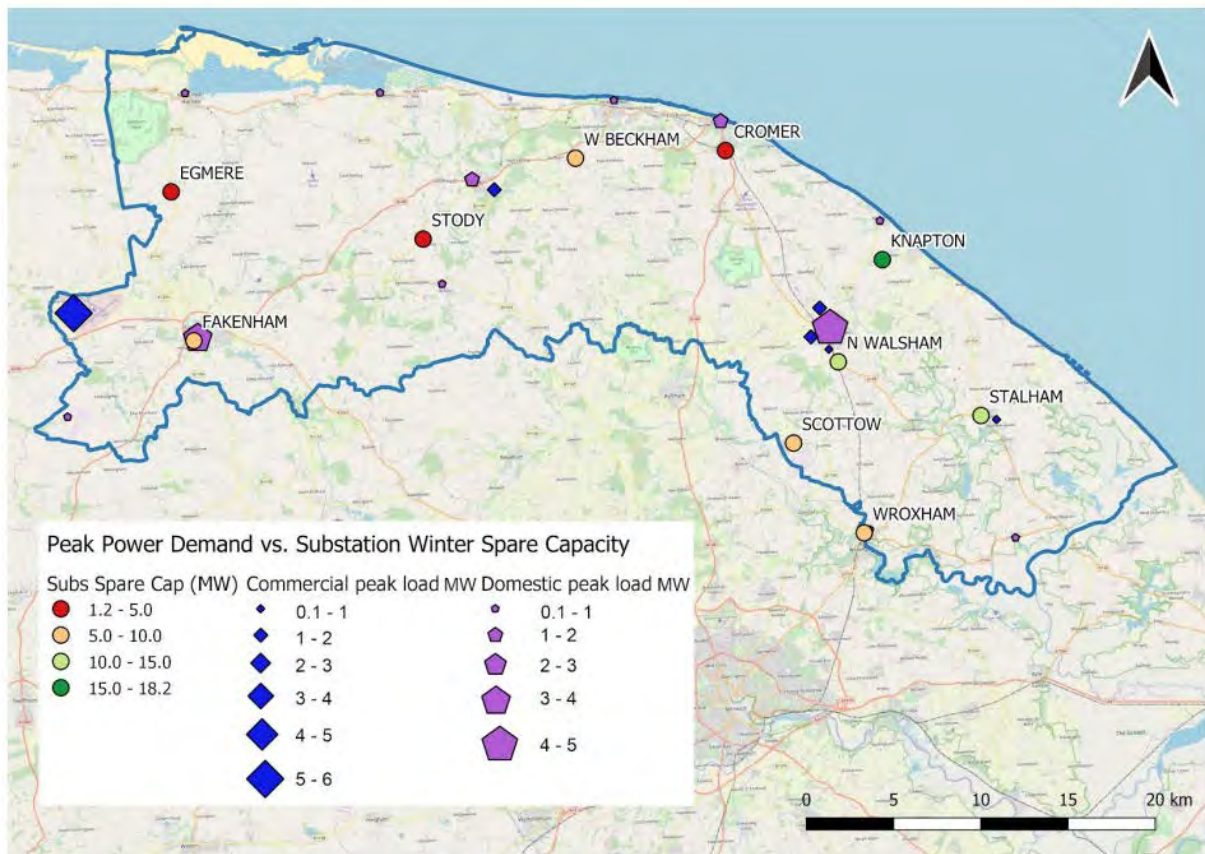


Figure 1: Development site demand mapped against winter spare capacity

[Greater Norwich Energy Infrastructure Study](#) (2019) - provide evidence in order for the emerging GN Local Plan to support development and the spatial distribution of growth. By reviewing existing energy demand for electricity, gas and heat we created and mapped a baseline across the region, identifying areas of the highest demand. Plans for development, both commercial and domestic, were also reviewed and the likely additional peak power demand was forecast, based on benchmarks and coming changes to government policy. The final important element is the capacity at each electricity substation across the region. These are the crucial parts of the infrastructure, which can dictate if development is possible or not. This shows the current load on these substations and does not account for 'reserved' capacity where part of the available headroom on the substation has already been committed to a future customer. The substations in green have no capacity issues, however there is only one on the map. Those in dark orange and red already have little spare capacity and will struggle to serve any additional development without any mitigation measures.

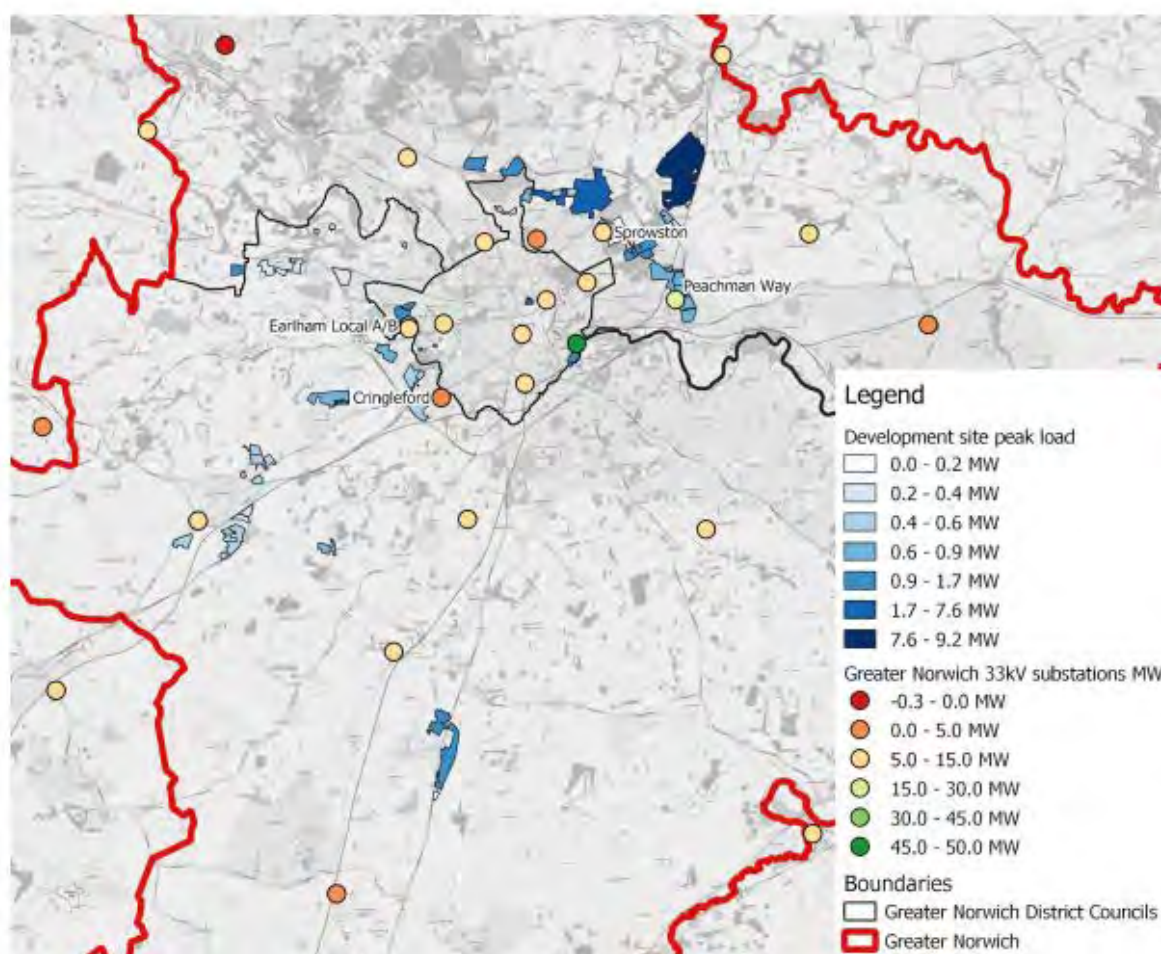


Figure 1: Planned development sites and existing substation spare capacity within Greater Norwich

The [Great Yarmouth Infrastructure Plan](#) 2020 says 'As part of the preparation of the Local Plan Core Strategy, UK Power Networks confirmed that there was sufficient headroom in the electricity distribution networks to accommodate the overall housing growth needs. No further site-specific requirements were identified in relation to the allocated sites in the Local Plan Part 2'.

No specific issues relating to gas and electricity are identified.

16. Health and social care

The NPPF says at para 20: 'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision¹³ (inter alia) community facilities (such as health, education and cultural infrastructure)'.

The NPPG says: 'Plan-making bodies will need to discuss their emerging strategy for development at an early stage with NHS England, local Clinical Commissioning Groups, Health and Wellbeing Boards, Sustainability and Transformation Partnerships/Integrated Care Systems (depending on local context), and the implications of development on health and care infrastructure'.

NHS England is not currently aware of a specific need for additional health facilities within the Broads Executive Area. There is currently sufficient capacity to cope with the existing populations in the area. Additionally, there is not at present, due to capacity reasons, a need to expand the health facilities outside the Broads Executive Area into the Broads Executive Area.

Should housing or population growth increase from the current levels, NHS England in conjunction with the relevant Integrated Care Systems (ICSs) would need to review the growth or projected growth to ensure that suitable facilities are available to meet the needs of patients within the areas. Where significant growth occurs, this could result in the requirement of future expansion of existing premises or the procurement of new facilities. Discussions would take place with existing practices. A business case would need to be reviewed based upon the information and proposals at the time.

Where significant housing growth is planned the NHS would be looking to secure appropriate Section 106 contributions to assist in mitigating the cost of providing such additional health infrastructure.

The Norfolk HUDU model provides estimates, based on different housing growth scenarios, for the additional health care needs required in Norfolk and Waveney to take account of projected growth. The figures are high level and contribute to understanding the potential strategic needs for ICS areas and are not intended to set requirements for specific developments.

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

The Broads Authority will work with other parties to fully understand the needs of the proposed housing numbers for Norfolk and Waveney.

At this stage, it is not proposed to have a specific policy on health facilities.

17. Education

The NPPF says at para 20: *'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision¹³ (inter alia) community facilities (such as health, education and cultural infrastructure)'.*

Para 100: *It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

a) give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and

b) work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Discussions with Suffolk and Norfolk County Councils indicate that there is not likely to be a requirement for any schools to expand into the Broads Authority Executive Area in this plan period. Future development proposals will be assessed as they emerge and seek S106 developer contributions if justified and satisfy the CIL 122 Regulations.

East Suffolk Council said the following regarding education as part of the technical consultation: If the Broads was to consider absorbing any housing of major scale in the Oulton area, then current primary school space challenges in the area (The Limes Primary School is very close to capacity) could be a significant issue.

At this stage, it is not proposed to have a specific policy on education establishments.

18. Places of Worship, Local Services (shops, pubs, post offices...) and Community Facilities

The NPPF says '88. *Planning policies and decisions should enable (inter alia), d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship*'.

The Local Plan will have a general policy for determining changes to and new community, visitor and recreation facilities.

Pubs will continue to have their own specific policy in the Local Plan.

Open space, allotment, play and sport field need is assessed by the Broads' constituent districts. They assess the entire district, including that which is the Broads. The need is translated into standards for open space and a policy in the Local Plan will defer to these policies.

