

Broads Local Plan Local Infrastructure Report

February 2024

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1. Introduction

Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences. By its very nature, it underpins everything we do and is fundamental to our daily lives. Infrastructure supports new development and facilitates the growth of jobs and access to technology and services.

The NPPF, at paragraph 20, says:

Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: Inter alia

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure)

This report seeks to summarise the needs and approaches to provision of local infrastructure.

A draft version of this report was sent to some stakeholders for a three-week technical consultation. The responses received are at Appendix 1.

2. The Authority's constituent districts and their infrastructure studies

To support their proposals in current Local Plans and to support future proposals in future Local Plans, our District Council's assess the infrastructure requirements. The Broads' housing need number is included within our district's total housing need and the infrastructure needs of that total number for the entire district will be assessed through these studies. The Authority works closely with its constituent districts as Local Plans are produced. Here are the most recent Infrastructure Studies. Please note that North Norfolk District Council do not appear to have such a study on the website.

- [Great Yarmouth Infrastructure Plan \(2020\)](#) - This document identifies the various forms of infrastructure that might be required to meet the level of growth planned in the Great Yarmouth Local Plan Part 2 to 2030. It presents an overview of growth patterns and their infrastructure projects needed to support such growth, their costs and the funding involved with this. This study has been prepared in consultation with infrastructure providers.
- This report is a review of the infrastructure requirements within the Greater Norwich Area: [Greater Norwich Infrastructure Needs Report](#). There is also the [Five Year Infrastructure Investment Plan](#) which identifies the projects from the [Greater Norwich Infrastructure Plan](#) whose delivery is considered to be a priority for achieving the economic growth targets, as set out in the [Joint Core Strategy](#) and the [Greater Norwich City Deal](#).

- [Waveney Infrastructure Study](#) - This document identifies what infrastructure might be required to support the growth ambitions in the Waveney Local Plan. Where possible it identifies the cost, the organisation responsible for delivery, and any potential funding sources. The study has been prepared in consultation with infrastructure providers.
- At the time of writing, North Norfolk District Council were at examination into their Local Plan. Their infrastructure related information can be found here: [Home | 4: Evidence base and supporting documents \(north-norfolk.gov.uk\)](#)

It should also be noted that LPAs are required to produce Infrastructure Funding Statements each year. The infrastructure funding statement (IFS) must set out the amount of future planning obligation expenditure where funds have been allocated. The BA's Statement is here: [Developer contributions \(broads-authority.gov.uk\)](#).

At the time of writing, the district councils have not asked the Broads Authority to include specific infrastructure in the emerging Local Plan. We will continue to work closely with the District Councils.

3. Norfolk Strategic Planning Framework

As part of the [Norfolk Strategic Planning Framework](#) (NSPF) (January 2021) work is ongoing at a Norfolk-wide level to address the same issues as listed in the NPPF, but from a more strategic view point. Whilst the NSPF looks at strategic infrastructure this report summarises infrastructure at a local level. The following are agreements from the NSPF:

Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 26 - Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues: • Infrastructure • Governance • Heritage • Marine Protected areas • Marine and coastal employment • Sustainable port development • Energy – offshore wind and oil and gas • Access for tourism and recreation • Sustainable fisheries and aquaculture in small harbour towns • AONB and Seascape and landscape (character and natural beauty) • Biodiversity • Marine aggregates • Cabling • Water quality/water supply and sewerage • Climate change/ Coastal erosion and coastal change management

Agreement 28 - In recognition of: a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; b) the pressure that development in Norfolk could place on these assets; and c) the importance of ecological connections between habitats Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

As the Local Plan is produced, we will ensure it addresses the agreements set out in the NSPF.

4. Norfolk and Suffolk - Strategic Infrastructure

The [Norfolk Strategic Infrastructure Delivery Plan](#) (NSIDP) (2022) has been produced by Norfolk County Council working with all the local planning authorities and utility providers. It identifies strategic infrastructure requirements and provides an update on the delivery of a range of projects. The projects in the NSIDP reflect the key infrastructure needed to deliver the scale of

growth ambitions outlined in the NSPF. The NSIDP is a working document that will be regularly updated as information becomes available. The NSIDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development.

In Suffolk, there is a public sector led partnership, working with councils and partners to promote countywide economic growth. [Suffolk Growth](#) works at both a strategic and operational level, providing links across our multi-faceted growth agenda. Generally, the partnership work to:

- Connect transport investment and the development of the local economy,
- Ensure public investment in infrastructure and business development support delivers best value (economic, social and environmental) for Suffolk's firms.
- enable growth of the visitor economy and support the rethinking of local high streets to deliver for residents, businesses and tourists, including our ambition to become the UK's first green tourist destination.

The main infrastructure identified that is particularly relevant to the Broads, is the dualling of the Acle Straight. The current local plan has a policy on the Acle Straight and this will be rolled forward.

5. The housing and residential moorings need for the Broads

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

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

5.1 Residential dwellings

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

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

- 2019/20: 21 dwellings

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

Most Local Planning Authorities now have their housing need calculated using the Standard Methodology. The NPPG says that the ‘standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply’.

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

Working with Great Yarmouth Borough Council, who were commissioning work on their housing need at the same time as us, we commissioned ORS Consultants to calculate the housing need for the entire Broads area. The [study study](#) was completed in May 2022¹ and identifies a housing need for the Broads from 2021 to 2041 as follows:

Projected Dwellings needed for the Broads by Local Authority

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

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

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

5.2 Residential moorings

The Housing and Planning Act 2016 sets out the requirement to understand the need for those living on boats.

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

¹ A second version was issued in September 2022 to correct some minor typographic and other errors which were found in the original Great Yarmouth Borough Council and the Broads Authority Local Housing Needs Assessment, May 2022. The two reports are the same in every important respect; in particular, the housing need figures are the same in both reports.

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

We commissioned RRR Consultancy to calculate the housing need for the entire Broads area. The study² was completed in July 2022 and identifies a residential mooring need of 48, as follows:

Table 10

Residential moorings need to 2041

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

5.3 The Utilities Site

The Utilities Site is a brownfield site in Norwich. It is next to other brownfield sites which have the potential for regeneration. Working with Norwich City Council and Broadland and South Norfolk Councils, a partnership has formed to collectively look at sites in this area – the East Norwich Regeneration Area. Combined with the other four sites, it is fair to say that much infrastructure will be required. A [Masterplan](#) has been produced and at the time of writing, an SPD was being produced. The infrastructure needs of that wider scheme are considered in those two documents.

Development in the Broads may require local specific infrastructure. The Utilities Site will require significant infrastructure and that site is part of a wider regeneration area subject to a Masterplan and emerging SPD.

6. Transport

The NPPG Paragraph 104 says: *Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*

- a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*

² [Residential Moorings Need Assessment August 2022 \(broads-authority.gov.uk\)](#)

- c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*

The NPPF at paragraph 85 recognises the difference between rural and urban areas:

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

6.1 Acle Straight

An important transport consideration is the dualling of the Acle Straight. Whilst on one hand this is local to the Broads, it is also of strategic importance as the road is a Trunk Road. The A47 is the main strategic route linking Norfolk to the midlands and the north (westbound) and central/northern Europe (eastbound). The Authority has an adopted policy relating to this in the Local Plan (2019) which will be rolled forward to the new Local Plan.

6.2 Policies in the Local Plan

New allocations could have local highway network impacts of varying scales. The Authority will work with the relevant Local Highways Authority. Individual allocations will be considered by the Highways Authority. Indeed, the Highways Authority will still assess individual planning applications. Please note that those allocations rolled forward from the 2019 Local Plan that have planning permission (OUL2, STO1 and THU1) are deemed adequate in relation to transport. And all other sites that are to be included in the new Local Plan were assessed through the [Housing and Economic Land Availability Appraisal \(HELAA\)](#) and both Norfolk and Suffolk County Councils as Local Highways Authorities provided comments to consider and take on board when assessing the sites.

Development allocations and development boundaries are located in more sustainable locations where services and facilities can be accessed by modes other than single occupancy cars. The [Development Boundaries Topic Paper](#) is of relevance.

Some dis-used railways allocated in the Local Plan and safeguarded to enable them to be used as recreation routes.

6.3 Public transport, walking, wheeling and cycling.

Public transport is supported, although it should be noted that the scale of growth and the sites allocated in the Local Plan will not be of a scale to generate the need for viable changes to bus routes. In relation to rail, the Local Plan seeks to identify and allocate rail stations. For walking and cycling, please see the Green Infrastructure section. Norfolk County Council is currently consulting on a Walking, Wheeling and Cycling Strategy for Norfolk (December 2023).

6.4 Alternative fuels

Since June 2022, the Building Regulations have been changed so new homes and buildings such as supermarkets and workplaces, as well as those undergoing major renovation, are required to install electric vehicle charge points.

It is not proposed to set a standard for electric vehicle charging points in the new Local Plan for the Broads although there will be a policy relating to fire risk and the design and location of charging points.

6.5 Relevant district documents

Great Yarmouth Borough Council:

[Local Plan Part 2 Transport Modelling](#): The purpose of the study is to assess the impact on the A47 trunk road of three additional allocations that are part of the Great Yarmouth Draft Local Plan 2. The study demonstrates the impact on the A47 trunk road of the following allocations:

- Policy ADA1 – Land to the south of Links Road Gorleston-on-Sea – 500 dwellings;
- Policy ADA4 – Land to the north of the A143 Beccles Road, Bradwell – 600 dwellings; and
- Policy PDP6 – Beacon Park District Centre – (subject to a lapsed planning consent)

The impact of including the three additional allocations either constrained to NTEM growth levels or with unconstrained growth, is to increase the likelihood of traffic congestion around the junction of A47 / Links Road / Beaufort Way.

