Broads Employment and Economy Topic Paper

February 2024

Table of Contents

1. Introduction

The economy is an important element of plan-making. The NPPF identifies an economic objective: *'to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'*.

As the new Local Plan for the Broads is produced, this report seeks to bring together information and findings to inform the economy section of the Local Plan. Generally, this is an update of a previous version of this Topic Paper. Documents were checked online to see if they were still valid, or, if not, updated versions were assessed. Furthermore, general thoughts of stakeholders and the public have been ascertained through the Issues and Options consultation and these too will be considered as the Economy section of the Local Plan is produced.

Norfolk County Council is developing a Norfolk Economic Strategy over the next 6 months (from December 2023).

Our six district councils and two county councils were asked for their thoughts on this document in a three-week technical consultation. Responses are included at Appendix E.

2. Key findings

The content of this Employment and Economy Topic paper is contained primarily in the various Appendices. This part of the report identifies the key areas, lists the Appendices, and summarises what is in each one and brings out findings relevant to the Broads.

2.1 NPPG and NPPF requirements relating to the economy - Appendix A

The National Planning Policy Practice Guide (NPPG) and National Planning Policy Framework (NPPF) set out requirements for Local Plans in relation to the economy, business, and employment. Relevant parts of these documents are included at Appendix A. The following shows how the Broads Local Plan responds to these requirements:

- The Broads Authority has produced a Housing and Economic Land Availability Assessment (HELAA) (as required by the NPPG https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment)
- With regards to 'ensuring the vitality of town centres', the Authority has produced a joint policy approach for Oulton Broad district Shopping Centre with East Suffolk
- Council and a joint policy approach for Hoveton Town Centre with North Norfolk District Council.
- The Local Plan has a housing target.

- There is no employment target for the Broads as the evidence in the district wide studies does not require this – they do not state that the Broads is required to include or meet an employment target in the Local Plan.
- The Local Plan does not identify strategic sites for employment as the work undertaken for the entire districts does not require the Broads Local Plan to find such sites – they do not state that the Broads is required to include or meet an employment target in the Local Plan.
- The Economy, Tourism and Retail section sets out the strategy.
- The Broads Authority does not undertake Economy Development functions; the constituent Councils undertake this function.
- Retail studies have been undertaken by district councils and incorporated into the Broads Local Plan in relation to Oulton Broad District Shopping Centre and Hoveton Town Centre.
- Quantitative employment work has been undertaken by district councils and none of these studies identify a jobs target for the Broads.

2.2 Literature Review - Appendix B

Amongst the literature reviewed are the Economy studies produced by the Authority's six constituent Councils. These studies provide the basis for forming an economic strategy. Each district is different and therefore the needs are different. The work undertaken by our six constituent councils does not require employment land to be allocated within the Broads to meet the Council's target. The various studies show the following:

- South Norfolk, North Norfolk and Great Yarmouth economies are 'stuck' and Norwich's is 'stifled'[1].
- The Tourism sector is important to the Broads. The Broads has a zone of influence in relation to tourism. The Tourism Strategy identifies priorities for the next five years as well as states the land and water-based tourism uses in the Broads and suggest markets to target.
- Other documents are of general relevance to the Broads and need to be considered. Indeed, those documents need to ensure they consider the Broads when they are prepared and delivered.

2.3 Economic Baseline - Appendix C

There are a variety of sources for data on the local economy and analysis has given a broad picture.

- According to the Census 2021:

[1] The places that are growing quickly but whose growth is restricted by their boundaries are the stifled. The places that are still dealing with the fallout of the industrial trauma of the 1980s are the stuck.

    - Top Industries in which people work are: Wholesale and retail trade; repair of motor vehicles and motor cycles and Human health and social work activities and Construction
    - Qualifications: Level 4 and above – 39%
    - Top occupations of those living in the Broads: Managers, directors and senior officials, professional occupations, Skilled trade occupations and Associate professional and technical occupations
- Tourism: Visitor numbers 7.185 Million, Direct spend £455.67 Million, Economic impact £617.92Million, Direct employment: 4,999 FTEs (STEAM report).
- Out of work benefits are down from COVID19 levels (NOMIS).

2.4 Comments received as part of the Issues and Options consultation - Appendix D

Generally, clarity in the Farm Diversification policy is supported. No concerns raised relating to the employment policies of the Local Plan at this stage.

3. How the Local Plan addresses Employment and the Economy

The following policies that relate to the economy and employment will be in the Local Plan.

Employment section

Policy SP10: A prosperous local economy

Policy SP11: Waterside sites

Policy DM25: New employment development

Policy DM26: Protecting general employment

Policy DM28: Development on waterside sites in employment or commercial use, including boatyards

Policy DM38: Permanent and temporary dwellings for rural enterprise workers

Policy TSA3: Griffin Lane – boatyards and industrial area

Policy TSA4: Bungalow Lane – mooring plots and boatyards

Policy HOR6: Horning - Boatyards, etc. at Ferry Road. and Ferry View Road

Policy CAN1: Cantley Sugar Factory

Policy HOR8: Land on the Corner of Ferry Road, Horning

Policy POT1: Bridge Area

Tourism section

Policy SP12: Sustainable tourism

Policy DM29: Sustainable tourism and recreation development

Policy DM30: Holiday accommodation – new provision and retention

Policy HOV4: BeWILDerwood Adventure Park

Retail policies

Policy DM51: Retail development in the Broads

Policy HOV5: Hoveton Town Centre and areas adjacent to the Town Centre

Policy OUL3 - Oulton Broad District Shopping Centre

Sectors

Policy SSPUBS: Pubs network

Policy DM44: Visitor and community facilities and services

Appendix A: NPPG and NPPF requirements relating to the economy.

Generally, the NPPG refers to the following. As these sections are quite long, they have not been copied over, but the link added.

- Housing and Economic Land Availability Assessment (HELAA) https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment
- 'Ensuring the vitality of town centres' https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres
- Housing and economic development needs assessments https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments

The following are the relevant references in the NPPF

National Planning Policy Framework (publishing.service.gov.uk)

8: an economic objective – to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social, and environmental priorities; and a platform for local people to shape their surroundings.

81. Planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

82. Planning policies should: a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period; c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

83. Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative, or high technology industries, and for storage and distribution operations at a variety of scales and in suitably accessible locations.

84. Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; b) the development and diversification of agricultural and other land-based rural businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside; and 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.

85. 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. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist

Appendix B Literature Review

The following documents have been produced by various organisations, but all have relevance to some extent to the Broads. This section summarises the documents briefly, highlighting anything in particular that relates to the Broads.

B1 Sustainable Tourism in the Broads 2016 – 2020[2]

The purpose of the strategy and action plan is to guide how tourism is developed, managed, and promoted in the period from 2016 to 2020. It is a document for everyone engaged with and affected by tourism in the Broads. It provides the basis for agreeing annual priorities and actions and for checking progress. This strategy and action plan builds on two previous versions, covering 2006-10 and 2011-15.

The water-based product

- Cabin hire motor cruisers
- Private motor cruisers
- Day hire motor boats
- Sailing craft licensed for hire
- Other non-powered craft, include rowing boats, canoes, punts and other small craft.
- Boat trips
- Water-based activities provide an increasingly important component of the Broads
- offer. Sailing, rowing, canoeing and stand up paddle boarding are part of this.

The land-based product

- Serviced accommodation (hotels, inns, guest houses, B&B
- Self-catering accommodation
- touring caravan and camping parks
- Pubs, restaurants, and cafés play a very important role in the Broad's offer, often in waterside locations.
- Visitor attractions add considerably to the diversity of the Broads experience.
- Nature reserves and wildlife sites can be found throughout the Broads
- Retail, arts, and craft centres
- Walking
- Cycling is well suited to the flat landscapes.