Regarding the shopping area in Oulton Broad, a policy like that in the Waveney Local Plan will continue to be in the Local Plan.

Regarding shopping areas at Potter Heigham Bridge, the area will continue to have its own policy.

The Hoveton Town Centre policy will continue to be part of the Local Plan.

There are some policies on specific local services and facilities. Other policies in the Local Plan will help determine applications for other uses and facilities.

19. Police

Norfolk and Suffolk Police were contacted, through the Architectural Liaison Officers to confirm if the dwellings and residential moorings which could be planned for in the Local Plan raised any policing concerns. **The Local Plan will not cause any strain on the police services.**

There is no requirement for the Local Plan to address operational policing requirements.

20. Open Space and play, sport, recreation and Local Green Space

Currently, the Local Plan for the Broads seeks to protect open space and play identified on [policies maps](#) and seeks new provision in line with the standards of the districts. Further open spaces have been identified and will be protected in the Local Plan. Open space studies of our District Councils are as follows:

[Great Yarmouth Open Space Provision - Local Plan Topic Paper](#) (2020) – assesses the current open space and play provision and identifies open space requirements.

[North Norfolk Open Space Assessment](#) (2020) – assesses the current open space and play provision and identifies open space requirements.

[North Norfolk Amenity Green Space Study](#) (2019) - this is an appraisal of Open Space, Education & Formal Recreation Spaces, and Local Green Space options, in the Towns, Villages & Open Countryside in North Norfolk

[Waveney Open Space Needs Assessment](#) (2015) - The assessment includes an audit of parks and gardens, amenity green spaces, play spaces and allotments located within Waveney District (including those located in areas within Waveney District that are administered by the Broads Authority). Areas of biodiversity value have been identified and information relating to areas important to the biodiversity network has been collated and discussed. An overview of natural and semi-natural green space and cemeteries is provided and discussed in the context of the green infrastructure network and their contribution towards biodiversity. Green corridors that can support the movement of people and wildlife in the built-up areas of the District and habitats which provide key linkages in the green infrastructure network for people and wildlife are discussed. The River Wensum Strategy Delivery plan will be updated in early 2024.

[Waveney Playing Pitch and Outdoor Sports Facilities Assessment](#) (2014) - to identify the existing quantity and quality of pitches and outdoor sports facilities in Waveney district, identify areas with a deficiency or surplus of provision and to make recommendations for the provision, protection, and improvement for playing pitches and outdoor sports facilities across the district.

Norwich City Council is starting work on a park's regeneration strategy, and Greater Norwich are working on a new Green Infrastructure Strategy.

The [East Suffolk Leisure Strategy](#) was published in Nov 2021 and covers open space as well as sports and leisure.

The Waveney GI Strategy will be partially replaced by the (currently emerging) Healthy Environments SPD - general design guidance included in the GI strategy will be superseded by the SPD, but the recommendations re meeting open space needs in specific areas are considered to still be in date. Consultation on the draft SPD runs until 10th January 2024 - [Draft Healthy Environments Supplementary Planning Document - East Suffolk Council, Strategic Planning Consultations \(inconsult.uk\)](#).

The [East Suffolk Cycling and Walking Strategy](#) was adopted in 2022.

The Local Plan will continue the policy approach of protecting and enabling provision of open space in line with the standards set by the districts.

In terms of leisure and sport, there are two sports centres in the Broads and these will have their own policies: Broadland Sports Club and Ditchingham Maltings Sports Ground.

Continue with policies on these two important sports centres in the Broads.

In terms of Local Green Space, the current sites were [assessed](#), alongside new sites put forward for consideration.

Some areas of Local Green Space will be allocated in the new Local Plan.

21. Green Infrastructure

The NPPF defines green infrastructure (GI) as ‘a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities’.

There are some policies already in the Local Plan that are particularly relevant to Green Infrastructure. For example, local green spaces and former railway tracks are protected and safeguarded, there are policies specifically on Green Infrastructure and recreational access around the Broads.

The following studies are of relevance. They are summarised and discussed below.

21.1 Integrated Access Strategy (2024)

One of the purposes of the Broads Authority is to promote the enjoyment of the Broads.

Footpaths and bridleways are important assets in the Broads. The main document that seeks to meet this purpose is the [Integrated Access Strategy](#). This seeks to meet the following key aims:

Land-based access – aims

- Provide appropriate information on access to recreational opportunities and interpretation about recreational sites.
- Maintain, improve, and promote sustainable modes of transport in and to the Broads by working with local authorities and transport providers.
- Support the development of cycle hire facilities, cycle security and routes in new locations for the benefit of boaters and land-based visitors.
- Identify and promote the development of new access routes to improve the connectivity of the existing public access network, including rights of way, permissive paths, and long-distance routes.
- Maximise and promote use of appropriate open access land under CROW Act 2000.
- Seek opportunities to increase provision for electric charging points for cars and bikes.
- Identify potential new bridleway routes that will allow riders to avoid dangerous road riding – including shared use routes suitable for horse riding, cycling, and walking.
- Assist partners in priority path maintenance in the Broads, where the Broads Authority can add value.

Land-to-water access – aims

- Support the development of paddle trails with appropriate land-based facilities in suitable areas.
- Identify appropriate locations where improved car parking, paddle storage, secure trailer parking and cycle storage would benefit users (e.g., at slipways).
- Seek opportunities to extend and formalise access to new areas of navigable water space by paddle craft where appropriate.
- Improve access to the water's edge and alongside water for the purposes of walking, angling (including angling platforms) and bird watching.
- Improve links from moorings to land-based facilities and visitor destinations.
- Improve and expand access points between land and water, including visitor moorings, staithes, safety moorings, canoe portages, ferries, and slipways, where possible.
- Work in partnership to protect staithes rights and access benefits they bring.
- Support provision of public boat trips which support accessibility.

Mooring and demasting provision – aims

- Improve the availability and accessibility of information to users on mooring opportunities, location details and facilities available.
- Maintain the free use of Broads Authority unstaffed moorings.
- Maintain a policy of no net reduction on publicly accessible mooring length directly managed by the Broads Authority.
- The Broads Authority should not enter leases for mooring sites that require the payment of annual fees higher than those recommended by the Authority's Property advisers.
- Promote most effective use of mooring space through double alongside or stern-on mooring at appropriate sites.
- Promote provision of charging points for vessel electric batteries for propulsion.
- Seek contributions/ establish charges for ancillary services e.g., water donation points, electricity provision from pillars.
- The Broads Authority will work to ensure wherever possible that the distribution of short stay moorings is a maximum of 30-minute cruising time apart (equal to 2 miles distance at 4mph).
- Seek to provide de-masting mooring opportunities at all four quadrants of low bridges.
- Adopt a range of mooring design options which offer value for money where access to land is not essential.
- Increase the proportion of moorings with design features allowing greater range of usability, accessibility, low freeboard, etc.

The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in this strategy.

21.2 River Wensum Strategy

The vision of this strategy is to ‘To breathe new life into the river by enhancing it for the benefit of all and increasing access to, and greater use of, this important asset. An enhanced river corridor, with its unique natural and historic environment, will once again play an important part in the growth and vitality of the city, strengthening the visitor economy and helping to give the city a competitive advantage in attracting inward investment’. The [River Wensum Strategy delivery plan](#) sets out the projects that have either been delivered or are planned.

The Local Plan will continue the policy approach of enabling delivery of the River Wensum Strategy.

21.3 Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (RAMS) and Norfolk RAMS

Whilst access to the countryside and coast are important for people in terms of physical and mental health and wellbeing, if it is not managed, there could be likely significant effects on the protected sites in the area. Recreational impact has been identified as an issue that needs addressing at all the protected sites in Norfolk and the coastal protected sites in Suffolk. That is why the Broads Authority, like other relevant local planning authorities, is collecting tariffs from holiday homes and residential dwellings (as well as other types of relevant development) to pool with money from the other authorities, to mitigate likely significant effects on protected sites. This money will then be spent on both capital and revenue projects at the protected sites to help protect them.

More information can be found here: [Habitat mitigation \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/habitat-mitigation)

The Local Plan will need to ensure the collection of the tariff and delivery of mitigation.

21.4 Relevant district documents

Some of our constituent districts have produced Green Infrastructure Studies and these may be relevant to the Broads. The ones in place (or being produced) at the time of writing are included below.

[Greater Norwich Local Plan Green Infrastructure Study Report \(2020\)](#) - Discusses potential improvements in some areas near to or within the Broads.

[Waveney Green Infrastructure Strategy](#) (2015) – looks into play, green corridors and churchyards for example. Discusses potential improvements in some areas near to or within the Broads.

[East Suffolk Cycling and Walking Strategy](#) (2022) – Some of the proposals are within the Broads and are generally supported.

The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in these documents, as relevant.

21.5 Biodiversity Net Gain

Whilst not an infrastructure item itself, the net gain requirement could produce more green infrastructure and habitats.

The Local Plan will ensure the requirements of Biodiversity Net Gain are met.

22. Blue Infrastructure

Water is a key aspect of the Broads and one of the purposes of the Broads Authority is to protect the interest of navigation. The Local Plan for the Broads includes various policies to protect and support appropriate enhancements to access to and enjoyment of the water (blue infrastructure). Particularly important is moorings, slip ways, waterside facilities and water quality (as discussed earlier in this document). Particularly important is the Integrated Access Strategy (see previous) as that highlights the importance of improved links between land and water and to the water's edge.

The Local Plan will continue the policy approach of protecting navigation and enabling appropriate improvements.

23. Developer contributions

NPPF para 35 says: *'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan'.*

It should be noted that the Levelling up and Regeneration Act 2023 seeks the introduction of an Infrastructure Levy to replace Section 106 and Community Infrastructure Levy. It is understood that trials will be ongoing and it could be a number of years before this Levy comes into place. The Authority will keep informed of progress.

For affordable housing need, we have regard to/defer to the affordable housing policies of the relevant district council. As stated in earlier sections, there are no specific requirements relating to education and health. Policies will be in place to address green and digital infrastructure. In terms of transport, we will work with the Highways Authorities to understand any local impact each allocation needs to address. There are policies in the local plan relating to flood and water management and these will set out requirements for developers. There will be a whole plan viability assessment completed as well.

24. Summary

- 1) At the time of writing, the district councils have not asked the Broads Authority to include specific infrastructure in the emerging Local Plan. We will continue to work closely with the District Councils.
- 2) As the Local Plan is produced, we will ensure it addresses the agreements set out in the NSPF.