[Great Yarmouth Transport Strategy and Implementation Plan - 6 April 2020 \(norfolk.gov.uk\)](#): This document sets out the transport vision for Great Yarmouth, highlighting the challenges and opportunities along with the transport infrastructure that needs to be delivered within the short and medium-term to enable growth to come forward sustainably as well as supporting the existing local communities. The transport infrastructure presented in this strategy has been sifted from an initial long-list of options which have been subject to stakeholder engagement, appraisal and prioritised using a bespoke Strategic Assessment tool and the Department for Transport's (DfT) Early Assessment and Sifting Tool (EAST), which compares the Strategic, Economic, Managerial, Financial and Commercial case for each transport option. An Action Plan has then been produced to take forward the identified options along with a series of recommended next steps.

Norwich City Council

[About Transport for Norwich - Norfolk County Council](#): Transport for Norwich is a programme of work to improve accessibility by all forms of transport around the city. The aim is to encourage the use of more sustainable forms of transport, such as public transport, cycling and walking, while also improving the capacity of the road network. It's also designed to stabilise traffic levels and as a result improve air quality around the city. It is a partnership between Norfolk County Council and Norwich City Council, as well as local authorities within Greater Norwich on schemes

in the wider area. Funding is from sources including the Department for Transport, developer contributions, New Anglia Local Enterprise Partnership and local growth funds.

East Suffolk Council

The following evidence was produced to support the Waveney Local Plan.

- Traffic Modelling

Assessing the impact upon the highway network of development planned in the Local Plan and identifying junctions that are likely to experience congestion in the future.

- [Suffolk County Transport Model Forecast Model Report](#) (2017)
Assessing the impact on the highway network from different growth scenarios.
- [Suffolk County Transport Model Forecast Model Report Addendum](#) (2017)
Examining the traffic impact from access options for growth to the south of Beccles.
- [Suffolk County Transport Model Preferred Option Traffic Forecasting Report](#) (2018)
Assessing the impact of the emerging preferred option. It includes updates to the model from the July 2017 reports.
- [Technical Note – Response on Beccles Transport Impact Assessment](#) (2018)
A response to issues raised within the Beccles Transport Impact Assessment, which was commissioned by Worlingham Parish Council.

6.6 Hoveton and Wroxham network improvement strategy

The [Hoveton and Wroxham network improvement strategy \(2020\)](#) identified potential measures to help address existing transport network constraints and transport improvements to facilitate the growth identified in the emerging Local Plans. This work produced some key findings:

- Through traffic is a significant proportion of the journeys.
- The highest quantities of traffic pass through Norwich Road / Stalham Road (A1151) with the majority travelling South towards Norwich.
- There is scope to encourage a greater use of sustainable transport.
- The A1151 Norwich Road / B1140 Salhouse Road mini-roundabout operates close to capacity with high delays in AM peak hour.
- The A1151 Norwich Road / Church Road / Station Road / A1151 Stalham Road junction is affected by high demand from the adjacent signal-controlled pedestrian crossing which creates queues.
- The A1151 Stalham Road / A1062 Horning Road / B1354 Horning Road West double mini-roundabout junction is close to capacity in both AM and PM peak hours and experiences congestion on all arms.

6.7 Transport East

[Transport Strategy 2023-2050](#): Through this strategy, we aim to overcome some of the transport challenges experienced, while also delivering a fit for purpose, high quality, inclusive and sustainable transport network that will be able to accommodate future growth in the area.

Strategic priorities and linked goals are as follows:

Decarbonisation to net-zero

Working to achieve net zero carbon emissions from transport, building on our status as the UK's premier renewable energy region. Our decarbonisation pathway underpins the other three pathways in the Strategy.

Goal 1: Reduce demand for carbon intensive trips through local living; making it easier for people to access jobs and services locally or by digital means

Goal 2: Shift modes by supporting people to switch from private car to active and passenger transport, and goods to more sustainable modes like rail

Goal 3: Switch fuels with all private, passenger transport, fleet and freight vehicles switching to net zero carbon fuels at the earliest opportunity

Goal 4: Zero carbon growth by supporting authorities and developers to plan, locate and design new development that reduces the need for people to make carbon-intensive trips

Connecting growing towns and cities

Providing enhanced links between our fastest growing places and business clusters. Improving access for people to jobs, suppliers, services, and learning; enabling the area to function as a coherent economy and improving productivity.

Goal 5: Improve connections and access within our urban centres through better walking, cycling and passenger transport, supporting sustainable access to services, education, training, jobs and leisure

Goal 6: Deliver faster and more reliable connections between our growing places and to the rest of the UK, to support business growth, skills development and employment

Goal 7: Fully integrate transport networks, services and operations across the Transport East region, through a customer-focused approach, enabling seamless and safe end-to-end journeys by sustainable modes that are attractive to all.

Energising coastal and rural communities

A reinvented sustainable coast for the 21st century which powers the UK through energy generation. Supporting our productive rural communities and attracting visitors all year round.

Goal 8: Increase accessibility for rural communities to education, training, services and jobs through; better ways of taking people to places sustainably, supporting more local trips through

closer provision of goods and services, supporting regional partners and the digital sector to provide alternative options to travel

Goal 9: Improve connections along our 500miles of coastline, and connect our coastal communities to the rest of the region and the UK, supporting levelling-up and boosting our coastal industries.

Unlocking international gateways

Better connected ports and airports to help UK businesses thrive, boosting the nation's economy through better access to international markets and facilitating foreign investment.

Goal 10: Improve connectivity, journey time and reliability for freight, passengers and employees to ports and airports

Goal 11: Move goods and people sustainably to ports and airports by shifting modes including to rail and water

Goal 12: Increase the use of alternative fuels for both port and airports, and for the vehicles moving people and goods onwards from international gateways.

[Strategic Investment Programme \(February 2023\)](#): This document sets out the proposed approach to a Strategic Investment Programme to enable delivery of the Transport Strategy. It is a supporting document for the Transport East Strategy, and the main document will be reviewed every three years or in response to emerging guidance and policy; the Appendices to this document will be updated annually.

The scale of growth proposed will not have strategic transport impacts. There may be some more local highway changes or improvements that could be needed as a result of schemes. We will contact the relevant Highways Authority regarding any allocations that are proposed. We will ensure we keep up to date with any relevant documents and strategies.

7. Telecommunications

NPPF paragraph 114 says: *Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*

7.1 Mobile coverage

In 2020, 87% of those over 16 had a smartphone³. Whilst there remain many mobile “not-spots” in Norfolk and Suffolk (some rural areas and parts of the coast in particular), the use of smartphones to access the internet has increased hugely; in 2015, smartphones overtook the use of laptops as the number one device to access the internet in the UK⁴.

Norfolk County Council⁵ commissioned an independent study in 2018, where the mobile signal was tested with consumer devices around Norfolk to establish a true picture of mobile voice and data coverage. They are using this information to work with mobile providers to improve coverage and tackle ‘not spots’ across the county. The survey covered:

- More than 3,400 miles of Norfolk’s roads
- 30 railway stations
- Main railway lines
- Enterprise zones
- Popular tourist destinations

The survey showed that phone signals for voice calls in Norfolk were an issue, with only 82% of call attempts being successful. The call failures happened throughout the county, across a broad range of locations and for all operators. Norfolk County Council provided the information from the survey in [interactive maps](#), allowing residents to see which of the four major providers - EE, Telefonica/O2, Three and Vodafone – have the best coverage in the area for the needs.

Suffolk County Council do not seem to have equivalent information relating to mobile coverage.

7.2 Broadband

The use and demand for mobile and home fast internet connections will continue to grow exponentially - with increased dependency on technology in our everyday lives. Access to fast broadband is a vital component of infrastructure in today’s world. It is key to growing a sustainable local economy, vital for education and home working and an increasingly central part of community cohesion and resilience, particularly in the rural areas of the county. The availability, reliability and speed of mobile and fixed broadband provision is now a key consideration for most house buyers as well as tourists and many view it as essential as the traditional utilities. Similarly, it is also a key concern for the business sector. The services offered by Local Authorities, utility companies and banking services are increasingly reliant on digital infrastructure to provide services and interact with their customers. Planning policy can play an important role in helping to achieve the transformation in mobile and broadband provision. Local Planning Authorities have a pivotal role to play in encouraging and supporting developers to future-proof their developments and maximise their value by installing high-speed broadband

³ <https://www.statista.com/statistics/956297/ownership-of-smartphones-uk/>

⁴ [CMR UK 2015.docx \(ofcom.org.uk\)](#)

⁵ <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/campaigns/digital-connectivity/mobile-phone-coverage>

and by working with mobile telecoms companies to ensure there is a comprehensive and reliable network that minimises the impact on the landscape.

Not all urban areas are well-connected; as an example, new residential development does not always have broadband connectivity installed up-front and rural areas are often less well-served by broadband, and the low speed of connectivity can be an issue in both urban and rural areas. Not all properties in a rural county – particularly isolated farmhouses and small hamlets - will be feasible financially to connect up to a broadband network, although there are some examples of the residents of small villages working together to pool funding to secure and deliver fibre broadband⁶.

In Norfolk, [Better Broadband for Norfolk](#), [Local Full Fibre Network](#) and [Project Gigabit](#) have extended and will continue to extend the fibre broadband network to homes and businesses across the county where it wasn't economically viable for commercial companies to provide access. Funded through Norfolk County Council, BT and BDUK (Broadband delivery UK), the project is expected to have a huge positive impact on the economic and social development of Norfolk. The latest info taken from the [Think Broadband](#) data shows at October 2023, 96.7% of premises in Norfolk can now access superfast broadband. This map shows the upgraded postcodes to enable fast broadband and where it's planned for future delivery [Better Broadband for Norfolk coverage check \(arcgis.com\)](#).