[2] Sustainable Tourism in the Broads May 2016 (pdf | broads-authority.gov.uk)

Volume and value of tourism

It is estimated that in 2013 there were approximately 6.5 million visitors to the Broads National Park, the vast majority of which were day visitors. In addition, some 0.6 m visitors were staying outside the National Park but in its 'area of influence' and a further 0.2 m were staying on private boats and 0.14 m on hire boats in the Broads. This amounted to a total of around 7.5 million visitors. Visitor numbers showed a very slight increase between 2009 and 2013 but the overall picture was essentially static.

Looking only at the spending by visitors staying overnight, the above estimates suggest that within the designated area of the Broads National Park the economic impact of visitors staying in land-based accommodation, on hire boats and on private boats4 is very roughly equivalent and totals around £163m. However, this figure is more than doubled if the spending by visitors staying in the wider area influenced by the Broads is considered. Although there are seven times more private boats than hire boats, the spending generated by them is equal as hire boats are used for many more days in the year. Spending by day visitors in the designated area of the Broads National Park is estimated at over £212m. This accounts for around 57% of total visitor spending in the National Park. Day visitor spending in the wider area of influence is not included, as it is assumed in the model that day visits, as distinct from staying visitors to this area will not have been influenced by the Broads. Between 2009 and 2013 there was a small decline in the economic impact of visitor spending, at constant prices, albeit with year-on-year fluctuations. Although the data is not strictly comparable, the trend in performance of the Broads in terms of visitor numbers and spending appears to have been broadly in line with the trend for England outside London.

Performance of tourism businesses

A survey of tourism businesses in the Broads, conducted for the purposes of this strategy in 2015, enquired about their recent performance. This revealed a broadly positive or static picture, with 48% reporting growth in the past three years and 41% no change. Only 7% reported a decline. Despite this positive situation, when asked about the need to achieve a higher turnover and more income, almost half (48%) the businesses indicated that this was essential to achieve viability, with a further 20% saying that this was necessary to obtain a reasonable profit. One quarter were seeking more business even in July and August, with 50% seeking more business in April, May, June, and October. The largest proportion of respondents pointed to a particular need in February, March, and November

Issues, challenges and opportunities identified

Based on the above evidence and from the consultation undertaken with a range of interests in the Broads, a number of key issues, challenges and opportunities for tourism have emerged that need to be addressed in the strategy.

- Internationally protected wildlife sites
- The seasonality of visits

- Web and digital presence
- National Park status
- Conservation of the natural and cultural heritage
- Wildlife as a tourism asset
- Environmental impact, climate change and greening the tourism offer
- Facilities for water-based visitors
- Broads experiences for land-based visitors
- The quality of visitor services, notably the food offer
- The availability of information at point of need
- Broadband and mobile phone coverage
- Transport access
- Attracting new and younger markets
- The environment for business investment
- Coordination within and beyond the Broads
- Lack of funding

SWOT Analysis

Strengths	Weaknesses
• A fantastic waterspace and wetland landscape of international importance • Extensive uninterrupted inland waterways with long established boating product, including motor cruisers and yachts for hire and river trips • Distinctive cultural heritage themes and sites associated with the landscape • Exceptional and accessible birdlife and other wildlife • Close links to varied and complementary experiences in Norwich and the coast • Range of water-based activities, especially angling and canoeing • Some individual good quality accommodation and catering operations • Some unusual and popular visitor attractions • Good rail access	• Imbalance between north and south Broads in both supply and demand • Inconsistency in quality of accommodation and catering • Lack of coordination between tourism related bodies • Poor broadband and mobile coverage • Insufficient moorings and provision of waterside facilities • Undeveloped walking and cycling offer • Lack of funding for initiatives • Insufficient human resources to undertake necessary delivery • Seasonality of demand and of the offer
Opportunities	**Threats**
• Ability to use National Park brand • Recent improved access to London/South East • Forecast growth in domestic and inbound markets • Growing market interest in experiences, activities and wellbeing • Growing market interest in wildlife and natural heritage • Water, Mills and Marshes HLF project • EU funding for rural development • Private sector interest in sponsorship	• Reduction in public sector funding • Over-reliance on older markets • Concentration of visitor numbers/pressure on certain areas • Labour, skills and volunteer shortage • Climate change • Damage to natural and cultural assets (including from tourism) • Lack of business support for destination bodies • Inability to coordinate between key bodies • Competition from other destinations

Primary target markets

- Domestic short breaks and holidays - Couples post-family A flexible market.
- Domestic short breaks and holidays – Families
- Day visitors A relatively stable market, important for generating year-round business in local enterprises
- Overseas visitors Forecast to grow faster than domestic markets.
- Young independent travellers A flexible market.
- Groups Organised day trips and short breaks.
- People with disabilities
- Special interest Birdwatchers.

Key principles

- Pursuing sustainable growth
- Achieving more year-round visitor spending
- Focussing on conservation and environmental management
- Promoting and living up to the National Park status
- Spreading benefits to all parts of the Broads
- Providing a National Park for all
- Working in partnership

B2 Broads Plan 2022[3]

The Broads Plan is the single most important strategy for the Broads National Park, setting out a long-term vision and strategic objectives to benefit its landscape, environment, local communities and visitors. As a high-level overarching plan, it draws together and guides a wide range of plans, programmes, and policies relevant to the area. The Broads Plan is reviewed and updated on a regular basis, and this Plan covers the period 2022 to 2027.

Theme A Responding to climate change and flood risk

- A1 Prepare a long-term integrated flood risk strategy for the Broads, Great Yarmouth and interrelated coastal frontage and maintain current adaptive coastal, tidal and fluvial flood risk management approaches for the area
- A2 Work towards making all Broads Authority operations carbon neutral by 2030 and carbon zero by 2040
- A3 Agree carbon reduction targets for the Broads National Park and promote action to reduce emissions

Theme B Improving landscapes for biodiversity and agriculture

- B1 Restore, maintain and enhance lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques
- B2 Promote best practice water capture and usage across the Broadland Rivers Catchment and reduce point and diffuse pollution into the floodplain and water courses
- B3 Seek biodiversity net gain and enhance areas of fen, reed bed, grazing marsh and wet woodland, to protect peatlands as carbon sinks
- B4 Define, implement and monitor management regimes for priority species and invasive non-native species
- B5 Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to the National Biodiversity Network

[3] Broads Plan 2022 - 2027 (broads-authority.gov.uk)

Theme C Maintaining and enhancing the navigation

- C1 Maintain navigation water depths to defined specifications, reduce sediment input and dispose of dredged material in sustainable and beneficial ways
- C2 Maintain existing navigation water space and develop appropriate opportunities to extend access for various types of craft
- C3 Manage water plants and riverside trees and scrub, and seek resources to increase operational targets
- C4 Maintain and improve safety and security standards and user behaviour on the waterways

Theme D Protecting landscape character and the historic environment

- D1 Record, protect and enhance local built and cultural features, archaeology, geodiversity and potential hidden heritage, including ‘at risk’ assets
- D2 Maintain an up-to-date Broads Landscape Character Assessment
- D3 Maintain up-to-date Conservation Area designations, appraisals and management proposals
- D4 Reduce the impacts on the Broads of visual intrusion and noise and light pollution, and promote Dark Sky Discovery Sites

B3 The Making of an Industrial Strategy – Localis 2017 [4]

Localis are an independent, cross-party, leading not-for-profit think tank that was established in 2001. The work promotes neo-localist ideas through research, events, and commentary, covering a range of local and national domestic policy issues. This piece of research relates to the economy of the country.

The stifled and the stuck. The research also identifies two sets of places which require special intervention in the industrial strategy. Firstly, the places that are growing quickly but whose growth is restricted by their boundaries are the stifled. The research suggests these are the places that are successfully reorienting their economies based on demographic and economic trends. They are fast growing, with associated growing pains, but are often stymied by their administrative boundaries. They need the power to grow. Secondly, the places that are still dealing with the fallout of the industrial trauma of the 1980s are the stuck. The research suggests these are the thirty most structurally challenged local economies in England, which perform poorly on multiple indicators, both long term demographic trends and more immediate short term economic performance. They are penumbra economies that have not recovered from the 1980s. They have weak labour markets and much of the growth experienced in the past few decades has been in poorly paid and insecure sectors such as retail. Many have attracted a great deal of investment from central government and the European Union, but structural issues persist. Local council’s political make-up is often multi-party coalitions or, at the other end of the

[4] The making of an industrial strategy (localis.org.uk)

scale, 'one party states'. Greater top-down intervention is required, focused on building local capacity in leadership and skills.

