

Planning Committee

Agenda 04 April 2025

10.00am

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

John Packman, Chief Executive – Friday 28 March 2025

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

Introduction

1. To receive apologies for absence
2. To receive declarations of interest (see [Appendix 1](#) to the Agenda for guidance on your participation having declared an interest in the relevant agenda item)
3. **To receive and confirm the minutes of the Planning Committee meeting held on 07 March 2025** (Pages 4-8)
4. To note whether any items have been proposed as matters of urgent business
5. Chairman's announcements and introduction to public speaking
Please note that public speaking is in operation in accordance with the Authority's [Code of Practice for members of the Planning Committee and officers](#).
6. Request to defer applications included in this agenda and/or vary the order of the agenda

Planning and enforcement

7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**

There are no applications for consideration.
8. **Enforcement update** (Pages 9-15)
Report by Development Manager

Heritage

9. **Beccles Article 4 Direction revision** (Pages 16-40)
Report by Heritage and Design Manager

Policy

10. **Local Plan for the Broads - Call for Sites** (Pages 41-230)
Report by Planning Policy Officer
11. **Consultation responses** (Pages 231-234)
Report by Planning Policy Officer
12. **Local Plan - Preparing the publication version** (Pages 235-281)
Report by Planning Policy Officer

Matters for information

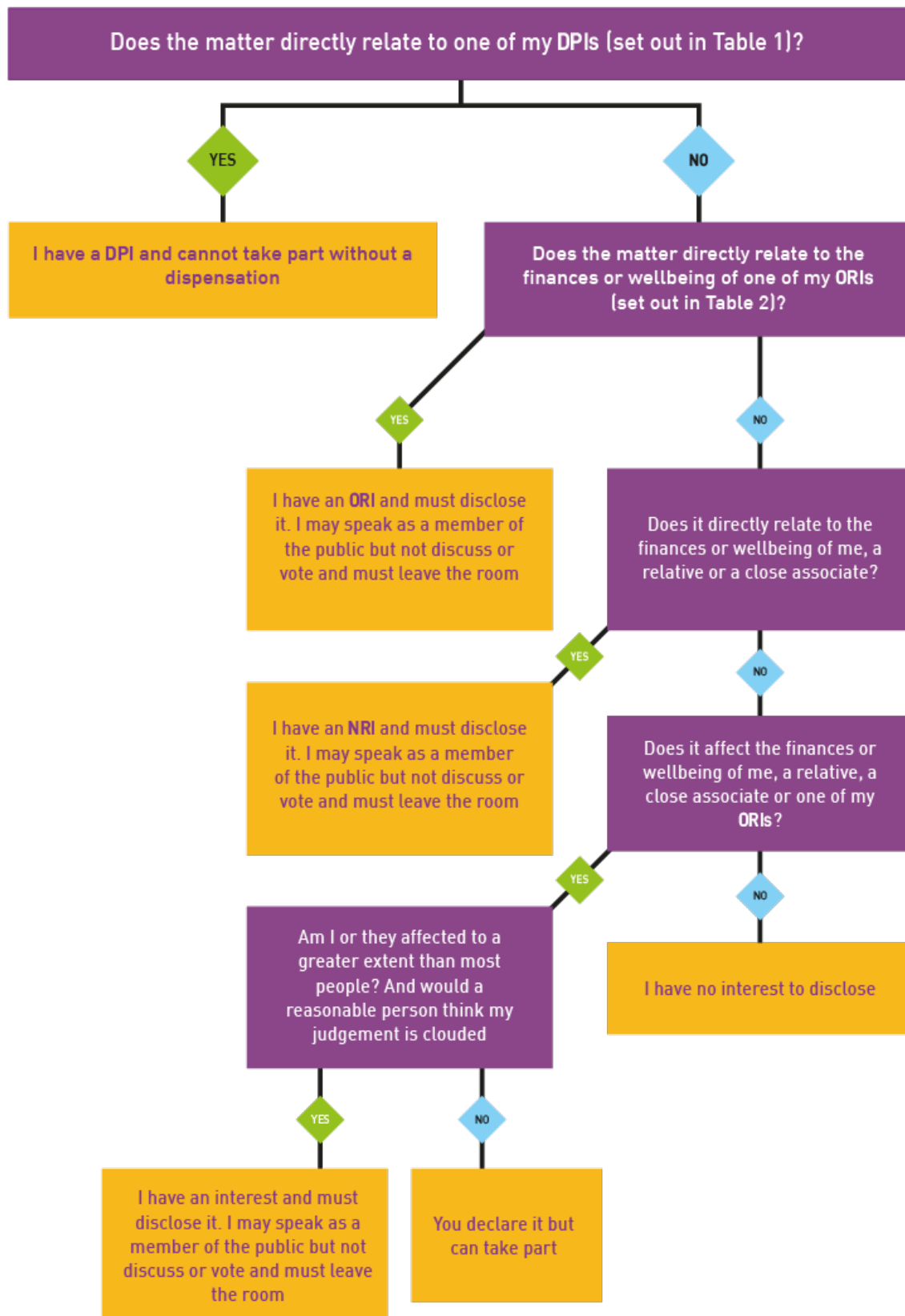
13. **Notes of the Heritage Asset Review Group meeting held on 21 March 2025**
(Pages 282-287)
14. **Appeals to the Secretary of State update** (Pages 288-290)
Report by Development Manager
15. **Decisions made by Officers under delegated powers** (Pages 291-294)
Report by Development Manager

Other matters

16. **Other items of business**
Items of business which the chairman decides should be considered as a matter of urgency pursuant to Section 100B (4)(b) of the Local Government Act 1972
17. **To note the date of the next meeting – Friday 02 May 2025 at 10.00am at The King's Centre, 63-75 King Street, Norwich, NR1 1PH**

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

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



Planning Committee

Minutes of the meeting held on 7 March 2025

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Present

Tim Jickells – in the Chair, Harry Blathwayt, Stephen Bolt, Andrée Gee, Tony Grayling, James Harvey, Martyn Hooton, Gurpreet Padda and Matthew Shardlow

In attendance

Natalie Beal – Planning Policy Officer (item 10), Jason Brewster – Governance Officer, Kate Knights– Heritage and Design Manager (item 9), Ruth Sainsbury – Head of Planning and Sara Utting – Senior Governance Officer

Members of the public in attendance who spoke

No members of the public in attendance.

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

Apologies were received from Leslie Mogford, Vic Thomson, Melanie Vigo di Gallidoro and Fran Whymark

Openness of Local Government Bodies Regulations 2014

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

2. Declarations of interest and introductions

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

3. Minutes of last meeting

The minutes of the meeting held on 7 February 2025 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business

5. Chair's announcements and introduction to public speaking

No members of the public had registered to speak. The Chair noted that this was the Senior Governance Officer's last Planning Committee before taking early retirement. The Chair

thanked her for her efforts supporting the committee and in particular her calm authority during meetings.

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

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

7. Applications for planning permission

There were no applications for consideration.

8. Enforcement update

Members received an update report from the Head of Planning (HoP) on enforcement matters previously referred to the Committee. Further updates were provided at the meeting for:

Land at the Beauchamp Arms Public House (Unauthorised static caravans)

The HoP confirmed that the previously cancelled Pre-hearing at Norwich Crown Court had been rescheduled for 11 March 2025.

9. Broads Authority Design Guide and Code endorsement

The Heritage and Design Manager (HDM) introduced the report, which documented the Broads Authority Design Guide and Code Supplementary Planning Document (SPD) in anticipation of its endorsement and approval by the Authority. The SPD comprised a Design Guide and a Design Code and both were consistent with the National Planning Policy Framework (NPPF) and the Levelling Up Regeneration Act 2023. The Design Code was intended to reflect the local character of the Broads and local aspirations for development within the area. National guidance stated that Design Codes should be prescriptive in nature and state requirements that must be met. Where applicants could not meet these requirements, they would have to justify the reasons for this non-compliance. The HDM indicated that, having undertaken three stages of consultation, the content of the SPD was complete although she indicated that the layout might be altered slightly, for the purposes of usability and accessibility, following a consultation with the Authority's Communications Team before final publication.

In response to a question the HDM indicated that the consultation responses had been numerous and wide ranging (as indicated in Appendix 2 of the report), that the SPD had been amended as a consequence of this feedback and that a key area for improvement in the most recent consultation had been regarding Sustainable Drainage Systems (SuDS).

Members supported the Broads Authority Design Guide and Code noting its concise and comprehensive method of stating the characteristics of good design within the Broads and its role in helping to preserve the Broads built vernacular.

Harry Blathwayt proposed, seconded by Andrée Gee

It was resolved unanimously to endorse the Broads Authority Design Guide and Code and recommend its adoption by the Broads Authority as a Supplementary Planning Document.

10. Consultation Responses

The Planning Policy Officer (PPO) introduced the report, which documented responses to East Suffolk Council's (ESC's) Neighbourhood Plan Guidance for Climate Change, ESC's Neighbourhood Plan Guidance for Housing, the pre-submission (Regulation 14) version of the Strumpshaw Neighbourhood Plan issued for consultation by the Strumpshaw Parish Council and the Custom and Self-Build Housing Supplementary Planning Document jointly produced by Broadland District and South Norfolk Councils. The PPO explained each of the consultation documents in turn.

East Suffolk Council's Neighbourhood Plan Guidance for Climate Change

The PPO had engaged the Authority's Carbon Reduction Projects Manager in the review of the ESC's Neighbourhood Plan Guidance for Climate Change and the proposed response consisted of three minor comments.

East Suffolk Council's Neighbourhood Plan Guidance for Housing

The proposed response to the ESC's Neighbourhood Plan Guidance for Housing sought some clarifications principally on ensuring the siting of new dwellings was consistent with the local plans.

Regulation 14 version of the Strumpshaw Neighbourhood Plan

The PPO indicated she had engaged with the Authority's Heritage and Design Manager and the Authority's Environment Policy Adviser in the review of the Regulation 14 version of the Strumpshaw Neighbourhood Plan. There were no significant issues with this neighbourhood plan and the proposed response sought clarification on a number of points and suggested improvements to some wordings. Since the report had been published the PPO had received additional comments from a Member. These sought to correct a mislabelled reference to the Strumpshaw Design Codes and Guidance, questioned the neighbourhood plan's assertion that the Strumpshaw Steam Museum was within a Site of Special Scientific Interest and some improvements to the Habitat Regulation Screening report.

Members supported both the response detailed in Appendix 2 of the report and the additional responses described.

Broadland District and South Norfolk Councils' Custom and Self-Build Housing Supplementary Planning Document

The response to the Broadland & South Norfolk Custom and Self-Build Housing Supplementary Planning Document as well as some minor corrections had requested considerations for possible landscape impacts and impacts to the Broads and its setting.

Martyn Hooton proposed, seconded by Matthew Shardlow.

It was resolved unanimously to endorse the nature of the proposed responses to the East Suffolk Council's Neighbourhood Plan Guidance for Climate Change, East Suffolk Council's

Neighbourhood Plan Guidance for Housing, the regulation 14 version of the Strumpshaw Neighbourhood Plan including the additional Member supplied comments, and the Custom and Self-Build Housing Supplementary Planning Document issued jointly by Broadland District and South Norfolk Councils.

11. Appeals to the Secretary of State

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

12. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 27 January to 20 February 2025 and any Tree Preservation Orders confirmed within this period.

13. Date of next meeting

The next meeting of the Planning Committee would be on Friday 4 April 2025 at 10:00am at The King's Centre, 63-75 King Street, Norwich.

The meeting ended at 10:23am.

Signed by

Chair

Planning Committee

04 April 2025

Agenda item number 8

Enforcement update

Report by Development Manager

Summary

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

Recommendation

To note the report.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
14 September 2018 BA/2018/0047/ UNAUP3	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravans (Units X and Y)	<ul style="list-style-type: none"> Authority given to serve an Enforcement Notice requiring the removal of unauthorised static caravans on land at the Beauchamp Arms Public House should there be a breach of planning control and it be necessary, reasonable and expedient to do so. Site being monitored. October 2018 to February 2019. Planning Contravention Notices served 1 March 2019.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Site being monitored 14 August 2019. • Further caravan on-site 16 September 2019. • Site being monitored 3 July 2020. • Complaints received. Site to be visited on 29 October 2020. • Three static caravans located to rear of site appear to be in or in preparation for residential use. External works requiring planning permission (no application received) underway. Planning Contravention Notices served 13 November 2020. • Incomplete response to PCN received on 10 December. Landowner to be given additional response period. • Authority given to commence prosecution proceedings 5 February 2021. • Solicitor instructed 17 February 2021. • Hearing date in Norwich Magistrates Court 12 May 2021. • Summons issued 29 April 2021. • Adjournment requested by landowner on 4 May and refused by Court on 11 May. • Adjournment granted at Hearing on 12 May. • Revised Hearing date of 9 June 2021. • Operator pleaded 'not guilty' at Hearing on 9 June. Trial scheduled for 20 September at Great Yarmouth Magistrates Court. • Legal advice received in respect of new information. Prosecution withdrawn and new PCNs served on 7 September 2021.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Further information requested following scant PCN response and confirmation subsequently received that caravans 1 and 3 occupied on Assured Shorthold Tenancies [27/10/2021] • Verbal update to be provided on 3 December 2021 • Enforcement Notices served 30 November, with date of effect of 29 December 2021. Compliance period of 3 months for cessation of unauthorised residential use and 4 months to clear the site [06/12/2021] • Site to be visited after 29 March to check compliance. 23 March 2022 • Site visited 4 April and caravans appear to be occupied. Further PCNs served on 8 April to obtain clarification. There is a further caravan on site [11/04/2022] • PCN returned 12 May 2022 with confirmation that caravans 1 and 3 still occupied. Additional caravan not occupied. • Recommendation that LPA commence prosecution for failure to comply with Enforcement Notice [27/05/2022] • Solicitor instructed to commence prosecution [31/05/2022] • Prosecution in preparation [12/07/2022] • Further caravan, previously empty, now occupied. See separate report on agenda [24/11/2022] • Planning Contravention Notice to clarify occupation served 25 November 2022 [20/01/2023] • Interviews under caution conducted 21 December 2022 [20/01/2023] • Summons submitted to Court [04/04/2023]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> Listed for hearing on 9 August 2023 at 12pm at Norwich Magistrates' Court [17/05/2023] Operator pleaded 'not guilty' at hearing on 9 August and elected for trial at Crown Court. Listed for hearing on 6 September 2023 at Norwich Crown Court [09/08/2023] Hearing at Norwich Crown Court adjourned to 22 September 2023 [01/09/2023] Hearing at Norwich Crown Court adjourned to 22 December 2023 [26/09/2023] Hearing postponed at request of Court, to 8 April 2024 rescheduled date [16/01/2024] Hearing postponed at request of Court, to 14 May rescheduled date [10/04/2024] Court dismiss Defendants' application to have prosecution case dismissed. Defendants plead 'not guilty' and trial listed for seven days commencing 23 June 2025 [14/05/2024] Officers attended pre-trial hearing and date of full trial confirmed as above. No further information added by defendant. (21/03/2025)
13 May 2022 BA/2022/0023/ UNAUP2	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised operation development comprising erection of workshop,	<ul style="list-style-type: none"> Authority given by Chair and Vice Chair for service of Temporary Stop Notice requiring cessation of construction 13 May 2022 Temporary Stop Notice served 13 May 2022. Enforcement Notice and Stop Notice regarding workshop served 1 June 2022 Enforcement Notice regarding kerbing and lighting served 1 June 2022 Appeals submitted against both Enforcement Notices [12/07/2022]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
		kerbing and lighting	<ul style="list-style-type: none"> • Appeals dismissed and Enforcement Notices upheld 29 July 2024. • Workshop to be dismantled and removed off site within two months; all associated structures and fixtures to be removed off site, services (electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months • Kerbed structure and lighting columns to be taken down and electricity connections to be taken up, all within two months; all structures, materials and associated debris arising from the above to be removed off site and the land to be made good within three months [30/07/2024] • Site visit to be carried out and owner reminded of compliance periods [27/09/2024] • Discussions continuing, held up by court case on other issue. [19/12/2024]
21 September 2022 BA/2017/0006/ UNAUP1	Land at Loddon Marina, Bridge Street, Loddon	Unauthorised static caravans	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravans. • Enforcement Notice served [04/10/2022] • Enforcement Notice withdrawn on 19 October due to minor error; corrected Enforcement Notice re-served 20 October 2022 • Appeals submitted against Enforcement Notice [24/11/2022] • Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024. • Residential use of the caravans to cease, the caravans and associated structures, fixtures, fittings and domestic paraphernalia to be removed off site, services (including water and electricity) to be disconnected and

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<p>infrastructure to be removed off-site and the land to be made good, all within six months [30/07/2024]</p> <ul style="list-style-type: none"> • Owner to be reminded that notice to be complied with by 29 January 2025 [27/09/2024] • Discussions continuing [26/11/2024]
<p>9 December 2022</p> <p>BA/2018/0047/UNAUP3</p>	<p>Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter</p>	<p>Unauthorised static caravan (Unit Z)</p>	<ul style="list-style-type: none"> • Planning Contravention Notice to clarify occupation served 25 Nov 2022. • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravan • Enforcement Notice served 11 January 2023 [20/01/2023] • Appeals submitted against Enforcement Notice [16/02/2023] • Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024. • Residential use of the caravan to cease within two months; the caravan and associated structure or fixtures to be removed off site, services (electricity and water) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months [30/07/2024] • Site visit to be carried out and owner reminded of compliance periods [27/09/2024] • Discussions continuing, held up by court case on other issue. [19/12/2024]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
31 March 2023 BA/2023/0004/ UNAUP2	Land at the Berney Arms, Reedham	Unauthorised residential use of caravans and outbuilding	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of the caravans • Enforcement Notice served 12 April 2023 • Enforcement Notice withdrawn on 26 April 2023 due to error in service. Enforcement Notice re-served 26 April 2023 [12/05/2023] • Appeal submitted against Enforcement Notice [25/05/2023] • Discussions continuing, held up by court case on other issue. [19/12/2024]
2 February 2024 BA/2022/0007/ UNAUP2	Holly Lodge. Church Loke, Coltishall	Unauthorised replacement windows in listed building	<ul style="list-style-type: none"> • Authority given to serve a Listed Building Enforcement Notice requiring the removal and replacement of the windows and the removal of the shutter. Compliance period of 15 years • LPA in discussions with agent for landowner [10/04/2024] • No resolution achieved through discussion. Legal advice sought [29/08/2024] • Case review – Listed Building Enforcement Notice to be served, in process of content being considered and drafted. • Listed Building Enforcement Notice served by hand on Friday 24th January. • Appeal submitted and valid – start date 19/03/2025. Will be dealt with by compliance officer. (21/03/2025)

Author: Steve Kenny

Date of report: 21 March 2025

Background papers: Enforcement files

Planning Committee

04 April 2025

Agenda item number 9

Beccles Article 4 Direction revision

Report by Heritage and Design Manager

Summary

It is proposed to cancel the existing Article 4 direction in the Beccles Conservation Area and make a new Article 4 Direction that would cover a smaller area.

Recommendations

To approve:

- i. the making of an Article 4 direction to cancel the existing Beccles Article 4 direction and
 - ii. the making of an Article 4 direction in a smaller area.
-

1. Introduction

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

2. Background

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

3. Proposed Article 4 Directions

- 3.1. It is proposed to serve two new Article 4 directions: one for the cancellation of the existing Article 4; the second for the new reduced area with fewer restrictions. They will be non-immediate and will not come into force until the date stated. There should not be any risk of damaging works being carried out in the meantime, as the existing Article 4 direction will remain valid until its cancellation by the new Article 4.
- 3.2. The first new Article 4 direction will cancel the existing Article 4 Direction dating from 1997.
- 3.3. The second new Article 4 direction will cover a reduced area between the river Waveney and Fen Lane, Northgate and the northern end of Puddingmoor (see [Appendix 3](#)). The southern end of Puddingmoor has been removed as this has a higher concentration of business premises, fewer traditional properties and more buildings that do not positively contribute to the character of the conservation area, due to an erosion of their original features. It is proposed that the new Article 4 direction will remove permitted development rights covering the following works, again only where fronting a relevant location:
 - Enlargement, improvement or other alteration to elevations
 - Alterations to roofs
 - Construction of a porch
 - Provision of a building, enclosure or pool
 - Hard surfacing
 - Erection or alteration of a chimney
 - Alteration or demolition of a fence or boundary wall
- 3.4. The list has been reduced. The removal of permitted development rights relating to the installation of a satellite dish has been withdrawn as few houses now have television delivered by satellite dishes. The painting of properties has also been removed. It is considered that the wording of Schedule 1, Part 2, Class C of the GDPO, 'the painting of the exterior of any building or work', means that it is appropriate to remove this from the Article 4 direction as it has a very broad scope and would mean that any painting, including redecoration for maintenance would need planning permission, which would potentially be onerous for home owners and the Local Planning Authority.
- 3.5. The process for making and confirming both of the Article 4 directions, along with our proposed timescales, is stated below (please note we are doing this concurrently with ESC who are also reducing the size of their Article 4 Direction within Beccles):

Making of the Article 4 Directions: if approved by the Planning Committee on 4 April, the Article 4 Directions will be 'made' (see [Appendix 4](#) and [Appendix 5](#));

- Serving of the Article 4 Directions: properties within the proposed new Article 4 Area and existing Article 4 Direction area will be served with a Notice on April 14 2025;
- Consultation: This must be at least 21 days and we are proposing that it runs for 5 weeks from 14 April to 23 May. Property owners will receive a letter, guidance note and the Notices. Site notices will be displayed within the area and a press notice published, as well as the Secretary of State being notified. Discussions with the Town Council have already taken place and they will be formally consulted. There will also be a public drop-in session on 9 May with officers from both ESC and the BA in attendance.
- Confirming: Consultation responses will be considered and amendments made as necessary. Should we decide to confirm the Article 4 directions, they will be brought back to Planning Committee for Members to decide whether to confirm in July 2025.
- Coming into force: It is intended that the Article 4 directions will come into force on Monday 4 August 2025. This will mean that the existing Article 4 direction is cancelled and the new Article 4 direction is in place from this date.

4. Financial implications

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

5. Risk implications

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

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

6. Conclusion

6.1. Members are asked to consider two officer recommendations:

- i. To approve the making of an Article 4 direction to cancel the existing Beccles Article 4 Direction.
- ii. To approve the making of an Article 4 direction to remove permitted development rights in a smaller area than existing.