- 3) The main large-scale infrastructure identified that is particularly relevant to the Broads, is the dualling of the Acle Straight. The current local plan has a policy on the Acle Straight and this will be rolled forward.
- 4) Development in the Broads may require local specific infrastructure. The Utilities Site will require significant infrastructure and that site is part of a wider regeneration area subject to a Masterplan and emerging SPD.
- 5) It is not proposed to set a standard for electric vehicle charging points in the new Local Plan for the Broads although there will be a policy relating to fire risk and the design and location of charging points.
- 6) The scale of growth proposed will not have strategic transport impacts. There may be some more local highway changes or improvements that could be needed because of schemes. We will contact the relevant Highways Authority regarding any allocations that are proposed. We will ensure we keep up to date with any relevant documents and strategies.
- 7) There is a policy that relates to telecommunications infrastructure emphasising the importance of addressing impacts on landscape in the Broads. The Local Plan will reflect the NSPF.
- 8) At this stage, the Authority is not aware of any specific security related issues that the Local Plan needs to address. Norfolk and Suffolk Architectural Liaison Officers are consulted at all stages of producing the Local Plan and their responses will be considered and addressed as appropriate.
- 9) The Local Plan will roll forward the current general support of the waste hierarchy as well as ensure any waste allocations in the Local Plans are considered. There is potential to improve reference to construction waste.
- 10) The Authority will continue with the 110l/h/d water usage requirement for new development. We will explore the potential to go lower than 110l/h/d. The Authority will introduce 90 l/h/d water usage for new residential development. The Authority will introduce requirements relating to water usage of non-residential development.
- 11) The Authority will address water quality in the Local Plan. The Authority will keep updated regarding Horning Knackers Wood Water Recycling Centre. The Local Plan will reflect Nutrient Neutrality. The Local Plan and Planning Team will use the information provided by Anglian Water Services in relation to Water Recycling Centres.
- 12) The NPPF, current and new Local Plan policies and current Flood Risk SPD will enable flooding and flood risk to be addressed.
- 13) There is a policy relating to the coast which generally supports the Shoreline Management Plan's approach. A Coast SPD has been produced.
- 14) Many current allocations in the Local Plan are partially on safeguarded minerals (sand and gravel) resource and this is identified. This approach is intended to be continued.

- 15) See separate Renewable Energy Topic Paper.
- 16) No specific issues relating to gas and electricity are identified.
- 17) At this stage, it is not proposed to have a specific policy on health facilities.
- 18) At this stage, it is not proposed to have a specific policy on education establishments.
- 19) There are some policies on specific local services and facilities. Other policies in the Local Plan will help determine applications for other uses and facilities.
- 20) There is no requirement for the Local Plan to address operational policing requirements.
- 21) The Local Plan will continue the policy approach of protecting and enabling provision of open space in line with the standards set by the districts.
- 22) Some areas of Local Green Space will be allocated in the new Local Plan.
- 23) The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in this strategy.
- 24) The Local Plan will continue the policy approach of enabling delivery of the River Wensum Strategy.
- 25) The Local Plan will need to ensure the collection of the tariff and delivery of mitigation.
- 26) The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in these documents, as relevant.
- 27) The Local Plan will ensure the requirements of Biodiversity Net Gain are met.
- 28) The Local Plan will continue the policy approach of protecting navigation and enabling appropriate improvements.
- 29) For affordable housing need, we have regard to/defer to the affordable housing policies of the relevant district council. As stated in earlier sections, there is no specific requirements relating to education and health. Policies will be in place to address green and digital infrastructure. In terms of transport, we will work with the Highways Authorities to understand any local impact each allocation needs to address. There are policies in the local plan relating to flood and water management and these will set out requirements for developers. There will be a whole plan viability assessment completed as well.

Appendix 1: Responses received as part of technical consultation

Organisation	Comment	Response
Norwich City Council	Line 29: Should this also refer to the Infrastructure Investment Fund, 5-year Infrastructure Investment Plan and Greater Norwich Infrastructure Plan documents?	Noted and text added to reflect this.
Norwich City Council	Sections 20 and 21 – Norwich City Council is starting work on a parks regeneration strategy, and Greater Norwich are working on a new Green Infrastructure Strategy. Might be helpful for these sections to make reference to these as emerging documents.	Noted and text added to reflect this.
Norwich City Council	Section 20 – Just bringing to your attention that the River Wensum Strategy Delivery plan will be updated in early 2024 so the link to this document may need updating once this has been done	Noted and text added to reflect this.
Norfolk Police and Suffolk Police	Only additional comments we have would have are to include SBD Security principles into some industry aspects such as boat yards, leisure/amenity spaces and caravan/lodge sites (if any).	Noted. We have included such reference in some draft policies of the Local Plan. No further action for this document.
Norfolk Police and Suffolk Police	Just to make you aware that the police may also have 'operations' in place for flooding management, so perhaps a nod to Partnership working.	
Norfolk Police and Suffolk Police	We have already commented regarding SBD principles within the Design guide for housing so that is covered I think.	Noted. We have included such reference in some draft policies of the Local Plan. No further action for this document.

Organisation	Comment	Response
Norfolk Police and Suffolk Police	With regarding to strains on policing any significant developments (over 100 houses) we would forward to our estates for CIL applications to help support with infrastructure to help support policing bigger areas, however if you are looking at 17 houses per year then I do not think that too much of a worry.	Noted.
Norfolk County Council – LLFA	Various comments and suggested track changes.	Most comments and track changes resulted in changes.
Norfolk County Council – Public Health	Reference to the County Councils ‘Walking, Wheeling and Cycling Strategy for Norfolk’ should be included in the transport section (currently available as a draft for consultation). CCGs have been replaced by ICSs which needs to be updated. Section 106 and CIL section (line 956 – 958) needs an update. Health infrastructure is not eligible for CIL as outlined in the Greater Norwich Infrastructure Plan.	Most comments and track changes resulted in changes.
Norfolk County Council – Minerals and Waste	Various comments and suggested changed.	Most comments and track changes resulted in changes.
Norfolk County Council – Education	Section is correct.	Noted.
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	NGET does not distribute electricity to individual sites and premises directly. It is the role of local distribution companies to distribute electricity to homes and businesses.	Noted.
Avison Young on behalf of National Grid Electricity Transmission	Specific development proposals within your local planning authority area are unlikely to have a significant direct effect upon NGET’s electricity transmission system. Generally, improvements to the system	Noted.

Organisation	Comment	Response
and National Gas Transmission.	to provide supplies to the local distribution network are as a result of overall regional demand growth rather than site specific developments.	
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.	Noted and changed.
Anglian Water Services	10.2 Might be worth mentioning here the government's Environmental Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress.	Noted and changed.
Anglian Water Services	10.3 We welcome this statement and hope the emerging Joint Protocol and supporting evidence base will assist with this.	Noted.
Anglian Water Services	10.1 Agree - revised draft is available on our website and a summary of WRMP has been sent via email to all LPAs. https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/	Noted.
East Suffolk Council	<u>Ch 2.</u> Reference here should be made to the annual Infrastructure Funding Statements that district councils prepare, as they update infrastructure items and/or costs (including whether some such costs are S106 or CIL funded). See https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/ for ESC's 22/23 IFS.	Reference to IFS added.

Organisation	Comment	Response
East Suffolk Council	<u>Ch 10.</u> Not in East Suffolk, but the strategic significance of Whitlingham WWTW appears to be under-played in the document, given its large size, huge catchment area, impact on nutrient neutrality etc.	Noted, but the section refers adequately to all Water Recycling Centres. No change.
East Suffolk Council	<u>Ch 11.</u> It does not directly affect the Broads, but the Lowestoft Tidal Flood Barrier project is probably worth a mention as the impacts will stretch into Oulton Broad and close to the BA boundary.	Reference added.
East Suffolk Council	<u>Ch 16.</u> Given Greater Norwich's general resistance to spending CIL on healthcare infrastructure, this might need to be considered further. As the Broads is not a CIL charging authority, it should probably be clearer that any healthcare infrastructure contributions would need to be generated via S106.	Section amended following comments from Norfolk County Council.
East Suffolk Council	<u>Ch 17.</u> If the Broads was to consider absorbing any housing of major scale in the Oulton area, then current primary school space challenges in the area (The Limes PS is very close to capacity) could be a significant issue.	Reference added to this issue.
East Suffolk Council	<u>Ch 18.</u> The recent use classes change introducing Class E means that any Oulton Broad shopping area policy would obviously need to reflect this.	Noted and this has been done.

Organisation	Comment	Response
East Suffolk Council	Ch 20. Sports and recreation doesn't appear to be mentioned as a standalone topic (recreation gets a few passing mentions) but it probably should, given the Broads' key status as a recreation destination and because some sports facilities may be close to – or even in – the BA area. The East Suffolk Leisure Strategy was published in Nov 2021 and covers open space as well as sports and leisure: https://www.eastsuffolk.gov.uk/assets/Leisure/East-Suffolk-Leisure-Strategy/East-Suffolk-Leisure-Strategy.pdf. The Waveney GI Strategy will be partially replaced by the (currently emerging) Healthy Environments SPD - general design guidance included in the GI strategy will be superseded by the SPD, but the recommendations re meeting open space needs in specific areas are considered to still be in date. Consultation on the draft SPD runs until 10th January 2024 - https://eastsuffolk.inconsult.uk/DraftHESPD2023/consultationHome. The East Suffolk Cycling and Walking Strategy was adopted in 2022 (https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/).	Agreed and reference made.

Planning Committee

18 July 2025

Agenda item number 14

Consultation responses

Report by Planning Policy Officer

Summary

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

This report includes the responses submitted to consultations that ended before the Planning Committee meeting.

Recommendation

To note the report and endorse the proposed responses.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with officer's proposed response.
- 1.2. Appendix 2 shows the consultation responses that have already been sent in. This is because the deadline was before the July Planning Committee or because the consultation was technical. Some of these were sent to Members by email for their comments before being sent in. They are included for information only.
- 1.3. Appendix 3 shows a consultation that is important for Members to note, but that no response is proposed.
- 1.4. The Committee's comments and endorsement are invited.

Author: Natalie Beal

Date of report: 17 June 2025

[Appendix 1](#) – Planning Policy consultations received and proposed responses

- [Defra - Biodiversity net gain for nationally significant infrastructure projects](#)
- [Defra - Improving the implementation of Biodiversity Net Gain for minor, medium and brownfield development](#)
- [MHCLG - Reform of planning committees: technical consultation](#)

Appendix 2 – Consultation responses sent in – for information only

- [MHCLG - Planning Reform Working Paper: Speeding Up Build Out](#)
- [Filby Neighbourhood Plan Review 2024](#)
- [Broadland and South Norfolk district-wide Design Codes](#)
- [MHCLG - Implementing measures to improve Build Out transparency: Technical consultation - GOV.UK](#)
- [DESNZ - Solar on car parks and electric vehicle charging: call for evidence](#)

Appendix 3 – consultations that we propose no response to

- [MHCLG - Planning Reform Working Paper: Reforming Site Thresholds](#)

Appendix 1 – Planning Policy consultations received

DEFRA – BNG for nationally significant infrastructure projects

Document: [Biodiversity net gain for nationally significant infrastructure projects - Defra - Citizen Space](#)

Due date: 24 July 2025

Proposed level: Planning Committee Endorsed

Notes

The government is seeking views on the implementation of biodiversity net gain (BNG) for nationally significant infrastructure projects (NSIPs).

The government is committed to achieving sustained economic growth to improve the prosperity of our country. The development of high-quality nature-positive infrastructure will support this mission.