Great Yarmouth, South Norfolk and North Norfolk are in the top 30 structurally weakest economies in England and classed as Stuck. Norwich is classed as stifled.

B4 Ipswich and Waveney Economic Areas Employment Land Needs Assessment 2016

Waveney District Council, along with Ipswich Borough Council, have produced the Ipswich and Waveney Economic Areas Employment Land Needs Assessment (March 2016)[5]. This runs to 2031. The report assesses the entire District, including that part which is the Broads. The study considers future quantitative land and floorspace requirements alongside related qualitative factors for individual sectors and employment uses.

The Waveney area is self-contained, particularly in terms of its workforce. Therefore, basing a functional area on the administrative boundary is justified through the focus on travel to work.

Lowestoft and Great Yarmouth collectively function as a leading centre for renewable energy, with much of the demand for commercial property driven by these energy and related sectors.

The Waveney Economic Area comprises the Waveney District administrative area, the most easterly District in Britain. Historically, Waveney's economy has been based on farming, printing, manufacturing, food processing and industries taking advantage of the coastal location, but in recent years has become increasingly recognised for its growing potential to support the offshore energy sector. Its proximity to planned and operational wind farms has generated economic benefits for the District's key town of Lowestoft and this trend is expected to continue in future.

Total employment stands at 47,109, having declined by 3% over the last four years. This suggests that Waveney's economy has particularly suffered from the effects of the recession, together with longer term structural challenges in the local economy. The key sectors in employment terms are public administration, health and education, finance and business services, retail, and manufacturing.

GVA per capita in Waveney is one of the lowest in the East of England and whilst the District's business base has been growing, this rate of growth also falls behind the regional and national average, with smaller sized businesses (0-9 employees) driving most of this growth. Waveney performs poorly across a range of labour market indicators including economic activity, unemployment, earnings, and skilled occupations.

In functional economic terms, Waveney is closely connected with neighbouring Great Yarmouth, with both towns playing an important role in servicing the renewable energy sector, and to a lesser extent the oil and gas industry. It has significantly weaker economic linkages with other

[5] Ipswich and Waveney Economic Areas - Employment Land Needs Assessment March 2016 (eastsuffolk.gov.uk)

Suffolk authorities, due in part to the relative distance between these locations and relatively poor condition of the highway network south from Lowestoft.

Waveney is characterised as having a buoyant industrial market, with the town of Lowestoft accommodating most of the industrial space and occupier requirements. Demand is particularly strong for modern, small, and medium sized industrial units with a typical size range of between 1,000sqft/100sqm and 25,000sqft/2,300sqm.

The recent designation of an Enterprise Zone has encouraged new commercial development (including speculative development) to come forward in the area over the past few years, including at Mobbs Way and Riverside in Lowestoft. However, employment land supply within the northern part of the town is nearly exhausted and in absence of new development land being identified, requirements are likely to be displaced to Great Yarmouth which benefits from greater availability of land.

Waveney is not an established office location and lacks the critical mass of office occupiers to compete for office-based activity and firms. What limited demand there is comes from local business churn in financial and business services, with some office occupiers connected to the energy sector.

Demand for rural employment space across the two Economic Areas is reported to be limited, with demand generally catered for by existing provision. These types of premises can play an important role in providing affordable workspace and retaining home based businesses within the local community, albeit local commercial property market agents do not expect to see any significant growth within this sector over the short to medium term. It will nevertheless be important that the various Councils continue to safeguard against any future downturns in traditional rural activities by encouraging the conversion and re-use of rural buildings for non-agricultural uses to grow and diversify the employment offer in the sub-region's rural economy.

Some of the key findings of the business survey include the following:

1. Key factors influencing choice in business premises within the sub-region include the cost and quality of premises, provisions of ICT and on-site car parking, while key factors influencing choice in business location within the sub-region include internet speeds, access to road networks, quality of the environment, local labour markets and access to local and regional markets.

2. Businesses were generally satisfied with the quality of their premises with an average score provided across the sub-region of 3.4 (out of 5, with a score of 5 representing an 'excellent' quality); with firms in the Ipswich Economic Area indicating a slightly higher perceived quality than those in the Waveney Economic Area.

3. Most surveyed businesses within the sub-region indicated that the space provided by their premises was 'about right' to meet their needs, although a quarter of all respondents indicated that they had 'not enough space' to meet their space requirements. This shortage of space was most prevalent in the Waveney Economic Area.

4. Around half the surveyed businesses indicated they have previously had difficulties in finding suitable premises to relocate within the sub-region, with the most cited difficulties including shortage of affordable and modern premises (for both office and industrial premises), high rents and rates and limited on-site car parking. The difficulty in finding suitable premises was reported to be greater in the Waveney Economic Area.
5. The surveyed businesses highlighted a strong ambition for growth, with almost three-quarters of respondents indicating they expected to expand their business operations in terms of land and premises during the next five to ten years. Most of these businesses anticipated a need for additional office accommodation.
6. To meet their growth requirements, nearly all respondents indicated they would most likely either relocate to another site in the same town or local area or expand on their existing employment site.
7. Generally, the surveyed businesses within the sub-region were satisfied with their local area as a business location, with an average score given of 3.5 (out of 5, with a score of 5 representing 'very satisfied'). A greater satisfaction was indicated by respondents in the Ipswich Economic Area compared to the Waveney Economic Area.
8. The respondents identified several strengths and weaknesses of their local areas as business locations, as well as key barriers to growth that primarily related to a shortage of suitable and affordable premises, poor internet infrastructure, attracting and retaining skilled workers, local traffic congestion, and the significant costs of relocation and expansion.

B5 Great Yarmouth Borough Council Employment Land Needs Review December 2022

Employment Land Needs Review (arcgis.com)

This Employment Land Needs Review has been prepared to ensure that the Borough has sufficient employment land to meet needs over the new plan period, to 2041. It provides an assessment of the economic context of the Borough and provides and estimation of future needs for employment space based on a range of sources. It also includes a review of existing employment areas within the Borough and provides conclusions on whether they should continue to be protected for employment uses in planning policy.

The analysis shows that there is still a significant role for employment uses in the Borough's economy. Historically, take up has been just over 2 hectares of land for employment use per year (over the last 10-20 years), this is despite fluctuations in the number of actual employment use jobs and total recorded employment uses floorspace within the Borough.

The two employment forecast scenarios provide a range of -522 to 699 employment use jobs to 2041, with the latter, upper range, the more recently modelled forecast. Ambitions to further develop Great Yarmouth as a centre for offshore renewable energy has the potential to boost the number of jobs. There are, however, signs of slow down, with decreasing floorspace recorded for industrial uses, and wider economic factors such as the recent increase in inflation.

Office use is still projected to rise, but the full impact of hybrid working (such as working from home) may have yet to be fully realised. In addition, the national trend to increase warehousing space to serve online shopping also has the potential to boost employment uses.

There is no guarantee that the higher range of the jobs growth will be achieved. However, a precautionary approach would be to take the higher end of the jobs growth projection as it is more up-to-date and will ensure that such growth can be met with available land rather than leaving it to unplanned development.

The existing employment sites have been audited with a detailed assessment of the use and functionality of each employment site. Recommendations have been made to remove some sites entirely, with other site boundaries amended, and some new sites identified. There is a consequent reduction in employment land, overall floorspace and employment floorspace. There is the potential that some of the lost employment land results in some additional employment land needs elsewhere. It is, however, considered that the revised employment site boundaries will allow the sites to perform better having taken account of alternative uses of land and constraints to deliver employment uses.