Author: Kate Knights, Heritage and Design Manager

Date of report: 06 March 2025

[Broads Plan](#) strategic objectives:

D1: Record, protect and enhance local built and cultural features

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

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

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

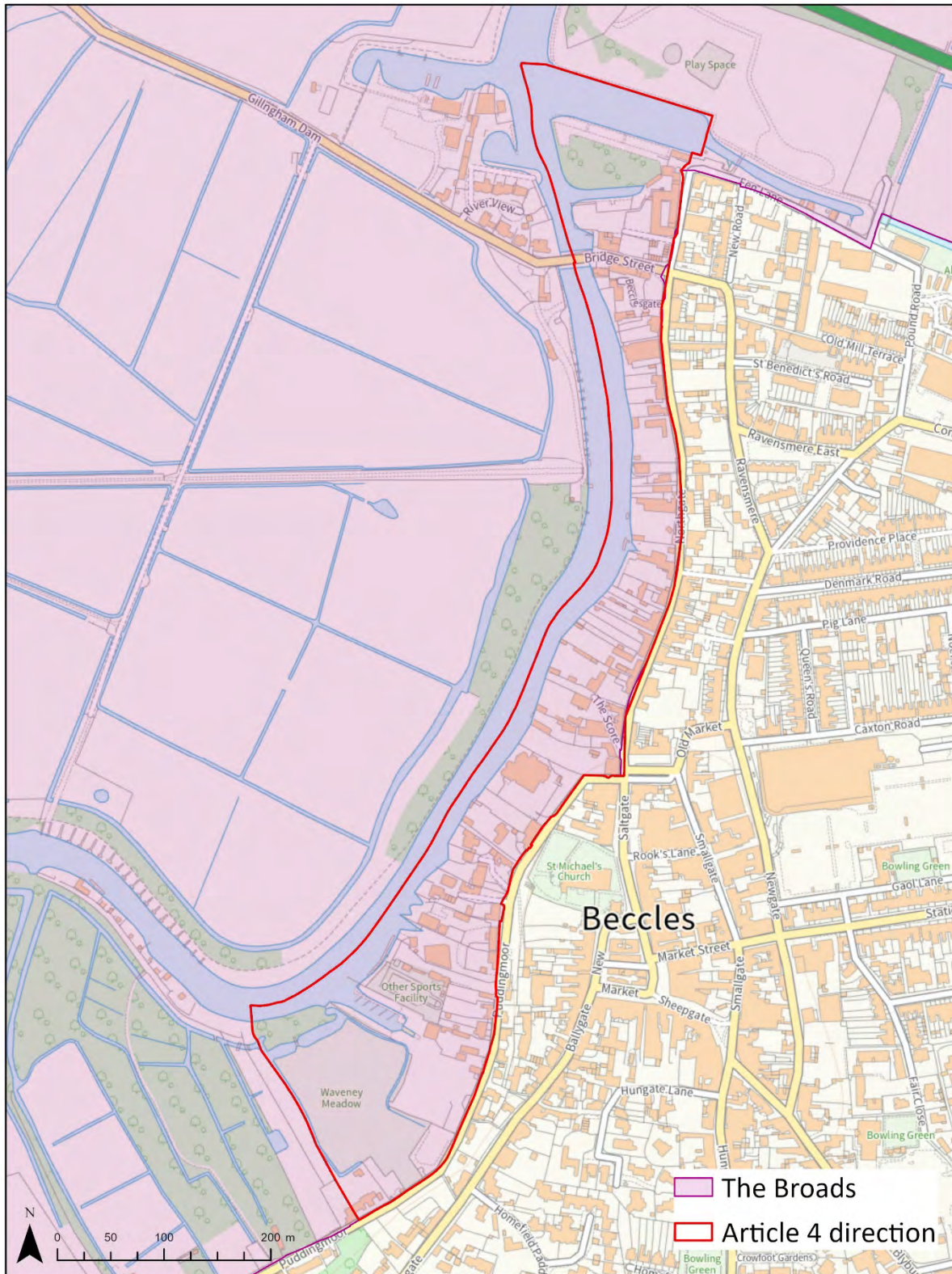
Appendix 2 - [Survey mapping of existing Article 4 Direction](#)

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

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

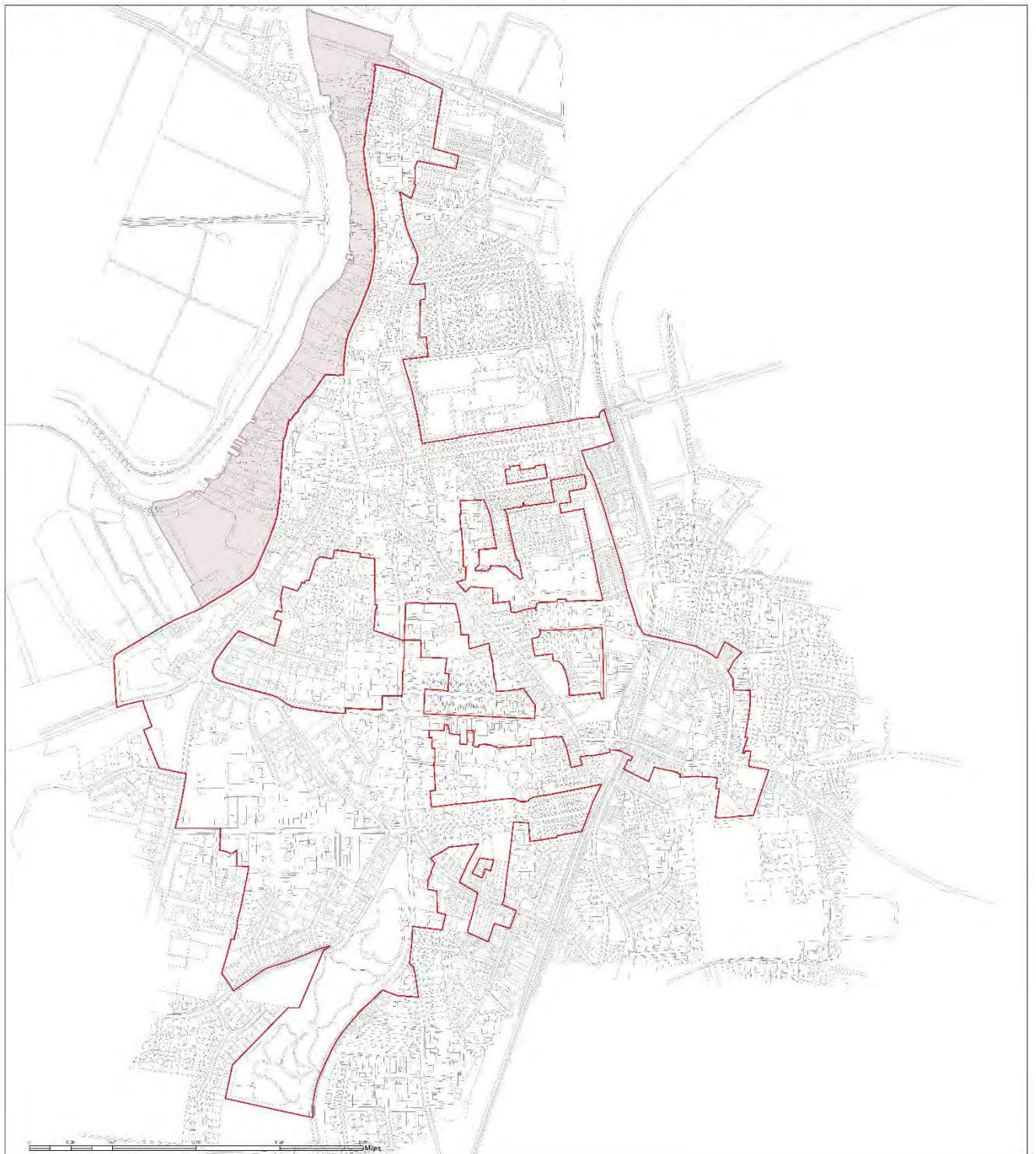
Appendix 5 - [Article 4 Direction for new area](#)

Appendix 1 - Map of existing Beccles Conservation Area Article 4 Direction area



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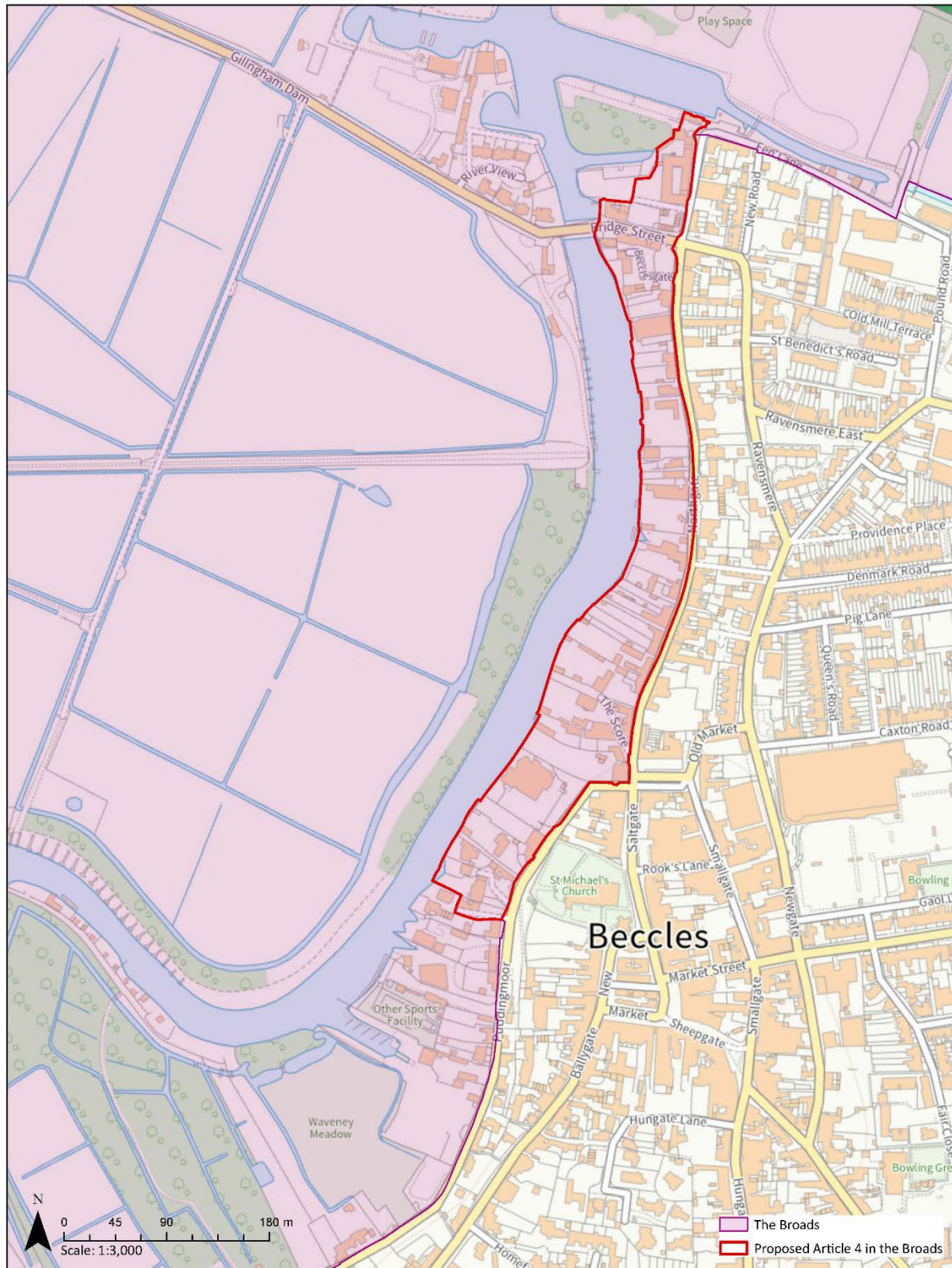
Appendix 2 - Survey mapping of existing Article 4 Direction Beccles Conservation Area Article 4 Review



- Beccles Conservation Area
- Beccles Conservation Area - Broads Authority

Appendix 3 - Proposed new Beccles Conservation Area Article 4 Direction area

Proposed Beccles Article 4 direction in the Broads



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

Direction Made under Article 4(1)

BROADS AUTHORITY

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

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

DIRECTION WITHOUT IMMEDIATE EFFECT

MADE UNDER ARTICLE 4(1)

CANCELLATION DIRECTION (No.1) 2025:

BECCLES CONSERVATION AREA DIRECTION 1997

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

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

SCHEDULE 1

TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT)

ORDER 1995

DIRECTION MADE UNDER ARTICLE 4(2)

BECCLES CONSERVATION AREA

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

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

SCHEDULE

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

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

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

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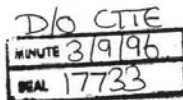
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The Common Seal of the)
Council was affixed to)
this Direction in the)
presence of)

M. Benji

CHIEF EXECUTIVE



29th July 1997

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

Direction Made Under Article 4(2)

BECCLES CONSERVATION AREA

[LegalOrder6.PRC]

SCHEDULE 2

Properties comprised in the land affected by this Direction:

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

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

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

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

MADE under the Common Seal of the Broads Authority

This 4th day of April 2025

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

.....

Authorised Signatory

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

This day of..... 20[]

The Common Seal of the Authority was hereto

affixed to this Direction in the presence of

.....
Authorised Signatory

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

Direction Made under Article 4(1)

BROADS AUTHORITY

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

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

DIRECTION WITHOUT IMMEDIATE EFFECT

MADE UNDER ARTICLE 4(1)

BECCLES CONSERVATION AREA DIRECTION (No. 1) 2025

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

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

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

SCHEDULE 1

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

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

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

SCHEDULE 2

Properties comprised in the land affected by this Direction:

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

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

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

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

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

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

This 4th day of April 2025

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

.....

Authorised Signatory

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

This day of..... 20[]

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

.....

Authorised Signatory

Planning Committee

04 April 2025

Agenda item number 10

Local Plan for the Broads- Call for Sites

Report by Planning Policy Officer

Summary

A call for sites for development sites to be included in the Local Plan was held in December 2024. This paper introduces the sites put forward, their assessment and proposed way forward.

Recommendation

To endorse:

- i. the Housing and Economic Land Availability Assessment (HELAA) part 2; and
- ii. the document "From HELAA to Local Plan part 2" (which includes the outcome of the assessment of the sites put forward).

1. Introduction

- 1.1. Following advice from the Planning Inspectorate, a call for sites was held prior to the pending Regulation 19 Local Plan consultation. The call for sites was held in December 2024. The call for sites was advertised to those on the contact database as well as agents that operate in the area. An online form needed to be filled out with information relating to the site being put forward. Sites were assessed using the HELAA methodology and stakeholders were asked for their thoughts on the proposed sites. A part 2 of the Housing and Economic Land Availability Assessment (HELAA)¹ has been produced, as well as a document that sets out if sites are to be taken forward to the Local Plan or not, called "From HELAA to Local Plan part 2"².

¹ Members may recall that there is already a HELAA in place, [Broads Authority Housing and Economic Land Availability Assessment \(Sep 2023\)](#), that assessed sites put forward as part of the first call for sites.

² Members may recall there is already a 'From HELAA to Local Plan' in place, [From the Housing and Economic Land Availability Assessment to the Local Plan \(Oct 2023\)](#), that explained the approach for the sites put forward and assessed in the HELAA.

2. About the HELAA

- 2.1. The Housing and Economic Land Availability Assessment (HELAA) is a key evidence document which supports the preparation of Local Plans. Its purpose is to test whether there is sufficient land to meet the objectively assessed need (OAN) and identifies where this land may be located. The HELAA represents just one part of wider evidence and should not be considered in isolation of other evidence. The HELAA assessment is based on information provided by the site promoter, information gathered from site visits as well as comments received from stakeholders.
- 2.2. The HELAA assessment is based on the adopted HELAA methodology. The methodology can be found here: [Central Norfolk Strategic Housing and Economic Land Availability Assessment: Methodology Final July 2016](#).
- 2.3. The HELAA methodology has also been applied to residential mooring sites. Although the HELAA methodology was not produced with assessing sites for residential moorings in mind, the considerations are the same. There are some additional considerations for residential moorings, and these are also included in this document.
- 2.4. A HELAA does not allocate land for development, that is the role of the Local Plan. The assessment does not determine whether a site should be allocated or given planning permission for development. The inclusion of a site as 'suitable' in the assessment does not imply or guarantee that it will be allocated, nor that planning permission would be granted. Including a suitable site with identified development potential within a HELAA document does NOT confer any planning status on the site, but means only that it will be considered as part of local plan production for potential development in the future and, where relevant, for potential inclusion on a statutory Brownfield Sites Register. No firm commitment to bring a site forward for development (either by the commissioning local planning authorities or other parties) is intended, or should be inferred, from its inclusion in a HELAA.

3. HELAA part 2

- 3.1. This includes maps of sites, photos taken on site, stakeholder comments and the assessment against the HELAA methodology discussed in section 2. It concludes if a site is suitable for development or not. See [Appendix 1](#).

4. From HELAA to Local Plan part 2

- 4.1. This explains if a site has been allocated in the Local Plan or not and summarises the reasons. This also includes a Sustainability Appraisal of the sites.
- 4.2. More detail is available in the HELAA itself. See [Appendix 2](#).

5. Summary of sites put forward

5.1. 16 sites were put forward for consideration. The following table is a brief summary of the HELAA assessment and also states if the site was taken forward for allocation or not.

Site name	Proposal	Summary assessment	Suitable for allocation in the Local Plan?
Land south of Marsh Road, Halvergate	4 dwellings	<ul style="list-style-type: none"> • Lack of services and facilities within a walking distance from the site (only a bus service). • Landscape and townscape impacts. • Highway objection. 	No
Land north of Thrigby Road, Filby	5 dwellings	<ul style="list-style-type: none"> • Eroding gap between Thrigby and Filby. • Would put development pressure on the site opposite, in GYBC planning area. • Conflict between removal of hedge for visibility and need to retain hedge for townscape/landscape purposes. • Access on a bend where national speed limits apply. • Highway objection to the proposed allocation. There is a lack of footway provision, the access would require significant tree removal and there is insufficient forward visibility to form a safe access. • The site is on grade 1 agricultural land. 	No

Site name	Proposal	Summary assessment	Suitable for allocation in the Local Plan?
Land at Ivy Lane, Oulton Broad	15 residential moorings	<ul style="list-style-type: none"> • Peat excavation. • Settlement fringe area. • Changes the character of the area. • Mature hedgerow at risk to accommodate road and footway. • Development likely to result in loss of biodiversity. • Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic. 	No
Land at Ivy Lane, Oulton Broad	250 residential caravans	<ul style="list-style-type: none"> • Settlement fringe area. • Would significantly change the character of the area. • Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic. • Development likely to result in loss of biodiversity. • Impact on the setting of Ivy Farm • Mature hedgerow at risk to accommodate road and footway. • Concern regarding impact on mature trees on site. 	No

Site name	Proposal	Summary assessment	Suitable for allocation in the Local Plan?
Land at Ivy Lane, Oulton Broad	80 residential dwellings	<ul style="list-style-type: none"> • Settlement fringe area. • Changes the character of the area. • Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic. • Development likely to result in loss of biodiversity. • Impacts on the setting of Ivy Farm. • Mature hedgerow at risk to accommodate road and footway. • Concern regarding impact on mature trees on site. 	No
Land at Home Farm, The Street, Thurne	3 dwellings	<ul style="list-style-type: none"> • Lack of access to key services. • There are trees and hedgerow on the southern boundary which would need to be removed as part of the proposal. • This site has high biodiversity value. • The site has not been marketed in accordance with the Local Plan policy, and this is one of the reasons a previous scheme had been refused. • The site is on grade 2 agricultural land. 	No
Land off Hall Lane, Postwick	5 dwellings	<ul style="list-style-type: none"> • Lack of access to key services. • Highway objection. • Landscape impact. • The Parish Council says that the development is in conflict with the emerging Neighbourhood Plan. 	No

Site name	Proposal	Summary assessment	Suitable for allocation in the Local Plan?
Land north of Marsh Road, Tunstall	3 dwellings	<ul style="list-style-type: none"> • No key services. • Highway Objection to the proposed allocation. • Negative impact on landscape character. • Negative impact on church and setting. • The site is on grade 2 agricultural land. 	No
Land south of Marsh Road, Tunstall	4 dwellings	<ul style="list-style-type: none"> • No key services. • Highway objection to the proposed allocation. • The site is on grade 2 agricultural land. • The site has not been marketed in accordance with the Local Plan policy. 	No
Land at Broad Lane, Filby	2 dwellings	<ul style="list-style-type: none"> • Highway objection, mainly relating to visibility at the main road. • Near to peat and a survey would be needed. • Loss of marsh and habitat. 	No
The Old Boatyard, Whitlingham Lane, Trowse	4 dwellings	<ul style="list-style-type: none"> • According to the HELAA, the site was deemed suitable for 4 dwellings. • The site has not been marketed in accordance with the Local Plan policy. 	No

Site name	Proposal	Summary assessment	Suitable for allocation in the Local Plan?
Land at Half Moon Barn, Upper Street, Horning	2 dwellings	<ul style="list-style-type: none"> • Lack of services and facilities within a walking distance from the site. • The site is within Horning Knackers Wood Water Recycling Centre catchment. • Highway objection. • Adequate visibility from access is likely to be unachievable. • New access onto a corridor of movement not supported. • The site is on grade 1 agriculture land. 	No
Land to the north of Upper Street, Horning	45 dwellings	<ul style="list-style-type: none"> • Lack of services and facilities within a walking distance from the site. • The site is within Horning Knackers Wood Water Recycling Centre catchment. • Landscape and townscape impacts. • Highway objection. • Adequate visibility from access is likely to be unachievable. • New access onto a corridor of movement not supported. • The site is on grade 1 agriculture land. 	No
Car Park at former Windboats site, Grange Walk, Norwich Road, Wroxham	2 dwellings	<ul style="list-style-type: none"> • Highway objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable. • Will closing two car parks result in illegal or inconsiderate parking by those visiting the site? • The site has not been marketed in accordance with the Local Plan policy. 	No

Site name	Proposal	Summary assessment	Suitable for allocation in the Local Plan?
Former Windboats site, Grange Walk, Norwich Road, Wroxham	15 dwellings	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable. • Will closing two car parks result in illegal or inconsiderate parking by those visiting the site? • The site has not been marketed in accordance with the Local Plan policy. 	No
Land at Marlpit House Belaugh, Green Lane, Coltishall	2 dwellings	<ul style="list-style-type: none"> • Lack of services and facilities within a walking distance from the site. • Landscape and townscape impacts. • Highway objection. • Adequate visibility from access is likely to be unachievable. 	No

6. New site allocations

6.1. None of the sites are proposed to be allocated for development for the reasons set out in the From Local Plan to HELAA Part 2.

