

# Planning Committee

16 July 2021

Agenda item number 12

## Local Plan Issues and Options Bite Size Pieces – July 2021

Report by Planning Policy Officer

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### Summary

The review of the Local Plan is underway. This report introduces some sections of the emerging draft Issues and Options stage of the Local Plan. This covers the United Nations Sustainable Development Goals, Vision and objectives, Changes/standards that may be introduced by the Government, About the Broads and Local Green Space sections.

### Recommendation

Members' thoughts and comments on the draft sections are requested.

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## 1. Introduction

- 1.1. The review of the Local Plan is underway. Members will recall the [Local Plan for the Broads - review](#) report to a recent Planning Committee updating them on this review.
- 1.2. The first document produced as part of the review of the Local Plan will be an Issues and Options consultation. As well as advertising that we are reviewing the Local Plan, this stage identifies some issues and related options and seeks comments. Responses will inform the subsequent stages of the Local Plan.
- 1.3. Members may recall the 'bite size' pieces approach that was taken in the production of the current Local Plan, whereby Members of Planning Committee had the opportunity to see and discuss sections of the Local Plan as they were produced. This approach was successful and well received so we intend to take this approach for the review of the Local Plan. As a result, this report introduces bite size pieces of the Issues and Options.
- 1.4. Members will of course be presented with the final draft version of the Issues and Options to endorse it for consultation, at a later Planning Committee.
- 1.5. The bite size pieces are as follows, and can be found as appendices to this report, and Members thoughts on these reports/draft sections of the Issues and Options are welcomed.
  - United Nations Sustainable Development Goals

- Vision and objectives
- Changes/standards that may be introduced by the Government
- About the Broads
- Local Green Space

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Date of report: 28 June 2021

Appendix 1 – United Nations Sustainable Development Goals

Appendix 2 – Vision and objectives

Appendix 3 – Changes/standards that may be introduced by the Government

Appendix 4 – About the Broads

Appendix 5 – Local Green Space



**Local Plan for the Broads - Review  
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**Introducing the United Nations Sustainable Development Goals (UN SDGs)**

**1. What are the UN SDGs?**

[The 2030 Agenda for Sustainable Development](#), adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership. They recognise that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests.

**2. What are the Goals?**

The following image shows the 17 Goals.

More detail can be found here: [THE 17 GOALS | Sustainable Development \(un.org\)](#) (be aware that a video plays automatically). At this link, you can click on each Goal to find out more.



### 3. Relevance to planning and Local Plans

Planning has a key role to play in the successful implementation of the SDGs because of the aim to work in the wider public interest and the overall purpose of the UK planning systems to achieve sustainable development. The Goals provide an opportunity to strengthen commitment to plan for sustainable development.

The UN SDGs are starting to be embedded in local plans, mainly by assessing parts of the Local Plan against the Goals. Indeed, one of the changes proposed to the NPPF<sup>1</sup> is to include reference to the UN SDGs. The draft NPPF text is:

## 2. Achieving sustainable development

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs<sup>4</sup>. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection<sup>5</sup>.

### 4. How we will use the UN SDGs

We intend to use them to assess the objectives of the Local Plan as well as the Sustainability Appraisal Objectives. There may be a more central role in the Local Plan for the Goals; we will ensure that we are kept up to date with how other Local Planning Authorities use the UN SDGs.

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<sup>1</sup> Draft NPPF update:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/961244/Draft\\_NPPF\\_for\\_consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/961244/Draft_NPPF_for_consultation.pdf)



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**Vision and Objectives**

**1. Introduction**

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

The long-term vision for the Broads in the current Local Plan (adopted 2019) mirrors that in the Broads Plan (adopted 2017). This was done to give consistency between these two important documents.

The timing of the Local Plan review coincides with the review of the Broads Plan, and the updated vision will apply to both documents.

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

**2. Current vision**

The long-term vision for the Broads, as set out in the Local Plan (2019), is shown in Table 1.