It is important that the new Local Plan has sufficient land available to meet that identified jobs growth and likely take up of employment land. Based on the higher jobs growth projection, the forecasted employment land need would be 6 hectares to 2041 (this is compared to -6.82 hectares on the lower jobs forecast range). However, based on the continued employment land take up rate to 2041, the new Local Plan would require 38.42ha (based on 17 years plan period with adoption in 2024) of land. In addition to projections and trends, there is the potential for growth within the offshore energy sector to require employment jobs uplift and consequent employment land. Consequently, there is a justification for a higher level of need of employment land than just what has been projected through jobs growth. A precautionary approach would be to recommend an employment need of approximately 39 hectares of employment land.

The above recommended (revised) employment site areas include undeveloped land totalling 19.38 hectares. In addition, the potential allocation of an extension to Beacon Business Park (comprising 20.12 hectares) could help to support ambitions of growth within the offshore energy sector. In total, the undeveloped employment land on protected sites and the potential allocation would result in 39.5 hectares of additional land potentially available for employment use.

The potential for 39.5 hectares of undeveloped employment land would provide significant headroom to cater for projected employment land needs, but also would have the potential to meet a similar employment land take up to that witnessed over the last 10-20 years. It is important to note that such land has been identified without knowledge of private landowner intentions, therefore the deliverability of such land remains uncertain. Clearly, further investigation will be required as part of the Housing and Economic Land Availability Assessment (HELAA) to better inform the delivery of individual sites.

B6 Greater Norwich Councils' Employment Work

The Greater Norwich Town Centres & Retail Study Update (2020) was prepared during the COVID19 pandemic.

Key messages relating to retail are:

- The pressures facing certain parts of the retail sector, particular high street comparison goods retailers, have continued with several business failures and other retailers seeking to down-size their store portfolios and concentrate on larger centres. These trends have been intensified throughout 2020 due to the severe impacts of the COVID-19 pandemic, as businesses were forced to shut and attracted fewer customer visits into stores.
- In relation to the changes in per capita retail expenditure forecasts since the completion of the 2017 Study, a comparison between the latest data published by Experian and the 2017 work reveals no substantial change in convenience goods spending up to 2035. However, there is a significant downgrading of future growth in comparison goods in the period up to 2035 (+58% in the 2017 Study and +36% in the latest assessment).
- A key influencing factor for this change is spending via the internet. Spending via the internet, particularly in relation to comparison goods has been a growing trend for many years although the impact of the COVID-19 pandemic has led to a significant increase in the market share of this channel in 2020 (23.4% in 2019 and 30.6% in 2020). Whilst there is predicted to be a small 'bounce back' in 2021, it is unlikely that the share of spending via the internet will return to levels seen pre-2020.

quantitative expenditure/floorspace capacity key messages are:

• There has not been a significant change in the convenience goods floorspace forecasts across each of the three main geographic areas. It remains the case that there is no quantitative requirement to plan for net additional convenience goods floorspace, although, as outlined below, there may be very good qualitative reasons why a modest amount of convenience goods floorspace should be placed in new local centres to support the day to day needs of new communities.

• For the reasons outlined above, there has been a material change in the level of retail expenditure available to support 'bricks and mortar' comparison goods floorspace across the Greater Norwich area. The changes has, unsurprisingly, been focused upon the Norwich urban area. Our updated assessment considers the fall in available expenditure since 2017 and shows a small over-supply in comparison goods floorspace across the two rural areas, whilst the over-supply in the Norwich urban area is circa -20,000sq m net. These levels of 'negative capacity' confirm the current draft strategy for retailing in the new Local Plan which is not to allocate sites/locations for net additional comparison goods floorspace. Instead, the forecast over-supply would reinforce an approach which seeks to concentrate upon existing provision in terms of redevelopment, refurbishment/remodelling, and, in some instances, down-sizing and repurposing to other land uses appropriate to town centre environments.

B7 Norwich Town Deal

Norwich City Council[6] was awarded £25m at the end of 2020 from the Ministry of Housing, Communities and Local Government to deliver eight key projects.

Developed in partnership with the Norwich Vision Group, local communities, partners, and public/private investors; these projects will provide a highly significant boost to deliver major regeneration alongside much needed skills infrastructure and jobs at a time when we are facing an unprecedented challenge to the future prosperity of the city, its residents and business community.

Eight core projects will support the delivery of jobs, homes, skills, and action to reduce our carbon emissions. Projects include activities which ensure all our residents directly benefit from the proposed investment.

B8 New Anglia LEP Economic Strategy[7]

The Norfolk & Suffolk Economic Strategy outlines ambitious plans for future growth across Norfolk and Suffolk.

Bringing together public and private sector partners with education and the VCSE sector, it sets out our ambition for Norfolk and Suffolk:

'Our ambition is to transform our economy into a globally recognised, technology-driven and inclusive economy which is leading the transition to a zero-carbon economy through sustainable food production, clean energy generation and consumption and digital innovation; becoming one of the best places in the world to live, work, learn and succeed in business.'

We want Norfolk and Suffolk to be:

– A higher-performing, clean, productive, and inclusive economy.

– An inclusive economy with an appropriate and highly skilled workforce, where everyone benefits from clean economic growth.

– The place where high-growth businesses with aspirations choose to be.

– A well-connected place, locally, nationally, and internationally.

– An international-facing economy with high-value exports.

– A centre for the UK's clean energy sector.

– A place with a clear, defined, ambitious offer to the world.

---

[6] Norwich Town Deal | Norwich City Council

[7] Norfolk and Suffolk Economic Strategy - New Anglia

We recognise this will not be achieved by one partner alone, or by any single strand of investment or action. We have always been most successful when we work together for the benefit of those who live, work, learn in and visit Norfolk and Suffolk. The actions in this strategy will help lead us out of these challenging circumstances and deliver on our region's potential.

Local partners across business, business support organisations, local authorities, public health, education providers and VCSE have come together to agree this strategy and are all committed to:

- **Collaborating** – to secure and align investment and actions to build a cleaner, more inclusive, and productive economy.
- **Inspiring** – the next generation, current workforces, businesses, VCSE organisations and communities to innovate, and embrace automation and clean growth through strong collaborative leadership.
- **Innovating** – exploiting our expertise and innovation capabilities to pioneer solutions to the major challenges facing the world in the 21st century. Ensuring we capitalise locally on the application and diffusion of this innovation and the emerging growth opportunities.
- **Investing** – in people, sustainable infrastructure, innovation, social and environmental value, health and wellbeing, leveraging more investment to deliver on our ambitions.

OUR UNDERPINNING SECTORS

There is significant opportunity for cross sector collaboration and innovation. Tackling the labour, supply chain and productivity challenges in these sectors and maximising their growth opportunities are key parts of this strategy.

Construction and development

Large and diverse, with emerging specialisation in Passivhaus and sustainable design

Creative industries

Strong and diverse sector, with major concentrations around Norwich and Ipswich

Financial services, insurance & professional services

One of the largest general insurance and financial services clusters in Europe

Health and social care

Transformational partnership working to deliver first of its kind Integrated Care Academy and research impact through the Norwich Institute of Healthy Ageing

Advanced manufacturing and engineering

National expertise in automotive, civil aviation, space, composites, and pharmaceuticals

Life sciences and biotech

International expertise in the fields of food, health, and microbiome –advanced cluster of animal health and emerging pharmaceutical manufacture

Ports and logistics

UK's largest container port at Felixstowe and nationally significant ports for the energy and agri-food sectors, with a strong logistics cluster

Visitor economy

A varied and significant tourist offer, from coast and countryside

Voluntary, community and social enterprise

The voluntary, community and social enterprise sector has an important role to play in supporting those furthest from the labour market

OUR ECONOMY AT A GLANCE

£38bn contribution to the UK plc

£244,354 Median house price (England in 2020: £255,900)

25% higher salary in 'Green Jobs' than the economy average

36% STEM take (UK 41%)

£28,452 median gross wage (England £31,777)

£5.2bn goods exported in 2019

75.9% employment levels, that's higher than the 74.4% UK average

63,460 independent enterprises

Increasing our region's productivity levels to the UK average would contribute an additional £4bn gross value per annum to our economy.'