Author: Natalie Beal

Date of report: 11 February 2025

Appendix 1 – [Housing and Economic Land Availability Assessment Part 2](#)

Appendix 2 – [From HELAA to Local Plan Part 2](#)

Housing and Economic Land Availability

Assessment – part 2

To assess sites put forward during the December 2024 call for sites.

February 2024

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1. Introduction

1.1. About this assessment

The purpose of this assessment is to provide information on the range and extent of land which could be considered for development to meet the objectively assessed needs identified for housing and economic development in the Broads across the period 2021-2041. The Housing and Economic Land Availability Assessment (HELAA) is a key evidence document which supports the preparation of Local Plans. Its purpose is to test whether there is sufficient land to meet the objectively assessed need (OAN) and identify where this land may be located. The HELAA represents just one part of wider evidence and should not be considered in isolation of other evidence.

This is an additional HELAA to the one completed in September 2023: [Broads Authority Housing and Economic Land Availability Assessment \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/housing-and-economic-land-availability-assessment).

This HELAA Part 2 assesses sites put forward through the December 2024 call for sites.

The NPPF says at para 68 'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment'.

The NPPG¹ says an assessment should:

- a) identify sites and broad locations with potential for development;
- b) assess their development potential; and
- c) assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

1.2. The HELAA Methodology²

This HELAA methodology has been agreed by each of the commissioning Local Planning Authorities (LPAs)³ in line with the Duty to Cooperate. A consistent methodology across the Norfolk area is considered beneficial and will ensure each LPA prepares its HELAA in a consistent way. This will ensure that each of the individual LPAs understand the level of growth that can be planned for and the areas of each District where the growth could be accommodated. At a more detailed level it will also help the LPAs choose the best individual sites to allocate in Local Plans to meet the growth planned.

The HELAA methodology will apply to the local planning authority areas of:

- a) Breckland Council;

¹ [NPPG Housing and economic land availability assessment - GOV.UK](https://gov.uk/nppg/housing-and-economic-land-availability-assessment)

² [Norfolk HELAA Methodology July 2016](#)

³ Commissioning Local Planning Authorities (LPAs) are: Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, and South Norfolk District Council.

- b) Broadland District Council;
- c) Broads Authority⁴;
- d) Great Yarmouth Borough Council;
- e) Borough Council of King's Lynn and West Norfolk;
- f) North Norfolk District Council;
- g) Norwich City Council; and,
- h) South Norfolk Council.

The Consultation for the HELAA methodology was undertaken across the seven districts and the Broads Authority between 21 March and 3rd May 2016. The methodology was broadly supported with most comments seeking greater clarity and context.

Please note that the HELAA methodology has also been applied to residential mooring sites. Although the HELAA methodology was not produced with assessing sites for residential moorings in mind per se but has been used. There are some additional considerations for residential moorings, and these are also included in this document.

The Norfolk HELAA Methodology is based on the HELAA used in the preparation of the East Suffolk (Waveney) Local Plan and so there is still consistency between the part of the Broads in Norfolk and that in Suffolk.

1.3. NPPG requirements for the HELAA

The NPPG⁵ states some core outputs expected from a HELAA to ensure consistency, accessibility and transparency:

NPPG requirement	Place in this document
a list of all sites or broad locations considered, cross-referenced to their locations on maps	<ul style="list-style-type: none"> • Contents page. • Also see section for each site.
an assessment of each site or broad location, including: <ul style="list-style-type: none"> • where these have been discounted, evidence justifying reasons given; • where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when; 	<ul style="list-style-type: none"> • See section for each site.

⁴ The Broads Authority area includes a small part of Suffolk, and this methodology is consistent with that used by East Suffolk District Council, formerly Waveney District Council, as it produced the Waveney Local Plan.

⁵ [Housing and economic land availability assessment - GOV.UK](#)

NPPG requirement	Place in this document
an indicative trajectory of anticipated development based on the evidence available.	This will follow in the Local Plan.

1.4. What the HELAA is and what the HELAA is not

It is important to note that the NPPG says ‘the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority’s (or, where relevant, elected Mayor or combined authority) requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements’. Paragraph: 001 Reference ID: 3-001-20190722.

Important: A Housing and Economic Land Availability Assessment does not allocate land for development. That is the role of the Local Plan. The assessment does not determine whether a site should be allocated or given planning permission for development. The inclusion of a site as ‘suitable’ in the assessment does not imply or guarantee that it will be allocated, nor that planning permission would be granted should an application be submitted for consideration.

Including a suitable site with identified development potential within a HELAA document does NOT confer any planning status on the site but means only that it will be considered as part of local plan production for potential development in the future and, where relevant, for potential inclusion on a statutory Brownfield Sites Register. No firm commitment to bring a site forward for development (either by the commissioning local planning authorities or other parties) is intended, or should be inferred, from its inclusion in a HELAA.

1.5. Colour coding used in table.

Turning to the colour coding used in the HELAA. Please refer to the HELAA Methodology⁶ for explanations for the colour used.

1.6. Next steps

Following assessment in the HELAA, these sites will be considered in the round as there could be other issues to consider when deciding to allocate or not these sites that are not considered in the HELAA. Another paper will be produced that summarises each site and proposes a way forward for each of them in terms of the Local Plan.

⁶ [Norfolk HELAA Methodology July 2016](#)

1.7. Nutrient enrichment and recreational impact issues

In some places in this document, there is reference to nutrient enrichment and recreational impact issues. More information can be found here for [GI RAMS](#) and [Nutrient Neutrality](#). But at the time of writing, in all of Norfolk and parts of Suffolk, a tariff system is in operation to mitigate the impacts of recreation as a result of development. And in terms of Nutrient Neutrality, which applies to parts of Norfolk, at the time of writing (December 2024), there were some schemes in place and more were being worked up. The HELAA refers to these as important considerations but does not consider these to be showstoppers.

1.8. 'Indicative Flood Zone 3b'

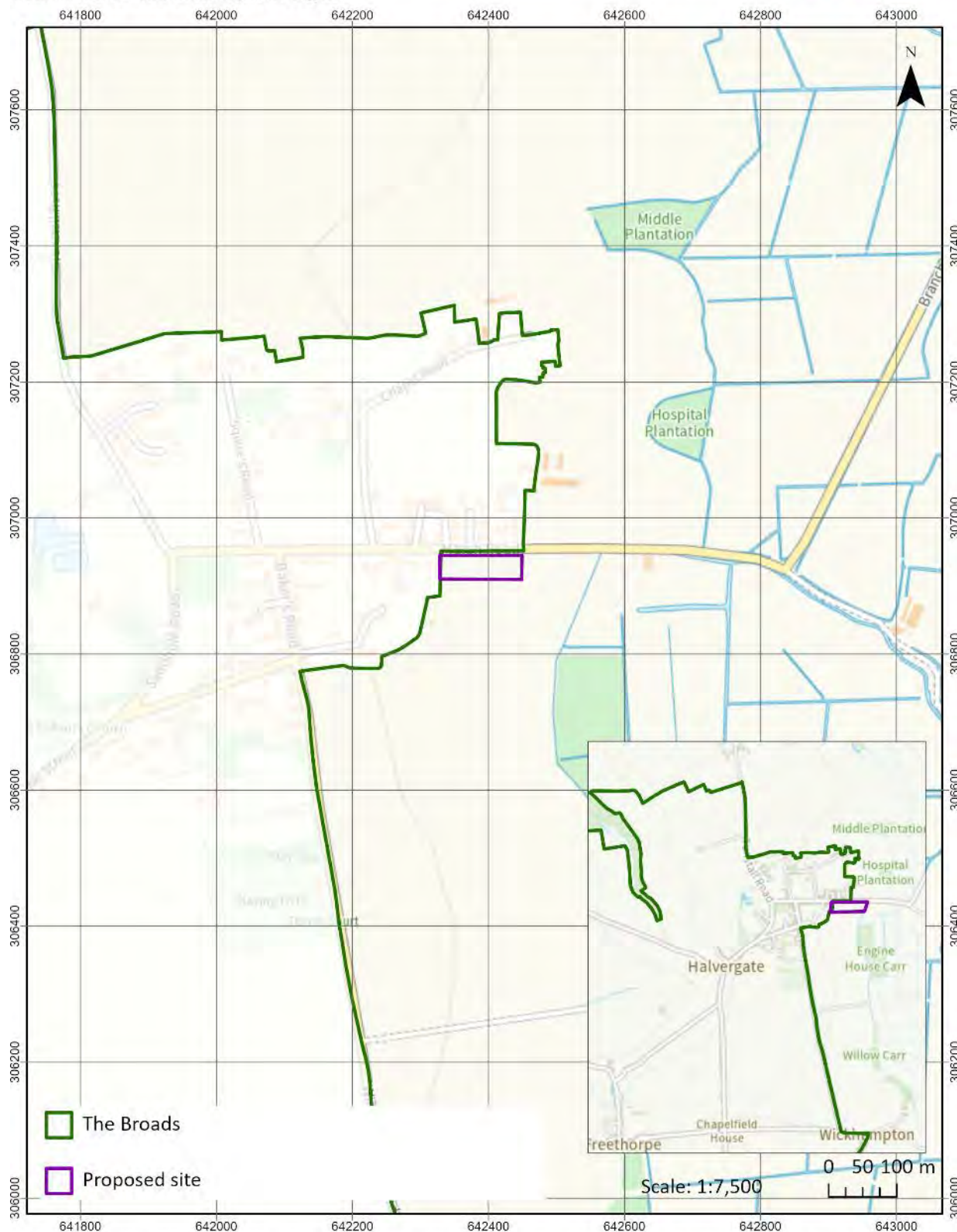
At the time of producing the Strategic Flood Risk Assessments, not all areas have been modelled for flood risk. In the absence of detailed hydraulic model information, a precautionary approach has been adopted with the assumption that the extent of Flood Zone 3b would be equal to Flood Zone 3a. In the SFRAs, this precautionary approach is represented as a separate layer and is termed 'indicative extent of Flood Zone 3b'. If a proposed development is shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site-specific Flood Risk Assessment to define and confirm the extent of Flood Zone 3b. This may require detailed hydraulic modelling. Ordinarily, any development in flood zone 3b would not be considered further in the HELAA, but given the precautionary approach, it is noted if the site is in 3b and that is then a consideration later in the assessment tables; it is not seen as a showstopper currently.

2. Land south of Marsh Road, Halvergate

2.1. Map of site

Residential dwellings/hectare

Land south of Marsh Road, Halvergate



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2.2. Photos of site



The western boundary of the site.



The existing entrance into the site.



Showing the site and the southern boundary hedge.



There are utilities at the eastern road frontage.



Looking east along Marsh Road



Looking west along Marsh Road

2.3. Stakeholder comments

Stakeholder	Comments
<p>Broads Authority Development Management Team</p>	<p>This site is reasonably well sited in terms of being adjacent to existing residential development and partly opposite existing residential development. It is not in flood zones 2 or 3.</p> <p>This is not a village which could be considered as a sustainable location, it does not have a provision of basic services, it does not benefit from good road connections, there are no notable local employment opportunities. This is a location which will depend predominantly on the private motor car for all the needs of the village population.</p> <p>No development boundary, but there is one for Freethorpe, along with the description of Freethorpe, Halvergate and Wickhampton as a village cluster due to the presence of a primary school in Freethorpe. There is an allocation in Freethorpe for 40 dwellings and that could utilise the school spaces.</p> <p>The site is unusual in that it comprises a small section of field to the north of a large field in established arable use, but there do not appear to be any characteristics which would make the subject site land different from the land immediately to the south. In this area it is commonly drainage ditches which separate land and what land is used for, such is the case for the land to the east of the subject site and arable field. There is no ditch between the arable land and subject site, only a hedgerow boundary.</p> <p>On the basis of the above officers do not think this site is appropriate for new housing as it is not a sustainable location.</p> <p>Same comments apply for 4 dwellings scheme.</p>
<p>Broads Authority Heritage and Design</p>	<p>This site is immediately adjacent to the Halvergate Conservation Area, which adjoins it to the north and west and is in close proximity to Halvergate Marshes Conservation Area to the east, both of which are designated heritage assets. Any development here could therefore affect the setting of the designated heritage assets and as such any development will need to ensure that the significance and character and appearance of the areas is not compromised by development within its setting.</p> <p>To the north-east of the site on the opposite side of Marsh Road is the locally listed WW2 Home guard shelter, again the setting of which must be considered.</p> <p>It should also be noted that there is the potential for archaeological remains on the site and as such I would suggest that Norfolk County Council Historic Environment team should be consulted as this could potentially be a constraint on development.</p>

Stakeholder	Comments
	<p>The Norfolk Historic Environment Record states (Record no: 30301) that there are cropmarks of medieval and post medieval date on the site, indicative of a possible moated site and rectilinear enclosure. Another archaeological site also covers a small part of the site (Record no: 49387) with cropmarks of potentially Iron Age or Roman date.</p> <p>A Heritage Impact Assessment would therefore certainly be required for any development on the site.</p> <p>I am mindful of the fact that within the Halvergate Conservation Area Appraisal it is specified on page 40 that there are good uninterrupted views across the marshes from Wickhampton Road, close to Halvergate Hall. Although development does currently extend further east along Marsh Road on the northern side of Marsh Road, its scale, position and the mature hedges in the area mean that it is not prominent in wider views of the village. I therefore have some concerns that development on the proposed site, especially at the density proposed, would impact on the setting of the Halvergate and Tunstall conservation area, by encroaching on its wider landscape setting, which does contribute to the conservation area's significance.</p> <p>However, there may be means of mitigating this harm, for example retention and consolidation of the hedge along the southern edge of the site, retention of as much of the hedgerow along Marsh Road as possible and restricting development to single storey or 1.5 storey (which would also be in keeping with the adjoining development). Rather than cul-de-sac type development, individual properties continuing the established building line (or set back slightly to allow retention of the hedge) with gardens running south would be the most appropriate form of development.</p> <p>To summarise, there are potential impacts on designated and non-designated heritage assets (archaeology – further advice from County required). Development of no more than half of the site (western side) at a low density with low scale buildings may be possible with mitigation measures to minimise harm.</p> <p>Same comments apply for 4 dwellings scheme.</p>
Halvergate Parish Council	Following an informal meeting of Cllrs the inclusion of the land in the Broads Authority development plan was supported and the preference shown for development was for either 4 bungalows or 8 semi-detached bungalows.
Norfolk County Council Heritage	<p>43 dwellings:</p> <p>It is most likely the crop-marks on this site relate to changes in road layout and agricultural activity of post-medieval date. The road is clearly a former continuation</p>

Stakeholder	Comments
	<p>of The Street, out of use by the 1790s as not shown on Faden's map of Norfolk (http://www.fadensmapofnorfolk.co.uk/). We would expect results of a geophysical survey be submitted with any planning applications. We would most likely recommend conditions for a post-consent programme of archaeological mitigation starting with trial trenching. The site would be amber in a RAG assessment.</p> <p>4 dwellings:</p> <p>For a smaller proposed development of 4 dwelling we would probably recommend conditions for a post-consent programme of archaeological mitigation starting with trial trenching, depending in the location of the application site in relation to the crop-marks. The site would be amber in a RAG assessment.</p>
Norfolk County Council Education	<p>43 dwellings:</p> <p>This size and scale of development is likely to increase numbers for the local school to a point it could present an issue for the education authority to place pupils. There is no opportunity to expand the school on its existing site which would mean some children may need transporting to the next nearest school. Due to the rural nature of this part of the county it would be difficult to meet the statutory walking and cycling routes to get children to school sustainably.</p> <p>4 dwellings:</p> <p>This size and scale of housing is not likely to impact the existing local school based on the current forecast detail available.</p>
Broads Authority Landscape Architect	<p>The area appears to be a long thin site and from experience these can be very difficult to develop successful layouts on, and pressure is then placed to remove hedgerows to make space for a sufficiently deep site to contain some back-to-back plots.</p> <p>If this one was to be allocated, the majority of the hedge would need to be retained, so access would need careful consideration.</p> <p>Query how the sites could accommodate 43 residential dwellings here. That's a large number and the edge of the village is mainly bungalows so this would probably need to follow suit and would be a low-density development likely with single or 1.5 storey at most as I can't see how 2 storeys could be acceptable in this location. The site would also need to accommodate green infrastructure, and potentially open space would be required.</p>

Stakeholder	Comments
	<p>The nearest PROW is some distance to the east. Overall the character of the site put forward is that of rural farmland but then very quickly changes to the marshland character to the east. The site is right on the edge of that marshland character, and this makes me very unsure about whether the site could accommodate any development.</p> <p>Reducing the size of the scheme would reduce potential impact, and reflecting the development pattern opposite would make some sense – but I'd want to see the rest of the site included though not developed - and used for BNG/open space and as a way of transitioning into the wider landscape character. Not least because otherwise it would leave a very strange parcel of land which I'm sure would not be particularly usable for the farmer.</p> <p>Overall I'm not keen on this site, especially in the shape and number put forward.</p> <p><i>The Agent then amended the submission to be for 4 dwellings on a small site.</i></p> <p>Reducing the size of the scheme would reduce potential impact, and reflecting the development pattern opposite would make some sense – but I'd want to see the rest of the site included though not developed - and used for BNG/open space and as a way of transitioning into the wider landscape character. Not least because otherwise it would leave a very strange parcel of land which I'm sure would not be particularly usable for the farmer.</p>
<p>Norfolk County Council Highways</p>	<p>43 residential dwellings</p> <p>Highway objection to the proposed allocation. The location has no local facilities and will be reliant on the private car. Furthermore, the scale is out of keeping with the local network.</p> <p>Smaller site area and 4 dwellings</p> <p>Highway objection to the proposed allocation. The location has no local facilities and will be reliant on the private car. A recent appeal for 3 dwellings at a location nearby was dismissed on the availability of local facilities.</p>
<p>Norfolk County Council – Lead Local Flood Authority.</p>	<p>43 dwellings:</p> <p>Mainly located within Flood Zone 1 but FZ2 and FZ3 directly to the east with a very small area of FZ2 appearing to encroach upon the western site boundary.</p> <p>No on-site sewers – Foul sewers run along the boundary with Marsh Road.</p> <p>Not located within a Source Protection Zone (SPPZ).</p> <p>No flood records on-site or within 500m.</p> <p>On-site: Surface water flow path in 0.1%, 1% and 3.33% AEP events runs along the front of site (Marsh Road) with other minor surface water flowpaths and areas of surface water ponding / pooling in all three AEP events within 500m. The LLFA</p>

Stakeholder	Comments
	<p>consider that there is potential for the presence of the surface water flowpath to impact upon access into site and the number of dwellings proposed.</p> <p>Small part of the site to the west lies within Broads Internal Drainage Board.</p> <p>No onsite watercourses, however ordinary watercourses (some within the IDB area) and drainage ditches are located within 100m. An EA main river also lies within the vicinity of the site (more than 1000m).</p> <p>LLFA Assessment: Moderate surface water issues / constraints identified (particularly the presence of the surface water flowpath along Marsh Road) which will require further assessment by the Local Planning Authority (AMBER RAG)</p> <p>4 dwellings:</p> <p>Located within Flood Zone 1.</p> <p>No on-site sewers – Foul sewers run along boundary with Marsh Road.</p> <p>Not located within Source Protection Zone (SPZ).</p> <p>No flood records on-site or within 500m.</p> <p>On-site: Surface water flow path in 0.1%, 1% and 3.33% AEP events runs along the front of site (Marsh Road) with other minor surface water flowpaths and areas of surface water ponding / pooling in all three AEP events within 500m. The LLFA consider that there is potential for the presence of the surface water flowpath to impact upon access into site and the number of dwellings proposed.</p> <p>Close to but not located within the Broads Internal Drainage Board area.</p> <p>No onsite watercourses, however ordinary watercourses (some within the IDB area) and drainage ditches located within 100m. An EA main River also lies within the vicinity of the site (more than 1000m).</p> <p>LLFA Assessment: Moderate surface water issues / constraints identified (particularly the presence of the surface water flowpath along Marsh Road) which will require further assessment by the Local Planning Authority (AMBER RAG)</p>
Anglian Water Services	<p>Anglian Water is the water and sewerage undertaker for this location. There is a sewer along the western boundary and a rising main and pumping station to the east. The pumping station would be in the ownership of AW and therefore should not form part of the site boundary. A minimum buffer of 15m from the pumping station to the boundary of any residential property would be required to avoid any adverse impacts arising from noise or odour for example. There are also easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p> <p>The site is within the Freethorpe-Halvergate Rd WRC catchment. There is currently no capacity at the WRC to accommodate growth in the catchment. However, there</p>

Stakeholder	Comments
	<p>is a proposed growth scheme for AMP8 (2025-30) in our PR24 Business Plan – this is subject to final determination by Ofwat which is expected on 19th December 2024. The site would need to be phased to allow the growth scheme to be delivered before connecting to our network and WRC. The site allocation policy would need to ensure that the growth scheme is delivered before connecting to our network and WRC i.e. require the developer to demonstrate that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site.</p> <p>The site for 4 dwellings – this does not include the rising main and pumping station.</p>
Broadland District Council	<p>Broadland has never allocated in Halvergate. There is history of affordable housing exception site development however.</p>
Broads Authority Ecologist	<p>A Habitats Regulation Assessment will apply due to potential impacts of the proposal on European designated sites, namely the Broads SAC and Broadland SPA.</p> <p>Nutrient Neutrality Mitigation will apply due to the locality of the site within the Broads National Park, and the development being located adjacent to designated sites namely Halvergate Marshes part of the Broads SAC & SPA.</p> <p>Ecological assessments will be required to assess the sites habitats and species, and to help mitigate potential impacts of the development proposal.</p> <p>From the information provided the site appears to be currently in arable production, with hedgerows surrounding most of the land parcel. The site is directly adjacent to Halvergate marshes to the east, part of the Broads SAC, Broadland SPA. There is arable land to the south and west, with a mixture of arable and developed land to the north.</p> <p>Existing hedgerows should be retained and enhanced.</p> <p>We would expect Biodiversity net gain to be implemented on site within this sensitive locality close to the Broads European designated SAC and SPA. Biodiversity enhancements including tree and hedgerow planting should be incorporated into the proposal to improve habitat connectivity and provide wildlife corridors.</p> <p>Likely potential for recreational disturbance on nearby designated sites with 43 residential dwellings proposed.</p> <p>Some localised increase in recreational disturbance to designated sites.</p>

2.4. Site assessment

Planning history: None on site, but this scheme is near the bus stop and the findings are relevant.