**Table 1**

Long-term vision for the Broads (Local Plan 2019)

**By 2036 the Broads will be a place where...**

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

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

This living, working, 'big skies' landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances experience and enjoy it as a place of escape, adventure, enjoyment, work, learning and tranquillity, and as a source of national pride and identity. Sustainable living can be seen

in action and there is a buoyant rural economy. Local communities are taking an active part in decisions about their future and are known for having been pivotal in the transformation to a low carbon, 'climate-smart' society.

The Broads National Park will be forever recognised as fundamental to our prosperity and to our mental and physical health and wellbeing. It will be forever treasured as a place that provides a “breathing space for the cure of souls”.

## 2. Potential changes to the vision

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

- We are working to net Zero 2040 in the National Parks. This needs to be captured in a more specific form than just a 'climate smart' society, e.g. “emissions in the Broads executive area are on course for a target of net-zero”.
- The Broads is ready to deal with the impacts of climate change, including sea level rise, with space for species to adapt and move as the landscape adjusts.
- Resilience - this would apply in particular to flood risk and water resources.
- There is a viable and well used public transport network for residents and visitors.
- A greater proportion of visits are by rail, bus, bicycle and foot.
- Traffic noise and boat engine noise have a lower impact on the wild spaces and rivers.
- Agriculture in the Broads is net-zero in line with the NFU National Ambition.
- The Broads' soils are well cared for, productive, and retaining their stored carbon.
- Local Plan - 2036 will need to be replaced with the end date of the new Local Plan period.
- Reference to the housing needs of the area.
- A stronger emphasis on biodiversity at the heart of nature recovery

## 3. Current objectives

The objectives of the Local Plan tend to relate back to the vision. The current objectives are shown in Table 2.

**Table 2**

Local Plan for the Broads - objectives

Ref	Objective
OBJ1.	The Broads remains a key national and international asset and a special place to live, work and visit.
OBJ2.	There are areas of true tranquillity and wildness, giving a real sense of remoteness.
OBJ3.	The Broads is a unique, highly valued and attractive environment where the landscape character and setting is protected, maintained and enhanced.
OBJ4.	The rich and varied natural environment is conserved, maintained, enhanced and sustainably managed.

OBJ5.	The coastal section of the Broads is used and managed in a beneficial and integrated way for people and wildlife.
OBJ6.	Water quality is improved and water is managed using appropriate measures to increase capture and efficiency, prevent pollution and reduce nutrients. Flood risk to people, property and landscapes is managed effectively.
OBJ7.	'Climate-smart thinking' minimises future adverse impacts and makes use of opportunities in an area vulnerable to a changing climate and sea level rise.
OBJ8.	The area's historic environment and cultural heritage are protected, maintained and enhanced. Local cultural traditions and skills are kept alive.
OBJ9.	The housing needs of the community are met.
OBJ10.	Development and change are managed to protect and enhance the special qualities of the Broads as well as the needs of those who live in, work in and visit the area. The Broads Authority maintains close cooperation with the Local Planning Authorities adjoining its executive area.
OBJ11.	The Broads offers communities and visitors opportunities for a healthy and active lifestyle and a 'breathing space for the cure of souls'.
OBJ12.	There is a buoyant and successful rural economy.
OBJ13.	The Broads is renowned for sustainable tourism and supports a prosperous tourism industry.
OBJ14.	People enjoy the special qualities of the Broads on land and on water. Access and recreation are managed in ways that maximise opportunities for enjoyment without degrading the natural, heritage or cultural resource. Navigation is protected, maintained and appropriately enhanced, and people enjoy the waterways safely.
OBJ15.	The Broads continues to be important for the function, identity and recreation of the local community as well as over a wider area.
OBJ16.	Waste is managed effectively so there is no detriment to the environment.