In Suffolk, Suffolk's overarching aspiration is to deliver full coverage of better broadband services to all premises in Suffolk as soon as possible. The Better Broadband for Suffolk Programme⁷, run by Suffolk County Council, secured around £24m of public money (SCC and Central Government), which was been used to leverage further private sector investment from BT through a public procurement process. Here is the Programme history:

- In 2013, we achieved 50% superfast broadband coverage in Suffolk.
- In 2015, we reached 85% coverage.
- In 2020 the Better Broadband for Suffolk programme reached its 100,000th customer.
- In 2021, phase 3 of the Better Broadband for Suffolk programme started - this phase completed in early 2023 and extended coverage in the county past 98% (with speeds of 24Mbps or greater). To see the latest broadband coverage figures in the county, please go to [the Think Broadband website](#).

Project Gigabit is a £5 billion government infrastructure project aimed at delivering fast and reliable gigabit-capable broadband to homes and businesses in the hardest-to-reach parts of the UK. On 1 July 2023, it was announced that the contract for Suffolk, representing a £100 million investment in Suffolk, has been awarded by BDUK to CityFibre to provide new high speed Gigabit broadband capabilities. This will benefit around 80,000 properties across rural Suffolk.

⁶ More information can be found here: [Fibre Community Partnership | Openreach](#)

⁷ <https://www.betterbroadbandsuffolk.com/about>

7.3 Fibre to the premises

Traditionally the main challenge to installing high speed broadband in new developments, particularly smaller developments and/or those in rural areas, has been that of cost and the complexities of working with the providers. Although the cost to developers of installing high speed broadband at larger sites can be cost neutral, the cost per unit increases on smaller developments where economy of scale is reduced. In addition, installing fibre cabling for superfast broadband across private land can often double the per-kilometre cost. Fibre to the Premises (FTTP) uses fibre-optic cable direct from the exchange to a business or home. Unlike FTTC (fibre to the Cabinet), there is no use of the traditional copper wire from a street cabinet. While the copper wire from the cabinet to the premises makes for an economical alternative, it doesn't compare with the speeds that FTTP offers. While an FTTC connection offers up to 76Mbps, the full fibre option reaches up to 1000Mbps or 1Gbps. Not all homes or businesses need those speeds but the ultrafast option allows for future-proofing and growth. FTTP was designed to be easily expanded and improved upon so that bandwidth has more room for growth than the hybrid FTTC option. [Openreach](#) offer to install Fibre to the Premises (FTTP) free of charge to all new housing developments of 20 or more homes and an improved pricing structure all the way down to two homes.

A change to building regulations commenced from 26 December 2022. These changes mandate the installation of a gigabit-ready telecoms infrastructure during the construction of new homes.

7.4 5g

5g follows previous generations of mobile technology such as 3G, which led to the launch of smartphones, and 4G, which enabled faster browsing, allowing us to do things like watching videos on the move. All four major UK mobile networks have launched 5G services. Technology firms are also rolling out 5G-ready devices. 5G is much faster than previous generations of wireless technology. But it's not just about speed. 5G also offers greater capacity, allowing thousands of devices in a small area to be connected at the same time. The connectivity and capacity offered by 5G is opening up the potential for new, innovative services.

5G will use a wide range of frequency bands⁵, such as 700MHz, 3.4GHz and 30GHz.

The higher frequencies of 5G will have a shorter range. Achieving the levels of network capacity where there is a very high volume of network traffic will over time increasingly rely on smaller cells situated nearer to the ground on lampposts and other street furniture, in addition to rooftop and ground-based masts.

Whilst more base stations will be required, Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which can be rolled out on existing infrastructure where possible. The initial phase will be to strengthening the existing infrastructure or rebuilding the network where required, then densification for major areas using small high frequency cells which will be rolled out in areas with high demand.

7.5 Recent Government Consultations

In April 2021, the Government consulted on [changes to permitted development rights for electronic communications infrastructure: technical consultation](#). This consultation sought views on proposed planning reforms that will allow the deployment of telecoms equipment to be quicker whilst ensuring that there are appropriate environmental protections and safeguards in place.

In January 2021, the Government consulted on [changes to the Electronic Communications Code](#). Through this consultation, the Department for Digital, Culture, Media and Sport sought views on whether changes to the Electronic Communications Code can help ensure that the UK has sufficiently robust electronic communications networks to deliver the coverage and connectivity consumers and businesses need.

Following these consultations, the [Product Security and Telecommunications Infrastructure Act 2022 \(legislation.gov.uk\)](#) was produced and has received Royal Assent.

7.6 NSPF and telecommunications

The Norfolk Strategic Planning Framework has two relevant agreements:

- Agreement 24 - To support the high-speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.
- Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations

7.7 Codes of practice

[Cabinet Siting and Pole siting Code of Practice Issue 2](#) (2016): The purpose of this Code of Practice is to provide guidance to Code Operators, agents, contractors, planning and highway authorities and other persons entitled to be notified of the proposed deployment of electronic communications apparatus on the siting, keeping, maintenance and use of above the ground electronic communications apparatus, specifically cabinets and poles utilised by fixed line Code Operators, not including masts utilised by mobile Code Operators (which falls under a separate code of practice).

[Code of Best Practice on Mobile Network Development in England](#) (2016): The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social

inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code applies to all forms of wireless development, but very obviously is most relevant to proposals for new masts or base stations and significant additions, extensions or replacements of existing sites.

There is a policy that relates to telecommunications infrastructure emphasising the importance of addressing impacts on landscape in the Broads. The Local Plan will reflect the NSPF.

8. Security

Paragraph 97 of the NSPF says: *Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:*

a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and

b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

At this stage, the Authority is not aware of any specific security related issues that the Local Plan needs to address. Norfolk and Suffolk Architectural Liaison Officers are consulted at all stages of producing the Local Plan and their responses will be considered and addressed as appropriate.

9. Waste

The [National Planning Policy for Waste](#) states ‘Positive planning plays a pivotal role in delivering this country’s waste ambitions’

The NPPG states: *While such authorities may not have the planning functions in respect of the preparation of Local Plans covering waste, or dealing directly with waste planning applications, they must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy. This might include:*

- *working constructively with waste planning authorities to identify and protect those sites needed for waste management facilities. Local planning authorities should consider the need for waste management alongside other spatial planning objectives*
- *integrating local waste management opportunities in proposed new development*
- *considering, where relevant, the likely impact of proposed, non-waste related development on existing waste management sites and on sites and areas allocated for waste management*
- *promoting sound management of waste from any proposed development, such as encouraging on-site management of waste where this is appropriate, or including a planning condition to encourage or require the developer to set out how waste arising from the development is to be dealt with*
- *including a planning condition promoting sustainable design of any proposed development through the use of recycled products, recovery of on-site material and the provision of facilities for the storage and regular collection of waste*
- *ensuring that their collections of household and similar waste are organised so as to help towards achieving the higher levels of the waste hierarchy.*

The Broads Authority is not the minerals and waste authority. The Authority's constituent districts are responsible for collecting waste from domestic properties while Norfolk and Suffolk County Council are the Waste Disposal Authorities and are therefore responsible for disposing of refuse as well as being the Minerals and Waste Local Planning Authority, producing Minerals and Waste Local Plans.

The County Councils are consulted at each stage of the Local Plan production and their responses will be considered and addressed as appropriate. There are some waste consultation areas that are in the Broads, which the Broads Authority are aware of and will act upon as required.

9.1 Norfolk County Council

The [Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD 2010-2026](#) (the 'Core Strategy') was adopted in September 2011. The [Norfolk Minerals Site Specific Allocations DPD](#) and the [Norfolk Waste Site Specific Allocations DPD](#) were both adopted in October 2013. The County Council are in the process of reviewing the three documents and bringing them together into one local plan. The Broads Authority will monitor progress and address any relevant policies or requirements as we produce our Local Plan.

The following table identifies the safeguarded waste management sites (see section 10.4 for safeguarded wastewater sites) where either the site itself or the consultation area for the site falls within the Broads Authority Executive Area.

SITE NAME	OPERATOR	TYPE
Caister on Sea (Household Waste Recycling Centre)	Norse LTD	Waste management site Consultation Area
Great Yarmouth-MT Skips	M T Skips	Waste management site

SITE NAME	OPERATOR	TYPE
West Caister (Materials Recycling)	Norfolk County Council	Waste management site Consultation Area
Cantley (inert landfill)	British Sugar PLC	Waste management site and 250m consultation Area

9.2 Suffolk County Council

The [Suffolk Minerals and Waste Local Plan](#) was adopted in 2020. This does not propose any minerals or waste sites in the Broads area. In addition, there are no existing waste or minerals management facilities in the Broads. There seems to be some wastewater treatment plants safeguarding areas that could be of relevance to the Local Plan.

9.3 The Local Plan and waste

Generally, the Local Plan supports the waste hierarchy. In terms of construction waste, as it accounts for a high proportion of waste that ends in landfill, it seems prudent to improve how that is considered in the Local Plan.

The Local Plan will roll forward the current general support of the waste hierarchy as well as ensure any waste allocations in the Local Plans are considered. There is potential to improve reference to construction waste.

10. Water

Adequate water and wastewater infrastructure are needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

The NPPG says:

What are the water supply, wastewater and water quality concerns that plans need to address?

These will vary depending on the character of the local area, the [type of issues the plan covers](#) and the contribution that can be made to a '[catchment-based approach](#)' to water. Wastewater treatment plants are waste developments and handled by the waste planning authority. In plan-making, there are a number of broad considerations relevant to water supply and water quality:

- [infrastructure](#) (water supply and wastewater)
- [water quality](#)
- [wastewater](#)
- [cross-boundary concerns](#)
- [strategic environmental assessment and sustainability appraisal](#)

- *habitats regulations assessments.*

Early discussions between strategic policy-making authorities and water and sewerage companies can help to ensure that proposed growth and environmental objectives are reflected in company business plans. Growth that requires new water supply should also be reflected in companies' long-term water resources management plans. This will help ensure that the necessary infrastructure is funded through the [water industry's price review](#).