Application number	Description	Decision	Date
BA/2019/0177/NEIGHB Appeal reference: 3245582.	Application for 7 dwellings.	Refused and then appealed. Appeal dismissed: The appeal site would not be a suitable location for new housing. It would not reduce the need to travel nor encourage such by sustainable means. It would serve to promote unsustainable patterns of development, contrary to the Council's settlement hierarchy and consequently the other policies I have cited above.	September 2020

Site address: Land south of Marsh Road, Halvergate		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Suggested through December 2024 call for sites. According to Agent, previous submissions for this site have been made in 2011 and 2013. See table above.
Site Size (hectares)		0.42 hectares
Greenfield / Brownfield		Greenfield – arable
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No (SSSI Impact Zone and SSSI, SAC, SPA and RAMSAR up to eastern boundary)
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		No - Flood zone 1 according to SFRA
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 43 dwellings initially. Then reduced to 4 dwellings		
Density calculator		9.5 dwellings per hectare – 4 dwellings
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		There is direct access from the public highway. The speed limit changes partway along Marsh Road frontage to the site.

		If dwellings are along the road frontage, adequate visibility splays required – there is a mature hedge in place currently.
Accessibility to local services and facilities		There is a bus stop nearby with peak hour service (73C) to and from Acle and then onto Great Yarmouth. There is a footway on the north side of Marsh Road, but this stops near the pub. There are no other key services in Halvergate.
Utilities Capacity		The site is within the Freethorpe-Halvergate Rd WRC catchment. There is currently no capacity at the WRC to accommodate growth in the catchment. However, there is a proposed growth scheme for AMP8 (2025-30) in our PR24 Business Plan – this is subject to final determination by Ofwat which is expected on 19 th December 2024. The site would need to be phased to allow the growth scheme to be delivered before connecting to our network and WRC. The site allocation policy would need to ensure that the growth scheme is delivered before connecting to our network and WRC i.e. require the developer to demonstrate that that there is capacity available in the sewerage network and at the receiving water recycling centre to accommodate wastewater flows from the site.
Utilities Infrastructure		<p>There are cables overhead along the boundary of the site with the road.</p> <p>There is a sewer along the western boundary and a rising main and pumping station to the east. The pumping station would be in the ownership of AW and therefore should not form part of the site boundary. A minimum buffer of 15m from the pumping station to the boundary of any residential property would be required to avoid any adverse impacts arising from noise or odour for example. There are also easements for many of AW underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p>
Contamination and ground stability		Greenfield land, laying fallow currently.
Flood Risk		In flood zone 1, but some elements of surface water flood risk along the northern boundary.
Coastal Change		

Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Hedge will need retaining. There are views through the site to the Broads, including views of Mutton's Mill (Grade 2* listed mill). Reinforcement of the hedges.
Townscape		Reducing the size of the scheme would reduce potential impact, and reflecting the development pattern opposite would make some sense. Rest of site used for BNG/open space and as a way of transitioning into the wider landscape character.
Biodiversity and Geodiversity		SSSI, RAMSAR, SPA and SAC near to the. Would need to mitigate from recreation impacts. Not in scope for nutrient enrichment mitigation. Deciduous woodland/hedges borders site. Not on peat.
Historic Environment		There are potential impacts on designated and non-designated heritage assets (archaeology – further advice from County required). Development of no more than half of the site (western side) at a low density with low scale buildings may be possible with mitigation measures to minimise harm. Conditions needed for a post-consent programme of archaeological mitigation starting with trial trenching, depending in the location of the application site in relation to the cropmarks.
Open Space		
Transport and Roads		Highway objection to the proposed allocation. The location has no local facilities and will be reliant on the private car. A recent appeal at a location nearby was dismissed on the availability of local facilities.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where,	No	

by whom, how much for etc.)		
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 2 years to complete, so 2 dwellings per year is presumed.
Comments	Agent says will take up to 2 years to complete.	
Achievability (including viability)		
Comments	Agent says 'Should an housing allocation be awarded for this site, we would commence marketing to attract a suitable developer. We anticipate an Option Agreement would be negotiated, whilst the developer achieved their Planning Permission. On realising a suitable Planning Permission, we would expect the developer to commence construction, so long as the demand remained'.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • Scheme could consider the SPA, SCA, RAMSAR and SSSI that is next door to the site in its design. • GI RAMS – payment likely. • BNG – on site or off-site mitigation. • Any development here could therefore affect the setting of the designated heritage assets and as such any development will need to ensure that the significance and character and appearance of the areas is not compromised by development within its setting. • To the north-east of the site on the opposite side of Marsh Road is the locally listed WW2 Home guard shelter, again the setting of which must be considered. • A Heritage Impact Assessment would therefore certainly be required for any development on the site. • Conditions needed for a post-consent programme of archaeological mitigation starting with trial trenching, depending in the location of the application site in relation to the cropmarks. • There are cables overhead along the boundary of the site with the road. • A minimum buffer of 15m from the pumping station to the boundary of any residential property would be required to avoid any adverse impacts arising from noise or odour for example. • There are also easements for many of AWS underground assets, and the design and layout should ensure that these assets are within public open 	

	<p>space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p> <ul style="list-style-type: none"> • There is currently no capacity at the WRC to accommodate growth in the catchment. However, there is a proposed growth scheme for AMP8 (2025-30) in our PR24 Business Plan. The site would need to be phased to allow the growth scheme to be delivered before connecting to our network and WRC. • Ecological assessments will be required to assess the sites habitats and species, and to help mitigate potential impacts of the development proposal • Biodiversity net gain to be implemented on site within this sensitive locality close to the Broads European designated SAC and SPA. • Biodiversity enhancements including tree and hedgerow planting should be incorporated into the proposal to improve habitat connectivity and provide wildlife corridors. • However, there may be means of mitigating this harm, for example retention and consolidation of the hedge along the southern edge of the site, retention of as much of the hedgerow along Marsh Road as possible and restricting development to single storey or 1.5 storey (which would also be in keeping with the adjoining development). Rather than cul-de-sac type development, individual properties continuing the established building line (or set back slightly to allow retention of the hedge) with gardens running south would be the most appropriate form of development. • Include rest of field for BNG/open space and as a way of transitioning into the wider landscape character. • Highway objection to the proposed allocation. The location has no local facilities and will be reliant on the private car. • If dwellings are along the road frontage, adequate visibility splays required – there is a mature hedge in place currently.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 2 years to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Loss of hedges along road frontage for access to dwellings. • Lack of access to services – only one key service.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

3. Land north of Thrigby Road, Filby

3.1. Map of site



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3.2. Photos of site



Looking northeast along Thrigby Road



At the junction to the farm and Thrigby Road



Looking at the site from the farm access



Showing the site from the farm access



Looking southwest along Thrigby Road



Showing the bend in the road before the site

3.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	<p>This proposed site appears clearly outside of the settlement limit, residential development on both sides of the road stop at roughly the same point, this stretches development to one side beyond this point, so there will be inevitable pressure to develop the opposite side and provide the balance which is characteristic of development in Filby.</p> <p>When a village is stretched like this, one end does not wholly feel like it is part of the same village as the other. Filby already has that feel as it stretches along the A1064 and stretches down Thrigby Road. The subject site would only contribute to what already is an unsatisfactory situation.</p> <p>The existing separation between Thrigby and Filby is small, and easily lost through village creep, of which the proposed site is an example.</p>
Broads Authority Heritage and Design	There are no heritage constraints.
Filby Parish Council	<p>Filby Parish Council does not support the proposed site for the following reasons:</p> <p>It is outside the development boundary for Filby</p> <p>It is on a bend which is on a 60mph road so cannot be considered safe</p> <p>It would narrow the gap between the villages of Filby and Thrigby</p> <p>The proposed site is Grade 1 agricultural land and so should not be lost to housing.</p>
Norfolk County Council Heritage	We would recommend conditions for a post-consent programme of archaeological mitigation starting with trial trenching. The site would be amber in a RAG assessment.
Norfolk County Council Education	This size and scale of housing is not likely to impact the existing local school based on the current forecast detail available.
Broads Authority Landscape Architect	In principle this feels like it could be an acceptable allocation as a natural extension of the existing development pattern along Thrigby Road. The northern side of the road which this one relates to has greater capacity than the southern side – simply because of the geometry of the site and that it is somewhat contained before users of Thrigby Road enter a more rural landscape (albeit I understand much of the existing land use around this corner relates to equestrian use). Given the tight curve on this corner, officers are not sure how access would work – that would need careful consideration within any allocation as the visibility splays could be

Stakeholder	Comments
	quite tricky and probably would result in the total loss of the roadside hedgerow, which I would be very much against. Although the plot frontages along Thrigby Road are generally quite open, officers believe it would be appropriate here to retain as much of the hedgerow and rural character as possible, this could create a successful transition into the wider landscape and deal more effectively with the edge of the development boundary – which currently does feel somewhat abrupt.
Norfolk County Council Highways	Highway objection to the proposed allocation. There is a lack of footway provision, the access would require significant tree removal and there is insufficient forward visibility to form a safe access.
Norfolk County Council – Lead Local Flood Authority.	<p>Located within Flood Zone 1. Flood Zones 2 and 3 lie to the north and east of the site.</p> <p>No on-site sewers – Foul sewers run along boundary with Thrigby Road.</p> <p>Not located within a Source Protection Zone (SPZ)</p> <p>No flood records on-site. External and internal flood records within 500m</p> <p>On-site: None. Off-site Surface water flow paths and small areas of surface water ponding / pooling in 0.1%, 1% and 3.33% AEP events flowpath to impact upon access into site.</p> <p>Small part of the site to the west lies within Broads Internal Drainage Board.</p> <p>On-site: None. Off-site: ordinary watercourses (some within IDB area) and drainage ditches located within 100m.</p> <p>LLFA Assessment: No major surface water issues / constraints identified (Green RAG)</p>
Essex and Suffolk Water	<p>Thrigby Rd, Filby – We do not appear to have any underground assets running through this land, but any future development would need to check this with us.</p> <p>The development site is close to our land holding – Filby Broad. This is a SSSI and SAC site. As owners we are responsible for the designated features of the site and ensuring they are conserved. As such, any development this close to the protected site should be subject to the relevant environmental checks (for example, HRA) to ensure it would not be detrimental to the features of the site. Particularly relevant would be, how sewage is dealt with because the protected site already has elevated levels of N and P, and light/noise pollution which could affect bird populations. This is not an exhaustive list of considerations.</p>
Anglian Water Services	Anglian Water has no assets within the site boundary and is the sewerage undertaker for this location – the site is within the Caister-Pump Lane WRC catchment, which has sufficient dry weather flow headroom to accommodate the proposed growth.
Great Yarmouth Borough Council	<ul style="list-style-type: none"> - Filby is a small village with a limited range of services and facilities (classed as a 'Secondary village' in our existing Local Plan). The site is located off Thrigby Road, which has smaller stretches of footpath provision near to the primary school and junction with Main Road. Street lighting is also provided along most

Stakeholder	Comments
	<p>of the length adjacent to which existing residential properties are located and for which a 20/30mph speed restriction is in place. Whilst the site is on Thrigby Road, it lies beyond any footpath provision, is unlit, and close to a bend in the road where national speed limit applies. In this respect, whilst the site is within reasonable walking distance (by proximity) to the primary school, village shop and community hall, it lies within the stretch of the highway which may not be as attractive for walking or cycling than further along Thrigby Road towards the centre of Filby.</p> <ul style="list-style-type: none"> - The site falls within the Filby Primary School catchment. The latest pupil roll forecasting we have obtained from NCC indicates that the school will be over-capacity within the next five year when taking into account projected growth with no room to expand on the site.
Broads Authority Ecologist	<p>A Habitats Regulation Assessment will apply due to potential impacts of the proposal on European designated sites, namely the Broads SAC and Broadland SPA.</p> <p>Ecological assessments will be required to assess the sites habitats and species, and to help mitigate potential impacts of the development proposal.</p> <p>From the information provided the site appears to be currently in arable production with hedgerows on the east and southeastern fringe. The land parcel is located between a farm to the west and residential housing to the east. Arable land is located to the north and south of the site.</p> <p>Existing hedgerows should be retained and enhanced.</p> <p>We would expect Biodiversity net gain to be implemented on site within this sensitive locality close to the Broads European designated SAC and SPA. Biodiversity enhancements including further tree and hedgerow planting should be incorporated into the proposal to improve habitat connectivity and provide wildlife corridors.</p> <p>Some localised increase in recreational disturbance to designated sites.</p>

3.4. Site assessment

Planning history:

Application number	Description	Decision	Date
BA/1990/3023/HISTAP	Horse driving centre and manufacture of horse drawn vehicles	Approve Subject to Conditions	19 Oct 1990

Site address: Land north of Thrigby Road, Filby

Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Suggested through December 2024 call for sites.
Site Size (hectares)		0.4 hectares
Greenfield / Brownfield		Greenfield – horse grazing
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	No - Flood zone 1 according to SFRA	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 5 dwellings.		
Density calculator	12.5 dwellings per hectare	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		<p>Agent says: There is no existing access to the site. A single new access would be required from Thrigby Road. Alternatively, access could be taken by way of the existing access to Croft Riding School, adjacent to the west. Some minor upgrade works would be required to widen the driveway.</p> <p>There is an access to the farm off Thrigby Road. Road bends just before the site. The speed limit changes part way along Thrigby Road frontage to the site. No footways along Thrigby Road.</p> <p>Highway objection to the proposed allocation. There is a lack of footway provision, the access would require significant tree removal and there is insufficient forward visibility to form a safe access.</p>
Accessibility to local services and facilities		660m to the primary school.

		<p>Around 850m to the post office and bus stop with service with peak hour service to higher order settlement.</p> <p>A development boundary is proposed for the BA part of Filby.</p>
Utilities Capacity		
Utilities Infrastructure		There are cables overhead along the boundary of the site with the road.
Contamination and ground stability		There are no known ground condition issues at this time. The site is utilised as a paddock and so contamination issues are not anticipated.
Flood Risk		In flood zone 1, but some elements of surface water flood risk along the road frontage.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Hedge to be retained, but given bend and visibility splays, the hedge may be at risk of being removed. Appropriate here to retain as much of the hedgerow and rural character as possible, this could create a successful transition into the wider landscape and deal more effectively with the edge of the development boundary.
Townscape		
Biodiversity and Geodiversity		Would need to mitigate for recreation impacts. Not in scope for nutrient enrichment mitigation. Deciduous woodland/hedges borders site. Not on peat.
Historic Environment		We would recommend conditions for a post-consent programme of archaeological mitigation starting with trial trenching.
Open Space		
Transport and Roads		Highway objection to the proposed allocation. There is a lack of footway provision, the access would require significant tree removal and there is insufficient forward visibility to form a safe access.
Compatibility with neighbouring / adjoining uses		Agent says: Further residential dwellings and Croft Farm riding Centre are located to the northwest. The nature of the riding centre is such that adverse amenity impacts are not anticipated for either future residents or the users of the riding centre. Indeed, the stables and paddocks are already closely related to residential

		dwelling, seemingly without issue. Appropriate landscaping could be introduced to enhance separation.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 2 years to complete, so 3 dwellings per year is presumed.
Comments	Agent says will take up to 2 years to complete.	
Achievability (including viability)		
Comments	Agent says 'The site is well related to the main built form of Filby; an attractive and thriving village. The land is in single ownership and the landowner is keen to redevelop. There are no know technical constraints, or abnormal conditions affecting the site; indeed the site is not identified as being at risk of flooding and the waste water treatment works serving the village are identified as discharging outside of the nutrient neutrality catchment. As such it is considered that the site would be attractive either to self-builders or to small developers'.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • Conditions for a post-consent programme of archaeological mitigation starting with trial trenching • Scheme would need to consider the woodland on the boundary with the road, retaining hedge along the frontage. • Highways concern regarding access visibility and hedge removal. • Scheme would need to consider the surface water issues along the road frontage. • GI RAMS – payment likely. • Confirmation of surface water issues on the road frontage which may need addressing. • Access on a bend where national speed limits apply. 	

	<ul style="list-style-type: none"> • Grade 1 agricultural land – this cannot be overcome. • Eroding gap between Thrigby and Filby - this cannot be overcome. • Would put development pressure on the site opposite, in GYBC planning area. • There are cables overhead along the boundary of the site with the road. • Ecological assessments will be required to assess the sites habitats and species, and to help mitigate potential impacts of the development proposal. • We would expect Biodiversity net gain to be implemented on site within this sensitive locality close to the Broads European designated SAC and SPA. Biodiversity enhancements including further tree and hedgerow planting should be incorporated into the proposal to improve habitat connectivity and provide wildlife corridors.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 2 years to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Grade 1 agricultural land. • Eroding gap between Thrigby and Filby. • Would put development pressure on the site opposite, in GYBC planning area. • Conflict between removal of hedge for visibility and need to retain hedge for townscape/landscape purposes. • Access on a bend where national speed limits apply. • Highways objection to proposed allocation.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

4. Land at Ivy Lane, Oulton Broad

4.1. Map of site

Residential moorings:

Call for sites - December 2024
NR33 8HY - Area 1



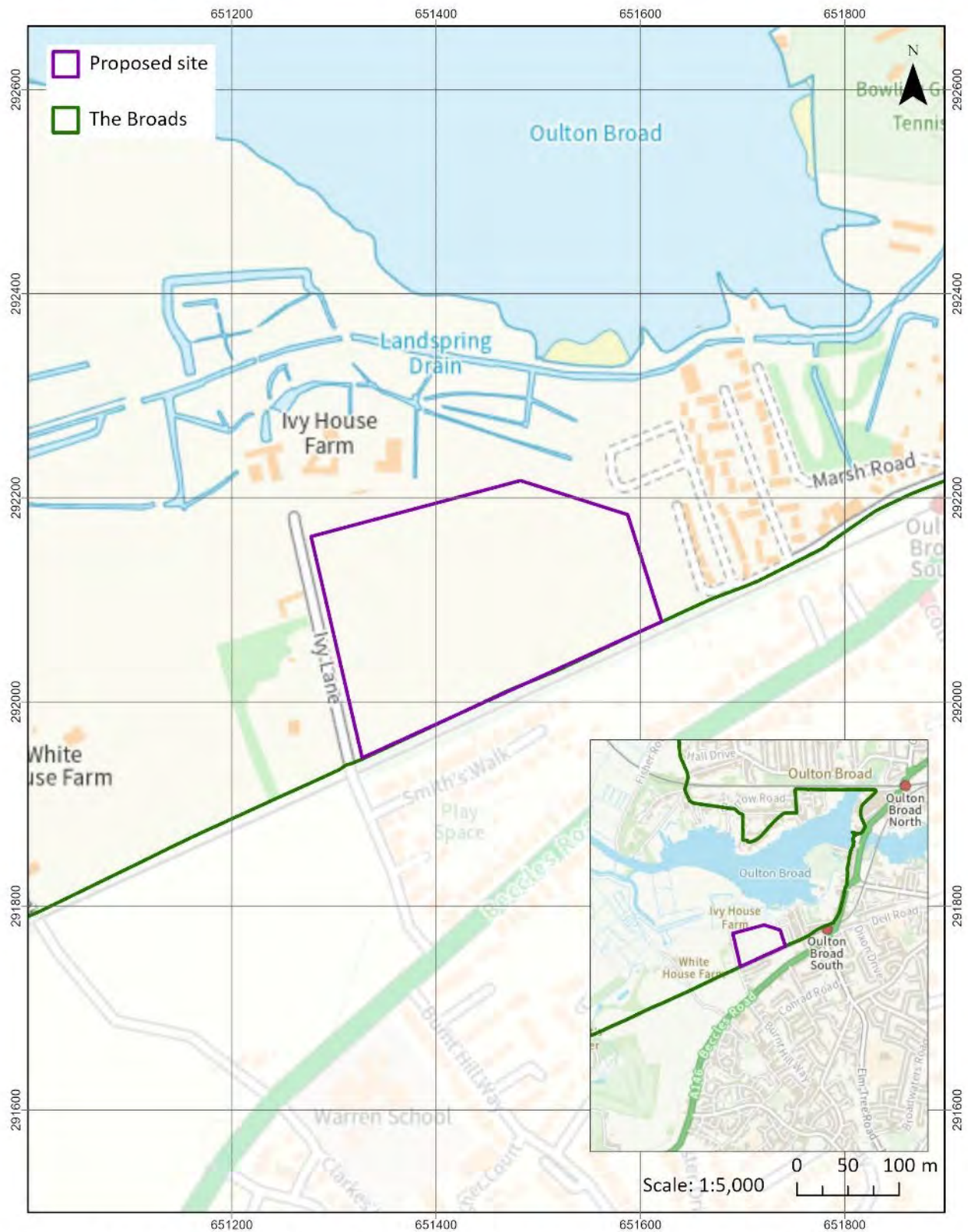
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Residential caravans:



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Residential dwellings:



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4.2. Photos of site

Residential caravans and houses site:



Showing the central area of the site. Looking from the footpath to the train track.



The north west corner of the site. Showing the public footpath.



Taken from the south west corner, looking north east – train track to the right.



The boundary between the two fields that make up the site.



Showing the eastern area of the site.



Showing the eastern boundary with the holiday park.



Looking west along the footpath with the site to the left.

Residential moorings site:



Looking towards where the residential moorings would be from the public footpath.



Showing where the residential moorings would be



Showing where the residential moorings could be.



Looking back towards the public footpath from near the water's edge.

Photos showing the access to the site:



Showing the mature trees and track to the site/hotel.



Access from main road to road towards the site.



Showing the track to the hotel/site.



The public footway runs through the neighbouring holiday park.

4.3. Stakeholder comments

General comment about the area from the Broads Authority Heritage and Design Officer: The site is located to the south and west of the Oulton Broad conservation area but it has the potential to impact on the setting of the conservation area (a designated heritage asset) and the setting of Ivy Farm, a 19th century farmstead which is considered a local identified heritage asset (see [Suffolk HER](#)) and so this needs to be considered.