#### 4. Potential changes to the objectives

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

- OBJ2 - Mention dark skies specifically
- OBJ5 – reference the importance of using the nature-based solutions
- OBJ7 – refer to net zero? Include adaptation?
- OBJ9 – could include warm, energy efficient homes

#### 5. United Nations Sustainable Development Goals (UN SDGs)

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

Table 3  
Local Plan objectives and UN Sustainable Development Goals

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

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



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**Changes/standards that may be introduced by the Government**

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

**Question: Until these are part of regulations/legislation, do you think the Local Plan for the Broads should have a 'meanwhile' standard? If so, what do you think that standard should be and why?**

**A. Electric vehicle charging points**

Issue

The Government consulted on [Electric vehicle chargepoints in residential and non-residential buildings - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/electric-vehicle-charging-points-in-residential-and-non-residential-buildings) in July 2019. Essentially, the issue the consultation seeks to address, and one which the Local Plan could have a meanwhile policy on, is the requirement for development to have electric vehicle charging points. Internal combustion engines sales are ending in 2030<sup>1</sup> and, more generally, petrol or diesel powered cars have significant impacts on climate change and localised air pollution. It is not clear when any changes will be implemented by the Government.

Approaches elsewhere

We are aware that some Neighbourhood Plans in preparation seek electric vehicle charging points as part of new development. For example, the draft Filby Neighbourhood Plan includes a standard of one electric vehicle charging point per residential parking space.

Some emerging Local Plans also talk about electric charging points. The Greater Norwich Regulation 19 Local Plan asks development to consider technologies like electric vehicle charging points, but does not set a standard. The emerging Great Yarmouth Local Plan encourages provision on all new developments, but does not set a standard. The emerging Dartmoor Local Plan includes the policy and standards as below:

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<sup>1</sup> [Consulting on ending the sale of new petrol, diesel and hybrid cars and vans - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans)

Table 4.4 Minimum standards for provision of EVCPs in off-street car parking spaces

Development Type	Electric vehicle charging points (EVCPs)*
New and replacement dwelling(s) with private driveway or garage	1 active EVCP per dwelling
New dwellings with communal car parking	5% of car parking spaces provide active EVCPs 50% of remaining spaces provide passive EVCPs
Non-residential commercial development and public car parks	5% of car parking spaces provide active EVCPs 50% of remaining spaces provide passive EVCPs

\* part provision rounded up

All EVCPs should be at least 32 Amps

#### Policy 4.5(2) Electric Vehicle Charging Points (EVCPs)

All development involving off-street car parking provision should provide electric vehicle charging points (EVCPs) to comply with the standards in Table 4.4. This may be varied only where it is proven essential for development viability.

The [Suffolk County Council Parking Standards](#) (2019) does set standards for electric vehicle provision (see page 68). For developments in Suffolk, this standard could be deferred to. If justified, the Authority could set its own standards that are different to these adopted standards.

For Norfolk, the [standards](#) were adopted in 2007. The current standards do not refer to electric vehicles. We will liaise with Norfolk County Council regarding any planned update to the standards. There could be potential for a standard to be set that applies to development in the Norfolk part of the Broads.

#### Options

The options therefore seem to be as follows:

1. Do not set a standard. Use the Suffolk standard for development in Suffolk. Wait until the Government standard comes in. Wait for the Norfolk standards to be reviewed.
2. Use the Suffolk standard and set a standard for the Broads part of Norfolk. This could potentially be the same as the Suffolk standard for ease of application. We would work with Norfolk Highways Authority in setting a standard for the Local Plan. This would effectively be a meanwhile standard, until a Government standard comes in. Also, a meanwhile standard until the Norfolk standards are adopted.
3. For Norfolk, encourage the appropriate provision of electric vehicles, rather than rely on standards. The Suffolk standard is in place to use. This would effectively be a meanwhile standard, until a Government standard comes in. Also, a meanwhile standard until the Norfolk standards are adopted.
4. Set out own standard for Norfolk and Suffolk parts of the Broads, worked up in liaison with both Highways Authorities. This would effectively be a meanwhile standard, until a Government standard comes in. Depending on what the Norfolk

standards say as and when it is in place, we will need to judge which standard takes precedent.