Strategic policy-making authorities will also need to consider the objectives in the government's [25 Year Environment Plan](#) to reduce the damaging abstraction of water from rivers and groundwater, and to reach or exceed objectives for rivers, lakes, coastal and ground waters that are specially protected.

Paragraph: 002 Reference ID: 34-002-20140306

Revision date: 22 07 2019

Water is a particularly important consideration in the Broads. Abstraction to serve development and wastewater can potentially have a profound impact on the quality of the system. Development and activities within the catchment can impact on the Broads, for example agricultural practices, even if located some way from the Broads, can lead to sediment and chemicals washing downstream to the Broads which can lead to reduced water depth, turbidity and impact on the aquatic system through excess nutrients. These are all matters which planning can influence potentially with close cooperation with neighbouring Local Planning Authorities.

10.1 Water supply

The following table summarises water supply in the Broads Authority Executive Area:

Document	Description	What it says about the Broads Executive Area
The Water Stressed Areas - 2021 Classification (Environment Agency, 2021).	This identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.	<p>The companies determined to be in areas of serious water stress are:</p> <ul style="list-style-type: none"> • Anglian Water – East Anglia • Essex and Suffolk Water
Essex and Suffolk Water Resource Management plan (2019) (please note that the next version is being produced)	Essex and Suffolk Water and Anglian Water Services have a statutory duty to prepare and maintain a Water Resources Management Plan (WRMP) under the Water Resources Management Plan Regulations 2007. These set out how the companies plan to maintain the balance between supply and demand over the next 25 years.	<p>Some of the Broads are in the Northern and Central Water Resource Zone. Demand in the WRZ is heavily influenced by the large population centres of Lowestoft and Great Yarmouth.</p> <p>In the Suffolk Northern Central WRZ, the flexibility over utilisation of the three main surface WTWs at Lound, Barsham and Ormesby provides a buffer to impacts from peak demands. Subsequent to the 1995-1997 drought, significant investment was made in network improvements and enhancement of security of supply within the groundwater fed zones of Hartismere and Blyth. This effectively removed any residual peak/critical period concerns, and hence no ADPW or similar peak scenarios are presented in this WRMP.</p> <p>The baseline supply demand balance graph for the Northern Central WRZ showed that a supply surplus was maintained across the full planning period.</p> <p>At the time of writing, the next WRMP was being produced. This is likely to imply that there is a need for water efficiency measures going forward.</p>

Document	Description	What it says about the Broads Executive Area
Anglian Water Services Water Resource Management Plan (2019) (please note that the next version is being produced)		<p>North Norfolk Coast and Norwich and the Broads Water Resource Zone are the relevant water resources zones (WRZs).</p> <p>Baseline shows that these two WRZs are in deficit by 2044-45.</p> <p>Different stages of the plan will see different WRZs in surplus deficit. The two relevant WRZs are shown to be in surplus after the demand management strategy.</p> <p>Despite our ambitious demand management strategy, the scale of the challenge is such that we still need carefully targeted investment in supply side capacity.</p> <p>The entire area is shown to be in surplus after supply side options are included.</p> <p>The WRMP, at the time of writing, was being updated.</p>
Anglia District River Basin Management Plan (2022).	<p>The Anglian river basin district (RBD) river basin management plan describes the challenges that threaten the water environment and how these challenges can be managed.</p>	<p>Significant water management issues are listed as:</p> <ul style="list-style-type: none"> • Physical modifications • Pollution from waste water • Pollution from towns, cities and transport • Changes to the natural flow and level of water • Negative effects of invasive non-native species • Pollution from rural areas <p>The need for water efficiency measures features strongly in the document.</p>

Document	Description	What it says about the Broads Executive Area
Meeting our Future Water Needs: a National Framework for Water Resources (2020)	The National Framework explores the long-term needs of all sectors that depend on a secure supply of water. This includes public water supplies provided by water companies to customers' homes and businesses; direct abstraction for agriculture, electricity generation and industry; and the water needs of the environment.	According to the Environment Agency, if no action is taken between 2025 and 2050, around 3,435 million additional litres of water per day will be needed in England to address future pressures on public water supply; within this figure it is estimated that the East of England will require an additional 570 million litres per day to meet the needs of residents and the agricultural sector, industry and energy sector.

Another source of information is existing water cycle studies completed by our districts:

District	Evidence	Information/policy
Broadland	WCS (2021) was produced for Norwich, SN, BDC, Norfolk County Council and the Broads Authority.	The water efficiency assessment can be used by GNA to develop a water use policy that requires developers to build new homes to meet the higher Building Regulation standards of 110l/h/d as a minimum, improving on it where possible and to consider working with AWS and other stakeholders to develop further options for retrofitting existing properties with efficiency fixtures and fittings. The Emerging Local Plan says this in policy 2: Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher optional standard.
Norwich		
South Norfolk		
North Norfolk	Not aware of any evidence.	Core Strategy and Development Management DPD policy relates to Code for Sustainable Homes. There is an emerging Local Plan under production which seeks 110l/h/d.

District	Evidence	Information/policy
GYBC	<p>The Water Cycle Scoping Study was a stage 1 report and was completed in 2009. This was not taken any further as the issues raised in the Scoping study were not significant to development plans at the time. This did include the Broads Authority Executive Area.</p>	<p>The emerging Local Plan (in examination) includes policy E7: Water conservation in new dwellings and holiday accommodation which says that new residential development, and holiday accommodation in buildings, will be supported only where it meets the higher water efficiency standard of requirement of 110 litres per person per day.</p>
Waveney (now East Suffolk council)	<p>Water Cycle Study 2017</p>	<p>The study concludes that a policy could be developed that ensures all housing is as water efficient as possible, and that new housing development should go beyond mandatory Building Regulations requirements, ideally to 110 l/h/d optional Building Regulations requirements where possible.</p> <p>Policy WLP8.28 – Sustainable Construction says that all new residential development in the District should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day unless it can be demonstrated that it is not viable or feasible to do so.</p>

10.2 Norfolk Strategic Planning Framework 2021

There is an agreement in the [Norfolk Strategic Planning Framework](#) that relates to water use.

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

According to The Housing Standards Review: Cost Impacts report that was produced for the Department for Communities and Local Government in 2014, the uplift in cost between 125 and 110 litres per person per day is just £9 per dwelling. It is noted that was in 2014 and the cost could be less now. The Government's Environmental Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress.

10.3 Water Resource East

WRE's [updated position statement \(February 2021\)](#) promotes a vision for Eastern England to have sufficient water resources to support a flourishing economy, a thriving environment and the needs of its population, and for the region to be seen as an international exemplar for collaborative integrated water resource management.

On an average day, in a dry year, the total consumptive demand for water in the WRE region is equivalent to 2,311 million litres (megalitres) per day. Most of this water (85%) is used for public water supply (PWS). Most of the rest is used for spray irrigation (8%), power generation (3%) and in the manufacturing, food and drink sectors (2%).

FUTURE WATER CHALLENGES FOR EASTERN ENGLAND

- Housing growth
- Agricultural growth
- Energy sector
- Systematic conservation planning
- Climate change

OPTIONS FOR MEETING FUTURE DEMAND FOR WATER IN EASTERN ENGLAND

- Water company leakage
- Water efficiency measures
- Supply options

Looking forward to the 2050s and beyond, our Initial Resource Position Statement estimated that up to an additional 1,656 megalitres of water could be needed per day. The largest drivers of this were abstraction reductions to drive environmental restoration and enhancement (500 megalitres per day), housing growth (408 megalitres per day) and additional water for irrigation (288 megalitres per day).

The Authority will continue with the 110l/h/d water usage requirement for new development. We will explore the potential to go lower than 110l/h/d.

10.4 Wastewater and treatment

Water quality is a key consideration in the Broads and the Local Plan will look into drainage. With regards to how wastewater is transferred from a property, due to the low-lying nature of the area and remoteness of some settlements connection to a public sewer is not always possible in the Broads. The alternative disposal methods employed can have a significant local impact on water quality.

Anglian Water is implementing a series of first-time sewerage projects of some villages in the Broads Area. Stokesby for example is one area that has benefitted from this project.

Through discussions with North Norfolk District Council, Anglian Water Services and the Environment Agency, it is apparent that there are capacity issues at the Horning Knackers Wood Water Recycling Centre. This Water Recycling Centre discharges to the River Bure and contributes nutrient loads to the downstream watercourses as well as the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA). Both Anglian Water and the Environment Agency agree that the Horning Knackers Wood Water Recycling Centre (WRC) does not currently have capacity to accommodate further foul flows. Horning Knackers Wood WRC is in protracted exceedance of the volumetric permit due to the continued ingress of surface and groundwater. This means that development that will increase the foul water load in the Horning area cannot come forward and cannot be permitted. The Joint Position Statement and Statement of Fact can be found here:

- [Joint Position Statement on Development in the Horning Knackers Wood Water \(broads-authority.gov.uk\)](#)
- [Horning Statement of Fact - Revised August 2023 \(broads-authority.gov.uk\)](#)

There are also other treatment works, identified in the Norfolk⁸ and Suffolk⁹ Minerals and Waste planning documents that are of relevance to the Broads. The list of safeguarded wastewater sites and consultation areas in Norfolk relevant to the Broads Authority Executive Area is below. There are no wastewater sites or wastewater consultation areas in the Broads part of Suffolk.

SITE NAME	OPERATOR	TYPE
Acle (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
Belaugh (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
Horning (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area

⁸ [Minerals and waste planning policies - Norfolk County Council](#)

⁹ [Suffolk Minerals and Waste Plan - Suffolk County Council](#)

SITE NAME	OPERATOR	TYPE
Stalham(water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
West Caister (water recycling centre)	Anglian Water Services Ltd	Wastewater Consultation Area
Whitlingham (water recycling centre)	Anglian Water Services Ltd	Wastewater Consultation Area

10.5 Nutrient neutrality

Alongside all other local planning authorities in Norfolk, the Broads Authority received a letter in 2022 from Natural England concerning nutrient pollution in the protected habitats of the Broads Special Area of Conservation and Ramsar site.