Comment from Suffolk CC Highways regarding the rail bridge: It is difficult to tell without an understanding of the intensification the development would present – alongside an understanding of existing trips – of which the Transport Assessment would be expected to cover. There could be concerns if the bridge is already constrained and the development intensifies the use in a significant way that it could create a new issue / exacerbate an existing issue to an unacceptable degree, should it lead to additional queues which result in highway safety issues. However, at this time that is unknown and as above, the Transport Assessment should cover this.

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
Broads Authority Development Management Team	This would have landscape impacts, pulling the built development at the Tingdene Marina further along the sensitive Broad edge. The existing marina at least had the caravan site as a partial backdrop; the adjacent area does not have the same benefit.	This is a lot of development at a site where the access to the A146 from Ivy Lane is so poor. Considering the additional daily vehicle movements I am not sure highways will like it. The existing caravan site has visual impact, even in	This is a lot of development at a site where the access to the A146 from Ivy Lane is so poor. Considering the additional daily vehicle movements, and the expected number of vehicles at 2 per dwelling,

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
	<p>Access appears to be poor, and the site would be remote from any parking area.</p> <p>Officers do not think we could support this.</p>	<p>the context of surrounding development. Any further use for caravans in this area would only be acceptable if the site is not visible from the Broad. The land at the SWT visitor centre site slopes upwards, not sure if it does the same on the east of Ivy Lane.</p>	<p>I am not sure highways will like it.</p> <p>It would be beneficial if this site was reasonably screened, but given the housing to the south of the railway line it would not appear particularly out of place and broadly corresponds with the settlement edge.</p>
Broads Authority Heritage and Design	<p>This site is located to the east of the Tingdene Marina. The area is currently undeveloped and forms part of an area of undeveloped riverbank, with reedbeds and natural landscape running along the south and east of Oulton Broad. The provision of residential moorings, along with all the ancillary paraphernalia here, would detrimentally change the character of the area and would not be considered to preserve and enhance the setting of the conservation area.</p>	<p>Firstly there is the potential for archaeological remains in the vicinity of Ivy Lane as there was a Palaeolithic find in the vicinity (see Suffolk HER record) and World War Two defences to the west of the site (see Suffolk HER record and here). These would potentially be constraints.</p> <p>I would have concerns that the proposal would have a detrimental impact on the setting of Ivy Farm, a locally identified heritage asset.</p>	<p>Firstly there is the potential for archaeological remains in the vicinity of Ivy Lane as there was a Palaeolithic find in the vicinity (see Suffolk HER record) and World War Two defences to the west of the site (see Suffolk HER record and here). These would potentially be constraints. There may be some potential for a lower density residential development than that proposed, that takes into account the potential archaeological constraints and the setting of Ivy Farm, a locally identified heritage asset. Equally the scale, layout and design of any development would need to limit visual impact on the wider open landscape to the north (Oulton Broad) and west (towards Carlton Marshes).</p>

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
Oulton Broad Parish Council	<p>The planning committee for Oulton Broad Parish Council have reviewed the local plan and unanimously agreed to reject any use of the land.</p> <p>Concerns over an overdeveloped small area which is prone to flooding, access via the small lane next to Ivy House Farm, where current disputes have taken place with dog walkers and the farm owners.</p> <p>The Parish Council would NOT like this added to the Local Plan.</p>		
Suffolk County Council Education	<p>Early Years: There is currently a deficit of places in the ward so additional places would increase this deficit.</p> <p>Primary: Dell Primary is forecast to have a deficit of places so additional demand on places would increase this deficit. However, part of the catchment area includes the East Suffolk Local Plan Kirkley Waterfront and Sustainable Urban Neighbourhood development. There have been ongoing discussions about this site with East Suffolk Council, particularly about primary provision across the area.</p> <p>Secondary: East Point Academy is forecast to have a deficit of places so additional demand on places would increase this deficit. The availability of places will be monitored with additional places being provided via local secondary school provision where required.</p>		
Broads Authority Landscape Architect	<p>I have reviewed the site for the suggested use of residential moorings. I would not support this one going forward given that the edge of the broad in this location is currently fairly natural and this would result in the introduction of an engineered edge that would erode the character of this part of the broad. I'd also be concerned that there would be an impact on the land beyond Landspring Drain if a development of this nature would require any on land infrastructure</p>	<p>I have reviewed the site for 250 residential caravan use, development of this site would result in the enclosure and urbanisation of the land which currently appears to be used as paddocks, increasing the area of settled broad. From a desktop review, it is not clear if development of this parcel of land could be visible from the broad itself and from properties to the north along Broadview Road, however the overall character would be negatively impacted by any development here, and I therefore wouldn't support the use of this site for residential caravans.</p>	<p>I have reviewed the site for 80 residential dwellings, the introduction of dwellings and associated infrastructure here would result in the enclosure of the land, urbanisation and increase the settled area of the broad. The introduction of dwellings in this area would not fit well with surrounding land uses and would likely have some visual impact as well as character impact when considering the context and surrounding landscape. Though not strictly a landscape issue, I also struggle to see how adequate access could be</p>

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
			created for this site, without significant impact on Ivy Lane itself. I therefore wouldn't support this site going forward.
SCC Archaeological Service	<p>The site is situated in an area of archaeological potential recorded on the County Historic Environment Record (HER), the northern most part of the site is partially within an area recorded as part of a medieval turbarry, indicated by account rolls for Flixton-by-Lowestoft dated 1355/7 (HER number LWT 153), which is highly suggestive of peat deposits within the immediate area.</p> <p>Within the eastern part of the site runs a series substantial WW2 period defensive system (LWT 284), consisting of an anti-tank ditch, barbed wire obstructions, lines of anti-tank cubes, including pillboxes, gun emplacements, slit trenches and weapon pits running between Oulton Broad, Lowestoft to Pakefield. These defences form part of a wider system of defences which encircled Lowestoft (LWT 309). Further WW2 defensive systems have been recorded to the east and west of the proposed sites, which comprise a search light batter and type 22 pillbox (LWT 268) and the site of a type 22 pillbox along with slit trench and barbed wire obstacles are located to the east of the proposed sites (LWT 271).</p> <p>To the east of the site is an area of cropmarks of intermittent ditch type features of unknown date (LWT 311). Additionally, archaeological excavation near to the site recorded the presence of early medieval archaeology along with preserved fish traps and wood (OUL 040)</p> <p>As a result, there is high potential for the proposed sites to contain archaeological heritage assets, including palaeo-environmental remains and preserved organic archaeological remains.</p> <p>We would advise trenched archaeological evaluation, comprising 5% sample of the proposed redline area along with appropriate palaeo-environmental sampling strategy is undertaken to inform on the archaeological potential of the sites and decisions on the need for further archaeological work before the commencement of development will be made on the results of the evaluation. SCCAS would recommend that this work is undertaken at the earliest opportunity, however, we would not be opposed to the archaeological evaluation, mitigation, reporting, archiving and public dissemination being secured by appropriately worded conditions in accordance with The NPPF (paras 217 and 218 December 2024).</p> <p>Due to the presence of substantial WW2 features SCCAS would strongly recommend a UXO survey of the sites are undertaken prior to the required archaeological works commencing.</p>		

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
Suffolk County Council Highways	<p>15 residential moorings: Unlikely to present a significant impact on highways. Consideration should be given to providing suitable pedestrian accessibility through potential improvements to existing Lowestoft Footpath(s) 14 and 15 which passes through the site and subsequently connect to Marsh Road to the east.</p>	<p>250 residential caravans: Traffic impacts will need to be considered through a suitable Transport Statement. Details of the likely traffic generation should be provided to establish potential impacts on the local highway network. Any assessment should consider existing traffic generation associated with the site to provide an understanding of the impacts the development proposal would have. This will assist in determining any additional network modelling / mitigation requirements. Consideration should be given to providing suitable pedestrian and cycle accessibility to the site through potential improvements to Ivy Lane and improvements to existing Lowestoft Footpath(s) 14 and 15 which pass through the site and subsequently connect to Marsh Road to the east.</p>	<p>80 residential dwellings: Traffic impacts will need to be considered through a suitable Transport Assessment. The Transport Assessment would need to be multi-modal (assessing all modes of travel), assessing the impacts on the highway network and determining required mitigation, as well as ensuring that safe and suitable access is provided for all users and appropriate measures to promote sustainable and active modes of travel are taken. As with the other examples, one way of improving accessibility to the site would be to provide suitable pedestrian and cycle accessibility to the site through potential improvements to Ivy Lane and improvements to existing Lowestoft Footpath(s) 14 and 15 which pass through the site and subsequently connect to Marsh Road to the east.</p>
Suffolk County Council – Lead Local Flood Authority.	<p>I have reviewed all sites, and the ones proposed for caravans are at low risk of surface water flooding while the moorings one is at high risk however given this likely to be a water compatible use we don't have any concerns regarding this. NB: the mapping is due to be updated on January 28th so risk level may change.</p> <p>Both sites are at high risk of river/coastal flooding so need to bear this in mind and the LPA will need to consult EA regarding this.</p>		

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
	Advice re requirements for sustainable drainage systems can be found on the SCC Website Guidance on development and flood risk - Suffolk County Council .		
Anglian Water Services	<p>There are no Anglian Water assets within the proposed site areas below – AW is the sewerage undertaker for this location. The sites are adjacent to the Lowestoft WRC catchment where there is dry weather flow permit headroom and therefore capacity to accommodate growth.</p> <p>With regard to residential moorings – I assume given existing moorings in this location, there will be pump out facilities nearby to meet The Broads LP policy requirements?</p> <p>The caravan/dwelling proposals would need to take account of climate change allowances when considering flood risk and ensure appropriate SuDS to mitigate surface water run-off from the site.</p> <p>In terms of connections to our network, we would require early engagement from the developer to ensure that there is a sustainable point of connection to our network. Our policy recommendation would still apply - to <u>require the developer to demonstrate that that there is capacity available in the sewerage network to accommodate wastewater flows from the site.</u></p>		
East Suffolk Council	<p>Site Description Foreshore. Area of low-lying grassland with the Land Spring Drain running from east to west. South of site comprises small fields and dense hedges and trees.</p> <p>Road Access Road access is via Ivy Lane onto the A146. Suffolk County Council Highways will need to be consulted about the capacity of Ivy Lane, as well as the safety of the junction with the A146.</p> <p>Railway Ivy Lane crosses the A146 via a narrow bridge. It will be necessary to consult Network Rail and Suffolk County Council</p>	<p>Site Description Three large fields. They are used by a dog training business and an electric vehicle charging station. The eastern field contains a number of trees.</p> <p>Road Access Road access is via Ivy Lane onto the A146. Suffolk County Council Highways will need to be consulted about the capacity of Ivy Lane, as well as the safety of the junction with the A146.</p> <p>Railway Ivy Lane crosses the A146 via a narrow bridge. It will be necessary to consult</p>	<p>Site Description Three large fields. They are used by a dog training business and an electric vehicle charging station. The eastern field contains a number of trees.</p> <p>Road Access Road access is via Ivy Lane onto the A146. Suffolk County Council Highways will need to be consulted about the capacity of Ivy Lane, as well as the safety of the junction with the A146.</p> <p>Railway Ivy Lane crosses the A146 via a narrow bridge. It will be necessary to consult</p>

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
	<p>Highways about the safety and capacity of the bridge.</p> <p>Surrounding Uses Ivy House Country Hotel; Ivy Pit scrap dealers; Ivy Farm Stables Caravan and Motorhome Club. All located to west of proposed residential moorings. Existing static caravans located to the east.</p> <p>Listed Buildings There are no listed buildings on or near the site.</p> <p>Conservation Area The site is not located in a conservation area.</p> <p>Flood Risk The northern edge of the site, which is the location of the 15 residential moorings, is located within Flood Zone 3b (functional flood plain). Residential houseboats would be a compatible use for flood zone 3b.</p> <p>Further work needed Gas, electricity and water infrastructure on the site.</p> <p>There is no indication from the information submitted whether use of the moorings would be brought forward in tandem with either of the two uses discussed below.</p>	<p>Network Rail and Suffolk County Council Highways about the safety and capacity of the bridge.</p> <p>Surrounding Uses Ivy House Country Hotel; Ivy Pit scrap dealers; Ivy Farm Stables Caravan and Motorhome Club. All located to west of proposed residential caravans. Existing static caravans located to the east. Railway runs along southern edge with housing beyond.</p> <p>Listed Buildings There are no listed buildings on or near the site.</p> <p>Conservation Area The site is not located in a conservation area.</p> <p>Relevant Policies The settlement boundary, as defined by Waveney Local Plan policy WLP1.2 (Settlement Boundary) is located on the opposite side of the railway line to this site.</p> <p>There is no neighbourhood plan in Oulton Broad.</p> <p>Flood Risk This site sits further south and most of it is located in flood zone 1. However, the north and east of the site</p>	<p>Network Rail and Suffolk County Council Highways about the safety and capacity of the bridge.</p> <p>Surrounding Uses Ivy House Country Hotel; Ivy Pit scrap dealers; Ivy Farm Stables Caravan and Motorhome Club. All located to west of proposed residential dwellings. Existing static caravans are located to the east. Railway runs along southern edge with housing to the south.</p> <p>Listed Buildings There are no listed buildings on or near the site.</p> <p>Conservation Area The site is not located in a conservation area.</p> <p>Relevant Policies The settlement boundary, as defined by Waveney Local Plan policy WLP1.2 (Settlement Boundary) is located on the opposite side of the railway line to this site.</p> <p>There is no neighbourhood plan in Oulton Broad.</p> <p>Flood Risk</p>

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
		<p>are located within or bordering flood zones 2 and 3.</p> <p>Further work needed Gas, electricity and water infrastructure on the site.</p>	<p>This site sits further south and most of it is located in flood zone 1. However, the north and east of the site are located within or bordering flood zones 2 and 3.</p> <p>Further work needed Gas, electricity and water infrastructure on the site.</p>
Broads Authority Ecologist	<p>The area extending north to Oulton Broad is situated on peat a finite resource, which supports Section 41 habitats namely fen, reedbed and wet woodland. These in turn support protected species such as water vole, otter, GCN and Schedule 1 birds.</p> <p>From the aerials – Section 41 habitats are present, with connectivity to important semi natural habitats likely supporting other protected species such as roosting and commuting bats.</p> <p>There should be no net loss of Section 41 habitats and connecting semi natural habitats should be retained and enhanced.</p> <p>This site is therefore not considered appropriate for development due to the potential for significant impacts on biodiversity. Development would likely result in a net loss in biodiversity.</p>	<p>From the aerials this area appears to support semi-natural grassland with boundary hedgerows and trees, as well as mature trees within the site. These habitats are likely to support protected species such as bats, birds, reptiles. Loss of natural habitats and connectivity would likely result in a net loss in biodiversity.</p> <p>Likely to be water quality impacts.</p> <p>Likely potential impacts of the proposal on European designated sites, namely the Broadland SPA and Broads SAC.</p> <p>This site is not considered appropriate for development due to the potential for significant impacts on biodiversity. Development would likely result in a net loss in biodiversity.</p>	

Stakeholder	Residential moorings	Residential caravans	Residential dwellings
	<p>Likely potential impacts of the proposal on European designated sites, namely the Broadland SPA and Broads SAC.</p> <p>Likely to be water quality impacts.</p>		
Broads Authority Waterways and Recreation Officer	For the Oulton Broad Residential Moorings, keep footpath intact, potentially widen to make more accessible.	-	

4.4. Site assessment

Planning history:

Application number	Description	Decision	Date
BA/2023/0222/FUL	Change of use of agricultural land to dog walking field	Approved	25/07/2023
BA/1994/6179/HISTAP	Retention of wooden landing stage and narrow plank access	Approved	19/07/1994
BA/2007/0070/OUT	Erection of 53 timber holiday lodges	Withdrawn	06/08/2007
BA/2007/0316/OUT	Erection of 53no timber holiday lodges	Refused on grounds of over intensive development, impact on character and appearance of area and additional hazards to traffic.	27/06/2008
BA/1997/6272/HISTAP	Alterations to flood defences	Approved	03/10/1997
Application adjacent to the site: BA/2018/0149/FUL	<p>Broadlands Marina, Marsh Lane, Oulton Broad.</p> <p>24 new private and 4 new visitor pontoon moorings as an extension to the Marina; removal of moorings within the reedbed area and a section of jetty; creation of additional reedbed, and reinstatement of slipway and pump out facilities.</p>	Approved	07/08/2019

Site address: Land at Ivy Lane, Oulton Broad		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites. See table at start of this section for planning history.	
Site Size (hectares)	2.27 hectares	
Greenfield / Brownfield	Greenfield – reedbed	
Ownership (if known) (private/public etc.)	Private	
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	Yes – part of area is SSSI Impact Zone and SSSI, SAC, SPA and RAMSAR, but that area could be removed from any allocation.	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	Yes - Flood zone 3b, but this is for residential moorings. Also at risk of tidal flooding with allowance for climate change.	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 15 residential moorings		
Density calculator	-	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		<p>Vehicles currently access the area to get to the uses along the track, but the use will increase given the proposals.</p> <p>A new access would need to be made to the site from the area of the Hotel. A parking area would also need to be put in place.</p> <p>Concern about the capacity of the bridge of the railway for more traffic and construction traffic.</p>

		<p>South of the rail track, there is a made road with a footway – 7.37m wide in total. The railway bridge is around 4m wide with no footway. The track between the railway bridge and hotel varies in width from just under 3m to around 3.8m with passing places. It is presumed that a road of similar width to that to the south of the railway, with a footway would be required. This would mean the hedge to the east of the track/west of the site is likely to need to be removed in its entirety.</p> <p>There is a footpath that would need to be considered in any scheme.</p>
Accessibility to local services and facilities		<p>From the current moorings to Tesco Express and the bus stop, it is around 1km. GP and school are around 1.5km away.</p> <p>If an access were to be put in place along the waterfront, through the neighbouring boatyards then a bus stop with peak hour service is around 500m away, GP is around 900m away and school is around 1km away.</p>
Utilities Capacity		Generally acceptable although detail regarding sewerage disposal required.
Utilities Infrastructure		There are cables overhead along the boundary of the site with the road.
Contamination and ground stability		
Flood Risk		Part in flood zone 2, 3 and 3b. Part is also at risk from tidal flooding when climate change considered. This is for residential moorings, however.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		The edge of the broad in this location is currently fairly natural and this would result in the introduction of an engineered edge that would erode the character of this part of the broad.
Townscape		Site is on peat. Peat a finite resource, which supports Section 41 habitats namely fen, reedbed and wet woodland. These in turn support protected species such as water vole, otter, GCN and Schedule 1 birds.

		Settlement fringe area.
Biodiversity and Geodiversity		SSSI, RAMSAR, SPA and SAC near to the site. Would need to mitigate from recreation impacts. Deciduous woodland/hedges borders site. Site is on peat and the scheme relies on a new basin being created. Development would likely result in a net loss in biodiversity.
Historic Environment		The site is located to the south and west of the Oulton Broad conservation area but it has the potential to impact on the setting of the conservation area (a designated heritage asset) and the setting of Ivy Farm, a 19 th century farmstead which is considered a local identified heritage asset (see Suffolk HER) and so this needs to be considered. As a result, there is high potential for the proposed sites to contain archaeological heritage assets, including palaeo-environmental remains and preserved organic archaeological remains. Within the eastern part of the site runs a series substantial WW2 period defensive system (LWT 284). The provision of residential moorings, along with all the ancillary paraphernalia here, would detrimentally change the character of the area and would not be considered to preserve and enhance the setting of the conservation area.
Open Space		
Transport and Roads		A small-scale residential moorings development with appropriate highway access is unlikely to give rise to any severe detrimental impact in highway terms.
Compatibility with neighbouring / adjoining uses		This would bring a residential use near to a boatyard and holiday accommodation. There is a public footpath.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development	Immediately	
	Within 5 years	✓

(tick as appropriate)	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		12 per year.
Comments	Agent says will take up to 1 year to complete.	
Achievability (including viability)		
Comments	No information provided by applicant to assess this.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • A new access would need to be made to the site from the area of the Hotel. A parking area would also need to be put in place. • Capacity of rail bridge to accommodate more traffic, including construction traffic, unknown. • Railway bridge is narrow when compared to access to existing dwellings near to Tesco. • Mature hedgerow at risk in order to accommodate road and footway. • Ensure footpath is considered and access maintained. • Access along waterfront through neighbouring boatyards may be useful. • Overhead cables. • Usual flood risk considerations for residential moorings. • Would result in the introduction of an engineered edge that would erode the character of this part of the broad. • Site is on peat. Would involve peat excavation – this cannot be overcome. • GI RAMS – payment likely. • BNG – on site or off-site mitigation. • Development would likely result in a net loss in biodiversity. • Would require a trenched archaeological evaluation, comprising 5% sample of the proposed redline area along with appropriate palaeo-environmental sampling strategy is undertaken to inform on the archaeological potential of the sites and decisions on the need for further archaeological work before the commencement of development will be made on the results of the evaluation. • Due to the presence of substantial WW2 features SCCAS would strongly recommend a UXO survey of the sites are undertaken prior to the required archaeological works commencing. • Part of site put forward is SPA, SAC, RAMSAR and SSSI – that could be removed from any allocation. • Scheme would need to consider the SPA, SCA, RAMSAR and SSSI that is next door to the site in its design. 	

	<ul style="list-style-type: none"> • Located in settlement fringe landscape character area – this cannot be overcome. • Concerns about changing the character of the area – this cannot be overcome. • Require the developer to demonstrate that there is capacity available in the sewerage network to accommodate wastewater flows from the site. • Some impact on education
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Peat excavation. • Settlement fringe area. • Changing character of the area. • Mature hedgerow at risk in order to accommodate road and footway. • Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic. • Development would likely result in a net loss in biodiversity.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for a new basin for residential moorings.	

4.5. Additional considerations for residential moorings

Criteria	Assessment
1: How many residential moorings or what length of residential moorings is proposed?	15 – in a new marina.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	See above
3: Are there moorings already? If so, what is the current use of the moorings (e.g., public, private, marina etc.)?	No – a new marina or basin would be required.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – Oulton Broads is fairly wide.
5: Is riverbank erosion an issue here? How would this be addressed?	Marina/basin would be excavated and likely have hard edging.
6: What are the adjacent buildings or land used for	Hotel, moorings and caravan park.