## **B. Energy efficiency standard of new dwellings**

### Issue

The [Future Homes Standard](#) of new dwellings was consulted on in 2019. Generally, this consultation seeks an uplift in the energy efficiency of new homes through changes to Part L (Conservation of fuel and power) of the Building Regulations. It is not clear when any changes will be implemented by the Government.

### Approaches elsewhere

We are aware that some other recent local plans are introducing their own standard for energy efficiency for new residential dwellings, until a national one is in place. For example, the emerging Greater Norwich Local Plan sets standards for new residential dwellings of a 19% reduction against Part L of the 2013 Building Regulations (amended 2016). The Dartmoor Local Plan refers to a minimum 10% reduction in carbon emissions over Building Regulations Part L 2013, using a fabric-first approach or Association for Environment Conscious Building (AECB) or Passivhaus certification. The Reading Local Plan, adopted in 2019 says all major new-build residential development should be designed to achieve zero carbon homes and all other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations. As and when the Future Homes Standard is in place, these policy approaches may be superseded.

### Current approach

The current Local Plan for the Broads addresses energy efficiency of dwellings (DM14) by seeking a fabric first approach, and for schemes of 10 or more, requiring 10% of predicted energy requirements by reducing the overall energy demand in the first place, using energy efficient and conservation measures and then finally by using decentralised and renewable or low-carbon sources for any residual amount.

### Options

The options therefore seem to be as follows:

1. Do not set a standard relating to building regulations. Wait until the Government standard comes in.
2. Continue with the current Local Plan approach.
3. Introduce a standard, up to 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations. The actual rate is likely to affect viability.

4. Investigate the potential for a net zero standard. Perhaps along the same threshold as the Reading policy; major development.
5. Consider referring to the Association for [Environment Conscious Building](#) (AECB) or [Passivhaus](#) certification, in a similar way to Dartmoor's Local Plan.

### **C. Energy efficiency standard of new buildings**

#### Issue

[The Future Buildings Standard](#) for non-residential buildings was consulted on in 2021. Generally, it sets out energy and ventilation standards for non-domestic buildings, existing homes and includes proposals to mitigate against overheating in residential buildings. It is not clear when any changes will be implemented by the Government.

#### Approaches elsewhere

Local Plans tend to set [BREEAM](#) standards. The emerging Greater Norwich Local plan says 'appropriate non-housing development of 500 square metres or above will meet the BREEAM "Very Good" energy efficiency standard, or any equivalent successor'. The adopted Reading Local Plan says 'all major non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Excellent' standards, where possible and all minor non-residential developments or conversions to residential are required to meet the most up-to-date BREEAM 'Very Good' standard as a minimum'. The emerging Dartmoor Local Plan refers to a minimum 10% reduction in carbon emissions over Building Regulations Part L 2013, using a fabric-first approach or Association for Environment Conscious Building (AECB) or Passivhaus certification.

#### Current approach

The current Local Plan for the Broads says 'developments of non-housing development over 1,000m<sup>2</sup> are required to meet or reduce at least 10% of their predicted energy using the hierarchy as set out at a, b and c above, and are encouraged to achieve at least the BREEAM 'Very Good' standard or equivalent'.

#### Options

The options therefore seem to be as follows:

1. Do not set a standard relating to building regulations. Wait until the Government standard comes in.
2. Continue with the current Local Plan approach, although as set out in **section x**, there could be a whole-scheme BREEAM approach rather than topic-specific and the threshold could be reduced to be similar to the Greater Norwich Local Plan.
3. Consider referring to the Association for [Environment Conscious Building](#) (AECB) or [Passivhaus](#) certification, in a similar way to Dartmoor's Local Plan.

## D. Biodiversity/Environment net gain

### Issue

At the time of writing, the [Environment Bill](#) was in the process of going through parliament. One of the parts of the Bill is Biodiversity Net Gain. Biodiversity net gain is an approach which aims to leave the natural environment in a measurably better state than beforehand. It is not clear when any changes will be implemented by the Government.