BNG is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

The government propose introducing BNG for NSIPs from May 2026. This will provide a clear framework to ensure new major infrastructure developments leave biodiversity in a measurably better state than before development took place. This will contribute to the government's legally binding Environment Act 2021 targets for biodiversity and provide wider benefits for climate change adaptation and mitigation.

Proposed response

Question 2: Do you agree that the proposed model text provides sufficient information on the biodiversity gain objective?

If an LPA has a BNG level, adopted in the Local Plan, of more than 10%, perhaps 20%, how is this proposed to apply to NSIPs located in that area?

Question 4: Do you agree that the proposed model text, alongside the statutory metric user guide, provides sufficient detail on the process for calculating biodiversity net gain?

This needs to refer to 'at least 10%' in all places rather than just once.

Question 6: Do you agree with the proposal that all habitats within the development site boundary (i.e. the order limits) must be included in the pre-development biodiversity value?

Agree.

Question 8: Do you agree that the proposed model text provides sufficient information on delivering biodiversity net gain on-site, off-site and using credits?

The document says: 'Non-significant on-site enhancements Non-significant enhancements and retained habitats can be included in metric calculations to contribute to the post-

development biodiversity value. Although nonsignificant on-site enhancements do not need a legal agreement to secure their maintenance, it is expected that their biodiversity value will remain at approximately the same or higher value over 30 years’.

So how will non-significant BNG be secured? LPAs currently use LEMP type conditions or Unilateral Undertakings to secure this.

Also, what about the monitoring of these and any fees to cover costs?

Question 10: Do you think there needs to be a bespoke policy on delivering BNG where land is temporarily used for construction of NSIP schemes?

Yes, but still need to require BNG as the impact of a temporary use can still be permanent or negative. Perhaps the land needs to return to the baseline at the least?

There needs to be guidance on how long ‘temporary’ is.

Question 11: Do you agree that the proposed model text provides sufficient information on the wider considerations for delivering biodiversity gains?

LNRS are important to use and could benefit the BNG. We query the weak wording around using LNRS and suggest that you consider making it a stronger requirement. What is the point of the LNRS if it is not to be used?

Question 12: Do you agree that the proposed model text provides sufficient information on the following:

- a) Evidence for submission?**
- b) Decision making?**

The wording relating to engaging with LPAs is only ‘encourage’. Early engagement needs to be a ‘must’.

Question 13: Do you agree with the proposal to allow updated biodiversity gain plans to be submitted to the relevant local planning authority for approval after consent is granted?

What about payment to the LPA for doing this work?

What powers does the LPA have if there are issues with what is proposed?

Regarding any enforcement action needed by the LPA, what fee is payable to the LPA?

NSIP gives consent based on the BNG documents provided, but what if through the LPA they want to change it? What powers does the LPA have?

Need to clarify which LPA – the LPA where the NSIP is, or the LPA where the BNG is? BNG could be offsite in National Character Areas, and that could be another LPA.

What is the ‘relevant LPA’? Where the NSIP is or where the BNG is to be?

Page 41 – says ‘Off-site habitat compensation’ – how does that relate to BNG? Is this a mistake or is this straying into something different?

Question 14: Do you have any evidence for us to consider as part of our final impact assessment on implementing BNG for NSIPs?

The financial impact on the LPA in terms of the roles they take in NSIP BNG.

Question 17: Do you have any additional comments on the draft biodiversity gain statement or on the next steps that are not covered by the previous questions?

By bringing LPAs into the NSIP BNG role, there needs to be new burdens payment consideration given the potential size/impact of an NSIP the required resources to deal with this additional requirement could be high. Also, the potential to charge monitoring fees.

Question 18: Do you think there are any other topics that should be covered in BNG guidance for NSIPs?

The role of LNRS in NSIP BNG.

We do not understand this proposed guide: ‘the roles of developers, local planning authorities and statutory bodies in engaging with BNG’. Is this just for NSIP BNG or BNG in general?

DEFRA – Improving the implementation of BNG for brownfield development

Document: [Improving the implementation of Biodiversity Net Gain for minor, medium and brownfield development - Defra - Citizen Space](#)

Due date: 24 July 2025

Proposed level: Planning Committee Endorsed

Notes

BNG is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

The government wants to know what you think about the implementation of biodiversity net gain (BNG) for minor, medium and brownfield development.

This consultation includes options around extending exemptions, simplifying the small sites metric and increasing ease of access to the off-site market. It also addresses specific challenges for brownfield developments.

The government is committed to encouraging economic growth through new development, while also supporting nature recovery. The government thinks amending BNG within the planning system will help achieve this mission.

Proposed response

DEFRA need to use this consultation opportunity to sort loopholes of applicants coming in for permission and then starting their development, so they get out of BNG because it is a pre-commencement condition.

Question: Do you support the following statements (yes/no):

- I. No changes should be made to exemptions *no*
- II. Some changes should be made (please state which options you support with thresholds were applicable) *yes*
- III. All minor development should be exempt *no*

Question: Do you agree that the self and custom-building exemption should be removed and that it should be replaced with an exemption for a single dwelling house?

Disagree overall.

We agree that the self/custom build issue needs addressing. In terms of self-build, LPAs are seeing many schemes say they are self-build to get out of BNG (and CIL where applicable). There is so much debate in the PAS forum on BNG about securing BNG for self-build and then enforcing BNG if the self-build becomes a market dwelling. By exempting all one dwelling

schemes, this could result in the loss of much habitat and according to this proposal would not need BNG.

There are fewer self/custom builds coming forward than for 1 dwelling. So exempting 1 dwelling means more would be exempt.

We think that even 1 dwelling, be it self or custom build or market, needs to provide BNG. In the protected landscape of the Broads National Park we only have these smaller residential developments and the cumulative impact of not requiring BNG for them would therefore have a greater impact on this protected landscape.

Question: Do you agree with the proposal for a 0.1 hectare threshold?

This is quite a large plot for one dwelling. Perhaps it is common for schemes to be around 35 dwellings per hectare. That 0.1 hectare area could site around 3 dwellings. This threshold is too high for one dwelling.

Question: Do you agree the area de minimis threshold should be extended? If yes, which of the following thresholds do you think is most appropriate: • 50 square metres • 100 square metres • 250 square metres • Other threshold

If raise threshold, more land that is developed is not providing BNG. We recommend staying with 25 square metres. If you are to raise the threshold, we strongly recommend keeping it at 25 in protected landscapes because of the sensitivity of landscape and habitats.

Question: Do you think the BNG requirement should be removed for minor development (for example including up to 9 residential homes) provide evidence for your response where possible.

All minor development should be exempt goes too far. That is a lot of habitat that could be lost as set out above - In the protected landscape of the Broads National Park we only have smaller residential developments and the cumulative impact of not requiring BNG for them would therefore have a greater impact on this protected landscape.

Question: if minor development were to be exempted from BNG, do you agree that the de minimis threshold should be extended to cover other types of development outside of the minor development category having little or no impact on biodiversity?

No – it needs to go through the BNG metric process.

Question: Do you agree that parks, gardens and playing fields development, as defined above, should be partially exempt from BNG? Please give evidence where possible.

Until the impact of a scheme is assessed, you don't know what the impact is – so no.

If only part of a proposed new sports pitch is low distinctiveness area habitat and the rest is a higher distinctiveness, would the BNG be only for higher distinctiveness part or would the fact that some of it was on low distinctiveness mean no BNG at all across the site? That needs to be clarified in any future approach.

The consultation document only refers to if there are trees, shrubs or hedgerows being affected – there are other habitats that are of a higher distinctiveness than low distinctiveness that could be affected by schemes.

Allotment or garden could have high distinctiveness.

If you make this change for sports pitches, this could be the start of then applying this change to other schemes that affect low distinctiveness. Some changes proposed will undermine the point of it in the first place.

Question: Do you agree that development whose sole or primary objective is to conserve or enhance biodiversity should be exempt from BNG? Please provide evidence where possible, including examples of developments that you think would be exempted. If yes, do you think there should be an upper size limit?

Schemes need to go through the BNG metric process as it depends on what the baseline is.

Question: Do you agree that temporary planning permission should be exempt from BNG? Please provide evidence where possible, including examples of developments that you think would be exempted. If yes, do you agree with the 5-year time limit?

Temporary development should not be exempted. This is because the development still affects and displaces the habitat on site, even if it is temporary. Also, temporary planning permissions can be extended and repeated. Or indeed, they become permanent and as BNG is a pre-commencement condition, and the development will be there when applying for it to be permanent, no BNG will be applicable when the development becomes permanent.

As for 5 years – that is 5 springs and summers that a wild flower meadow would bloom to benefit pollinators – that is just an example.

Question: Do you think the SSM should be used for medium development?

The issue is the habitat affected rather than the scale of development.

Also, the SSM does not have to be filled out by an ecologist and that might be acceptable for minor development, but we query that for larger development.

Question: Do you think the SSM should be able to be used on sites with European protected species present?

No as SSM doesn't need a qualified person to fill it out which is a concern for sites with these species.

Question: Do you think the SSM should be able to be used on sites with protected sites present?

No as SSM doesn't need a qualified person to fill it out which is a concern for sites with these species.

Question: If these changes are taken forward, and the SSM is re-badged as a low impact metric. Do you think there should be any other restrictions on use of the SSM?

A section that asks for how the person filling it out is a competent person would be useful.

Question: Would relaxing the biodiversity gain hierarchy for minor development support small developers to deliver BNG more easily?

What is the harm in the applicant still proving they can't provide onsite? Once they have proved that, then the proposed changes could be applied and be useful.

Question: Should the Spatial Risk Multiplier be disapplied for minor development purchasing off-site units?

What is the harm in the applicant still proving they can't provide onsite? Once they have proved that, then the proposed changes could be applied and be useful.

Question: Should we allow alternative habitat delivery for the loss of Open Mosaic Habitat?

Agree and this seems logical. But there needs to be evidence to determine appropriateness of alternative habitat.

Question: Do you have any suggestions as to the habitat mosaic which may provide the same ecological benefits as OMH or the key considerations we should be incorporating?

There needs to be evidence to determine appropriateness of alternative habitat.

MHCLG – Reform of Planning Committees

Document: [Reform of planning committees: technical consultation - GOV.UK](#)

Due date: 23 July 2025

Status: Technical consultation

Proposed level: Planning Committee Endorsed

Notes

In the King's Speech, the government announced that it would modernise the way planning committees operate to best deliver for communities and support much needed development. In December 2024, the Ministry of Housing, Communities and Local Government (MHCLG) published [Planning Reform Working Paper - Modernising Planning Committees](#) to seek views on three proposed actions to reform planning committees:

- introducing a national scheme of delegation so there is greater consistency and certainty about which decisions go to committee;
- requiring separate, smaller committees for strategic development so there is more professional consideration of key developments; and
- introducing a requirement for mandatory training for all planning committee members so they are more informed about key planning principles.

The government's objectives for these reforms are to:

- a) encourage developers to submit good quality applications which are compliant with plan policies;
- b) allow planning committees to focus their resources on complex or contentious development where local democratic oversight is required and a balanced planning judgement is made;
- c) ensure planning committee members get the training and support they need to fulfil their duties effectively; and
- d) empower planning professionals to make sound planning decisions on those cases aligned with the development plan.