Criteria	Assessment
7: What is the character or appearance of the surrounding area?	Reedbed, natural edge, Broad, hotel, moorings and caravan park.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	This could be part of any scheme. No basin or marina in place.
9: What car parking is there for people living on boats (e.g., car park or park on road)?	Car parking would need to be provided nearby as part of the scheme.
10: How can service and emergency vehicles access the area safely?	No access currently, but likely an access delivered as part of the scheme.
11: How would waste and sewerage be disposed of?	Mains
12: Is the area on mains sewerage?	Yes
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	Not considered it would. Although it is bringing residential moorings nearer to a boatyard/other moorings.
14: Who owns the site? If not, who does and have you told them about your proposal?	Site promoter
15: What is the current use of the site?	Reedbed and natural edge.

Site address: Land at Ivy Lane, Oulton Broad		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites. See table at start of this section for planning history.	
Site Size (hectares)	5.85 hectares	
Greenfield / Brownfield	Greenfield – dog training and grazing for horses and cows.	
Ownership (if known) (private/public etc.)	Private	
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	No	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 250 residential caravans		
Density calculator	42.74 dwellings per hectare	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		<p>Vehicles currently access the area to get to the uses along the track, but the use will increase given the proposals.</p> <p>Concern about the capacity of the bridge of the railway for more traffic and construction traffic.</p> <p>South of the rail track, there is a made road with a footway – 7.37m wide in total. The railway bridge is around 4m wide with no footway. The track between the railway bridge and hotel varies in width from just under 3m to around 3.8m with passing places. It is presumed that a road of similar width to that to the south of the railway, with a footway would be required. This would mean the hedge to the east of the</p>

		<p>track/west of the site is likely to need to be removed in its entirety.</p> <p>There is a footpath that would need to be considered in any scheme.</p>
Accessibility to local services and facilities		<p>Taking distances from the centre of the field...</p> <p>Using the track through the neighbouring site, train station is around 600m away, bus stop is around 800m away, school is around 1.4km away, GP is around 1.4km away.</p> <p>Using the main track in a southerly direction to the A146, Tesco Express is 550m away and the bus stop is 600m away.</p>
Utilities Capacity		Generally acceptable although detail regarding sewerage disposal required.
Utilities Infrastructure		There are cables overhead along the boundary of the site with the road.
Contamination and ground stability		The land is used for grazing and dog agility.
Flood Risk		In flood zone 1, but northern boundary in flood zone 2 and also at risk of tidal flooding with allowance for climate change.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		The overall character would be negatively impacted by any development here.
Townscape		<p>Development of this site would result in the enclosure and urbanisation of the land.</p> <p>Significant trees on site.</p> <p>Settlement fringe landscape.</p>
Biodiversity and Geodiversity		<p>Loss of natural habitats and connectivity would likely result in a net loss in biodiversity. Significant trees on site. These habitats are likely to support protected species such as bats, birds, reptiles. Loss of natural habitats and connectivity would likely result in a net loss in biodiversity.</p> <p>Hedge bordering the track is likely to need to be removed in its entirety to accommodate an access road and footway.</p> <p>Site is close to peat.</p>

Historic Environment		<p>The site is located to the south and west of the Oulton Broad conservation area but it has the potential to impact on the setting of the conservation area (a designated heritage asset) and the setting of Ivy Farm, a 19th century farmstead which is considered a local identified heritage asset (see Suffolk HER) and so this needs to be considered. As a result, there is high potential for the proposed sites to contain archaeological heritage assets, including palaeo-environmental remains and preserved organic archaeological remains. Within the eastern part of the site runs a series substantial WW2 period defensive system (LWT 284). Due to the presence of substantial WW2 features SCCAS would strongly recommend a UXO survey of the sites are undertaken prior to the required archaeological works commencing.</p> <p>Concerns that the proposal would have a detrimental impact on the setting of Ivy Farm, a locally identified heritage asset.</p>
Open Space		
Transport and Roads		<p>Traffic impacts will need to be considered through a suitable Transport Statement. Details of the likely traffic generation should be provided to establish potential impacts on the local highway network. Any assessment should consider existing traffic generation associated with the site to provide an understanding of the impacts the development proposal would have.</p>
Compatibility with neighbouring / adjoining uses		<p>There is a train line bordering the site to the south. That being said, there are properties already in place near the line. A successful hotel operates at the end of the track. There is a public footpath.</p>
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
<p>Is the site being marketed?</p> <p>Add any detail as necessary (e.g., where, by whom, how much for etc.)</p>	No	
When might the site be available for development	Immediately	✓
	Within 5 years	✓

(tick as appropriate)	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 1 year to complete, so 250 dwellings per year is presumed.
Comments	Agent says will take up to 1 year to complete.	
Achievability (including viability)		
Comments	No information provided by applicant to assess this.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • Scheme would need to consider the mature trees on site. • GI RAMS – payment likely. And as this is over 50 units of accommodation, open space. • BNG – on site or off-site mitigation. • Would require a trenched archaeological evaluation, comprising 5% sample of the proposed redline area along with appropriate palaeo-environmental sampling strategy is undertaken to inform on the archaeological potential of the sites and decisions on the need for further archaeological work before the commencement of development will be made on the results of the evaluation. • Due to the presence of substantial WW2 features SCCAS would strongly recommend a UXO survey of the sites are undertaken prior to the required archaeological works commencing. • Capacity of rail bridge to accommodate more traffic, including construction traffic, unknown. • Concerns about setting of Ivy Farm. • Development would likely result in a net loss in biodiversity. • Some impact on education • Consider dwellings near to a railway and amenity impacts. • Traffic impacts will need to be considered through a suitable Transport Statement. • Hedge bordering the track is likely to need to be removed in its entirety to accommodate an access road and footway. • Located in settlement fringe landscape character area – this cannot be overcome. • Concerns about changing the character of the area – this cannot be overcome. • Require the developer to demonstrate that there is capacity available in the sewerage network to accommodate wastewater flows from the site. • There are cables overhead along the boundary of the site with the road. • Amenity impacts of railway 	

	<ul style="list-style-type: none"> • Ensure footpath is considered and access maintained. • Railway bridge is narrow when compared to access to existing dwellings near to Tesco. • Mature hedgerow at risk in order to accommodate road and footway.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Settlement fringe area. • Changing character of the area. • Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic. • Development would likely result in a net loss in biodiversity. • Setting of Ivy Farm • Mature hedgerow at risk in order to accommodate road and footway. • Concern re impact on mature trees on site.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

Site address: Land at Ivy Lane, Oulton Broad		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites. See table at start of this section for planning history.	
Site Size (hectares)	5.85 hectares	
Greenfield / Brownfield	Greenfield – dog training and grazing for horses and cows.	
Ownership (if known) (private/public etc.)	Private	
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	No	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 80 residential dwellings		
Density calculator	13.68 dwellings per hectare	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		<p>Vehicles currently access the area to get to the uses along the track, but the use will increase given the proposals.</p> <p>Concern about the capacity of the bridge of the railway for more traffic and construction traffic.</p> <p>South of the rail track, there is a made road with a footway – 7.37m wide in total. The railway bridge is around 4m wide with no footway. The track between the railway bridge and hotel varies in width from just under 3m to around 3.8m with passing places. It is presumed that a road of similar width to that to the south of the railway, with a footway would be required. This would mean the hedge to the east of the</p>

		<p>track/west of the site is likely to need to be removed in its entirety.</p> <p>There is a footpath that would need to be considered in any scheme.</p>
Accessibility to local services and facilities		<p>Taking distances from the centre of the field...</p> <p>Using the track through the neighbouring site, train station is around 600m away, bus stop is around 800m away, school is around 1.4km away, GP is around 1.4km away.</p> <p>Using the main track in a southerly direction to the A146, Tesco Express is 550m away and the bus stop is 600m away.</p>
Utilities Capacity		Generally acceptable although detail regarding sewerage disposal required.
Utilities Infrastructure		There are cables overhead along the boundary of the site with the road.
Contamination and ground stability		The land is used for grazing and dog agility.
Flood Risk		In flood zone 1, but northern boundary in flood zone 2 and also at risk of tidal flooding with allowance for climate change.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		The overall character would be negatively impacted by any development here.
Townscape		<p>Development of this site would result in the enclosure and urbanisation of the land.</p> <p>Significant trees on site.</p> <p>Settlement fringe landscape.</p>
Biodiversity and Geodiversity		<p>Loss of natural habitats and connectivity would likely result in a net loss in biodiversity. Significant trees on site. These habitats are likely to support protected species such as bats, birds, reptiles. Loss of natural habitats and connectivity would likely result in a net loss in biodiversity.</p> <p>Hedge bordering the track is likely to need to be removed in its entirety to accommodate an access road and footway.</p> <p>Site is close to peat.</p>

Historic Environment		<p>The site is located to the south and west of the Oulton Broad conservation area but it has the potential to impact on the setting of the conservation area (a designated heritage asset) and the setting of Ivy Farm, a 19th century farmstead which is considered a local identified heritage asset (see Suffolk HER) and so this needs to be considered. As a result, there is high potential for the proposed sites to contain archaeological heritage assets, including palaeo-environmental remains and preserved organic archaeological remains. Within the eastern part of the site runs a series substantial WW2 period defensive system (LWT 284). Due to the presence of substantial WW2 features SCCAS would strongly recommend a UXO survey of the sites are undertaken prior to the required archaeological works commencing.</p> <p>Concerns that the proposal would have a detrimental impact on the setting of Ivy Farm, a locally identified heritage asset.</p>
Open Space		
Transport and Roads		<p>Traffic impacts will need to be considered through a suitable Transport Statement. Details of the likely traffic generation should be provided to establish potential impacts on the local highway network. Any assessment should consider existing traffic generation associated with the site to provide an understanding of the impacts the development proposal would have.</p>
Compatibility with neighbouring / adjoining uses		<p>There is a train line bordering the site to the south. That being said, there are properties already in place near the line. A successful hotel operates at the end of the track. There is a public footpath.</p>
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
<p>Is the site being marketed?</p> <p>Add any detail as necessary (e.g., where, by whom, how much for etc.)</p>	No	
When might the site be available for development	Immediately	✓
	Within 5 years	✓

(tick as appropriate)	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up 3-5 years to complete, so 16 to 27 dwellings per year is presumed.
Comments	Agent says will take up to 3-5 years to complete.	
Achievability (including viability)		
Comments	No information provided by applicant to assess this.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • Scheme would need to consider the mature trees on site. • GI RAMS – payment likely. And as this is over 50 units of accommodation, open space. • BNG – on site or off-site mitigation. • Would require a trenched archaeological evaluation, comprising 5% sample of the proposed redline area along with appropriate palaeo-environmental sampling strategy is undertaken to inform on the archaeological potential of the sites and decisions on the need for further archaeological work before the commencement of development will be made on the results of the evaluation. • Due to the presence of substantial WW2 features SCCAS would strongly recommend a UXO survey of the sites are undertaken prior to the required archaeological works commencing. • Capacity of rail bridge to accommodate more traffic, including construction traffic, unknown. • Concerns about setting of Ivy Farm. • Development would likely result in a net loss in biodiversity. • Some impact on education • Consider dwellings near to a railway and amenity impacts. • Traffic impacts will need to be considered through a suitable Transport Statement. • Hedge bordering the track is likely to need to be removed in its entirety to accommodate an access road and footway. • Located in settlement fringe landscape character area – this cannot be overcome. • Concerns about changing the character of the area – this cannot be overcome. • Require the developer to demonstrate that that there is capacity available in the sewerage network to accommodate wastewater flows from the site. • There are cables overhead along the boundary of the site with the road. • Amenity impacts of railway 	

	<ul style="list-style-type: none"> • Ensure footpath is considered and access maintained. • Railway bridge is narrow when compared to access to existing dwellings near to Tesco. • Mature hedgerow at risk in order to accommodate road and footway.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Settlement fringe area. • Changing character of the area. • Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic. • Development would likely result in a net loss in biodiversity. • Setting of Ivy Farm • Mature hedgerow at risk in order to accommodate road and footway. <p>Concern re impact on mature trees on site.</p>
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

5. Land at Home Farm, The Street, Thurne

5.1. Map of site

Call for sites - December 2024

Land at Home Farm, The Street, Thurne



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5.2. Photos of site



Showing the hard standing and barn.



Showing the hard standing and field.



Showing the field and old water pump.

5.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	I dealt with two applications at the adjacent site (immediate NW) which was called Home Farm Barns (BA/2020/0103/FUL and BA/2023/0377/FUL), both refused for various reasons, the one pertinent to this proposed site being the unsustainable location. Thurne is really poorly connected and does not have a range of local services. I do not see how this site could be compliant with local or national policy, I would not expect that we could support it.
Broads Authority Heritage and Design	The site is part of a wider farmstead and as such it would be preferable if a more holistic, rather than piecemeal approach could be taken to the wider site. As well as ensuring a more consistent design approach, this would also be beneficial in terms of access etc. There have been previous applications on the adjoining site, covering the farm buildings, including application BA/2023/0377/FUL and BA/2020/0130/FUL both of which were refused.

Stakeholder	Comments
	<p>The site is located in the centre of the attractive village of Thurne. Historic maps suggest that the oldest buildings on the wider farmstead site date from the 18th century, with others dating from the 19th century. It is a site of some historic significance, and the historic buildings would be considered locally identified heritage assets. The barns on the site in question are of relatively modern construction and are not of any architectural or historic significance.</p> <p>In terms of heritage, there may be potential for one or two dwellings, but these should be designed to be in keeping with the character of the site, so that they relate to the wider farmstead setting rather than appearing separate to it and boundary treatment to the east would need to be soft landscaped, as opposed to fencing.</p>
Thurne Parish Council	<p>Thurne is a small village with poor connectivity to the surrounding area, inadequate public transport, and apart from a public house and seasonal gift shop no local services or facilities. The site is not in a sustainable location and the use of private vehicles would be required for all basic day to day, and general needs. The proposal is therefore contrary to Criterion i) of the Local Plan for the Broads (2019), and the National Planning Policy Framework (2023).</p> <p>The area where the access track (for the proposed 3 houses) comes out onto The Street is a very busy part of Thurne:</p> <ul style="list-style-type: none"> • Visitors' park both on the road and in an area to the north • 'The Street' floods during high tides • Boats are coming to and from and being launched at the slipway • Visitors are using the public toilets • Ramblers are walking the Weaver's Way • There is Heavy Agricultural traffic going to and from arable land up the track and through Home Farm • Caravans are going to and from Home Farm site. <p>Thurne Parish Council wish to be advised of the Highways consultation as a minimum, there is a very narrow lane to the village and no public transport with approximately 60 properties in the village the Hedera site will increase the occupation in the village by more than 16% the Parish Council would not approve of any further development of scale without the issues of access being considered and recommendations in place to deal with the impact.</p> <p>Thurne has significant flood issues around the dykes in the village and the Parish Council has significant concerns that until the ongoing development (Hedera House) is completed the impact on these systems will be unknown.</p> <p>As mentioned above the Hedera site adjacent to this area will have an additional 10 properties for a village the size of Thurne this is a significant increase without</p>

Stakeholder	Comments
	<p>improved infrastructure we would not be supportive of any additional area developments without a clear plan to address these issues and a full understanding of the impact once these properties are completed.</p> <p>The Parish Council wish to declare their opposition to this site being included within the call for sites or allocated for development.</p>
Norfolk County Council Heritage	<p>Based on currently available information the above-mentioned application would not have any significant impacts on the Historic Environment in terms of below-ground archaeology.</p> <p>If this site was to come forward as a planning application, we would not recommend conditions for archaeological work. It would be green in a RAG assessment.</p>
Norfolk County Council Education	<p>This size and scale of housing is not likely to impact the existing local school based on the current forecast detail available.</p>
Broads Authority Landscape Architect	<p>The suggested site seems relatively well contained within an existing field boundary, as part of a series of small parcels outside of the main larger field pattern. There are a number of PROW that run through the surrounding farmland, this would need to be a consideration if the site were to be put forward for development as there are many locations where the site could be visible. The relationship between the Church and wider landscape also need consideration, as the introduction of additional built form on The Street could change the visibility and setting of the church.</p>
Norfolk County Council Highways	<p>No objection subject to creation of a suitable access with appropriate visibility. Acknowledge the similarities between the Halvergate site and the Thurne site. The Thurne site would be reliant on an existing access (subject to appropriate visibility being achieved), it is more central to the settlement and nearby to the limited facilities within the village.</p>
Norfolk County Council – Lead Local Flood Authority.	<p>Any future planning application for residential development of this site likely to be a minor due to its scale and fall outside of the LLFA remit / consultation thresholds.</p> <ul style="list-style-type: none"> • Part of the site (where any dwellings are likely to be situated) is located within Flood Zone 1 but Flood Zones 2 and 3 lie directly to the west and would affect access to the site. • No on-site foul or surface water sewers. • Not located within a Source Protection Zone (SPZ). • No flood records on-site or within 500m. • On-site: Surface water ponding / pooling within 0.1% and 1% AEP events present on site access (The Street) with surface water flowpaths and areas of surface water ponding / pooling in all three AEP events within 500m. The LLFA

Stakeholder	Comments
	<p>consider that there is potential for the presence of the surface water ponding / pooling to impact upon access into the site.</p> <ul style="list-style-type: none"> • Part of the site (approximately half) and its access lies within the Broads Internal Drainage Board (IDB). • No onsite watercourses present. However ordinary watercourses (some within the IDB area) and an EA main river lie within the vicinity of the site (within 500m). • LLFA Assessment: Moderate surface water / flooding constraints identified (particularly the fact that the access lies within FZ2/3) which will require further assessment by the Local Planning Authority (AMBER RAG)
Anglian Water Services	<p>This location is not within a WRC catchment and therefore would require a private sewerage treatment solution such as a package treatment plant, subject to the EA general binding rules or permit. Anglian Water is investigating a first-time sewerage scheme opportunity in the vicinity, but nothing is confirmed at this stage.</p> <p>There is a water main located along The Street.</p> <p>There are no AW assets within or adjoining the site.</p>
Great Yarmouth Borough Council	<ul style="list-style-type: none"> - Very small village with very few services (classed as a 'Tertiary Village' village in our existing Local Plan). A pub exists (The Lion) which is open Thursday-Sunday, and a gift shop (which is likely to be seasonal). - A limited number of additional facilities are available across other smaller villages such as Repps and Rollesby, however are between 3 and 5km away and on mostly unlit, national speed limit roads and without footways. Bus services are also very infrequent. Public rights of way exists around the site, however these only connect to the surrounding roads which remain unlit and are of national limit grade. Therefore, there is likely to be greater reliance upon the car over other more sustainable modes. - The site falls within the Rollesby Primary School Catchment. The latest pupil roll forecasting we have obtained from NCC indicates that there will remain some capacity at Rollesby Primary School over the next five years when taking into account projected growth. - The main access to the site is within FRZ2
Broads Authority Ecologist	<p>We are aware that this site has high biodiversity value, with protected species including nesting barn owl a Schedule 1 breeding bird and kestrels (amber listed in birds of conservation) using the site. Slow worm a priority action plan, section 41 species for conservation is also nearby and potentially uses the site. All these species are protected under the Wildlife and Countryside Act 1981.</p> <p>There should be no net loss of Section 41 species or habitats and connecting semi natural habitats should be retained and enhanced.</p>

Stakeholder	Comments
	<p>Any development may have potential impacts on European designated sites, namely the Broadland SPA located less than 500 meters to the Northwest.</p> <p>This site is therefore <u>NOT</u> considered appropriate for development due to the potential for significant impacts on biodiversity. Development would likely result in a net loss in biodiversity.</p>

5.4. Site assessment

Planning history:

Application number	Description	Decision	Date
BA/2020/0103/FUL	3 no. barn conversions to dwellings with associated garages, parking & gardens. Demolition of 3 existing barn buildings.	Refused mainly on marketing and lack of key services grounds.	06 Jul 2020
BA/1991/0052/HISTAP	Renewal of planning permission no. 6/88/1385/F for use of a portacabin as a shop	Approve Subject to Conditions	29 Jul 1991
BA/1988/3282/HISTAP	Erection of portacabin for use as shop	Unknown Historical App Decision	24 Sep 1988
BA/2000/0643/HISTAP	Renewal of planning permission no.06/97/0423/BF for use of portacabin as shop	Approve Subject to Conditions	20 Sep 2000
BA/1997/0442/HISTAP	Renewal of planning permission no. 06/94/0655/BF for use of portacabin as shop	Approve Subject to Conditions	24 Jun 1997
BA/1994/0286/HISTAP	Renewal of planning permission 06/91/0609/BF for use of portacabin as shop	Approve Subject to Conditions	01 Sep 1994

Site address: Land at Home Farm, The Street, Thurne	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites. A scheme for barn conversions was refused due to lack of marketing and lack of key services and facilities in the area.
Site Size (hectares)	0.24 hectares
Greenfield / Brownfield	Greenfield and brownfield
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)
National Nature Reserve	No

Ancient Woodland		No
Flood risk zone 3b		No - Flood zone 1 according to SFRA, but access is flood zone 3 and a small part to the west is flood zone 2.
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 3 dwellings.		
Density calculator		12.5 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		There is direct access from the public highway. There is an existing agricultural access which might need to be upgraded to allow an improved access. Suitable visibility required. Access to site in flood zone 3.
Accessibility to local services and facilities		No key services.
Utilities Capacity		This location is not within a WRC catchment and therefore would require a private sewerage treatment solution such as a package treatment plant, subject to the EA general binding rules or permit.
Utilities Infrastructure		Overhead wires near the site.
Contamination and ground stability		Part is greenfield so likely no concerns. Part is brownfield land but agent says only been used for storage.
Flood Risk		Flood zone 1 according to SFRA, but access is flood zone 3 and a small part to the west is flood zone 2.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments

Nationally and Locally Significant Landscapes		There may be potential for one or two dwellings, but these should be designed to be in keeping with the character of the site, so that they relate to the wider farmstead setting rather than appearing separate to it and boundary treatment to the east would need to be soft landscaped, as opposed to fencing. There are trees and hedgerow on the southern boundary which would not need to be removed as part of the proposal.
Townscape		
Biodiversity and Geodiversity		This site has high biodiversity value, with protected species including nesting barn owl a Schedule 1 breeding bird and kestrels (amber listed in birds of conservation) using the site. Slow worm a priority action plan, section 41 species for conservation is also nearby and potentially uses the site. All these species are protected under the Wildlife and Countryside Act 1981. Development would likely result in a net loss in biodiversity. There are trees and hedgerow on the southern boundary which would not need to be removed as part of the proposal.
Historic Environment		It is a site of some historic significance, and the historic buildings would be considered locally identified heritage assets. Introduction of additional built form on The Street could change the visibility and setting of the church. Old fashioned water pump in field. If this site was to come forward as a planning application we would not recommend conditions for archaeological work.
Open Space		
Transport and Roads		No objection subject to creation of a suitable access with appropriate visibility. Potential concern from Parish Council regarding the cumulative highways impact of this site and the neighbouring site that is being developed for 16 units.
Compatibility with neighbouring / adjoining uses		There is residential nearby.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where,	No	

by whom, how much for etc.)		
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 2 years to complete, so 1.5 dwellings per year is presumed.
Comments	Agent says will take up to 2 years to complete.	
Achievability (including viability)		
Comments	Agent says ‘The site is owned by NCC County Farms and there are no known abnormal costs to developing the site for housing. If the site were allocated for development, NCC development partners could seek planning permission for housing and construct the new homes within a 1-2 year period’.	
Overcoming Constraints		
Comments ⁷	<ul style="list-style-type: none">• Access to site in flood zone 3.• Creation of a suitable access with appropriate visibility• Potential concern regarding the cumulative highways impact of this site and the neighbouring site that is being developed for 16 units.• No key services.• Would require a private sewerage treatment solution such as a package treatment plant, subject to the EA general binding rules or permit.• Overhead wires near the site.• Designed to be in keeping with the character of the site, so that they relate to the wider farmstead setting rather than appearing separate to it and boundary treatment to the east would need to be soft landscaped, as opposed to fencing.• This site has high biodiversity value.• The historic buildings would be considered locally identified heritage assets.• If this site was to come forward as a planning application we would not recommend conditions for archaeological work.• Introduction of additional built form on The Street could change the visibility and setting of the church.• Old fashioned water pump in field.• Suitable access with appropriate visibility.• Grade 2 agricultural land.	