28%* at level 4+ Only 28% of jobs require level 4+ (UK 32%)

*Our economy is skewed towards occupations requiring lower-level qualifications.

1,675,300 total population

All people 16-64 (working age pop): **978,000** (58.4%) vs. 62.3% for England.

65's & over: 406,800 (24.3%) vs. 18.5% for England

Workforce NVQ Qualification levels in Norfolk & Suffolk

35% Level 4 (UK 43%),
19% Level 3 (UK 17%),
18% Level 2 (UK 15%),
14% Level 1 (UK 10%),
7% None (UK 7%),
5% Other (UK 6%)

B9 New Anglia LEP Growth Deal[8]

Our ambition is to transform the local economy into a global centre for talent and innovation. To achieve this we have signed a multi-million pound Growth Deal with Government which will boost the region's skills, drive innovation, target support to help small businesses to grow and improve transport and infrastructure.

New Anglia LEP's total Growth Deal from Government is £223.5m to 2021. To date, it has led to the creation of 3,005 jobs, 2,189 new learners, 802 new homes, and matched funding totalling £676.4m.

B10 STEAM report - 2023

STEAM is a tourism economic impact modelling process designed to engage the client and maximise the benefit of local tourism expertise.

This measures key statistics of the impact of tourism and visitor economy in the Broads. The headlines are

- 7.5M visitors (+ 5.4%)
- Economic impact £711m (+15%...inflation caveat…although spending more, prices are up so not buying 15% more)
- Supporting around 7,000 jobs (+6.8%)

B11 Norfolk Strategic Planning Framework - 2021

The NSPF provides a structure for tackling these planning issues across the county, especially those which have a strategic impact across local authority boundaries. It includes guidance relating to housing, economic growth, infrastructure, and the environment. The NSPF informs the Local Plans produced by all the authorities.

Agreement 8 - Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan

Agreement 9 - 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.

Local Plan response – no Tier One Employment Sites are in the Broads.

Agreement 10 - 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.

[8] Growth Deal - New Anglia

Local Plan response – Part of Greater Norwich is in the Broads, and we work closely with the planning teams of the Greater Norwich Councils. The Acle Straight is part of the A47 that runs through the Broads and there is a policy relating to that. There is a small stretch of coast in the Broads and there is a policy relating to that.

B11 Lowestoft Town investment plan 2021 to 2031[9]

The vision:
"Post Covid-19, Lowestoft will be a place, both to live and to work locally as the need and desire to travel becomes reduced. Therefore there will be a need for quality mixed tenure of housing close to the centre. There will be aspiration and ambition so everyone aims higher and believes they can be successful in their place; skilled and self-reliant: focussing on up-skilling local people, attracting new talent where necessary and growing a sustainable local economic base; retaining and inspiring young people to grow and keeping our own talent. We will collaborate and connect across the region and to London; whilst digitally opening up job opportunities. We will work across sectors and be place led. We will become resilient and sustainable, being robust and adaptive in responding to climate change. We will come together as a community using our town centre as it becomes a vibrant hub. A centre where the needs of functionality and fun are met, some shopping provided but where culture, leisure and escapism have a leading role and given recent experiences the importance of our place being where we're happy and a place we call home."

Priority projects:

- Employment, enterprise and skills
- Transforming our town centre; retail and leisure
- Celebrating our culture and heritage
- living your life in Lowestoft
- collaboration and connecting

East Suffolk Council will coordinate the development of the individual business cases for the prioritised Towns Fund projects along with project partners, including Associated British Ports, the Marina Theatre Trust and Lowestoft Town Council. As a part of the prioritisation process, projects have already gone through an outline business case project template, which will be developed into full business cases in-line with HM Treasury Green Book Business Case Guidance

[9] Lowestoft-Town-Investment-Plan.pdf (eastsuffolk.gov.uk)

Appendix C: Economic Baseline

C1 Out of work benefits (Wards)[10]

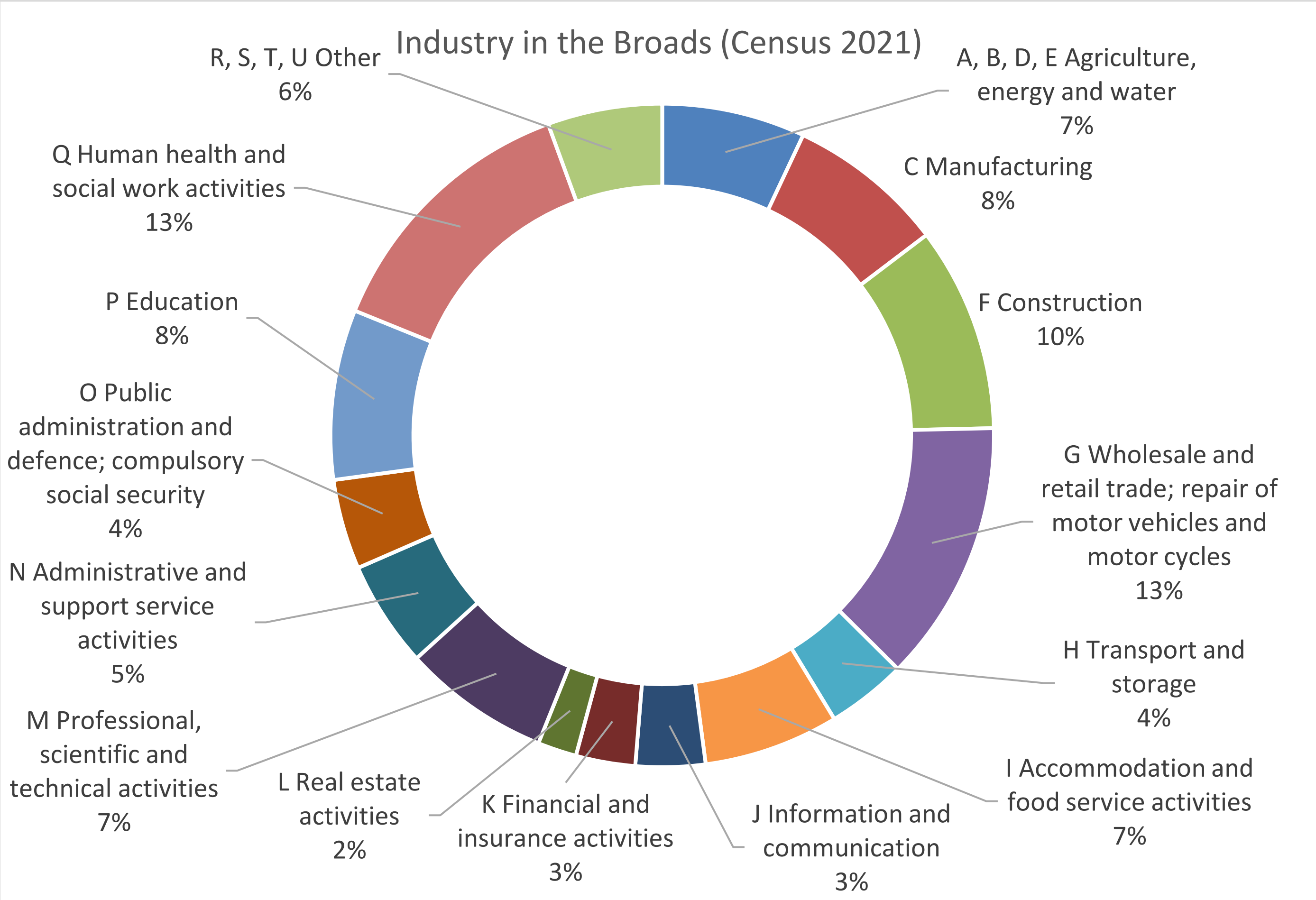
The Parishes that are in the Broads Executive Area are in the following Wards. The percentage figures show the number of out of work benefits claimants as a proportion of resident population aged 16-64. The average for Great Britain is 3.7%. as at September 2023 Red highlights the highest level and green highlights the lowers level. Please note that in most cases only part of the Parish is in the Broads Executive Area; this is the best data available for monitoring unemployment levels in the Broads.

