

# Broads Authority

28 November 2025

Agenda item number 13

## Local Plan - Regulation 19 re-consultation

Report by Planning Policy Officer

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### Purpose

The Regulation 19/Publication version of the Local Plan was consulted on between July and September 2025. Approximately 270 responses in support, seeking changes or objecting were received. It has become apparent, however, that the Sustainability Appraisal (SA) was missing some parts and had some other areas for improvement. A thorough review of the SA was undertaken and other amendments made. As such, it is proposed to re-consult on the Local Plan, amended SA and HRA. The Local Plan will not be changed and comments received to date will still be valid and logged and will be submitted to the Planning Inspector. This will result in a 2/3-month delay in submission.

### Recommended decision

To endorse:

- a) The Local Plan, amended 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
  - d) The fallback position, if required, of delegating authority for submitting the Local Plan to the Planning Inspectorate to the Chief Executive, in consultation with the Chair of the Broads Authority and Chair of the Planning Committee.
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## 1. Introduction

- 1.1. The Regulation 19/Publication version of the Local Plan was consulted on during July to September 2025. Approximately 270 comments were received – some supporting the plan, some seeking changes and some objecting.
- 1.2. It has become apparent that the Sustainability Appraisal (SA) that accompanied the Regulation 19/Publication version of the Local Plan did not have certain parts it needed. This is a legal process issue, rather than an issue with the content of the Local Plan. The SA was thoroughly checked, and some other improvements and amendments were identified and made. It is therefore proposed to re-consult on the Local Plan, HRA and amended SA.

- 1.3. The changes and approach described in this report were unanimously supported by the Planning Committee on the 7 November 2025.

## 2. The Local Plan

- 2.1. The Local Plan will not be changed from the version that was consulted on between July and September 2025. It will have an explanation of why we are re-consulting and dates will be amended. The November 2025 Regulation 19/Publication Local Plan can be found at Appendix 1 with changes highlighted in pink.
- 2.2. The comments received during the July to September consultation will still be valid and logged and will be passed on to the Planning Inspector when we submit the Local Plan. There will be no need for consultees to re-submit their comments.

## 3. Habitats Regulation Assessment (HRA)

- 3.1. The HRA will not be amended in any way. See Appendix 2. It is reassuring to hear from consultees that the HRA is supported.

## 4. Sustainability Appraisal (SA)

- 4.1. Amendments to tighten up and improve the SA were identified and have been made. The SA can be found at Appendix 3. No negative comments were received on the SA during the consultation period from July to September 2025 which is reassuring. The SA has been amended as follows. These changes are highlighted in Appendix 3.
  - Policies added to contents page to aid navigation to policies.
  - Non-technical summary added.
  - Section 1 – an explanatory box listing the changes as stated here.
  - Section 2 – new section explaining the requirements of the SA and how these have been met.
  - Section 3 – reference to the Publication SA consulted on between July and September 2025.
  - Section 4 – added text about how the baseline assesses the current state of the environment.
  - A new Section 5 - evolution of the environment without implementation of the Plan.
  - Policy PUBDM2, PUBDM4, PUBSOL1: ECO2 and ECO3 rows were missing and are now added.
  - Policy PUBDM8 Development and flood risk was labelled as PUBDM78, is PUBDM8.

- Policy PUBDM11: Green and blue infrastructure and Public Rights of Way: Columns A and B titles have been swapped – column A is the assessment of the proposed policy and B the assessment of the original 2019 policy. Title of section changed – was PUBDM111, is PUBDM11
- Policy PUBDM16: Biodiversity Net Gain – reference in column B to the policy being for 20% BNG rather than 10%.
- Policy PUBDM18: Mitigating Nutrient Enrichment Impacts: Was written as PUBDM178, now corrected to PUBDM18.
- Policy PUBSP15: Residential development – a note to explain why alternative need numbers have not been identified and assessed.
- Policy PUBDM47: Permanent and temporary dwellings for rural enterprise workers – explanation relating to the negative assessment against two SA objectives.
- Policy PUBDM51: Custom/self-build: Added text to column B – this was missing.
- Policy PUBDIL1: Dilham Marina (Tyler’s Cut Moorings): Column C erroneously had a + against SA objective ENV11 – this has been moved to column B.
- Policy PUBHOV4: BeWILDerwood Adventure Park: ECO3 column 1 was a – but should be a ?.
- Policy PUBNOR1: Utilities Site: SOC4, column C changed to a +/? as the site *could* deliver dwellings – originally it was a +.
- PUBTHU1 – now negative against SA Objective ENV1.
- Appendix 5 – general check of reasonable alternatives to ensure consistency.
- Appendix 7 – Policy PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks – cell in column titled ‘mitigating negatives/maximising positives’ filled as this was missing.
- Appendix 9 – a summary of the policies in the Local Plan.
- Appendix 10 – SWOT analysis, taken from the Local Plan.
- Appendix 11 – Explanation why reasonable alternatives were not taken forward.

## 5. Approach to the re-consultation

- 5.1. Following approval at the November Broads Authority meeting, it is proposed that the consultation runs from 28 November to 16 January 4pm. This is a period of 7 weeks.
- 5.2. We will not hold drop in events or attend Youth Advisory Boards as the Local Plan itself has not changed.
- 5.3. We will advertise the consultation using emails on our contact database, press advert and social media – we will explain why we are consulting and highlight the changes.

- 5.4. We will write specifically to those who have provided comments to explain the re-consultation and assure them their comments are logged and valid and will be submitted to the Planning Inspector.

## 6. Financial and time implications

- 6.1. This additional stage could cost around £1,000. This would be for the press advert and some printing.
- 6.2. It was hoped to submit the Local Plan at the start of December 2025. But this re-consultation will result in a delay to mid-February 2026 – of around 2/3-months. Submission will still be before the end of December 2026 to enable examination under the 2024 NPPF and the current Local Plan making system.
- 6.3. We will undertake as much preparatory work during the consultation, that would ordinarily have been undertaken through the examination, as possible and this could claw back some time and some cost.

## 7. Delegation

- 7.1. Members will recall that when the July 2025 Regulation 19/Publication version of the Local Plan was endorsed, it was agreed that submission could be delegated to officers in consultation with the Chairs. This delegation is included in the recommendations. It is hoped that the submission decision could come to Planning Committee and Broads Authority prior to submission, but this may not be possible due to the delay. We would bring the information to a subsequent Planning Committee and Broads Authority meeting for information if we submit under delegated powers.

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Date of report: 7 November 2025

Background papers: The original Broads Authority report endorsing the Local Plan for consultation: [Endorsing the Local Plan for Consultation \(Broads Authority 25 July 2025\)](#)

Appendix 1 – [Regulation 19 Local Plan November 2025](#)

Appendix 2 – [Habitats Regulations Assessment](#)

Appendix 3 – [Sustainability Appraisal November 2025](#)