The letter advised that new development within the catchment of these habitats comprising overnight accommodation has the potential to cause adverse impacts with regard to nutrient pollution. Such development includes, but is not limited to:

- new homes,
- student accommodation,
- care homes,
- tourism attractions,
- tourist accommodation,
- permitted development (which gives rise to new overnight accommodation) under the Town and Country Planning (General Permitted Development) (England) Order 2015, and
- Any development not involving overnight accommodation, but which may have non-sewerage water quality implications.

The Conservation of Species and Habitats Regulations 2017 require local planning authorities to ensure that new development does not cause adverse impacts to the integrity of protected habitats such as the Broads prior to granting planning permission. At present there are no identified mitigation solutions available locally to resolve these impacts.

Whilst the Authority assesses the implications of these matters, it cannot lawfully conclude that development within the catchment of the Broads Special Area of Conservation and Ramsar site will not have an adverse effect. Therefore, until these matters are resolved the Authority will not be able to grant planning permission for developments comprising overnight accommodation within the affected catchments.

The fundamental issue being phosphorous and nitrogen in the water causing eutrophication. Water Recycling Centres have been identified as one of the causes of nutrient enrichment.

Mitigation schemes are being worked up, both locally and nationally which may involve nature-based solutions as well as other solutions that involve infrastructure.

The Authority will address water quality in the Local Plan. The Authority will keep updated regarding Horning Knackers Wood Water Recycling Centre. The Local Plan will reflect Nutrient Neutrality.

11. Flood Risk

11.1 Flood Risk

Approximately 82.5% of the Broads Authority Executive Area is covered by flood zone 3 (3a & 3b). This equates to 25,472 hectares. The Broads Authority boundary is tightly drawn around the edge of the functional floodplain¹⁰. The extent and nature of flood risk, with significant areas of 'functional floodplain', means that flood risk is a major constraint on development in the Broads. Flood risk includes all type of flood risk, so in addition to tidal and fluvial sources of flood risk, there is also surface water, reservoir and groundwater sources of flood risk.

The flood risk in the Broads is predominately from fluvial and tidal sources which are interlinked. However, other sources of flood risk include groundwater and surface water. The whole character and development in the Broads over many hundreds of years has been closely associated with the water environment and flood risk. Much of the Broads area is defended by flood defence embankments, which are maintained by the Environment Agency to reduce flooding. The flood defences, where they exist, only reduce the risk of flooding through containing some water to a given area and will never eliminate the flood risk; this has been the case historically within the Broads.

Working, living and visiting the Broads have been, and will continue to be, activities that have co-existed with the risk of flooding. However, any new development (which includes change of use, etc) must be in line with government policy and minimise flood risk by avoidance where inappropriate development is directed away from areas of highest risk. In the Broads area, this means identifying the risks from flooding and ensuring appropriate development is at a low a risk level as possible while being compatible with the wetland and water-based environment.

The Broads is not subject to open sea conditions (relating to tidal range and wave action) but much of the Broads are tidally influenced fluvial waterbodies.

The Broads is not subject to open sea conditions (relating to tidal range and wave action) but much of the Broads are tidally influenced.

The flood probability mapping carried out within the SFRA does not signify the degree of hazard likely to be experienced in the Broads Authority area, especially in the more upstream catchment areas and those areas not at risk of breaching of coastal defences, because it does

¹⁰ The NPPG defines Zone 3b The Functional Floodplain as: This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise:

- land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
- land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).

not quantify depth or water velocity. Hazard, or “danger to people”, is a function of depth and velocity. Hazard is very site specific and could vary greatly over a relatively small area due to the presence of drains, dykes, quay-headings, flood banks, etc. Hazards can be hidden by floodwaters and a site-specific Flood Risk Assessment will need to measure this.

The typical Broads river has a permeable catchment¹¹, is groundwater dominated¹², and is a slow responding watercourse with a slow increase and decrease of flow in response to rainfall. Although tidal surges can develop rapidly within 6-12 hours because of the movements of weather systems in the North Sea, the Environment Agency Flood Warning System covers the whole of the Broads area which could provide early warning (for fluvial and tidal flooding). Signing up to this service is voluntary or it may be a requirement of planning permission.

The nature of flooding in the Broads is such that flood water is likely to have a slow velocity, may be shallow in depth and may be low hazard (depending on topography), unless it is in or beside a breach in defences where the flow will be greater and the risk would subsequently be higher.

Some people living and working within the Broads are historically familiar with the water environment and are unlikely to be surprised or alarmed by the possibility of floods or rising water levels or may be more prepared. That being said, others may not have had any experience of flooding and historic knowledge and historic connections does not necessarily lower people's vulnerability, it can also lead to complacency which increases vulnerability. Measures will need to be in place to ensure effective communication with visitors - an issue which is already addressed on many sites locally. The measures to take before, during and after a flood should be detailed within a Flood Response Plan for each development site.

Any development encroaching within any of the plotted Flood Zones may increase flood risk to adjacent areas. The effect on flood risk of several small encroachments is cumulative. If the requirements of the NPPF and NPPG are met in full, then additional development should not increase flood risk elsewhere.

11.2 The Broads Flood Risk Alleviation Project and Broadland Futures Initiative

The Broadland Flood Alleviation Project (BFAP) was a long-term project, led by the Environment Agency, to provide a range of flood defence improvements, maintenance and emergency response services within the tidal areas of the Rivers Yare, Bure, Waveney and their tributaries.

The main aim of project work was to strengthen existing flood defences and restore them to a height that existed in 1995 (a level defined by the Environment Agency) and make additional allowances for sea level rise and future settlement of the flood banks.

This aim has largely been achieved, through a phased programme of improvement works comprising:

¹¹ A river catchment is the area of land whose water drains into that river. A permeable catchment lies on porous rock, such as chalk or sandstone.

¹² Where groundwater accounts for much of the inflow and outflow of the watercourse.

- Strengthening the existing flood banks, restoring them to agreed levels where excessive settlement has occurred
- Replacing existing erosion protection that is in a poor condition using more environmentally acceptable methods wherever possible
- Providing new protection where erosion is currently threatening the integrity of the flood defences
- Carrying out works at undefended communities

The Broadland Futures Initiative (BFI)¹³ is a partnership for future flood risk management in the Broadland area. The main goal is to agree a framework for future flood risk management that better copes with our changing climate and rising sea level. Planning is needed now to secure support and make well-informed decisions.

The Initiative has been set up by organisations responsible for managing coastal and inland flood risk. The Environment Agency have the lead responsibility and will be working with Natural England, County Councils, Internal Drainage Boards, Broads Authority and National Farmers Union. The Broads Authority provides support to the Initiative Project Team and BFI governance arrangements.

The BFI also works in partnership with local communities and other stakeholders to identify the way forward. Through the BFI Elected Members Forum, local politicians make the core decisions to agree a framework for future flood risk management that better copes with our changing climate.

It is also worth noting the [Lowestoft Tidal Flood Barrier project](#) whose impacts will stretch into Oulton Broad and close to the BA boundary.

The NPPF, current and new Local Plan policies and current Flood Risk SPD will enable flooding and flood risk to be addressed.

12. Local Coastal Changes

The Broads Authority has a small stretch of coast in the Executive Area (Winterton/Horsey area). The Kelling to Lowestoft Ness Shoreline Management Plan unit 6.13 covers Eccles to Winterton Beach Road. Coastal erosion is a sensitive issue and the detail of the approach for this area is included in the Management Plan. As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. In relation to the present day, the Plan says: *‘Due to the considerable assets at risk and the uncertainty of how the coastline could evolve, the policy option from the present day is to continue to hold the line of the existing defence. This policy option is likely to involve maintenance of existing seawalls and reef structures, replacing groynes as necessary and*

¹³ Broadland Futures Initiative: <https://www.broads-authority.gov.uk/looking-after/climate-change/broadland-futures-initiative>

continuing to re-nourish beaches with dredged sand. This policy option will provide an appropriate standard of protection to all assets behind the present defence line, and, with the recharge, a beach will be maintained as well as a supply of sediment to downdrift areas.'

Some Norfolk and Suffolk coastal Local Planning Authorities have produced a joint [SPD](#) to guide and inform development on the coast and elaborate on Local Plan policies.

There is a policy relating to the coast which generally supports the Shoreline Management Plan's approach. A Coast SPD has been produced.

13. Minerals

See section 8 of this document for references and information about the Suffolk and Norfolk Minerals and Waste documents.

The NPPF states 'It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.'

The NPPF states 'Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.'

Whilst the Broads Authority is not a district council, it is not a mineral planning authority, therefore the below wording is relevant.

The NPPG states '*Whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in 3 ways:*

- 1. Having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps;*
- 2. In those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and*
- 3. When determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.'*

The following table identifies the safeguarded mineral extraction and mineral infrastructure sites where either the site itself or the consultation area for the site falls within the Broads Authority Executive Area.

Site Name	Operator	Type
Norton Subcourse Quarry	Breedon Trading Ltd	Mineral Extraction Site Consultation Area
Earsham Quarry	Earsham Gravels Ltd	Mineral Extraction Site and 250m Consultation Area
Trowse Railhead	Tarmac	Mineral Infrastructure Consultation Area

Many current allocations in the Local Plan are partially on safeguarded minerals (sand and gravel) resource and this is identified. This approach is intended to be continued.

14. Energy

The NPPG says that:

When drawing up a Local Plan, local planning authorities should first consider what the local potential is for renewable and low carbon energy generation. In considering that potential, the matters local planning authorities should think about include:

- the range of technologies that could be accommodated and the policies needed to encourage their development in the right places;*
- the costs of many renewable energy technologies are falling, potentially increasing their attractiveness and the number of proposals;*
- different technologies have different impacts and impacts can vary by place;*
- the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.*

Paragraph: 003 Reference ID: 5-003-20140306

Revision date: 06 03 2014

See separate Renewable Energy Topic Paper: [Local Plan for the Broads \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk)

15. Utilities

In relation to gas and electricity, no providers who were consulted raised any concerns with regards to the Objectively Assessed Housing Need for the Broads during the Issues and Options Consultation, December 2022.