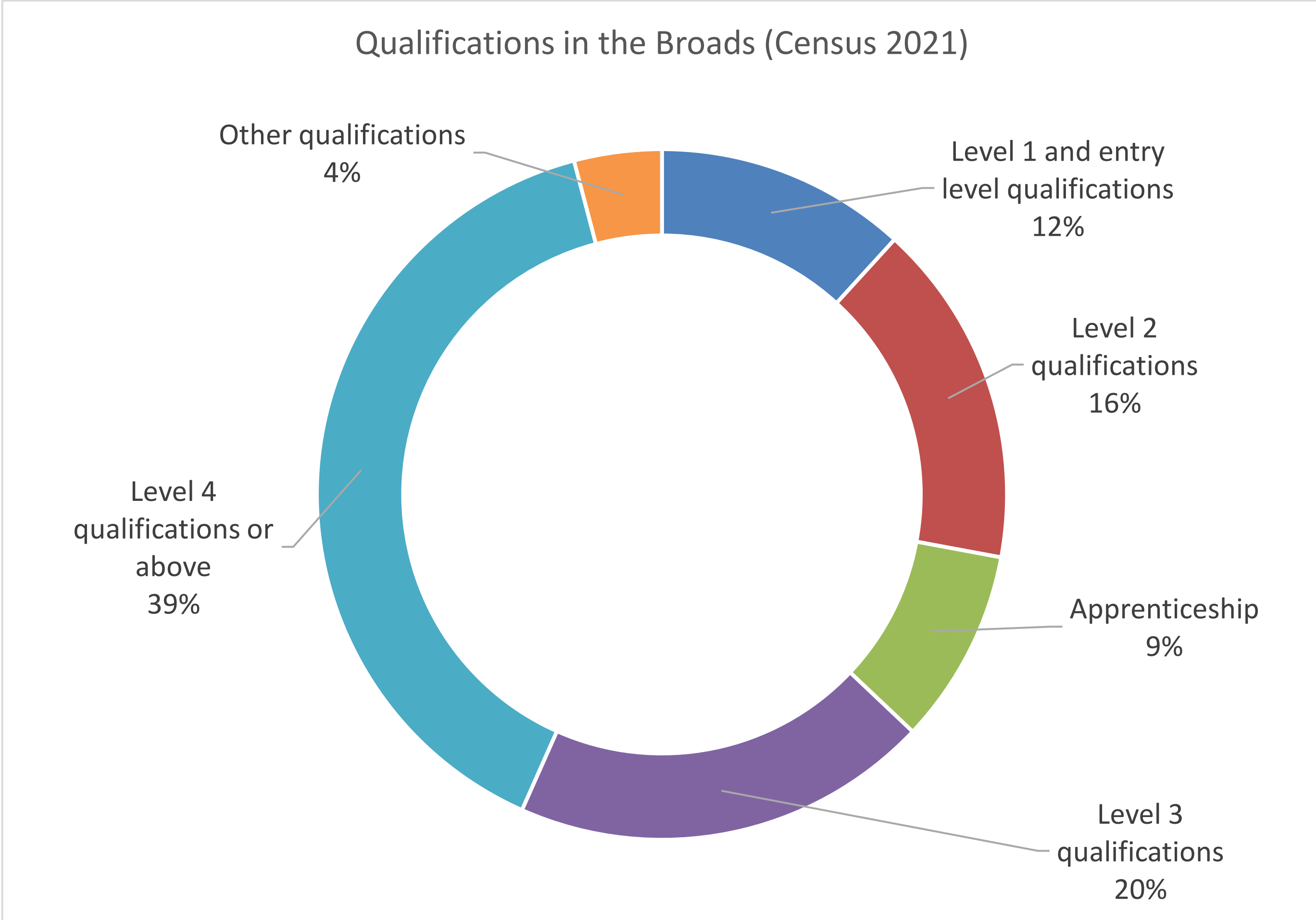
Ward	September 2021	September 2022	September 2023
33UCGN : Acle	2.4%	1.7%	1.6%
33UCGQ : Blofield with South Walsham	2.3%	1.6%	1.5%
33UCGR : Brundall	2.5%	1.6%	1.7%
33UCGT : Buxton	1.8%	1.5%	1.8%
33UCGU : Coltishall	2.8%	1.3%	1.6%
33UCHE : Marshes	2.7%	2.6%	1.9%
33UCHQ : Thorpe St Andrew South East	2.6%	1.6%	1.9%
33UCHR : Wroxham	2%	1.9%	1.9%
33UDFY : Bradwell North	2.2%	1.4%	1.7%
33UDGB : Caister South	3.5%	2.3%	2.7%
33UDGE : East Flegg	2.7%	2.5%	2.2%
33UDGF : Fleggburgh	2.5%	2.4%	1.9%
33UDGL : Ormesby	3.7%	2.3%	2.6%
33UDGP : West Flegg	2.7%	2%	2.3%
33UFGY : Happisburgh	2.8%	2.8%	1.7%
33UFHB : Hoveton	3.6%	2.1%	3.1%
33UFHM : Scottow	2.1%	1%	1.1%
33UFHR : Stalham and Sutton	3.7%	3%	3.3%
33UFHX : Waterside	3.3%	2.3%	1.7%
33UFHY : Waxham	2.4%	1.8%	1.3%
33UHHA : Chedgrave and Thurton	3.6%	2.8%	2.4%
33UHHF : Ditchingham and Broome	2.2%	1.7%	1.5%
33UHHG : Earsham	2.7%	2.3%	2.2%
33UHHK : Gillingham	2.9%	2.9%	2.5%
33UHHQ : Loddon	3.2%	3.2%	3.4%
33UHHY : Rockland	2.5%	1.4%	1.5%
33UHJC : Stoke Holy Cross	2.3%	1.6%	2.1%
33UHJF : Thurlton	2.9%	2.4%	1.9%
42UHFY : Beccles North	4.4%	3.3%	3.2%
42UHGB : Bungay	4.4%	3.4%	2.5%
42UHGD : Carlton Colville	2.8%	1.9%	1.8%
42UHGE : Gunton and Corton	2.7%	1.4%	1.8%
42UHGK : Lothingland (GYBC)	3.6%	2.4%	2.3%
42UHGN : Oulton Broad (Whitton)	3.5%	2.7%	2.1%