### Approaches elsewhere

The emerging Greater Norwich Local Plan says 'it will need to be demonstrated that the gain to biodiversity is a significant enhancement (at least a 10% gain) on the existing situation'. The emerging Reading Local Plan says development should provide a net gain for biodiversity wherever possible, but does not set a standard. The emerging Dartmoor Local Plan has this policy:

#### **Strategic Policy 2.3 (23) Biodiversity Net Gain**

1. Development ~~with the potential to impact on biodiversity~~ will be required to contribute towards biodiversity enhancement. Biodiversity enhancement should support the National Park's network of wildlife sites and priority habitats and maximise potential for other environmental gains; including soil, water and air quality, natural flood management, carbon sequestration and pollination.
2. Development involving 2 homes, 100m<sup>2</sup> of non-residential floorspace or a site area of 0.2 Hectares, or more, will be required to deliver 10% biodiversity **net gain**.
3. Development falling below the threshold in part 2 will be required to make a proportionate on-site contribution to wildlife enhancement in accordance with the thresholds in Table 2.2.
4. Off-site enhancement will only be acceptable where on-site provision is not possible, or it would make a better contribution to improving biodiversity than wholly on-site provision. Financial contributions in lieu will be accepted where it is demonstrated that on- or off-site provision is not possible or the Authority is satisfied it will enable greater environmental benefit.

### Current approach

The current Local Plan for the Broads has a detailed policy relating to biodiversity (DM13) and tends to seek enhancements to biodiversity, rather than net gain per se.

### Options

The options therefore seem to be as follows:

1. Do not set a standard relating to biodiversity net gain. Wait until the Government standard comes in. Continue with the current Local Plan approach.
2. Continue with the current Local Plan approach. Potentially encourage net gain in a similar way to Reading's Local Plan.

3. Introduce a standard of 10% in a similar way to Greater Norwich and Dartmoor Local Plans. Consider Environmental Net Gain<sup>2</sup>.

## **E. Accessible Homes**

### Issue

[Raising accessibility standards for new homes](#)<sup>3</sup> was consulted on in 2020. It considers how the existing optional accessible and adaptable standard for homes and the wheelchair user standard are used and whether government should mandate a higher standard or reconsider the way the existing optional standards are used. It is not clear when any changes will be implemented by the Government.

### Approaches elsewhere

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

### Current approach

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

### Options

The options therefore seem to be as follows:

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<sup>2</sup> Environmental net gain is the concept of ensuring that infrastructure developers leave the environment in a measurably better state compared to the pre-development baseline. Biodiversity net gain is a narrower measurement that refers only to habitats and is a requirement for achieving environmental net gain.

<sup>3</sup> The consultation covers these categories: M4(1) Category 1: Visitable dwellings. M4(2) Category 2: Accessible and adaptable dwellings. M4(3) Category 3: Wheelchair user dwellings.

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



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**About the Broads**

## **6.1 Introduction**

The Broads is an internationally important wetland and designated protected landscape of the highest order with a status equivalent to that of a National Park. The Broads is one of Europe's finest and most important wetlands for nature conservation. Its rich mosaic of habitats comprises, among other things, saltmarshes, intertidal mudflats, shallow lakes, fens, drained marshland, wet woodland, relict estuary and coastal dunes. Here are some of the Broads' most iconic features:

- 125 miles of lock free waterways.
- Over 25% of the UK's rarest wildlife.
- 60+ drainage mills that are still intact.

The following information gives some background to various aspects of the area's history and environment.

## **6.2 How the Broads were formed**

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

## **6.3 The Broads Authority**

The Broads Authority is a Special Statutory Authority, established under the [Norfolk and Suffolk Broads Act 1988](#)<sup>1</sup>. It has a statutory duty to manage the Broads for three purposes, none of which takes precedence:

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

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

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<sup>1</sup> [Broads Authority Act 2009](#) is also of importance.