As part of the MHCLG's engagement on the working paper it held eight workshops and meetings with key stakeholders including local planning authorities and chairs of planning committees. The Head of Planning attended one on 8 January this year and raised the concern that National Parks should be considered separately in relation to the first two proposals. This engagement following the publication of the working paper provided MHCLG with invaluable insight from those working across the sector as well as views from the general public. The key findings were:

- most respondents could see the case for a scheme of delegation to provide more consistency and certainty, but there were differing views about the structure of such a scheme;
- there was little support for separate strategic development committees, however, there was strong support for smaller committees generally to improve the quality of debate;
- there was strong support for mandatory training of planning committee members to improve their understanding of planning.

After careful consideration of the responses, the government has included the following measures in the [Planning and Infrastructure Bill](#) which was introduced into Parliament on 11 March 2025:

- a new power for the Secretary of State to set out which planning functions should be delegated to planning officers for a decision and which should instead go to a planning committee or sub-committee;
- a new power for the Secretary of State to control the size and composition of planning committees; and
- a new requirement for members of planning committees to be trained, and certified, in key elements of planning.

The measures in the Bill are enabling powers and the detailed provisions will be set out in regulations to be brought forward following Royal Assent for the Bill. This consultation seeks views on what detailed provisions should be included in the regulations.

Proposed response

Delegation of planning functions

The Planning and Infrastructure Bill will, subject to parliamentary approval, give the Secretary of State the power, through regulations, to set out which planning functions should be delegated to planning officers for a decision and which should go instead to a planning committee or subcommittee¹.

1. [Note that these reforms do not apply to **national park authorities** and development corporation planning committees due to the different structure of their committees and the types of applications they deal with.](#)

Question 1: Do you agree with the principle of having a two tier structure for the national scheme of delegation?

Question 2: Do you agree the following application types should fall within Tier A?

- applications for planning permission for:
- Householder development

- Minor commercial development
- Minor residential development
- applications for reserved matter approvals
- applications for non-material amendments to planning permissions
- applications for the approval of conditions including Schedule 5 mineral planning conditions
- applications for approval of the BNG Plan
- applications for approval of prior approval (for permitted development rights)
- applications for lawful development certificates
- applications for a Certificate of Appropriate Alternative Development

Question 3: Do you think, further to the working paper on revising development thresholds, we should consider including some applications for medium residential development (10-50 dwellings) within Tier A? If so, what types of application?

Question 4: Are there further types of application which should fall within Tier A?

Question 5: Do you think there should be a mechanism to bring a Tier A application to committee in exceptional circumstances? If so, what would those circumstances be and how would the mechanism operate?

Question 6: Do you think the gateway test which requires agreement between the chief planner and the chair of the planning committee is suitable? If not, what other mechanism would you suggest?

Question 7: Do you agree that the following types of application should fall within Tier B?

a) Applications for planning permission aside from:

- Householder applications
- Minor commercial applications
- Minor residential development applications

b) notwithstanding a), any application for planning permission where the applicant is the local authority, a councillor or officer

c) applications for s73 applications to vary conditions/s73B applications to vary permissions

Question 8: Are there further types of application which should fall within Tier B?

Question 9: Do you consider that special control applications should be included in:

- Tier A or
- Tier B?

Question 10: Do you think that all section 106 decisions should follow the treatment of the associated planning applications? For section 106 decisions not linked to a planning application should they be in Tier A or Tier B, or treated in some other way?

Question 11: Do you think that enforcement decisions should be in Tier A or Tier B, or treated in some other way?

Questions 1-11 relate to delegation of planning functions reforms that are **not applicable to national park authorities** (see note 1 above).

Responding on behalf of a national park authority, question is not applicable

Size and composition of committees

30. The working paper sought views on whether it would be beneficial to introduce a requirement for local planning authorities to have smaller, dedicated committees to deal with strategic development applications.

31. Most respondents to the working paper felt that such a requirement was unnecessary as local planning authorities already had the power to form such committees and were doing so where it was needed. There was, however, strong support for having smaller committees generally to improve the quality of debate while recognising the need for political balance.

32. In light of the responses, the government does not intend to take a power to require strategic development committees at this time. We will instead use guidance to encourage local planning authorities to adopt such an approach where it would be beneficial.

33. We are, however, seeking a power in the Planning and Infrastructure Bill for the Secretary of State to set out requirements on the size and composition of committees³.

3. [Note that these reforms do not apply to mayoral combined authorities, the Greater London Authority, **national park authorities** and development corporation planning committees due to the different structure of their committees and the types of applications they deal with.](#)

Question 12: Do you agree that the regulations should set a maximum for planning committees of 11 members?

Question 13: If you do not agree, what if any alternative size restrictions should be placed on committees?

Question 14: Do you think the regulations should additionally set a minimum size requirement?

Questions 12-14 relate to size and composition of committees reforms that are **not applicable to national park authorities** (see note 3 above).

Responding on behalf of a national park authority, question is not applicable

Mandatory training for planning committee members

35. The government recognises that many local planning authorities in England already train their members, and there is good take-up of the membership training offered by the Planning Advisory Service. However, the approach to training is inconsistent and varies across the country. A recent survey by the Planning Advisory Service shows that 45% of respondents indicate they do not have a good understanding of planning and planning processes following a form of training, which indicates that there is scope for a more consistent and qualitative approach to training.

36. Our working paper therefore, sought views on introducing mandatory training for committee members. The proposal was strongly supported and we are taking this forward, subject to Parliamentary approval, in the Planning and Infrastructure Bill.

37. In terms of content, industry engagement showed broad support for a combination of national content (e.g. National Planning Policy Framework, other statutory guidance and regulations) and content driven by local context (including the local development plan). The local planning authority will have a role to play in the training process, as many do already. We will use best practices of these for further guidance.

38. Industry engagement was supportive of a hybrid form of training: a mixture of online and face-to-face elements to reflect committee members' circumstances. There was a strong emphasis on ensuring the training demystified planning jargon as far as possible, recognising that members have other responsibilities and are not expected to be planning experts.

39. We will work with local government and the wider planning sector to develop a national planning committee package which seeks to meet these ambitions following the outcome of the Spending review.

40. One key feature (which is incorporated into the Bill's provisions) is the need for a member to have some form of training certification to ensure they can only make committee decisions if they have been trained. There are two basic options:

- a national certification scheme which would be procured by MHCLG and involve an online test for certification; or
- a local based approach where the local planning authority provides certification

41. Our preference is for a national certification scheme as it ensures independence and reduces the burden on individual local planning authorities, however it is likely to mean that the certification is based on national content only. We are aware of different views on this matter and would like to hear views before developing the training package with the sector.

Question 15: Do you agree that certification of planning committee members, and of other relevant decisions makers, should be administered at a national level?

Yes, welcome the use of accredited training and the resulting certification of PC members at a national level. Need to ensure that training is readily available to ensure new members can participate in PC meetings in a timely fashion. Accept that a national scheme would not cater for local context and this would be covered by supplementary training to be undertaken by the LPAs (assume funding would be covered by the New Burdens Doctrine).

Delegated decision making

42. Alongside our reforms to modernise planning committees we are committed to ensuring that delegated decision making is effective and as consistent as possible across the country. That is why we are taking steps to:

- introduce an overhaul of the local plans system to ensure that each area has an up to date local plan in place, making them simpler to understand and use so that communities can more easily shape them and will allow for an easier application of local plans to decision making
- consult on a set of National Decision Making Policies and a revised National Planning Policy Framework later this year that will create a clearer policy framework for decision making
- to support skills and resourcing by empowering local planning authorities to set their own planning fees to cover costs of delivering a good planning applications service

43. We also have an existing framework to measure the decision making performance of local planning authorities. The planning performance regime covers decision making by both committees and delegated officer, looking at quality of decision making by measuring the proportion of total decisions overturns at appeal (as well as speed of decision-making). As part of our work to modernise the planning system and ensure it is delivering the outcomes communities want, we could consider reviewing the thresholds in the performance regime to support high quality decision making across both committee and officer decisions.

Question 16: Do you think we should consider reviewing the thresholds for quality of decision making in the performance regime to ensure the highest standards of decision making are maintained?

Agree with reviewing the targets although may want to consider the timing of any proposed changes to ensure that the reason for improvements are fully understood in relation to the wider planning reforms.

Question 17: For quality of decision making the current threshold is 10% for major and non-major applications. We are proposing that in the future the threshold could be lowered to 5% for both. Do you agree?

The percentage of Broads Authority non-major planning appeals allowed by PINs was well under the threshold at 1.6% in 2023/24 and 0.6% 2024/25. We therefore have no comment to make.

Appendix 2 – Consultation responses sent in – for information only

MHCLG – Speeding Up Build Out

Document: [Planning Reform Working Paper: Speeding Up Build Out - GOV.UK](https://www.gov.uk/government/consultations/planning-reform-working-paper-speeding-up-build-out)

Due date: 07 July 2025

Proposed level: For information

Notes - The website says:

This paper invites views on further action the government should take to speed up homes being built. It sits alongside the government's technical consultation on requiring transparency and accountability measures for build out rates on housing sites.

We know that slow build out is of great frustration to many local planning authorities and communities that rightly expect homes, infrastructure and services that have been promised as part of a planning approval to be delivered as quickly as possible. We also know that developers are responsive to commercial incentives and build out homes at a rate that is beneficial to their business and reflective of the wider economic environment.

This paper therefore invites views on options the government could pursue to ensure the right incentives exist in the housing market, and local planning authorities have the tools they need, to encourage homes to be built out more quickly. In addition to the transparency and accountability measures set out in the technical consultation, this includes incentivising and supporting models of development that build out faster, such as partnership models, greater affordable housing, public sector master-planned sites, and smaller sites. We also invite views on giving local authorities the ability – as a last resort – to charge developers a new 'Delayed Homes Penalty' when they fall materially behind pre-agreed build out schedules.

Submitted response

- *Consultation refers to 'Local Authorities'. Needs to say 'Local Planning Authorities'. Not all LPAs are classed as LAs.*
- *Will there be new burdens payments for the extra checks? Or will a fee be charged when applicants submit various things?*
- *What if the LPA does not have the inhouse expertise to check the reasons given for the delay? For example, viability? Can we charge the developer for independent assessment like we do at application stage?*
- *It is not just large sites that this is relevant to. Small sites, or even as small as one dwelling, on land that is brownfield or a redundant building that is an eye sore which could be being vandalised or perhaps is prominent in a protected landscape or even be a heritage asset, could benefit from these proposals – the community wants those sites improved as well. Anything submitted will be proportionate to the size of the scheme.*

Filby Parish Council

Document: [Filby Neighbourhood Plan Review 2024](#)

Due date: 30 June 2025

Status: Review of made Neighbourhood Plan – regulation 14

Proposed level: For information

Notes

This is the Reviewed Filby Neighbourhood Plan, which updates the current plan that was made in April 2022. The plan has been reviewed to ensure current resident views are well reflected; to update on progress against key actions and policy achievements; and so that it reflects important changes to both national and local plan policy.