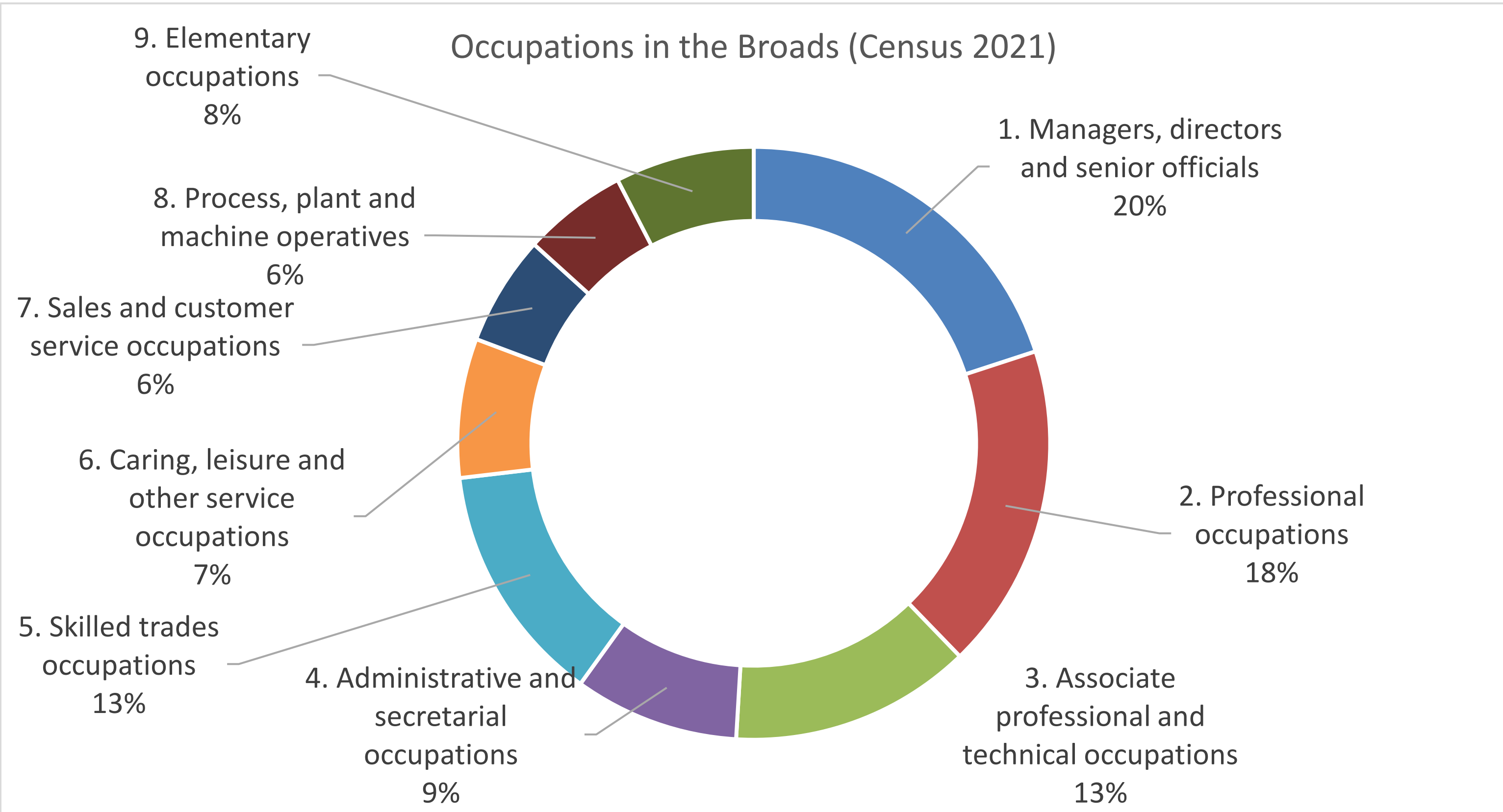
[10] http://www.nomisweb.co.uk

Ward	September 2021	September 2022	September 2023
42UHGT : Wainford	2.6%	1.6%	2.1%
42UHGW : Worlingham	2.3%	2.2%	1.5%

C2 Census 2021 – statistics relating to the economy and employment.







Appendix D: Comments received as part of the Issues and Options consultation

The Consultation on the Issues and Options version of the Local Plan was held at the end of 2022. The comments relevant to economy and employment are as follows. The Issues and Options document can be found here: [The Local Plan for the Broads: Review - Issues and Options Consultation (broads-authority.gov.uk)]

D1 Farm diversification

Question 26: Do you support this policy approach generally?

Bradwell Parish Council	We feel that there needs to be more focus on crops to feed the nation, so we are more independent on the effects of international events. So if this means subsidies then so be it.
Broads Society	The Society generally supports the current Policy DM27.
East Suffolk Council	Appropriate diversification of farming is generally supported by East Suffolk Council. Paragraph 84 of the National Planning Policy Framework states that policies should enable, 'the development and diversification of agricultural and other land-based rural businesses'. It is agreed that the approach should ensure land is not fragmented and that any diversification is supportive of the existing farm and does not reduce the farm's overall viability. In accordance with policy DM27 of the Broads Local Plan utilising existing structures where possible is recommended.
RSPB	We don't subscribe to the principle that as a general principle 'farmers may need to make changes less beneficial to the countryside'. Can you expand or give examples of what this might entail, because as presented this statement appears very open-ended and unregulated? We do not contest the principle of farm diversification making farms more viable, but there need to be limits agreed to ensure a sustainable approach is adopted.

Question 27: Do you have any thoughts on this particular issue (subdivision/fragmentation) in relation to farm diversification? Do you agree that the uses should be linked, so that it remains associated with the farm?

Bradwell Parish Council	Bearing in mind my answer above then the purpose should be linked to food production in line with the farms original use.
Broads Society	The Society supports the idea that farms should not be fragmented but also feels that other uses not strictly related to the farm could be acceptable as long as they were closely related, locationally, to the existing built form of the farm.
East Suffolk Council	East Suffolk Council supports ensuring that farms are not fragmented which helps protect the viability of the wider area. This allows a greater degree of control over the land, avoiding new planning units with inappropriate or disruptive uses. The East Suffolk Council - Suffolk Coastal Local Plan (September 2020) takes a similar approach within Policy SCLP4.7 which requires farm diversification to ensure farming remains the predominant use on the site.

East Suffolk Council	The fragmentation of land may have a wider impact on the character of the area (whether positively or negatively). The important landscape character attributes are defined in the Broads Authority Landscape Character Assessment, and it is important to note the strong relationships between the landscape character within East Suffolk as defined in the Waveney District Landscape Character Assessment: https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character- Assessment.pdf. Any adverse character impacts could have cross-boundary impacts.
RSPB	Agree with the principle of not allowing subdivision and fragmentation and that all land needs to be managed or 'developed.' There are huge benefits to wildlife in providing a network of locations (fields if you like) which provide rough ground for species such as owls. Not every speck of land needs to be worked. Longer term planning and contribution to the greater good of the landscape should be encouraged.

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

Bradwell Parish Council	You definitely need to ask for supporting information on how the diversification project/proposal will enable the farm to be viable.
Broads Society	The Society considers that the submission of a viability statement is a great way of getting the applicant to focus on whether or not any proposal is really financially viable and beneficial to them in practical terms.
East Suffolk Council	Farm diversification allows for non-agricultural uses ensuring the farms continued viability. This can mean that jobs are retained, and food security is continued. The Broads Authority may wish to note that policy SCLP4.7 of the East Suffolk Council - Suffolk Coastal Local Plan requires similar viability information stating that diversification is supported subject to, 'e) The diversification is supported by detailed information and justification that demonstrates that the proposals will contribute to the viability of the farm as a whole and its continued operation'.
East Suffolk Council	In developing a policy approach for this area, the Broads Authority may wish to consider stating that the level of supporting viability information should be of a scale appropriate to the size of development and set out that details of what viability information is appropriate in either the policy or within an appendix.
RSPB	Yes, to requiring additional information on viability, especially the time frame for the proposed projects. As stated clearly market trends will play a large part in directing choices about direction of farm business but retention of a set approach for a longer period will offer greater value, except when unforeseen circumstances show the proposed direction of travel is no longer viable.

Question 29: Do you have any thoughts on conversion and new build in terms of farm diversification?

Bradwell Parish Council	Limit farm diversification so the focus is on availability for food production going forward.
Broads Society	The Society would agree that conversion is preferable to new build (particularly in relation to holiday accommodation provision). However, there are site specific instances where new build would be acceptable and should not be ruled out. A criteria based policy which could allow new build would be a better way forward than restricting it totally.
Designing Out Crime Officer, Norfolk Police	Norfolk Constabulary will continue to work with the Planning Officers and applicants for any significant new build to encourage and implement Secured by Design standards.
East Suffolk Council	It is often beneficial to seek the retention and conversion of an existing building, as opposed to new development, particularly where it ensures the retention of buildings with positive character impact. As the issues and options document states it also potentially reduces the carbon impact.
East Suffolk Council	The East Suffolk Council - Waveney Local Plan includes policy WLP8.15 for new self-catering tourist accommodation. The policy states that new permanent self-catered accommodation can be allowed in the countryside where it involves conversion of rural buildings subject to a set of criteria. Were the Broads Authority to take forward a similar approach in the new Local Plan, consideration should be given to how best to ensure tourist accommodation arising from farm diversification can be protected from pressure to become residential over time.
East Suffolk Council	The Broads Authority may also wish to note that the Waveney Local Plan includes other policies governing conversion of existing rural building, namely, policies WLP8.11 (to residential use) and WLP8.14 (to employment use).
RSPB	New build if construction is shown to have a low or long-term neutral Carbon footprint, and will sit well within the landscape, should be considered. However, conversion of more permanent new build (bricks and mortar) would suggest the developer hasn't fully thought through construction and should be avoided and discouraged. Conversion of existing buildings if done sympathetically, following guidance and design principles should be encouraged.
Sequence UK LTD/Brundall Riverside Estate Association	2.70We would broadly support a policy that allowed for conversion of farm and indeed other buildings to both holiday let and permanent residential. Current policies within the Broads Local Plan do make it more challenging to secure residential and holiday let conversion with a preference for buildings to be first retained in their current use. This is out of step with other Local Plan policies and indeed paragraph 80, part c of the Framework and therefore we would welcome policies allowing more straightforward residential and holiday let conversion.