15.1 Gas

National Gas Transmission owns and operates the national transmission system throughout Great Britain which connects to eight regional networks. In the borough, National Grid also own and operate the local gas distribution network and are therefore also responsible for distributing

gas to the borough. National Grid has a duty to develop and maintain an efficient, co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. Bacton Gas terminal is a large gas terminal located on the north Norfolk coast with an underground pipeline connecting the terminal with the gas power station in South Denes in Great Yarmouth. There are likely to be no future supply issues with gas provision. Improvements to the gas distribution network are generally carried out as a result of significant growth in overall regional demand rather than site specific requirements.

15.2 Electricity

The electricity distributor for the area is UK Power Networks, which is known as a Distribution Network Operator (DNO), covering 29,000sq km of London, the south east and the east of England. Their role is to take electricity at high voltages from the National Grid and transform it down to voltages suitable for commercial and domestic use. UK Power Networks are responsible for ensuring that the infrastructure that brings power to homes, businesses, hospitals, schools and other public services continues to deliver reliable, safe and sustainable electricity at all times.

15.3 Relevant district documents

Some of our constituent districts have produced energy studies and these may be relevant to the Broads. The ones in place (or being produced) at the time of writing are included below.

[North Norfolk Power Study \(2019\)](#) – the aim of this study is to review current energy infrastructure and identify areas where there may be constraints on energy supplies now and in the future. The areas of planned development are shown in relation to the local substation, which is also colour coded in a traffic light system according to the available capacity. The substations in green have no capacity issues, while those in red have under 5 MW of spare

capacity and will struggle to serve major additional development without further reinforcement.

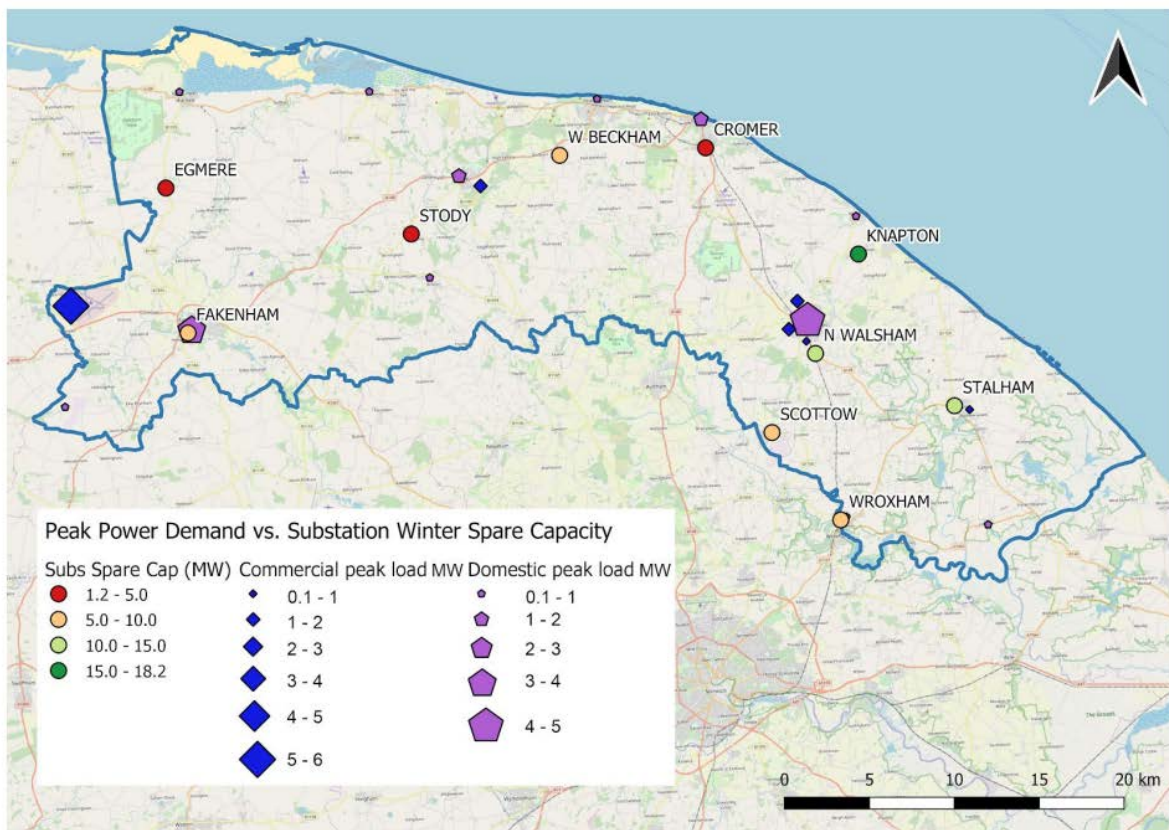


Figure 1: Development site demand mapped against winter spare capacity

[Greater Norwich Energy Infrastructure Study](#) (2019) - provide evidence in order for the emerging GN Local Plan to support development and the spatial distribution of growth. By reviewing existing energy demand for electricity, gas and heat we created and mapped a baseline across the region, identifying areas of the highest demand. Plans for development, both commercial and domestic, were also reviewed and the likely additional peak power demand was forecast, based on benchmarks and coming changes to government policy. The final important element is the capacity at each electricity substation across the region. These are the crucial parts of the infrastructure, which can dictate if development is possible or not. This shows the current load on these substations and does not account for 'reserved' capacity where part of the available headroom on the substation has already been committed to a future customer. The substations in green have no capacity issues, however there is only one on the map. Those in dark orange and red already have little spare capacity and will struggle to serve any additional development without any mitigation measures.

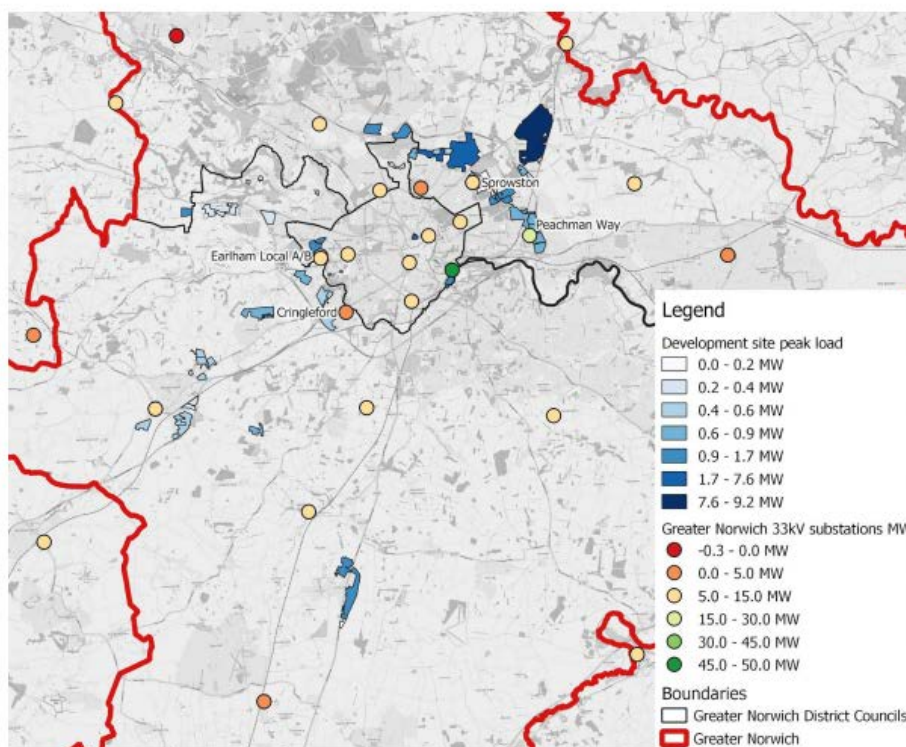


Figure 1: Planned development sites and existing substation spare capacity within Greater Norwich

The [Great Yarmouth Infrastructure Plan](#) 2020 says ‘As part of the preparation of the Local Plan Core Strategy, UK Power Networks confirmed that there was sufficient headroom in the electricity distribution networks to accommodate the overall housing growth needs. No further site-specific requirements were identified in relation to the allocated sites in the Local Plan Part 2’.

No specific issues relating to gas and electricity are identified.

16. Health and social care

The NPPF says at para 20: ‘Strategic policies should set out an overall strategy for the pattern, scale and

design quality of places, and make sufficient provision¹³ (inter alia) community facilities (such as health, education and cultural infrastructure)’.

The NPPG says: ‘Plan-making bodies will need to discuss their emerging strategy for development at an early stage with NHS England, local Clinical Commissioning Groups, Health and Wellbeing Boards, Sustainability and Transformation Partnerships/Integrated Care Systems (depending on local context), and the implications of development on health and care infrastructure’.

Paragraph: 005 Reference ID:53-005-20190722

Revision date: 22 07 2019

NHS England is not currently aware of a specific need for additional health facilities within the Broads Executive Area. There is currently sufficient capacity to cope with the existing populations in the area. Additionally, there is not at present, due to capacity reasons, a need to expand the health facilities outside the Broads Executive Area into the Broads Executive Area.

Should housing or population growth increase from the current levels, NHS England in conjunction with the relevant Integrated Care Systems (ICSs) would need to review the growth or projected growth to ensure that suitable facilities are available to meet the needs of patients within the areas. Where significant growth occurs, this could result in the requirement of future expansion of existing premises or the procurement of new facilities. Discussions would take place with existing practices. A business case would need to be reviewed based upon the information and proposals at the time.

Where significant housing growth is planned the NHS would be looking to secure appropriate Section 106 contributions to assist in mitigating the cost of providing such additional health infrastructure.