Submitted response

Comments on NP

- Para 13 – a new Local Plan for the Broads is emerging too
- You may want to have a section about emerging Local Plans for GY and BA. You may want to caveat this saying that neither new Local Plans had been adopted at the time of writing. GY's may talk about Filby and expected housing numbers to be delivered in it and ours refers to Filby having a development boundary.
- Para 28 refers to April 2022 and monitoring – monitoring is undertaken annually and it is now May 2025. I would suggest this needs checking and updating.
- Para 32 – not just older people downsizing, but younger people getting on the housing ladder
- Para 33 – I would suggest the average based on one sale is not statistically relevant. I wonder if you need to focus on the last five years and say how many dwellings were sold and say what the average cost was.
- I do not understand the second sentence of para 35.
- Para 36 – can you be clear if this is housing that is affordable or affordable housing? Added to this, you say a few times in the plan that residents say there is no need for new housing in Filby. But this paragraph talks about demand for affordable housing. Affordable housing, as defined in the NPPF, tends to only come forward when new housing schemes come forward. Furthermore, the Government want a certain number of homes built around the country. I recommend you check what you are referring to here and check if the message through the plan is consistent.
- The last part of para 36 – how does that stance relate to rural exception sites which are located adjacent to development boundaries?

- Policy H1 – It is not clear, and has not been justified in supporting text, why only schemes of 5 or more dwellings need to provide a mix. Indeed, this seems contrary to what has been said elsewhere in the plan (for example para 32) where there is reference to the need for 1 or 2 dwellings and reference the survey that supports certain number of bedrooms in dwellings. A scheme of 3 or 4 could still have a mix of dwelling sizes. I recommend this is checked as at the moment it seems to be contrary to the evidence and stance of the plan elsewhere and there is no justification given.
- H1 para a – I think you might be talking about M4(2) building regulation standard here where you refer to being accessible and adaptable. But you don't talk about this in the supporting text and I recommend you do. You might also want to refer to the stance of the existing and emerging Local Plans. For example, the Local Plan for the Broads at the moment seeks 20% of dwellings over 5 to be M4(2) and the emerging Local Plan says 'All new homes must be designed and built to meet requirement M4(2) of Part M of the Building Regulations unless it can be robustly demonstrated it is not practicable to do so due to the physical characteristics of the site. The Authority encourages larger schemes to consider providing dwellings designed and built to meet M4(3). For schemes that will result in at least ten affordable housing units (in line with the affordable housing policy) 10% of the affordable housing provided on site will comply with requirement M4(3) of the building regulations unless it can be robustly demonstrated it is not practicable to do so due to the physical characteristics of the site. Where exemptions are sought on practicality grounds, the minimum number of units necessary will only be exempted from the requirements'.
- H1 – starts off saying that schemes of 5 dwellings need to do something but then linked to that are the bullet points and the first one says all dwellings need to do something... so as written, it kind of does not flow logically.
- H1 b – is that on schemes of 5 dwellings or more? But H1 a is about all dwellings? Please be clear.
- H1 last part – I think some words are missing as it does not read well. I am also not sure what this adds to national or local policy. For example, the current local plan for the Broads seeks off site affordable housing contributions from schemes of 6-9 dwellings. You refer to that in para 37, but I think this section needs checking and clarifying. The emerging Local Plan for the Broads seeks off site contributions as follows:
 - o Brownfield schemes located on the waterfront: 3-9 dwellings
 - o Other brownfield schemes: 5-9 dwellings
 - o Greenfield schemes: 3-9 dwellings.
- Para 45 – the BA has an adopted design guide SPD now.
- H2 – do you want to show the gap between settlements that you want to protect on a map?

- H2 – last bit talks about using water butts to collect surface water. You might want to say rainwater.
- Para 78 – we have Local Green Spaces identified in the Local Plan. And Open Spaces are mapped: [DM7 OPEN SPACES.pdf](#)
- Para 79 – I don't know what this means: Policy E3 does not prevent adjacent proposals
- Para 81 – I recommend referring to justifying the need for lighting in the first place, before then talking about the design.
- Para 84 – you refer to the emerging local plan for the Broads and it continuing to have a policy on dark skies. But GYBC emerging Local Plan also has a policy on dark skies and I think you should refer to that.
- Policy E4 – GYBC have an emerging policy on dark skies. You might want to refer to something about the rest of Filby as per the GYBC policy?
- Policy E4 – add: opportunities to create more dark skies and lower dawn to dusk lighting would be considered favourable.
- Policy E5 takes a slightly more lenient stance than adopted Local Plan policy SP4 which gives stronger protection to BMV soils. And the emerging Local Plan continues this stance. The NPPF seeks the protection and enhancement of soils. The NPPF2024 also says at footnote 65, 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality'. As such, I recommend you re-consider this policy stance.
- Policy E6 – did you want to say that SUDS need to be multi-functional?
- Images need to have alt text
- Para 105 – this does not make sense: There is a footway along one side of the main road through the village, though part footway along Ormesby Lane, which is narrow, for residents to gain access to the village centre
- Para 128 says 'Development in the Broads Authority area is not subject to CIL as they have their own charging schedule'. This is incorrect. There is no CIL in the Broads.
- Access for horse riders, particularly disabled riders from Croft Farm is missing and not identified as an opportunity.
- Policy E1 – The policy could reference BNG. Their statement prioritises connectivity which is good but any planning app would need to meet the BNG requirements where applicable, which may not always result in enhancements to wildlife corridors. As a spatial priority though, it is good to have in the policy – alignment with the Broads Nature Recovery Strategy would ensure everyone is working to the same spatial priority map.

Comments on Design Guide

- Page 16 and settlement edge. There is no mention of GYBC and our policy relating to settlement fringe. This is a mapped landscape character type and needs to be referenced.
- I am not sure about highlighting must, should etc – doesn't make sense to me. The whole instruction or guidance is important. You are emphasising the wrong thing. Strongly recommend don't bold those words. It is quite distracting and loses the message.
- Images need to have alt text
- Page 31 case studies – lots of glazing that would cause light spill from the internal lights and affect light pollution so I am not sure these are the best examples given the Local Plans x 2 seek to protect dark skies.
- Page 43 – GYBC have done some dark skies work. What does their emerging Local Plan say about the rest of Filby? And then the map needs to reflect that.
- Page 44 – needs to start with justifying why lighting is needed in the first place.
- Page 44 – needs to talk about the impact of glazed frontages and internal lights spill as a source of light pollution and how automatic dusk to dawn blinds will need to be installed.

Broadland and South Norfolk Councils

Document: [Broadland and South Norfolk district-wide Design Codes | Broadland and South Norfolk \(southnorfolkandbroadland.gov.uk\)](#)

Due date: 23 June 2025

Status: Third consultation

Proposed level: For information

Notes

Over the last nine months, Tibbalds has been working with South Norfolk and Broadland District Council to produce a Design Code that is reflective of the key design issues and priorities across the two districts, substantially informed by previous rounds of engagement with residents and stakeholder bodies that took place during summer and autumn 2024. Once adopted, the Design Code and associated documents will form an important part of the planning guidance for both authorities and will be used by site developers designing residential schemes, as well as the planning team when assessing submitted proposals.

Submitted response

Throughout – still no reference to design of lighting. Development is likely to be on the edge of settlements. Therefore, lighting needs to be fully justified and if required, well-designed. There is little, if any, mention of lighting in the document. This is relevant to all development types.

Pg 4 - the map shows the two districts and the Broads Area - it is not clear that the Design Code does not cover the BA area. It needs to reference our Design Guide and Code.

H15 – Low carbon heat and renewable energy generation – is there an expectation of going beyond the Future Homes Standard?

H15.1 – In the development aiming to be net-zero, are they including transport?

H16: “It should also tackle surface water flooding challenges and when needed improve the local water quality” - we note that you use ‘must’ in H16.1

There is going to be development on the edge of settlements that could impact the Broads. The Design Guide needs to consider this impact. We made similar comments as part of the Village Clusters Local Plan consultation. The impacts could be on long views, landscape character and dark skies (from any lighting). The Design Guide needs to address this issue.

A general issue is that it refers to the urban fringes and show lots of pictures of historic buildings/good design but doesn't acknowledge the suburbs and typical 1970s/1980s etc houses & bungalows which make up a large part of the housing stock e.g Hellesdon. These may not be regarded as good design, but they need to be noted and addressed as many applications will be in these areas.

Throughout the document - should use local examples.

Pg 22 of the Design Code refers to Horsted Park, Chatham - which is in Kent. Use St. Micheals, Aylsham instead.

Pg 10 shows photos of Somerset and Cambridge.

Same for pg 11 - Bradford/Winsford.

MHCLG – Measures for Build Out

Document: [Implementing measures to improve Build Out transparency: Technical consultation - GOV.UK](#)

Due date: 07 July 2025

Proposed level: For information

Notes

This technical consultation seeks to gather views on the introduction of a new statutory build out framework which requires information to be submitted at different stages of the planning and development cycle and the power to decline to determine applications, utilising provisions in the Town and Country Planning Act (TCPA) 1990 (including as inserted by the Levelling-up and Regeneration Act 2023 (LURA)).

Submitted response

Q.1. Do you agree that the build out reporting measures should apply to developments which involve the building of new dwellings (including mixed use development)?

Yes

Q.2. Are there any other types of residential development that the build out measures should apply to? If yes, please give your reasons.

Residential moorings

Q.3. Do you agree with the proposed threshold of 50 dwellings for the build out measures to apply to?

Disagree – should apply from one net new dwelling. Small sites, or even as small as one dwelling, on land that is brownfield or a redundant building that is an eye sore which could be being vandalised or perhaps is prominent in a protected landscape or even be a heritage asset, could benefit from these proposals – the community wants those sites improved as well. Anything submitted will be proportionate to the size of the scheme.

How would you address the potential for sites above the proposed 50 dwellings to be split into smaller applications to get around the proposed requirements?

Q.4. Do you think a higher threshold should be set for development progress reports and the power to decline to determine applications? If so what should this threshold be?

No. See answer to number 3.

Q.5. Do you agree that this information should be covered in the build out statements?

Yes

Q.6. Do you have any further comments on the build out statement?

On big schemes it will be difficult to predict or foresee all matters that may affect a timetable of works.

Q.7. Do you agree that this information should be covered in commencement notices?

Inclusion of a completion date seems to duplicate the build out statement, and from experience would be almost impossible to define before works started. How many resubmissions are thought to be acceptable, especially if they are in conflict with the build out plan? They would have to resubmit both plans so why not combine the build out and commencement documents into one. A fine for providing insufficient details will not make the development commence but delay it if an appeal process is available and may reduce the capability of the developer affording the development, particularly as finances become more finely balanced.

Q.8. Do you agree with setting a 2 month period after the reporting period ends to submit the development progress reports?

Yes

Q.9. Which option for the reporting period for development progress reports do you agree with?

Neither.

Why not have it starting 1 year after commencement? This would prevent the developer asking to be excused from the report if the development has commenced just before or just after the reporting period, or the lpa underenforcing the lack of report.

Q.10. We recognise the information in development progress reports may be useful for lpas to calculate 5 year land supply (5yls), are there any impacts with the reporting periods proposed and the interaction with 5yls?