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

Bradwell Parish Council	The continued focus on diversification is not consistent with the country having self sufficiency in food production.
Broads Society	The Society feels that farm diversification should remain a subsidiary element to the overall agricultural function of the business and should not exceed more than 50% of the total business operation.
East Suffolk Council	As noted above, East Suffolk Council's view is that proposals for farm diversification should support the viability of the farm which will remain the main, primary use. A continuous loss of farmland to more diverse uses could, on a planning balance, change the primary use and the planning use class meaning it could fail its original objective.
Luke Paterson	4.there is discussion around the nature and scale of farm diversification, farm diversification is very important with BPS being REMOVED and the energy crisis effecting farm profitability. Old buildings are not always efficient to heat and may not be as suitable as a new build. I have diversified into tourism and see that this is the direction of travel for my business to maintain its sustainability.
Luke Paterson	6.Farmers PD rights should not be curtailed.
RSPB	A complete business plan should define whether a particular diversification proposal is sound financially, will be acceptable in terms of design and will have no adverse impact on surrounding land, water, and other interests. It isn't so much a case of whether a single farm has been diversified enough as much as it is the in-combination impact of several adjacent farms diversifying and changing the landscape character. However, even this approach should be given due consideration if the proposed approach is deemed to be more beneficial given prevailing impacts of climate change. The land management activity known to produce the highest release of CO2 into the atmosphere is arable cropping.

D2 Agriculture Development

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

Bradwell Parish Council	Option b.
Broads Society	The Society's preference is for 'Option a' to allow for a less constrained approach to any developing trends in the future. A specific policy might hamper an agricultural business from implementing speedier changes to the operation)
Designing Out Crime Officer, Norfolk Police	AS Q5 response - Consideration of condition of planning that the development and physical security meet Secured by Design standards.

East Suffolk Council	As the consultation document rightly sets out, agriculture is a key land use in the Broads and is important to the local economy. Within that context, there may be value in the Broads Authority giving further consideration to the feasibility of developing a new development management policy, specifically relating to agricultural buildings (option b).
Norfolk Wildlife Trust	Agricultural development – whilst we have no comments in principle on this question, we would recommend that any new development or renovation includes integral features of benefit for wildlife such as swift, bat and bee bricks, in order to help turn around the decline in these important species.
RSPB	Option b) should be chosen. A specific consideration relates to the creation of winter storage reservoirs to enable irrigation of arable crops and other forms of horticulture. Given the pressure on water resources and the Restoring Sustainable Abstraction decision made by Environment Agency facilitating the creation of new water storage reservoirs to capture winter rain and excess (perhaps reverse pumped storm flows) is paramount. This is especially attractive if farm clusters operate to create a shared structure as a single reservoir, which if sited appropriately is likely to have a lower impact on the landscape than several such structures if located on many individual farms. Obtaining planning permission for such structures is often a long-winded process and given these reservoirs protect both cropping and maintenance of groundwater sources, they should be applauded and supported.

D3 Existing policies

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

East Suffolk Council	Common Lane North Employment Area Common Lane North Employment Area is designated in Waveney Local Plan Policy WLP8.12. The northeast section of Common Lane North Employment area is situated close to the Broads Authority area boundary. Both the employment area boundary and settlement boundary are tightly drawn around existing buildings. There would be no justification to extend the Employment area boundary further north into the Broads authority area.

Appendix E – responses from short technical consultation

Organisation	Comment	Response and way forward
Norfolk County Council	NCC are developing an Economic Strategy over the next 6 months.	Text added
East Suffolk Council	**2.0 Key Findings**: Potentially the headings could be more descriptive and explanatory within sections 2.1 through to 2.4. This depends on the intended audience but there are many statements within the bullet points that would benefit from additional context and relevance being expanded or explained. There is also a need to ensure consistency of the bullet labels used within the document.	Bullets made more consistent. This is a summary of more information in appendices – no change.
East Suffolk Council	**3.0 How the Local Plan addresses Employment and the Economy**: Again, the section would benefit from an extended introduction to provide context and explain the relevance of the policies that relate to the economy.	The introduction is quite clear in what this section talks about. It is not proposed to copy over the policies from the Local Plan. No change.
East Suffolk Council	**Appendix A**: The use of copy and paste to draw attention to relevant sections of extensive document can be appropriate but more explanation in the introduction would be recommended.	Again, introduction and purpose of this section is clear.
East Suffolk Council	**Appendix B**: The section would also benefit from a brief critical appraisal of the available evidence. For example, there is no explanation as to what is meant by the Volume or Value of Tourism, the strengths and weaknesses of this study.	The aim of the section is to refer to relevant literature. This is done by summarising what the literature says. Links are provided to the documents so they can be accessed if the reader desires. No change.
East Suffolk Council	**Appendix C:** The economic baseline could also benefit from a critical appraisal or explanatory note about their inclusion. Something that would inform any lay person reading the document.	The date is self-explanatory. Relevant information is included in the Local Plan. No change.
East Suffolk Council	**Appendix D:** Depending on the purpose and use of the paper, the 'raw' consultee responses may have benefited from a qualitative assessment to highlight the key issues identified.	The section includes the response verbatim which is our preferred approach. No change.

Organisation	Comment	Response and way forward
East Suffolk Council	Page 2. 1. Introduction – Could detail be added in how the evidence in the document was assembled?	Agreed. Text added.
East Suffolk Council	2.1 b) The use of just East Suffolk Council as a term would be fine.	Changed.
East Suffolk Council	d) Could this point be expanded by a sentence explaining the evidence that led to the Broads Authority not needing an employment target?	Agreed. Text added.
East Suffolk Council	e) Similar to above, a sentence explaining the reason why would be useful.	Agreed. Text added.
East Suffolk Council	h) Could be defined 'retail work'?	The word 'studies' used instead.
East Suffolk Council	2.2 Perhaps some examples of the 'other documents' would be useful	These are included in the literature review. No change.
East Suffolk Council	Page 3. 2.3 Potentially clarify that the local authority references specifically to the Broads Authority area.	This comment is not clear. There is no such reference in that section. No change.
East Suffolk Council	Assume the last 2 bullet points are not from the census so should be sourced separately.	Sources added.
East Suffolk Council	2.4 Do the headers need to include the original question to give a more clear explanation?	Appendix D includes the questions. No change.
East Suffolk Council	Page 8 Appendix B the paragraph says '2020 The Tourism Company 9', which appears to be an error. Here and elsewhere what appears to be a footnote should be superscript to be clear.	Amended.
East Suffolk Council	Page 9 Primary target Markets, percentages of visitors falling into each type would be interesting.	Information not available.
East Suffolk Council	Page 10 B2 Broads Plan should this be at the top? Everything should be linked back to the Broads Plan.	The literature review is not in any particular order. Content with how it is presented. No change.
East Suffolk Council	Page 11 B4 could note that the needs assessment is to 2031.	Added.
East Suffolk Council	Page 15 Reference has been made to the Norwich Plan but could the Lowestoft Plan also be included?	Added.
East Suffolk Council	Page 18 B9 Is this still active? Worth checking	The Strategy is still on the website. No change.
East Suffolk Council	Perhaps more explanation of STEAM could be useful	Explanation added.