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

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

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

#### **6.4 The Broads Authority Executive Area**

The designated Broads Authority Executive Area covers parts of Norfolk and North Suffolk, as shown in white in Map 1 below<sup>2</sup>. The Executive Area includes parts of Broadland District, South Norfolk District, North Norfolk District, Great Yarmouth Borough, Norwich City, and East Suffolk Council area. The councils for those areas do not have planning powers in the Broads area, but retain all other local authority powers and responsibilities. Norfolk County Council and Suffolk County Council are the county planning authority for their respective part of the Broads, with responsibilities that include minerals and waste planning and are also the Lead Local Flood Authority.

The Broads does not sit in isolation. There are important linkages with neighbouring areas in terms of the community and economy – what happens outside the Broads affects the area, and vice versa.

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<sup>2</sup> A map of the Broads with extra information can be found on page 2 of [Broadcaster 2021 \(yudu.com\)](https://www.broadcaster2021.yudu.com).

**Map 1: Broads Authority Executive Area**

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database rights 2016.  
Ordnance Survey  
100021573



## 6.5 The landscape of the Broads

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

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

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

said, the vernacular of the Broads is evolving. The Authority is open to the potential for modern design, which may contribute to the future cultural heritage of the Broads.

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

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

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

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

## 6.6 The economy of the Broads

Tourism is the mainstay of the Broads' economy. In 2019, the Broads and surrounding area (including the area of influence) received around 8.1 million visitors, bringing an estimated £490 million and directly supporting more than 7,435 FTE jobs<sup>3</sup>. Land and water based tourism is important in the area with around 12,071 boats on the Broads in 2019 (10,602 private craft and 1,469 hire craft). Many people also enjoy bird watching, walking, cycling, angling, visiting heritage sites and just being near the water.

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

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<sup>3</sup> STEAM Report: Volume and Value of Tourism in the Broads 2019

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

A diverse range of other businesses are located in the Broads. These tend to be small scale and service related; a notable exception being the large sugar beet processing plant at Cantley on the River Yare.

**The Local Plan needs to ensure that the local economy, most of which is rural-based is able to continue to thrive. The impacts of COVID19 and the related restrictions placed on businesses will be important to understand, although it could be that the country bounces back as restrictions ease and as the population of the country are vaccinated.**

## 6.7 The Natural Environment of the Broads

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

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

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

**The Broads is an important area for biodiversity. It is also one of the reasons why our community live here and tourists come to visit. We need to ensure we understand how development can impact and enhance biodiversity and reflect this in the Local Plan.**

## 6.8 Historic environment and culture of the Broads

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

The Broads Authority Executive Area contains over 270 Nationally Listed Buildings, 15 Scheduled Monuments and 25 Conservation Areas. The area has been identified by Historic England as being a site of exceptional potential for waterlogged archaeology, and the Broads Authority maintains a Local List of heritage assets. The Broads is also home to numerous heritage craft including the famous trading wherries, other historic sailing and motor vessels.

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

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

## 6.9 Navigating the Broads

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

The Executive Area comprises approximately 1,974ha of water space and open water bodies, covering 843ha. Many of these water bodies are broads in the traditional sense, having been formed from medieval peat diggings and used as water transport routes linking settlements with the main rivers and tributaries. Others are of more recent and/or different origin, such as at Whitlingham Country Park, which was developed on the site of a gravel quarry. Some broads have public navigation rights, others have more limited access, generally for environmental or land ownership reasons, while some others are landlocked and inaccessible to craft.

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

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

## 6.10 The boats and people who sail them

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

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

## 6.11 The Community of the Broads

The resident population of the Executive Area is about 6,300 people. Living in the Broads, particularly close to the water, is highly prized and this is reflected in local house prices. Local communities strongly identify with the area and value its special qualities. The Broads Authority Executive Area covers parts of over 90 parishes in Norfolk and Suffolk (see [Appendix A](#) for a list of parishes and the districts they are in, as well as a map showing this information).