Yes

Q.11. Do you agree with the proposals for how the completion date is specified for the purposes of development progress reports?

Yes

Q.12. Do you agree with the proposals about who submits the development progress report?

Yes

Q.13. Do you agree with the information it is proposed development progress reports will cover?

Yes

Q.14. Is there any other information you think development progress reports should cover?

No

Q.15. Do you have any views on how a joint approach to submitting a commencement notice could be facilitated on sites where multiple developers are involved?

Each phase should be reported by the main developer who starts. For multiple developers working on the same un-phased development, they would need to work together, maybe appointing a professional to represent them all.

Q.16. Do you agree with making provisions in the regulations that would enable a joint submission of the development progress report where multiple developers are involved?

Yes

Q.17. Do you agree that this information should be covered in development progress reports where a joint approach is taken?

Yes

Q.18. Do you have any views on what information other than in build out statements and development progress reports LPAs should have regard to when considering whether the carrying out of the earlier development has been unreasonably slow?

It would be have to be carefully considered whether the power to decline a new application for a development has failed is appropriate for a new unconnected developer who buys the failed site.

Q.19. Do you have any comments on the scope of the guidance?

The intention to speed up development and ensure completion may be compromised by the additional red tape proposed here.

Department for Energy Security and Net Zero

Document: [Solar on car parks and electric vehicle charging: call for evidence](#)

Due date: 18 June 2025

Status: Call for evidence

Proposed level: For information

Notes

The Department for Energy Security and Net Zero (DESNZ) is seeking evidence and feedback on a proposal to mandate the introduction of solar canopies on new outdoor car parks and explore opportunities for deployment on existing car parks, above a certain size; this includes car parks in both public and private ownership. We are considering, subject to this call for evidence, whether multi-storey car parks and residential car parks should be in scope. We also welcome evidence and feedback on other ways that government action could increase the deployment of solar canopies on outdoor car parks and views on what further changes can be made to the planning and permitting regime when installing electric vehicle chargepoints.

Submitted response

Solar on car parks:

Another benefit could be lighting would point downward and be contained under the canopy to some extent so perhaps benefit dark skies and reduce the impact of light pollution from car parks without solar panels, but that have lighting.

Mandating solar panel canopies is not appropriate for all car parks. For example, some car parks are designed or might need be designed to blend in using landscaping. So perhaps a canopy is not appropriate in some locations. Perhaps rural areas or conservation areas and maybe not everywhere in protected landscapes. By adding a canopy, the bulk of the car park becomes similar to a one storey building.

There may need to be some kind of assessment to ascertain the amount of sun a car park gets or will get to see whether a solar panel canopy will work. Shade from buildings on landscaping could cause issues.

Is a potential benefit management of surface water? Or indeed, would that need to be a design consideration? We are experiencing more rain bursts and will continue to do so, so dealing with the rain could be a benefit to solar canopies but also needs to be a requirement as part of their design.

Another benefit is the consumption of energy of the individual car on a hot day in terms of cooling the car – the car would have been in the shade so perhaps the air conditioning might not need to work as hard with benefits on fuel/energy consumption.

How would the Government's stance on mandating solar panel canopies over car parks sit with the Permitted Development Right that currently exists? Would that be removed? Or

would that stay – this will need clarifying. The considerations open to LPAs through the PD route are all relevant and need to be considered if they are going to be mandated.

Some remote car parks are unlikely to have a grid connection.

EV charging points

Risk of fire needs consideration. We hope to introduce a policy to ensure applicants place EV charging points where, if batteries caught on fire, it would not have a major impact. You need to talk to the Fire Service about this and national guidance is needed on this matter.

Many types of EV charging points have lights on that are superfluous but can impact dark skies of an area and the nocturnal character – they are a form of light pollution and often not needed. There are other ways to highlight the presence of them in the dark, perhaps with glow in the dark products. Anything put in place must address needless lighting on EV points that cannot be turned off and cause glare, light spill and light pollution and affect nocturnal character to the detriment of people and wildlife.

The location and design of such points can impact landscape character and heritage assets and so this needs to be considered and addressed.

Appendix 3 consultations that we propose no response to

MHCLG – Reforming Site Thresholds

Document: [Planning Reform Working Paper: Reforming Site Thresholds - GOV.UK](#)

Due date: 09 July 2025

Proposed level: For information

Notes

This working paper seeks views on reforming site size thresholds in the planning system to better support housing delivery on different types of sites. This means taking a graduated approach to the system as a whole – removing and streamlining disproportionate requirements on small and medium sites, while maintaining and strengthening requirements on major development. It explores how different site sizes should be treated within the planning system and considers the case for removing barriers specific to developers in this part of the sector.

The paper primarily explores the simplification of planning requirements for the smallest of sites and the introduction of a medium-sized site threshold within the planning system – in recognition of the particular needs of this scale of development. These changes aim to provide certainty to the sector, ensure the planning system is more targeted and proportionate across different scales of development, and help small and medium builders (SMEs) deliver the homes our communities need. This supports a key objective of our Long-Term Housing Strategy to diversify the housing market and deliver a reformed housebuilding system, which will be set out in full later this year.

The main changes proposed are to bring a medium category into the site thresholds for development:

- **minor** – will be taken to be anything which does not fall within either medium or major definitions (i.e. sites under 10 dwellings or less than 0.5ha if no number is known)
- **medium** – where the number of dwellings to be provided is between 10 and 49; and the site is less than 1 hectare (and if there is no known number of dwellings, the site is between 0.5 and 1 hectares)
- **major** – where the number of dwellings to be provided is 50 or more or the site is more than 1 hectare

Submitted response

No response proposed as this will not impact on the Broads area.

Heritage Asset Review Group

Notes of the meeting held on 13 June 2025

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Present

Harry Blathwayt – in the Chair, Peter Dixon, Andrée Gee, Tony Grayling, Tim Jickells, Gurpreet Padda, Michael Scott and Matthew Shardlow

In attendance

Jason Brewster – Governance Officer, Kayleigh Judson – Heritage and Design Planning Officer and Kate Knights – Heritage and Design Manager

1. Notes of HARG meeting held on 21 March 2025

The notes of the meeting held on 21 March 2025 were received. These had been submitted to the Planning Committee on 4 April 2025.

2. Historic Environment Team progress report

The Heritage and Design Manager (HDM) and the Heritage and Design Planning Officer (HDPO) presented the report providing an update on progress with key items of work by the Heritage and Design Team between the end of 22 March and 13 June 2025.

Conservation areas – update

Neatishead Conservation Area

Neatishead Conservation Area Appraisal (CAA) had been completed and then approved by the Planning Committee on 2 May 2025.

Coltishall and Horstead Conservation Area

The next CAA to be undertaken by the Authority would be of the Coltishall and Horstead Conservation Area, which was last appraised in 1983. This conservation area included parts of the executive areas of both the Broads Authority and Broadland District Council (as indicated by a map of the conservation area). The Authority had agreed, in conjunction with Broadland District Council, to lead this appraisal.

Other conservation areas

The Authority were also consulted on CAAs being undertaken by neighbouring district councils. The Heritage and Design Team (HDT) had been in discussions regarding the Bracondale Conservation Area which was last appraised by Norwich City Council in 2011 and included parts of the former Carrow Works site. The intention was to bring the current appraisal up to date and, given the scope of the East Norwich regeneration plan, to increase the boundary of the conservation area to include a larger area of the former Carrow Works site and include more of the river. Additional buildings on the Carrow Works site had been listed by Historic England in the last couple of years. A Member asked whether the East Norwich regeneration plan would complicate this appraisal. The HDM responded that the appraisal would assess the existing structures to identify what is and what is not of significance and, ideally, the resulting assessment would inform the development proposals.

East Suffolk Council (ESC) had commenced an appraisal of the Somerleyton Conservation Area previously appraised in 2011. Only a small fraction of this Conservation Area fell within the Broads Executive Area, however this area included land historically utilised by the local brick works, an important heritage site, to gain access to the River Waveney. This heritage site and other areas of significance near the marina were not well reflected in the conservation area and these areas had been highlighted by the HDT during initial discussions with ESC regarding the CAA. ESC would likely be re-appraising the Beccles Conservation Area in 2026.

Beccles Article 4 Direction

As discussed at the previous HARG meeting (21 March 2025) the Article 4 Direction (A4D) at Beccles had undergone a public consultation and would return to the Planning Committee on 18 July 2025 for approval. An A4D provided a mechanism for restricting permitted development rights on residential properties in the context of particular sites and/or areas and, in the context of a Conservation Area, could be used to restrict works that may otherwise be detrimental to the amenity of an area. The Authority proposed to reduce the area covered by its A4D which would see the removal of the southern part of Puddingmoor from the Article 4. Areas of the A4D to the north and west that covered open space would also be removed (a map was presented illustrating the truncated A4D area). A review of restrictions associated with the A4D had resulted in the removal of both a restriction relating to the installation of satellite dishes and a restriction associated with painting the exterior of a residential dwelling.

Listed buildings

Quinquennial Survey

In response to a question the Heritage and Design Team Manager confirmed that the quinquennial survey included the designated heritage assets of Listed Buildings and Scheduled Monuments however other designations, such as Registered Parks and Gardens and Conservation Areas, were excluded.

Since March 2025 a number of buildings had been surveyed including (the assessments were provided during the post-meeting walking tour):

Foundry Bridge, Norwich: A single-span, Grade II listed iron bridge built in 1880. The bridge was found to be in sound condition but would benefit from repainting to prevent deterioration of the metalwork. The abutments had vegetation growth which needed to be removed.

Bishop Bridge, Norwich: A Grade II* listed bridge and scheduled ancient monument circa 1340 onwards consisting of three spans of segmental stone arches on piers. The listing included the parapet with semi-circular return at west end and wrought-iron lamp-standard on north side. The bridge appeared to be in a sound condition although it would benefit from removal of vegetation. Repointing was required of the stone masonry on the south west abutment and the brickwork on the flanking wall of the bridge to the north east.

Fye Bridge, Norwich: A Grade II listed brick and stone bridge rebuilt in 1933. This location had a history of bridges dating back to the early 12th century. The bridge condition was generally sound. There may have been a boat strike to the stone stringcourse on the north east corner of the bridge.

Blackfriar's (or St George's) Bridge, Norwich: A single-span, Grade II listed bridge built in 1784 using Portland Stone with iron balustrades. The structure was found to be in sound condition.

St Miles Bridge, Norwich: A single-span, Grade II listed cast iron bridge built in 1804. Possibly the oldest metal bridge in East Anglia and of simple construction with iron panels bolted together. The metal work had some graffiti and signs of small areas of corrosion so would benefit from redecoration.

Enforcement

Manor Farmhouse, Ashby with Oby

The Heritage and Design Planning Officer (HDPO) provided an update on Manor Farmhouse that had a Listed Building Consent (LBC) to replace UPVC windows and doors with timber equivalents. This had been a long running matter and the original owner, having been granted a 10 year compliance period, had managed to replace two windows in eight years. This property subsequently changed ownership in 2022 and the new owners had agreed to complete the remaining work associated with the LBC to the existing deadline. This work had been successfully completed, as indicated in photographs of the property. The owners had commenced remedial work to the exterior painted brickwork to replace the modern paint with a porous equivalent.