The Norfolk HUDU model provides estimates, based on different housing growth scenarios, for the additional health care needs required in Norfolk and Waveney to take account of projected growth. The figures are high level and contribute to understanding the potential strategic needs for ICS areas and are not intended to set requirements for specific developments.

The [Planning in Health Protocol](#) presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Council Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly consult to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments.

The Broads Authority will work with other parties to fully understand the needs of the proposed housing numbers for Norfolk and Waveney.

At this stage, it is not proposed to have a specific policy on health facilities.

17. Education

The NPPF says at para 20: *‘Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision¹³ (inter alia) community facilities (such as health, education and cultural infrastructure)’.*

Para 95: It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and

b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

Discussions with Suffolk and Norfolk County Councils indicate that there is not likely to be a requirement for any schools to expand into the Broads Authority Executive Area in this plan period. Future development proposals will be assessed as they emerge and seek S106 developer contributions if justified and satisfy the CIL 122 Regulations.

East Suffolk Council said the following regarding education as part of the technical consultation: If the Broads was to consider absorbing any housing of major scale in the Oulton area, then current primary school space challenges in the area (The Limes Primary School is very close to capacity) could be a significant issue.

At this stage, it is not proposed to have a specific policy on education establishments.

18. Places of Worship, Local Services (shops, pubs, post offices, etc) and Community Facilities

The NPPF says '84. *Planning policies and decisions should enable (inter alia), d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship*'.

The Local Plan will have a general policy for determining changes to and new community, visitor and recreation facilities.

Pubs will continue to have their own specific policy in the Local Plan.

Open space, allotment, play and sport field need is assessed by the Broads' constituent districts. They assess the entire district, including that which is the Broads. The need is translated into standards for open space and a policy in the Local Plan will defer to these policies.

Regarding the shopping area in Oulton Broad, a policy like that in the Waveney Local Plan will continue to be in the Local Plan.

Regarding shopping areas at Potter Heigham Bridge, the area will continue to have its own policy.

The Hoveton Town Centre policy will continue to be part of the Local Plan.

There are some policies on specific local services and facilities. Other policies in the Local Plan will help determine applications for other uses and facilities.

19. Police

Norfolk and Suffolk Police were contacted, through the Architectural Liaison Officers to confirm if the dwellings and residential moorings which could be planned for in the Local Plan raised any policing concerns.

Norfolk Constabulary stated in November 2023 that an additional 17 dwellings a year or so would not cause any strain on the policy services.

There is no requirement for the Local Plan to address operational policing requirements.

20. Open Space and play, sport, recreation and Local Green Space

Currently, the Local Plan for the Broads seeks to protect open space and play identified on [policies maps](#) and seeks new provision in line with the standards of the districts. Further open spaces have been identified and will be protected in the Local Plan. Open space studies of our District Councils are as follows:

[Great Yarmouth Open Space Provision - Local Plan Topic Paper](#) (2020) – assesses the current open space and play provision and identifies open space requirements.

[North Norfolk Open Space Assessment](#) (2020) – assesses the current open space and play provision and identifies open space requirements.

[North Norfolk Amenity Green Space Study](#) (2019) - this is an appraisal of Open Space, Education & Formal Recreation Spaces, and Local Green Space options, in the Towns, Villages & Open Countryside in North Norfolk

[Waveney Open Space Needs Assessment](#) (2015) - The assessment includes an audit of parks and gardens, amenity green spaces, play spaces and allotments located within Waveney District (including those located in areas within Waveney District that are administered by the Broads Authority). Areas of biodiversity value have been identified and information relating to areas important to the biodiversity network has been collated and discussed. An overview of natural and semi-natural green space and cemeteries is provided and discussed in the context of the green infrastructure network and their contribution towards biodiversity. Green corridors that can support the movement of people and wildlife in the built-up areas of the District and habitats which provide key linkages in the green infrastructure network for people and wildlife are discussed. The River Wensum Strategy Delivery plan will be updated in early 2024.

[Waveney Playing Pitch and Outdoor Sports Facilities Assessment](#) (2014) - to identify the existing quantity and quality of pitches and outdoor sports facilities in Waveney district, identify areas with a deficiency or surplus of provision and to make recommendations for the provision, protection, and improvement for playing pitches and outdoor sports facilities across the district.

Norwich City Council is starting work on a park's regeneration strategy, and Greater Norwich are working on a new Green Infrastructure Strategy.

The East Suffolk Leisure Strategy was published in Nov 2021 and covers open space as well as sports and leisure: <https://www.eastsuffolk.gov.uk/assets/Leisure/East-Suffolk-Leisure-Strategy/East-Suffolk-Leisure-Strategy.pdf>.

The Waveney GI Strategy will be partially replaced by the (currently emerging) Healthy Environments SPD - general design guidance included in the GI strategy will be superseded by the SPD, but the recommendations re meeting open space needs in specific areas are considered to still be in date. Consultation on the [draft SPD](#) completed 10 January 2024.

The East Suffolk Cycling and Walking Strategy was adopted in 2022 (<https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/>).

The Local Plan will continue the policy approach of protecting and enabling provision of open space in line with the standards set by the districts.

In terms of leisure and sport, there are two sports centres in the Broads and these will have their own policies: Broadland Sports Club and Ditchingham Maltings Sports Ground.

Continue with policies on these two important sports centres in the Broads.

In terms of Local Green Space, the current sites were [assessed](#), alongside new sites put forward for consideration.

Some areas of Local Green Space will be allocated in the new Local Plan.

21. Green Infrastructure

The NPPF defines green infrastructure (GI) as ‘a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities’.

There are some policies already in the Local Plan that are particularly relevant to Green Infrastructure. For example, local green spaces and former railway tracks are protected and safeguarded, there are policies specifically on Green Infrastructure and recreational access around the Broads.

The following studies are of relevance. They are summarised and discussed below.

21.1 Integrated Access Strategy (2019)

One of the purposes of the Broads Authority is to promote the enjoyment of the Broads. Footpaths and bridleways are important assets in the Broads. The main document that seeks to meet this purpose is the [Integrated Access Strategy](#). This seeks to meet the following key objectives:

- (1) To improve links between land and water and to the water’s edge
- (2) To improve access links to local facilities, settlements, and visitor destination points
- (3) To improve access for all in the Broads
- (4) To encourage sustainable travel choices such as public transport, walking, cycling and non-powered boating, and improve links between public transport provision, visitor destination points and access routes

- (5) To deliver the River Wensum Strategy through the River Wensum Strategy Partnership
- (6) To encourage provision of access routes that relieve visitor pressure on internationally designated sites, avoid disturbance of protected species and help to accommodate growth
- (7) To provide appropriate information on access to recreational opportunities and interpretation about recreational sites.

The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in this strategy.

21.2 River Wensum Strategy

The vision of this strategy is to 'To breathe new life into the river by enhancing it for the benefit of all and increasing access to, and greater use of, this important asset. An enhanced river corridor, with its unique natural and historic environment, will once again play an important part in the growth and vitality of the city, strengthening the visitor economy and helping to give the city a competitive advantage in attracting inward investment'. The [River Wensum Strategy delivery plan](#) sets out the projects that have either been delivered or are planned.

The Local Plan will continue the policy approach of enabling delivery of the River Wensum Strategy.

21.3 Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (RAMS) and Norfolk RAMS

Whilst access to the countryside and coast are important for people in terms of physical and mental health and wellbeing, if it is not managed, there could be likely significant effects on the protected sites in the area. Recreational impact has been identified as an issue that needs addressing at all the protected sites in Norfolk and the coastal protected sites in Suffolk. That is why the Broads Authority, like other relevant local planning authorities, is collecting tariffs from holiday homes and residential dwellings (as well as other types of relevant development) to pool with money from the other authorities, to mitigate likely significant effects on protected sites. This money will then be spent on both capital and revenue projects at the protected sites to help protect them.

More information can be found here: [Habitat mitigation \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/habitat-mitigation)

The Local Plan will need to ensure the collection of the tariff and delivery of mitigation.

21.4 Relevant district documents

Some of our constituent districts have produced Green Infrastructure Studies and these may be relevant to the Broads. The ones in place (or being produced) at the time of writing are included below.

[Greater Norwich Local Plan Green Infrastructure Study Report \(2020\)](#) - Discusses potential improvements in some areas near to or within the Broads.

[Waveney Green Infrastructure Strategy](#) (2015) – looks into play, green corridors and churchyards for example. Discusses potential improvements in some areas near to or within the Broads.

[East Suffolk Cycling and Walking Strategy](#) (2022)—Some of the proposals are within the Broads and are generally supported.

The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in these documents, as relevant.

21.5 Biodiversity Net Gain

Whilst not an infrastructure item itself, the net gain requirement could produce more green infrastructure and habitats.

The Local Plan will ensure the requirements of Biodiversity Net Gain are met.

22. Blue Infrastructure

Water is a key aspect of the Broads and one of the purposes of the Broads Authority is to protect the interest of navigation. The Local Plan for the Broads includes various policies to protect and support appropriate enhancements to access to and enjoyment of the water (blue infrastructure). Particularly important is moorings, slip ways, waterside facilities and water quality (as discussed earlier in this document). Particularly important is the Integrated Access Strategy (see previous) as that highlights the importance of improved links between land and water and to the water's edge.

The Local Plan will continue the policy approach of protecting navigation and enabling appropriate improvements.

23. Developer contributions

NPPF para 34 says: *'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan'.*

It should be noted that the Levelling up and Regeneration Act 2023 seeks the introduction of an Infrastructure Levy to replace Section 106 and Community Infrastructure Levy. It is understood that trials will be ongoing and it could be a number of years before this Levy comes into place. The Authority will keep informed of progress.