The National Census 2011<sup>4</sup> gives these facts and figures about the community of the Broads: **6,271** people live here, **49.8%** male and **50.2%** female. The mean age of the population is **49.3**, and the **majority** work full time or are retired. **Most** identify their health as good or very good, with **9.6%** reporting a long-term health problem or disability that limits their day to day activities 'a lot'. The Broads has a population density of **0.2 people per hectare**, and the number of households increased by **307** between 2001 and 2011.

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<sup>4</sup> The most recent Census was held in early 2021. Over time, more findings of the Census will be released and this section will be updated.

The 2019 Indices of Multiple Deprivation (IMD) give an interesting insight into the community of the Broads. The IMD maps for the Broads have been assessed as part of a Deprivation Topic Paper<sup>5</sup>.

**Many settlements are split between two Local Planning Authorities. So we need to ensure that we work with the neighbouring LPA. The community is an important asset to the area and their needs will need to be addressed in the Local Plan.**

## 6.12 Pressure on the Broads

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

**The area is popular to live in and visit. But with so many important assets like heritage, landscape and biodiversity, there is potential for harm to be caused. The Local Plan needs to understand and address this pressure.**

## 6.13 Access and Recreation

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

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

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

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<sup>5</sup> <To be completed>

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

## Appendix A: Map and list of districts and parishes of the Broads



Add table of parishes - to follow



**Local Plan for the Broads - Review  
Issues and Options bitesize pieces  
July 2021**

**Local Green Space**

The NPPF says 'designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them'. In the Local Plan for the Broads 2019, we allocate some areas as Local Green Space. These are listed below and can be found [here](#).

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

We are aware that Neighbourhood Plans that are in production or adopted often identify and allocate Local Green Spaces. We do not need to repeat those allocations in the Local Plan as Neighbourhood Plan policies have the same weight as Local Plan policies. But are there any other areas that you think meet these criteria that you would like us to consider as Local Green Spaces? If so, please fill out the nomination form at **Appendix x**.

For a site to potentially be allocated a local green space in the emerging Local Plan, nominations need to meet the following criteria:

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

The NPPF also says;

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

**If you would like to nominate a local green space, please fill out the form at [Appendix x](#).**

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

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

## Appendix x: Local Green Space Nomination Form

### Are there any green spaces in your parish that are important to your community?

If so, please fill out this form with details of your nomination of areas to be designated as Local Green Space.

Please email the completed form, maps and photos to: [PlanningPolicy@broads-authority.gov.uk](mailto:PlanningPolicy@broads-authority.gov.uk) and title your email 'Local Green Space Nomination'.

**Your name:**

**Your email address:**

**Your phone number:**

- **What is the address of the proposed local green space?**

- **Have you included a map?**

**Yes      No**

Your map should show the boundary of the green space (draw a line around it in a highlighter perhaps) as well as give the context to enable officers at the Broads Authority to find the site easily.

- **Have you included photographs of the proposed local green space?**

**Yes      No**

Please answer these questions:

**1: Will the green space endure to 2041 and beyond? Why do you think this?**

**2: How far is the green space from the community it serves? How is the area in reasonably close proximity to the community it serves?**

**3: Is the green space local in character? Why do you think this?**

**4: How is this space demonstrably special to the local community? How does it hold a particular local significance?** For example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.

**5: The NPPF says 'designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services'. How does your allocation address this?**

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Please note that:

- We will undertake site visits
- We may contact neighbours to the space for their thoughts
- We will ask the local Parish/Town Council for their thoughts on the nomination.
- We will check adopted/emerging Neighbourhood Plans to ensure there is no repetition.
- We will check adopted/emerging Local Plans to see if any nominations are already protected as open space.
- Your nomination will be assessed by a panel of Officers from the Broads Authority as well as relevant District Council.
- Some sites will be taken forward to the Preferred Options for consultation and some will not. We will make our reasons known and aim for the process to be as transparent as possible.
- We cannot guarantee that your nomination will be allocated as a Local Green Space as the nomination might not be suitable.
- Your nomination will be made public.

You can find more information on Local Green Space here:

- The Government's National Planning Policy Guidance: <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>