In response to a question the HDPO confirmed that the Authority's Planning Enforcement Officer (PEO) would continue to monitor properties that had successfully completed compliance work. In this case the PEO's visits provided a useful mechanism by which the owner could communicate with the Heritage and Design Team.

Holly Lodge, Coltishall

The Heritage and Design Manager (HDM) reminded Members of a Listed Building Enforcement Notice served at Holly Lodge, Coltishall requiring the removal and replacement of the existing UPVC windows which had been installed without listed building consent. The owner had subsequently lodged an appeal and the Authority was waiting the date for the Planning Inspector's site visit.

Matters for information

The Heritage and Design Manager (HDM) provided updates on recent appeal decisions that related to heritage assets.

Appeal decision APP/E9505/D/24/3346992: 6 Bureside, Skinners Lane, Wroxham

The appeal property was a large detached late Victorian house characteristic of the larger Broads' riverside houses in the area, set in large grounds by the riverside. It was sited within the Wroxham Conservation Area, was referred to in the Wroxham Conservation Area Appraisal as 'one of the grandest late Victorian houses in the village' and was a locally identified heritage asset. The proposal was to replace single glazed timber windows and doors with double glazed UPVC. As indicated in the photographs, the existing windows had a lot of detail that would not have been replicated by the replacement windows, with the dimensions of the UPVC glazing bars being deeper and wider than the existing wooden versions. The Authority had refused permission concluding that the development failed to preserve and/or enhance the Wroxham Conservation Area, the use of UPVC would form an inappropriate feature on the building, disrupting the traditional use of materials in the locality and the use of UPVC would cause 'less than substantial' harm to the character of the conservation area. The Planning Inspector supported the Authority's decision, stating that "UPVC is a modern material that unlike timber frames, would not soften in appearance through weathering. The proposal would introduce modern materials that would appear as incongruous architectural features within the historic fabric of the host dwelling". The appeal was dismissed.

A Member asked whether builders, when asked to replace timber framed windows with UPVC equivalents, would be able to advise on the possible need for planning permission. The Heritage and Design Manager responded that the approach to UPVC windows varied between Local Planning Authorities and a builder may not be aware of the Authority's stricter stance and/or the boundary of the Authority's Executive Area.

Appeal decision APP/E9505/W/25/3359289: Manor Gates Garden, Staithe Road, Ludham

The proposal sought retrospective approval for a boat cover which had already been erected over a single boat mooring within a private dyke running west of Womack Water up to Staithe Road in Ludham. The appeal site was located within an area of wet woodland alongside the dyke that formed part of the extensive detached grounds of Manor Gates, a property located on Staithe Road. The boat cover consisted of a tubular steel frame covered with heavy duty

drab olive brown vinyl which the Planning Inspector had described as “reminiscent of a scout tent or temporary shelter”. The Planning Inspector strongly supported the Authority’s decision to refuse retrospective permission referring to impacts not just within the Ludham Conservation Area but included the Broads protected landscape and, despite the development not being visible from a public vantage point, concluded that it still had an adverse impact on the conservation area.

3. Any other business

Suffolk County Council appointment to the Broads Authority

The Authority had been informed that Melanie Vigo di Gallidoro had stood down as Suffolk County Council’s representative to the Broads Authority. Melanie had been a Member of the Authority since June 2017 during which she had been a member of both HARG and the Planning Committee. Melanie chaired HARG from November 2017 until September 2021 and chaired the Planning Committee from April 2018 until September 2022. The Chair thanked Melanie for her hard work and dedication to the Authority adding that the Authority would miss her greatly.

Last meeting for the Heritage and Design Planning Officer

The Heritage and Design Manager (HDM) indicated that the Heritage and Design Planning Officer (HDPO) would be leaving the Authority over the summer and this would be her last HARG meeting. The Chair thanked the HDPO for her hard work and support. It was noted that the HDPO’s dissertation into the historic chalets of the Broads had been instrumental in nine waterside chalets becoming nationally listed in 2024.

4. Date of next meeting

The next HARG meeting would be held on Friday 3 October 2025.

The meeting ended at 10:36am.

After the meeting the Heritage and Design Team escorted Members on a walking tour of the listed structures on the River Wensum, Norwich starting at Foundry Bridge and following the river upstream to the Pumphouse at New Mills Yard.

Signed by

Chair

Planning Committee

18 July 2025

Agenda item number 16

Appeals to the Secretary of State update

Report by Development Manager

Summary

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

Recommendation

To note the report.

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2023/0291/TPOA BA/2023/0002/REF APP/TPO/E9505/9846	Mr J Calver	Appeal received by the BA on 23 August 2023 Appeal start date 2 July 2024	River Green Yarmouth Road Thorpe St Andrew	Appeal against refusal to grant permission for works to TPO tree: T1: Horse Chestnut - Reduce primary stems by approximately 6m & reduce limb at 5.5m.	Delegated decision 11 August 2023 Fast track appeal so no LPA Statement required Site Visit date TBC

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2024/0032/CLEUD BA/2024/0001/REF APP/E9505/X/24/3350415	Mr John Atkins	Appeal start date 26 November 2024	Driftwood, 104 Lower Street, Horning, Norfolk	Lawful Development Certificate for 10 years use as holiday accommodation	Delegated decision 8 May 2024 LPA Statement submitted
BA/2022/0007/UNAUP2 BA/2025/0001/ENF APP/E9505/F/25/3361103	Mr Richard Howlett	Appeal start date 19 March 2025 Written reps	Holly Lodge Church Loke, Coltishall, Norwich	Appeal against Listed building enforcement notice - Installation of UPVC windows	Committee Decision 2 February 2024
BA/2024/0427/FUL BA/2025/0002/REF APP/E9505/W/3362363	Mrs Angela Robinson	Appeal start date 28 March 2025 Written Reps	Riversdale House, Barton Turf	Appeal against refusal - Replace 110m Quay Heading	Delegated decision 27 January 2025 Appeal Dismissed 30 June 2025
BA/2024/0436/HOUSEH BA/2025/0001/HHAPP APP/E9505/W/25/3363918	Mr Keith Thomas	Appeal start date 2 May 2025	7 North West Riverbank, Potter Heigham	Open structure pavilion/boathouse over mooring - Retrospective	Delegated decision 17 January 2025 Fast track appeal so no LPA Statement required

Author: Steve Kenny

Date of report: 30 June 2025

Background papers: BA appeal and application files

Planning Committee

18 July 2025

Agenda item number 17

Decisions made by officers under delegated powers

Report by Development Manager

Summary

This report sets out the delegated decisions made by officers on planning applications from 16 May 2025 to 3 July 2025 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Beccles Town Council	BA/2025/0090/FUL	Waveney Meadow Puddingmoor Beccles Suffolk	Mr Paul Cunningham	Replacement play equipment, new path, & removal of 3 pine trees	Approve Subject to Conditions
Beccles Town Council	BA/2025/0080/FUL	Beccles Rowing Club Plot No 11 Puddingmoor Beccles Suffolk NR34 9PL	Mr Mark Smith	Over-cladding the existing quay heading.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Burgh Castle Parish Council	BA/2025/0092/HOUSEH	Holly Cottage Back Lane Burgh Castle Norfolk NR31 9QJ	Mrs Deana Burrell	Erection of a single story side & rear extension with sky lantern	Approve Subject to Conditions
Coltishall Parish Council	BA/2025/0102/APPCON	Boatyard Maltings 30 Anchor Street Coltishall Norfolk NR12 7AQ	Penny Keeley	Details of Condition 3: details of dormer cheeks materials and front door of permisison BA/2020/0217/HOUSEH	Approve
Great Yarmouth	BA/2025/0022/FUL	Land North West Black Gate Farm High Mill Road Great Yarmouth Norfolk	Mr Kelvin Allen	Erection of a barn to accommodate internal stables	Approve Subject to Conditions
Horning Parish Council	BA/2025/0085/HOUSEH	Burehaven Ferry Cott Lane Horning Norfolk NR12 8PP	Andy Blatch	Replacement windows and doors to rear and side elevation	Approve Subject to Conditions
Horsey Parish Council	BA/2025/0095/COND	Horsey Windpump Somerton Road Horsey Norfolk NR29 4EE	General Manager Victoria Egan	Retain portable building for an additional 5 years, variation of condition 1 of permission BA/2021/0395/FUL	Approve

Parish	Application	Site	Applicant	Proposal	Decision
Hoveton Parish Council	BA/2025/0076/FUL	Tshukudu Lodge Meadow Drive Hoveton Norfolk NR12 8UN	Stephen & Donna Stone	Replacement of an existing quay heading, the reshaping and lengthening of the existing cut and new decking.	Approve Subject to Conditions
Martham Parish Council	BA/2025/0126/APPCON	46 Riverside Martham Great Yarmouth Norfolk NR29 4RG	Mr J Fieldhouse	Details of condition 3: biodiversity gain plan of permission BA/2024/0244/FUL	Approve
Oulton Broad Parish Council	BA/2025/0009/FUL	Mooring 13 Plot 2 Boathouse Lane Lowestoft Suffolk NR32 3PP	Mr Robin Day	Replace 28m of existing timber quay-heading and staging with oak piling and capping to the northeast side and plastic piling with timber waling and capping to the southwest side with new decking and coir logs to prevent bank erosion.	Approve Subject to Conditions
Postwick With Witton Parish Council	BA/2025/0119/HOUSEH	The Old Stables Oaks Lane Postwick Norwich Norfolk NR13 5SL	Ms Anna Loake	Erection of 3 bay cart lodge, one with softwood doors, constructed of solid oak frame with softwood weatherboarding and reclaimed pantile roof.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
South Walsham Parish Council	BA/2025/0037/FUL	Goose Quay Fleet Lane South Walsham Norwich Norfolk	Mr & Mrs P. Walland	Replacement of 56m of timber quay heading with new timber quay heading, replace 25m of timber quay heading within boatshed, with plastic piling. Construct timber slipway adjacent to boat shelter.	Approve Subject to Conditions
Thorpe St Andrew Town Council	BA/2025/0108/LBC	Manor House And Well Cottage 12 Yarmouth Road Thorpe St Andrew Norfolk NR7 0EF	Mr Jeremy Clarke	Replace staircase, alterations to first floor structure	Approve Subject to Conditions
Thorpe St Andrew Town Council	BA/2025/0088/HOUSEH	12 Manor House Yarmouth Road Thorpe St Andrew Norfolk NR7 0EF	Mr Jeremy Clarke	Erection of garden cabin	Approve Subject to Conditions
Wroxham Parish Council	BA/2025/0028/APPCON	Bureside 6 Skinners Lane Wroxham Norfolk NR12 8SJ	Mr and Mrs G & R Parker	Details of Conditions 3: external materials, and 6: arboricultural method statement and tree protection plan of permission BA/2024/0269/HOUSEH	Approve

Tree Preservation Orders confirmed by officers under delegated powers

Parish	Address	Reference number	Description
N/A	N/A	N/A	N/A

Author: Steve Kenny

Date of report: 4 July 2025