For affordable housing need, we have regard to/defer to the affordable housing policies of the relevant district council. As stated in earlier sections, there is no specific requirements relating to education and health. Policies will be in place to address green and digital infrastructure. In terms of transport, we will work with the Highways Authorities to understand any local impact

each allocation needs to address. There are policies in the local plan relating to flood and water management and these will set out requirements for developers. There will be a whole plan viability assessment completed as well.

24. Summary

- 1) At the time of writing, the district councils have not asked the Broads Authority to include specific infrastructure in the emerging Local Plan. We will continue to work closely with the District Councils.
- 2) As the Local Plan is produced, we will ensure it addresses the agreements set out in the NSPF.
- 3) The main large-scale infrastructure identified that is particularly relevant to the Broads, is the dualling of the Acle Straight. The current local plan has a policy on the Acle Straight and this will be rolled forward.
- 4) Development in the Broads may require local specific infrastructure. The Utilities Site will require significant infrastructure and that site is part of a wider regeneration area subject to a Masterplan and emerging SPD.
- 5) It is not proposed to set a standard for electric vehicle charging points in the new Local Plan for the Broads although there will be a policy relating to fire risk and the design and location of charging points.
- 6) The scale of growth proposed will not have strategic transport impacts. There may be some more local highway changes or improvements that could be needed because of schemes. We will contact the relevant Highways Authority regarding any allocations that are proposed. We will ensure we keep up to date with any relevant documents and strategies.
- 7) There is a policy that relates to telecommunications infrastructure emphasising the importance of addressing impacts on landscape in the Broads. The Local Plan will reflect the NSPF.
- 8) At this stage, the Authority is not aware of any specific security related issues that the Local Plan needs to address. Norfolk and Suffolk Architectural Liaison Officers are consulted at all stages of producing the Local Plan and their responses will be considered and addressed as appropriate.
- 9) The Local Plan will roll forward the current general support of the waste hierarchy as well as ensure any waste allocations in the Local Plans are considered. There is potential to improve reference to construction waste.
- 10) The Authority will continue with the 110l/h/d water usage requirement for new development. We will explore the potential to go lower than 110l/h/d.
- 11) The Authority will address water quality in the Local Plan. The Authority will keep updated regarding Horning Knackers Wood Water Recycling Centre. The Local Plan will reflect Nutrient Neutrality.
- 12) The NPPF, current and new Local Plan policies and current Flood Risk SPD will enable flooding and flood risk to be addressed.

- 13) There is a policy relating to the coast which generally supports the Shoreline Management Plan's approach. A Coast SPD has been produced.
- 14) Many current allocations in the Local Plan are partially on safeguarded minerals (sand and gravel) resource and this is identified. This approach is intended to be continued.
- 15) See separate Renewable Energy Topic Paper.
- 16) No specific issues relating to gas and electricity are identified.
- 17) At this stage, it is not proposed to have a specific policy on health facilities.
- 18) At this stage, it is not proposed to have a specific policy on education establishments.
- 19) There are some policies on specific local services and facilities. Other policies in the Local Plan will help determine applications for other uses and facilities.
- 20) There is no requirement for the Local Plan to address operational policing requirements.
- 21) The Local Plan will continue the policy approach of protecting and enabling provision of open space in line with the standards set by the districts.
- 22) Some areas of Local Green Space will be allocated in the new Local Plan.
- 23) The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in this strategy.
- 24) The Local Plan will continue the policy approach of enabling delivery of the River Wensum Strategy.
- 25) The Local Plan will need to ensure the collection of the tariff and delivery of mitigation.
- 26) The Local Plan will continue the policy approach of enabling appropriate improvements to access and green infrastructure in line with the projects and principles set out in these documents, as relevant.
- 27) The Local Plan will ensure the requirements of Biodiversity Net Gain are met.
- 28) The Local Plan will continue the policy approach of protecting navigation and enabling appropriate improvements.
- 29) For affordable housing need, we have regard to/defer to the affordable housing policies of the relevant district council. As stated in earlier sections, there is no specific requirements relating to education and health. Policies will be in place to address green and digital infrastructure. In terms of transport, we will work with the Highways Authorities to understand any local impact each allocation needs to address. There are policies in the local plan relating to flood and water management and these will set out requirements for developers. There will be a whole plan viability assessment completed as well.

Appendix 1: responses received as part of technical consultation

Organisation	Comment	Response
Norwich City Council	Line 29: Should this also refer to the Infrastructure Investment Fund, 5-year Infrastructure Investment Plan and Greater Norwich Infrastructure Plan documents?	Noted and text added to reflect this.
Norwich City Council	Sections 20 and 21 – Norwich City Council is starting work on a parks regeneration strategy, and Greater Norwich are working on a new Green Infrastructure Strategy. Might be helpful for these sections to make reference to these as emerging documents.	Noted and text added to reflect this.
Norwich City Council	Section 20 – Just bringing to your attention that the River Wensum Strategy Delivery plan will be updated in early 2024 so the link to this document may need updating once this has been done	Noted and text added to reflect this.
Norfolk Police and Suffolk Police	Only additional comments we have would have are to include SBD Security principles into some industry aspects such as boat yards, leisure/amenity spaces and caravan/lodge sites (if any).	Noted. We have included such reference in some draft policies of the Local Plan. No further action for this document.
Norfolk Police and Suffolk Police	Just to make you aware that the police may also have ‘operations’ in place for flooding management, so perhaps a nod to Partnership working.	
Norfolk Police and Suffolk Police	We have already commented regarding SBD principles within the Design guide for housing so that’s covered I think.	Noted. We have included such reference in some draft policies of the Local Plan. No further action for this document.

Organisation	Comment	Response
Norfolk Police and Suffolk Police	With regarding to strains on policing any significant developments (over 100 houses) we would forward to our estates for CIL applications to help support with infrastructure to help support policing bigger areas, however if you are looking at 17 houses per year then I don't think that too much of a worry.	Noted.
Norfolk County Council – LLFA	Various comments and suggested track changes.	Most comments and track changes resulted in changes.
Norfolk County Council – Public Health	Reference to the County Councils 'Walking, Wheeling and Cycling Strategy for Norfolk' should be included in the transport section (currently available as a draft for consultation). CCGs have been replaced by ICSs which needs to be updated. Section 106 and CIL section (line 956 – 958) needs an update. Health infrastructure is not eligible for CIL as outlined in the Greater Norwich Infrastructure Plan.	Most comments and track changes resulted in changes.
Norfolk County Council – Minerals and Waste	Various comments and suggested changed.	Most comments and track changes resulted in changes.
Norfolk County Council – Education	Section is correct.	Noted.

Organisation	Comment	Response
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	NGET does not distribute electricity to individual sites and premises directly. It is the role of local distribution companies to distribute electricity to homes and businesses.	Noted.
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	Specific development proposals within your local planning authority area are unlikely to have a significant direct effect upon NGET's electricity transmission system. Generally, improvements to the system to provide supplies to the local distribution network are as a result of overall regional demand growth rather than site specific developments.	Noted.
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.	Noted and changed.
Anglian Water Services	10.2 Might be worth mentioning here the government's Environmental Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress.	Noted and changed.
Anglian Water Services	10.3 We welcome this statement and hope the emerging Joint Protocol and supporting evidence base will assist with this.	Noted.

Organisation	Comment	Response
Anglian Water Services	10.1 Agree - revised draft is available on our website and a summary of WRMP has been sent via email to all LPAs. https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/	Noted.
East Suffolk Council	<u>Ch 2.</u> Reference here should be made to the annual Infrastructure Funding Statements that district councils prepare, as they update infrastructure items and/or costs (including whether some such costs are S106 or CIL funded). See https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/ for ESC's 22/23 IFS.	Reference to IFS added.
East Suffolk Council	<u>Ch 10.</u> Not in East Suffolk, but the strategic significance of Whitlingham WWTW appears to be under-played in the document, given its large size, huge catchment area, impact on nutrient neutrality etc.	Noted, but the section refers adequately to all Water Recycling Centres. No change.
East Suffolk Council	<u>Ch 11.</u> It doesn't directly affect the Broads, but the Lowestoft Tidal Flood Barrier project is probably worth a mention as the impacts will stretch into Oulton Broad and close to the BA boundary.	Reference added.
East Suffolk Council	<u>Ch 16.</u> Given Greater Norwich's general resistance to spending CIL on healthcare infrastructure, this might need to be considered further. As the Broads isn't a CIL charging authority, it should probably be clearer that any healthcare infrastructure contributions would need to be generated via S106.	Section amended following comments from Norfolk County Council.
East Suffolk Council	<u>Ch 17.</u> If the Broads was to consider absorbing any housing of major scale in the Oulton area, then current primary school space challenges in the area (The Limes PS is very close to capacity) could be a significant issue.	Reference added to this issue.

Organisation	Comment	Response
East Suffolk Council	<u>Ch 18.</u> The recent use classes change introducing Class E means that any Oulton Broad shopping area policy would obviously need to reflect this.	Noted and this has been done.
East Suffolk Council	<p><u>Ch 20.</u> Sports and recreation doesn't appear to be mentioned as a standalone topic (recreation gets a few passing mentions) but it probably should, given the Broads' key status as a recreation destination and because some sports facilities may be close to – or even in – the BA area. The East Suffolk Leisure Strategy was published in Nov 2021 and covers open space as well as sports and leisure: https://www.eastsuffolk.gov.uk/assets/Leisure/East-Suffolk-Leisure-Strategy/East-Suffolk-Leisure-Strategy.pdf.</p> <p>The Waveney GI Strategy will be partially replaced by the (currently emerging) Healthy Environments SPD - general design guidance included in the GI strategy will be superseded by the SPD, but the recommendations re meeting open space needs in specific areas are considered to still be in date. Consultation on the draft SPD runs until 10th January 2024 - https://eastsuffolk.inconsult.uk/DraftHESPD2023/consultationHome.</p> <p>The East Suffolk Cycling and Walking Strategy was adopted in 2022 (https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/).</p>	Agreed and reference made.