⁷ A previous version of this report mistakenly referenced the non-removal of trees and hedgerow on the southern boundary [14/04/2025]

	<ul style="list-style-type: none"> • GI RAMS – payment likely. • BNG – on site or off site mitigation.
Trajectory of development	
Comments	Delivered immediately to 5 years, but taking 2 years to develop.
Barriers to Delivery	
Comments ⁸	<ul style="list-style-type: none"> • Access to services. • Grade 2 agricultural land. • This site has high biodiversity value.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

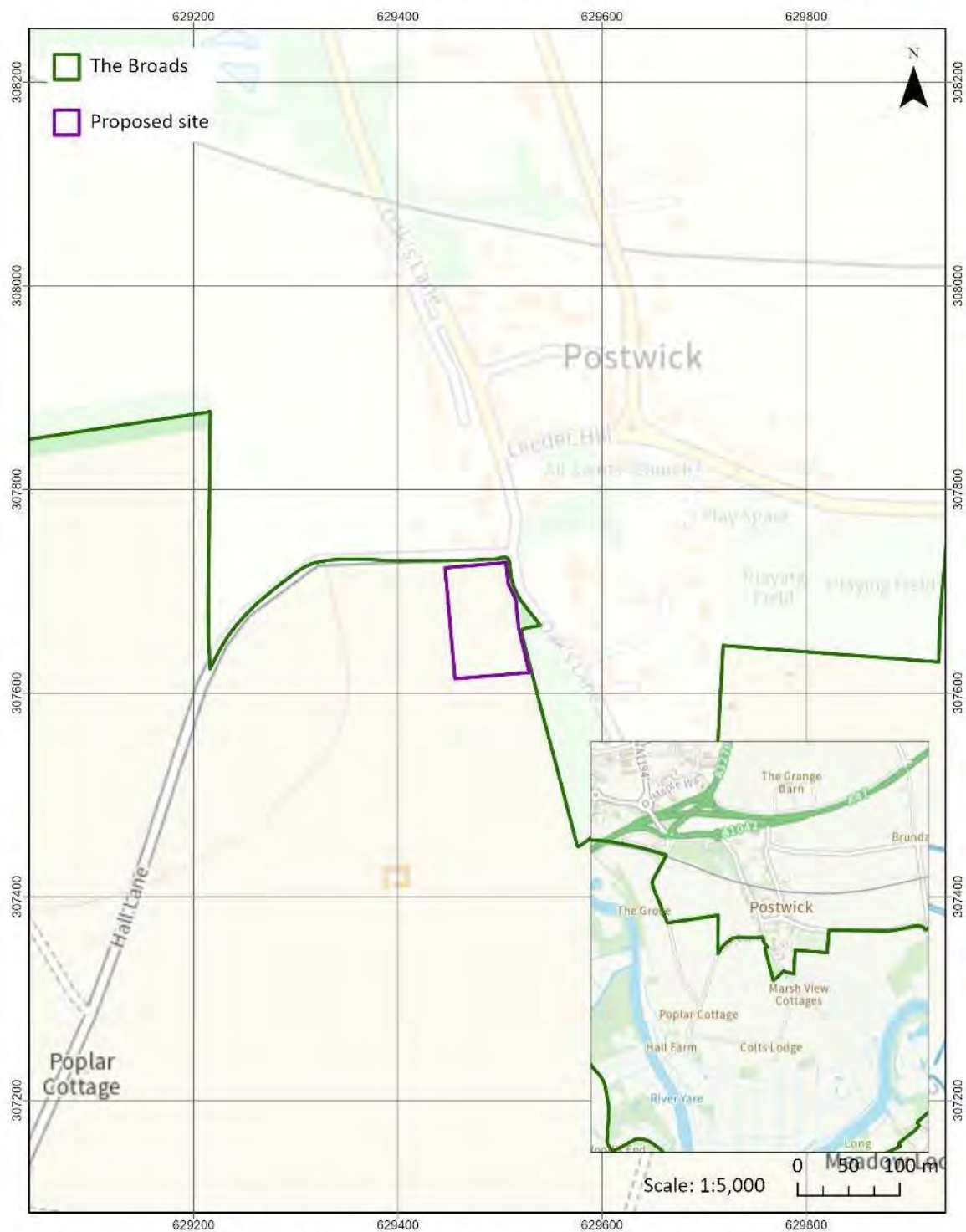
⁸ A previous version of this report mistakenly referenced the non-removal of trees and hedgerow on the southern boundary [14/04/2025]

6. Land off Hall Lane, Postwick

6.1. Map of site

Call for sites - December 2024

Postwick Hall, Hall Lane, Postwick, Norwich, NR13 5HQ



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6.2. Photos of site



Looking west along Hall Lane – site is on the left.



Showing the site, taken from the north east corner.



Showing the eastern boundary of the site.



Oaks Lane, with the site to the right of the picture.

6.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development	Postwick is not in a sustainable location, it lacks a shop or any basic service. All it appears to have in its favour is that over 1km away is a park and ride. This does not meet local planning policy standards and can only be considered an unsustainable

Stakeholder	Comments
Management Team	<p>location. It may be close to the edge of a city, but the separation is enough to make a private vehicle necessity for residents.</p> <p>On the plus side they are not looking to remove the existing woodland and are seeking to provide additional woodland. However, this would be with a housing development between the two which fragments the habitat. Also the human presence in the centre would lessen its value.</p> <p>There is possible justification for the location of development in terms of it being opposite existing housing, but there could be pressure for further housing to the south and to the west. That being said, this site would distort the compact shape of the existing settlement.</p>
Broads Authority Heritage and Design	<p>The southern part of the site is within an area where cropmarks of medieval and post medieval field systems and a possible undated trackway have been found (see Norfolk HER record) and this may be considered a constraint. Postwick House, which sits opposite the site would also be considered a locally identified heritage asset, the setting of which should be considered.</p> <p>In terms of design, the site is outside the established area of settlement. Although there are a number of dwellings further to the south along Oaks lane, these are situated on the eastern side of the road and the distinction between the built up area to the east and the surrounding landscape to the west is very clear. I would therefore prefer not to see development encroaching on to the western side of the road. It would be out of keeping with the prevailing settlement pattern in the vicinity.</p>
Postwick with Witton Parish Council	<p>After careful consideration of the proposal, the Council would like to outline the following concerns:</p> <ol style="list-style-type: none"> 1. The proposed development has been deemed unacceptable by the Council due to its location -: <ol style="list-style-type: none"> a. The site access is via single lane country roads b. No hard pavements or pedestrian segregation from traffic along single lane roads c. Drainage issues and also crosses a drainage ditch d. Poor visibility at Hall Lane with conflict with heavy plant and farm machinery coupled with the increase in other types of diverse commercial activities at Hall Farm 2. There has been a significant increase in traffic and size of farm vehicles over the last few years which this development will exacerbate. There is still existing planning permission for a nearby wedding venue which, if it recommences, raises significant concerns regarding road safety and congestion.

Stakeholder	Comments
	<ol style="list-style-type: none"> 3. The proposed development will disrupt the green corridor down Oaks Lane, necessitating a thorough ecological survey to assess potential impacts on local wildlife both during construction and after. 4. There are no community benefits stemming from this proposal, which raises concerns about its alignment with the interests of existing residents. 5. The rural character of our village is at risk of being compromised. Given the location's prominence and elevation, it is crucial to maintain green space and rural access, especially in the countryside. 6. Considerable housing growth has already occurred in our parish (more than 200%); therefore, there is an urgent need to explore options for the Broads Authority's 58 houses in more suitable locations. 7. Discussions have highlighted the Broadland flood risk, making this proposal inappropriate until outstanding concerns are adequately addressed. 8. Concerns regarding flood risk especially given the experience of the previous development and the inadequacy of drainage ditches etc – flooding issues still not fully addressed with the dwellings and road still occurring. 9. It should be noted that while the proposed site is not designated as ecological land, it does possess ecological value that should not be overlooked. 10. An independent assessment carried out as part of the Neighbourhood Plan has indicated an 'amber' rating for the site; points from this assessment can be shared for further consideration. 11. There is also discussion surrounding whether the proposed development focuses solely on social housing, which must be clarified to understand its impact fully. 12. The Council also wants to highlight that the existing permissive pathways on the site plans (some of which are shingle) should not be labelled as a public cycle route or walkway. 13. The development is in conflict with the emerging Neighbourhood Plan of which the draft has been recently submitted.
Norfolk County Council Heritage	Conditions for a programme of archaeological work starting with trial trenching. Rated amber.
Norfolk County Council Education	<p>General Comments, on sites of less than 20 proposed dwellings</p> <p>The other sites are deemed suitable to support the existing schools the communities serve and will promote and support the sustainability of the schools in close proximity. Consideration of the impact on walking and cycle routes should be achieved in order to support sustainable modes of transport and reduce families using their motor car where possible.</p>
Broads Authority	I have reviewed this site for 5 residential dwellings, I wouldn't be keen on this due to potential landscape impact, I can see from the plan attached that the suggested

Stakeholder	Comments
Landscape Architect	access would be off Hall Lane and that the development would be somewhat surrounded by new woodland planting. However, I don't think this sits well with the landscape context, and although this could be around potential direct impact on the existing trees and hedgerows, it would create a somewhat isolated development that wouldn't relate in anyway to the existing development pattern.
Norfolk County Council Highways	Highway Objection to the proposed allocation. The highway network is not of a standard to support further development.
Norfolk County Council – Lead Local Flood Authority.	<p>Any future planning application for residential development of this site likely to be a minor due to its scale and fall outside of the LLFA remit / consultation thresholds.</p> <ul style="list-style-type: none"> • Site located within Flood Zone 1 but close to Flood Zones 2 and 3. • Adjacent to foul water sewers. • Located within a Source Protection Zone 2 (SPZ). • No flood records on-site or within 500m. • On-site: Surface water flowpath within all three AEP events present where site access likely with areas of surface water ponding / pooling and flowpaths in all three AEP events within 500m of the proposed site. • Site not within but in close vicinity to the Broads Internal Drainage Board (IDB). • No onsite watercourses or any off-site within the vicinity of the site (within 500m). • LLFA Assessment: Moderate surface water / flooding constraints identified (which will require further assessment by the Local Planning Authority (AMBER RAG))
Anglian Water Services	<p>This site is within the catchment for Whitlingham WRC. There is a growth scheme to increase dry weather flow headroom in AMP8 (2025-30) at Whitlingham identified in our Business Plan – we received final determination of our plan by Ofwat on 19 December 2024 – the date for Anglian Water's formal response to the determination is 18th February 2025. Factoring in existing commitments, there is no available headroom at the WRC until the growth scheme is delivered and we would recommend a pre-occupancy clause is attached to any grant of permission to ensure development is not occupied until this time.</p> <p>There are AW assets within and adjoining the site. A rising main is located within the eastern boundary of the site. A water main and sewer adjoining the eastern boundary and sewer to the northern boundary. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p>

Stakeholder	Comments
Broads Authority Ecologist	<p>From aerial photographs the proposed development site appears to be an area of undeveloped marsh (needs confirming), therefore there would be a loss of priority habitat and associated species.</p> <p>The area is within the Yare Broads and Marshes SSSI impact zone.</p> <p>Potential nutrient issues affecting Postwick marshes network of ditches in close vicinity if housing not on mains sewage.</p> <p>Existing hedgerows, trees and woodlands should be conserved and enhanced.</p> <p>There should be no net loss of priority habitats, therefore we do not support this site being developed for housing.</p>

6.4. Site assessment

Site address: Land off Hall Lane, Postwick		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Suggested through December 2024 call for sites. BA consulted on this as part of potential allocation for Neighbourhood Plan. Also considered as part of emerging Neighbourhood Plan.
Site Size (hectares)		0.72 hectares
Greenfield / Brownfield		Greenfield – arable
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No (SSSI Impact Zone)
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		No - Flood zone 1 according to SFRA
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 5 dwellings.		
Density calculator		6.9 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments

Access to site		<p>Poor visibility at Hall Lane with potential for conflict with heavy plant and farm machinery coupled with the increase in other types of diverse commercial activities at Hall Farm.</p> <p>There is still existing planning permission for a nearby wedding venue which, if it recommences, raises significant concerns regarding road safety and congestion.</p> <p>Highway Objection to the proposed allocation. The highway network is not of a standard to support further development.</p>
Accessibility to local services and facilities		1.3km to the Postwick Park and Ride. No other key services in the village.
Utilities Capacity		Factoring in existing commitments, there is no available headroom at the WRC until the growth scheme is delivered and we would recommend a pre-occupancy clause is attached to any grant of permission to ensure development is not occupied until this time.
Utilities Infrastructure		<p>There are cables overhead along the boundary of the site with the road.</p> <p>There are AW assets within and adjoining the site. A rising main is located within the eastern boundary of the site. A water main and sewer adjoining the eastern boundary and sewer to the northern boundary. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p> <p>HSE pipeline consultation zone. Outer zone from gas pipe to/from Bacton terminal.</p>
Contamination and ground stability		
Flood Risk		In flood zone 1, but some elements of surface water flood risk along the eastern boundary. Drainage ditch nearby.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads

Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Mature trees and hedges. There could be pressure for further housing to the south and to the west.
Townscape		This site would distort the compact shape of the existing settlement. I would therefore prefer not to see development encroaching on to the western side of the road. It would be out of keeping with the prevailing settlement pattern in the vicinity. Does not sit well with the landscape context, and although this could be around potential direct impact on the existing trees and hedgerows, it would create a somewhat isolated development that wouldn't relate in any way to the existing development pattern. Existing hedgerows, trees and woodlands should be conserved and enhanced.
Biodiversity and Geodiversity		The housing development could fragment the habitat. Existing hedgerows, trees and woodlands should be conserved and enhanced. Potential loss of priority habitat and associated species.
Historic Environment		The southern part of the site is within an area where cropmarks of medieval and post medieval field systems and a possible undated trackway have been found (see Norfolk HER record) and this may be considered a constraint. Postwick House, which sits opposite the site would also be considered a locally identified heritage asset, the setting of which should be considered. Conditions for a programme of archaeological work starting with trial trenching
Open Space		
Transport and Roads		Highway Objection to the proposed allocation. The highway network is not of a standard to support further development.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed?	No	

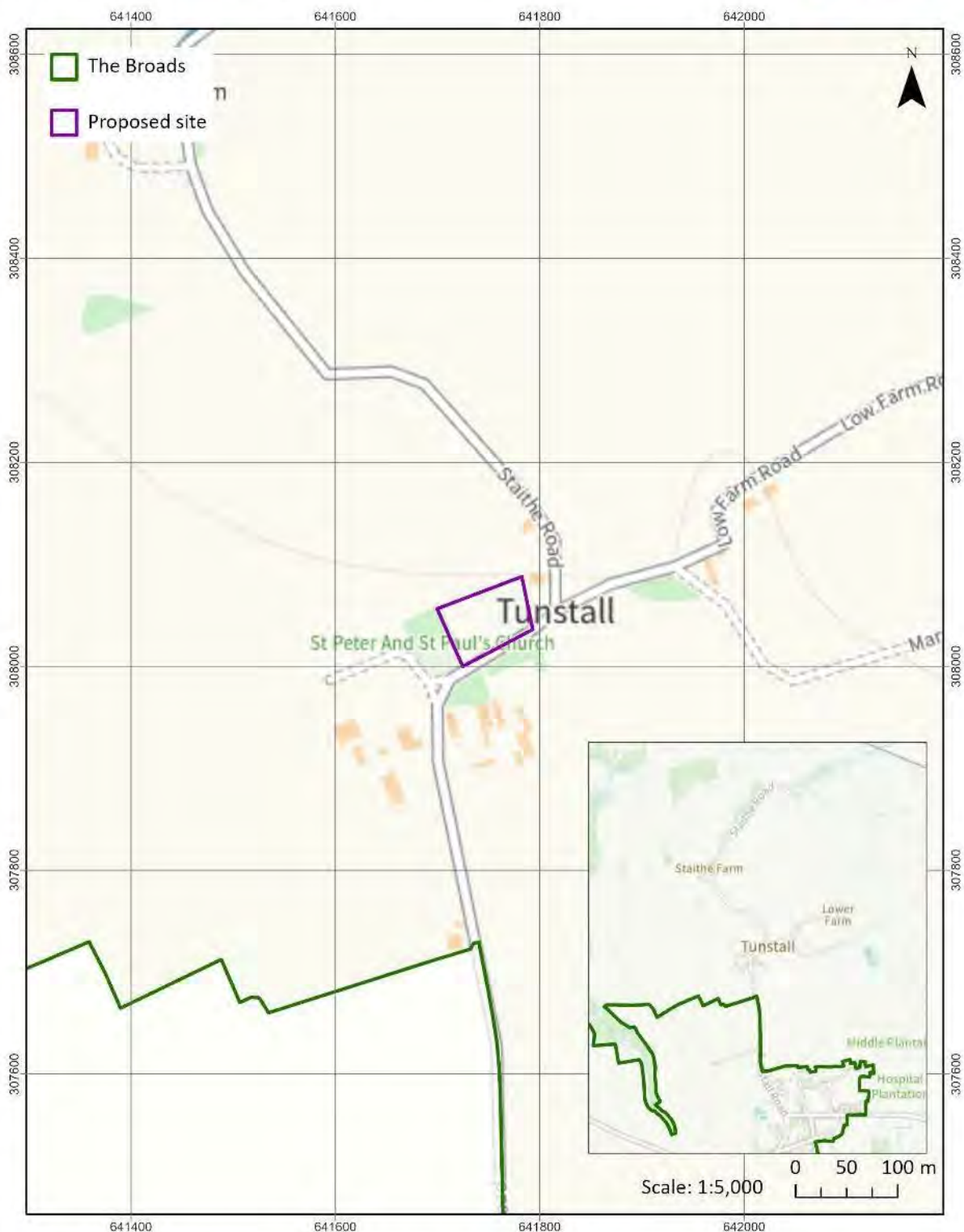
Add any detail as necessary (e.g., where, by whom, how much for etc.)		
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	Agent says will take up to 1 years to complete, so 5 dwellings per year is presumed.	
Comments	Agent says will take up to 1 year to complete.	
Achievability (including viability)		
Comments	Agent says 'The proposer is the landowner (or the owner of Postwick Hall Farm) and he is willing to make the plot available as soon as possible after any harvesting of the crop on the arable part of the site. His business would build-out the site and he is a very experienced small developer. He believes that there is a strong demand for the units being proposed as there is a great need for modest dwellings and for single storey. There are no particular physical constraints on the site itself'.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • Poor visibility at Hall Lane with potential for conflict with heavy plant and farm machinery coupled with the increase in other types of diverse commercial activities at Hall Farm. • There is still existing planning permission for a nearby wedding venue which, if it recommences, raises significant concerns regarding road safety and congestion. • Highway Objection to the proposed allocation. The highway network is not of a standard to support further development. • Lack of key services • Factoring in existing commitments, there is no available headroom at the WRC until the growth scheme is delivered and we would recommend a pre-occupancy clause is attached to any grant of permission to ensure development is not occupied until this time. • Cables overhead • Conditions for a programme of archaeological work starting with trial trenching • There are AW assets within and adjoining the site • HSE pipeline consultation zone. Outer zone from gas pipe to/from Bacton terminal. • Consider drainage ditch 	

	<ul style="list-style-type: none"> • Some surface water • Does not sit well with the landscape context, • Existing hedgerows, trees and woodlands should be conserved and enhanced. • Potential loss of priority habitat and associated species. • Cropmarks of medieval and post medieval field systems • Locally identified heritage asset. • Highways objection.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	Access to services. Highways objection. Landscape impact.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

7. Land north of Marsh Road, Tunstall

7.1. Map of site

Call for sites - December 2024
Land north of Marsh Road, Tunstall



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7.2. Photos of site



Looking north, showing the site from site entrance.



Church on the west boundary of the site.



Looking east along the road.



Entrance to the site from the road.

7.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	<p>This is not a sustainable location and meets no basic requirement in terms of accessibility and services.</p> <p>Tunstall Road is a narrow and without any formal passing places, so access is poor.</p> <p>The agricultural land is Grade 2 and should be protected.</p> <p>I do not see how we support development at this location</p>
Broads Authority	<p>The site sits immediately adjacent to the Halvergate and Tunstall Conservation Area on three sides. It is also directly adjacent to the grade II* listed church of St Peter and St Paul, as well as being in close proximity to locally listed</p>

Stakeholder	Comments
Heritage and Design	<p>structures such as the K6 telephone kiosk opposite. The setting of these designated and non-designated heritage assets would need to be considered. Although no finds are identified on the site (on the Norfolk HER), it would be reasonable to assume that the site could be of archaeological interest (it may be worth checking with the County?).</p> <p>Officers would have great concerns regarding the proposal for the development of three dwellings on this site. There are key views of the church from the east and the relatively isolated setting of the church is considered to contribute to its significance. This would be eroded with residential development on the proposed site.</p>
Halvergate Parish Council	Regarding the two sites put forward in Tunstall, Halvergate and Tunstall parish council are supportive of including both sites in the Broads Authority's proposed development plan. The council has specific comments/conditions, but it understands these can be addressed if and when a planning application is submitted.
Norfolk County Council Heritage	Conditions for a programme of archaeological work starting with trial trenching. Rated amber.
Norfolk County Council Education	<p>General Comments, on sites of less than 20 proposed dwellings</p> <p>The other sites are deemed suitable to support the existing schools the communities serve and will promote and support the sustainability of the schools in close proximity. Consideration of the impact on walking and cycle routes should be achieved in order to support sustainable modes of transport and reduce families using their motor car where possible.</p>
Broads Authority Landscape Architect	I have reviewed this site for 3 residential dwellings. I can see there could be some logic in 'annexing' the southern end of the field, and this would unlikely have significant overall impacts on the wider field pattern. However, the main sensitivities here are the proximity to the church and its landscape setting (which is not only a heritage issue but a landscape one too) and that of PROW in the vicinity which would be impacted by any development in this location, due to the current level of openness of the landscape. I don't believe this location could accommodate development without negative/adverse impacts on both the landscape setting associated with the church (and physical landscape features such as large mature trees), and views from long distance footpaths (Halvergate FP1 in particular). I therefore wouldn't support the inclusion of this site.
Norfolk County Council Highways	Highway Objection to the proposed allocation. The highway network is not of a standard to support further development.

Stakeholder	Comments
Norfolk County Council – Lead Local Flood Authority.	<p>Any future planning application for residential development of this site likely to be a minor due to its scale and fall outside of the LLFA remit / consultation thresholds.</p> <ul style="list-style-type: none"> • Site located within Flood Zone 1. • No on-site foul or surface water sewers. • Not located within a Source Protection Zone (SPZ). • No flood records on-site or within 500m. • On-site: Small area of surface water ponding / pooling within 0.1% AEP event present Off-site: Small areas of surface water ponding / pooling in all three AEP events within 500m. Small ponds also showing within vicinity of site on mapping. • Site not located within the Broads Internal Drainage Board (IDB). • No onsite watercourses or any off-site within the vicinity of the site (within 500m). • LLFA Assessment: No major surface water issues / constraints identified (Green RAG)
Anglian Water Services	<p>This location is not within a WRC catchment and therefore would require a private sewerage treatment solution such as a package treatment plant, subject to the EA's general binding rules or permit.</p> <p>There is a water main adjoining the southern boundary of the site, as our underground assets are often located in roadside verges. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p>
Broads Authority Ecologist	<p>A Habitats Regulation Assessment will apply due to potential impacts of the proposal on European designated sites, namely the Broadland SPA located some 600m to the East of the proposed development.</p> <p>Ecological assessments will be required to assess the impact of sites on habitats and species, and to help mitigate potential impacts of the development proposal.</p> <p>From the information provided the site appears to be currently in arable production.</p> <p>Existing hedgerows and trees should be retained and enhanced.</p> <p>We would expect Biodiversity net gain to be implemented on site within this sensitive locality close to the Broads European designated SAC and SPA. Biodiversity enhancements including tree and hedgerow planting should be incorporated into the proposal to improve habitat connectivity and provide wildlife corridors.</p> <p>Some localised increase in recreational disturbance to designated sites.</p>

7.4. Site assessment

Site address: Land north of Marsh Road, Tunstall		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.		Suggested through December 2024 call for sites.
Site Size (hectares)		0.47 hectares
Greenfield / Brownfield		Greenfield – arable
Ownership (if known) (private/public etc.)		Private
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar		No (SSSI Impact Zone)
National Nature Reserve		No
Ancient Woodland		No
Flood risk zone 3b		No - Flood zone 1 according to SFRA
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 3 dwellings.		
Density calculator		6.38 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Highway Objection to the proposed allocation. The highway network is not of a standard to support further development. Tunstall Road is a narrow and without any formal passing places, so access is poor.
Accessibility to local services and facilities		1.3km to bus stop. Country roads with no footways. No other key services nearby.
Utilities Capacity		This location is not within a WRC catchment and therefore would require a private sewerage treatment solution such as a package treatment plant, subject to the EA's general binding rules or permit.
Utilities Infrastructure		There are easements for many of Anglian water underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that

		maintenance and repairs can be carried out when necessary. Overhead lines at northern edge of site.
Contamination and ground stability		
Flood Risk		In flood zone 1, but some elements of surface water flood risk on site.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Do not believe this location could accommodate development without negative/adverse impacts on both the landscape setting associated with the church (and physical landscape features such as large mature trees), and views from long distance footpaths (Halvergate FP1 in particular).
Townscape		
Biodiversity and Geodiversity		Existing hedgerows and trees should be retained and enhanced. Some localised increase in recreational disturbance to designated sites.
Historic Environment		Listed church to the west of the site. There are key views of the church from the east and the relatively isolated setting of the church is considered to contribute to its significance. This would be eroded with residential development on the proposed site. Conditions for a programme of archaeological work starting with trial trenching.
Open Space		
Transport and Roads ⁹		Highway Objection to the proposed allocation. The highway network is not of a standard to support further development.
Compatibility with neighbouring / adjoining uses		Other than the church the neighbouring uses are residential and agricultural.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed?	No	

⁹ A previous version of this report mistakenly labelled this section as Access to site [14/04/2025]

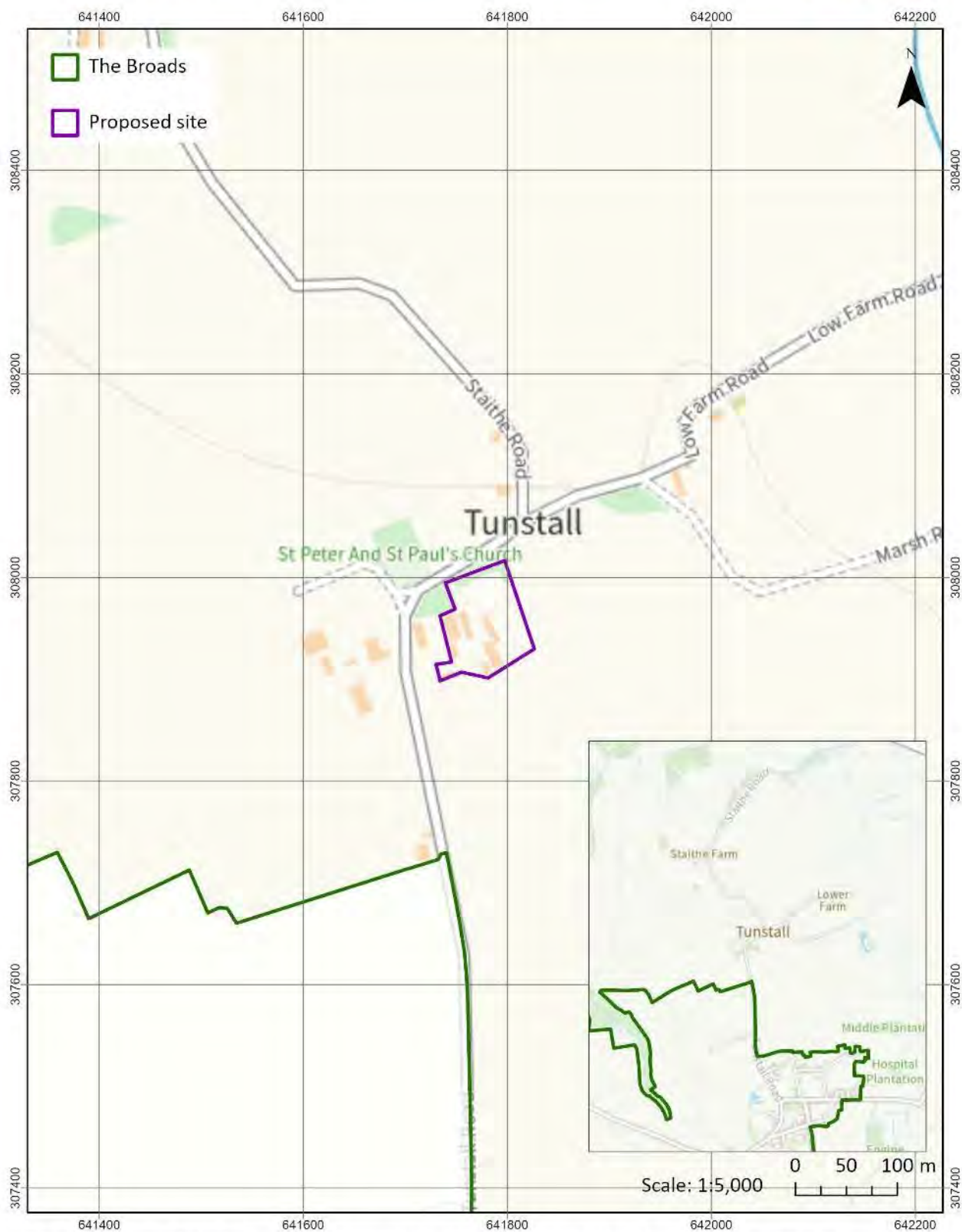
Add any detail as necessary (e.g., where, by whom, how much for etc.)		
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	Agent says will take up to 1 year to complete, so 3 dwellings per year is presumed.	
Comments	Agent says will take up to 1 year to complete.	
Achievability (including viability)		
Comments	Agent says 'We do not anticipate any abnormal constraints on the site. The site is in a good location that would be attractive to potential purchasers. The development of the site would form a natural infill to this part of the settlement. The site is available now and deliverable within the next 1 to 2 years'.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • The agricultural land is Grade 2 and should be protected. • Highway Objection to the proposed allocation. • No key services. • Would require a private sewerage treatment solution such as a package treatment plant • There are easements for many of Anglian Water underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary. • Overhead lines at northern edge of site. • Some elements of surface water flood risk on site. • Negative/adverse impacts on both the landscape setting associated with the church (and physical landscape features such as large mature trees), and views from long distance footpaths (Halvergate FP1 in particular). • Existing hedgerows and trees should be retained and enhanced. • There are key views of the church from the east and the relatively isolated setting of the church is considered to contribute to its significance. This would be eroded with residential development on the proposed site. • Conditions for a programme of archaeological work starting with trial trenching. • GI RAMS – payment likely. 	

	<ul style="list-style-type: none"> • BNG – on site or off-site mitigation.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation. • No key services. • Negative impact on landscape character. • Negative impact on church and setting. • Grade 2 agricultural land
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

8. Land south of Marsh Road, Tunstall

8.1. Map of site

Call for sites - December 2024
Land south of Marsh Road, Tunstall



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8.2. Photos of site



Access to the site from the road.



The track to the buildings and some farm buildings



Looking north back towards the road from the farm.



Looking towards farm buildings to the west.



The north east corner, looking south west.



Open part of the site, just along the track from the road.



Buildings to the west of the site.



Wooden border of the site with the road.

8.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	<p>This is not a sustainable location and meets no basic requirement in terms of accessibility and services.</p> <p>Tunstall Road is a narrow and without any formal passing places, so access is poor.</p> <p>This is a farm site surrounded by farmland. Is this site now redundant or will they be needing new agricultural buildings elsewhere?</p> <p>There is potential harm to the setting of a listed building.</p> <p>I do not see how we support development at this location.</p>
Broads Authority Heritage and Design	<p>The site sits within the Halvergate and Tunstall Conservation Area and is a farmyard which was historically likely to have been associated with the adjoining grade II listed Hall Farm House (now known as Tunstall Hall). It is located to the south of the grade II* listed Church of St Peter and St Paul. The boundary wall between the site and Tunstall Hall to the west is curtilage listed and the single storey barn in the south-west corner of the site is on the Broads Authority's Local List (photo 8599).</p> <p>Given the site's location within the conservation area and in proximity to a number of other designated heritage assets, I would suggest that any development would have to be carefully designed and should include the retention of the locally listed barn (potentially its sympathetic conversion) and preferably the retention and conversion of the other 19th century barns that run almost north-south to the west of the site (in photo 8596) and also contribute to the character of the conservation area, relate to the historic use of the listed Tunstall Hall (Hall Farm) – thereby contributing to its significance and the wider farming heritage of the village.</p>

Stakeholder	Comments
Halvergate Parish Council	<p>Regarding the two sites put forward in Tunstall, Halvergate and Tunstall parish council are supportive of including both sites in the Broads Authority's proposed development plan.</p> <p>The council has specific comments/conditions, but it understands these can be addressed if and when a planning application is submitted.</p>
Norfolk County Council Heritage	Conditions for a programme of archaeological work starting with trial trenching. Amber rating.
Norfolk County Council Education	<p>General Comments, on sites of less than 20 proposed dwellings</p> <p>The other sites are deemed suitable to support the existing schools the communities serve and will promote and support the sustainability of the schools in close proximity. Consideration of the impact on walking and cycle routes should be achieved in order to support sustainable modes of transport and reduce families using their motor car where possible.</p>
Broads Authority Landscape Architect	<p>In terms of the land to the south, it appears this is far less sensitive, in terms of the proximity to the setting of the church and PROW. Though there are a number of physical landscape features such as trees and possibly hedgerows that would warrant protection, it appears that this location could accommodate some development without negative/adverse impacts.</p> <p>If allocated, the height of any development and layout would need to be key considerations to ensure any development would read as a small group of buildings (similar to that of farm buildings etc) rather than a block of housing, in particular as viewed from Halvergate FP11. The overall sensitivity of this footpath is likely to be less than those to the north, as this connects through fields between the hamlet at Tunstall and larger settlement at Halvergate and is far less isolated. However, any visual impact would still need to be carefully considered and managed through the appropriate placement of built form, careful consideration of boundary treatments etc and the use of well placed trees or landscape measures to help assimilate any development into the location.</p>
Norfolk County Council Highways	Highway Objection to the proposed allocation. The highway network is not of a standard to support further development.
Norfolk County Council – Lead Local Flood Authority.	<p>Any future planning application for residential development of this site likely to be a minor due to its scale and fall outside of the LLFA remit / consultation thresholds.</p> <ul style="list-style-type: none"> • Site located within Flood Zone 1. • No on-site foul or surface water sewers. • Not located within a Source Protection Zone (SPZ). • No flood records on-site or within 500m.

Stakeholder	Comments
	<ul style="list-style-type: none"> On-site: Small area of surface water ponding / pooling within 0.1% AEP event present. Off-site: Small areas of surface water ponding / pooling in all three AEP events within 500m. Small pond also showing on site on mapping. Site not located within the Broads Internal Drainage Board (IDB). No onsite watercourses or any off-site within the vicinity of the site (within 500m). LLFA Assessment: No major surface water issues / constraints identified (Green RAG)
Anglian Water Services	This location is not within a WRC catchment and therefore would require a private sewerage treatment solution such as a package treatment plant, subject to the EA's general binding rules or permit.
Broads Authority Ecologist	<p>The site appears to be an existing farm, with buildings potentially supporting protected species such as bats and barn owls. The site would provide excellent access for these species to the wider countryside for feeding and breeding opportunities.</p> <p>There are mature trees and hedgerows on site, which can support nesting birds as well as bat roosts, and feeding and commuting networks for bats</p> <p>Due to the high likelihood of protected species using this site, and the importance of retaining historic roost / nesting sites we do not support this site for future development.</p>

8.4. Site assessment

Site address: Land south of Marsh Road, Tunstall	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites.
Site Size (hectares)	0.74 hectares
Greenfield / Brownfield	Brownfield and greenfield. Agent says the barns would be converted: 'Conversion of existing barns to residential use. There are a number of barns, both modern and traditional. It would be the aim to convert the traditional barns for residential use'.
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)
National Nature Reserve	No

Ancient Woodland		No
Flood risk zone 3b		No - Flood zone 1 according to SFRA
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 4 dwellings.		
Density calculator		5.4 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Highway Objection to the proposed allocation. The highway network is not of a standard to support further development. Tunstall Road is a narrow and without any formal passing places, so access is poor. Public footpath to east of the site.
Accessibility to local services and facilities		1.3km to bus stop. Country roads with no footways. No other key services nearby.
Utilities Capacity		This location is not within a WRC catchment and therefore would require a private sewerage treatment solution such as a package treatment plant, subject to the EA's general binding rules or permit.
Utilities Infrastructure		There are cables overhead along the boundary of the site with the road.
Contamination and ground stability		Agent says: 'The ground conditions are stable and there are no known contamination or potential contamination issues on the site'.
Flood Risk		In flood zone 1.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		There are a number of physical landscape features such as trees and possibly hedgerows that would warrant protection. It appears that this location could accommodate some development without negative/adverse impacts. The height of any development and layout would need to be key
Townscape		

		considerations to ensure any development would read as a small group of buildings (similar to that of farm buildings etc) rather than a block of housing, in particular as viewed from Halvergate FP11. Any visual impact would still need to be carefully considered and managed through the appropriate placement of built form, careful consideration of boundary treatments etc and the use of well-placed trees or landscape measures to help assimilate any development into the location.
Biodiversity and Geodiversity		Area of woodland. The site appears to be an existing farm, with buildings potentially supporting protected species such as bats and barn owls. The site would provide excellent access for these species to the wider countryside for feeding and breeding opportunities. There are mature trees and hedgerows on site, which can support nesting birds as well as bat roosts, and feeding and commuting networks for bats.
Historic Environment		The site sits within the Halvergate and Tunstall Conservation Area and is a farmyard which was historically likely to have been associated with the adjoining grade II listed Hall Farm House (now known as Tunstall Hall). It is located to the south of the grade II* listed Church of St Peter and St Paul. Given the site's location within the conservation area and in proximity to a number of other designated heritage assets, any development would have to be carefully designed and should include the retention of the locally listed barn (potentially its sympathetic conversion) and preferably the retention and conversion of the other 19 th century barns that run almost north-south to the west of the site (in photo 8596) and also contribute to the character of the conservation area, relate to the historic use of the listed Tunstall Hall (Hall Farm). Conditions for a programme of archaeological work starting with trial trenching.
Open Space		
Transport and Roads		Highway Objection to the proposed allocation. The highway network is not of a standard to support further development. Tunstall Road is a narrow and without any formal passing places, so access is poor. Public footpath to east of the site.
Compatibility with neighbouring / adjoining uses		

Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 1 year to complete, so 5 dwellings per year is presumed.
Comments	Agent says will take up to 1 year to complete.	
Achievability (including viability)		
Comments	Agent says 'There are no abnormal constraints that would impact the delivery of the site. The site is in single ownership and available for gaining planning permission now and development in the short term. The dwellings would be attractive to the market, being of a design appropriate for the surroundings and appealing to a buyer looking for this sort of property'.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation • Tunstall Road is a narrow and without any formal passing places, so access is poor. • Public footpath to east of the site. • No key services. • This location is not within a WRC catchment and therefore would require a private sewerage treatment solution such as a package treatment plant, subject to the EA's general binding rules or permit. • There are cables overhead along the boundary of the site with the road. • There are a number of physical landscape features such as trees and possibly hedgerows that would warrant protection. • Any visual impact would still need to be carefully considered and managed through the appropriate placement of built form, careful consideration of boundary treatments etc and the use of well-placed trees or landscape measures to help assimilate any development into the location. 	

	<ul style="list-style-type: none"> • The site would provide excellent access for bats and barn owls to the wider countryside for feeding and breeding opportunities. • Located within the conservation area and in proximity to a number of other designated heritage assets, any development would have to be carefully designed and should include the retention of the locally listed barn • Conditions for a programme of archaeological work starting with trial trenching. • GI RAMS – payment likely. • BNG – on site or off site mitigation.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation. • No key services. • Grade 2 agricultural land.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

9. Land at Broad Lane, Filby

9.1. Map of site

Call for sites - December 2024
Broad Lane Filby nr293HH



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9.2. Photos of site



Looking to the north



Looking west along Broad Lane



Showing access onto the site



Showing the eastern boundary



Looking towards the southwest corner



Looking east along Broad Lane

9.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	About two thirds of the site is in flood zone 3, and about 90% of the site is in flood zone 2. There may be a small pocket that has development potential in the northwest corner of the site, but otherwise this is a site that is susceptible to flooding and a caution should be exercised in terms of more vulnerable.
Broads Authority Heritage and Design	There are no particular heritage constraints. However, in terms of design, from mapping and aerial photographs it would seem that predominantly development in the immediate vicinity is relatively large, detached properties on substantial plots. I would therefore suggest that four properties may be too much, as a cul-de-sac form of development would be uncharacteristic. I would suggest there may be potential for a maximum of two properties in order for development to be in accordance with both our Local Plan and the Filby Neighbourhood plan, both of which require that development should reflect the prevailing characteristics of the area.
Filby Parish Council	Filby Parish Council supports the site on the basis that the site will only hold two dwellings as affordable houses as it is outside the development boundary; and wish to note that the road is unmade and cannot sustain more dwellings than the proposed two.
Norfolk County Council Heritage	Conditions for a programme of archaeological work starting with trial trenching. Amber rated.

Stakeholder	Comments
Norfolk County Council Education	<p>General Comments, on sites of less than 20 proposed dwellings</p> <p>The other sites are deemed suitable to support the existing schools the communities serve and will promote and support the sustainability of the schools in close proximity. Consideration of the impact on walking and cycle routes should be achieved in order to support sustainable modes of transport and reduce families using their motor car where possible.</p>
Broads Authority Landscape Architect	<p>I wouldn't object to allocation for two dwellings along the frontage, looks like a few trees on the site and some habitat which could be of interest – so boundaries to reflect the protection and/or enhancement of those if would fall within the allocated site area. I doubt there is any visibility from the broad and existing development in area appears to be two storey, so, providing that is along the frontage and not a back to back arrangement there should be an issue - but could put a height restriction on if there is an issue with visibility.</p>
Norfolk County Council Highways	<p>We don't believe adequate visibility from Broad Lane onto the A1064 Main Road is achievable and therefore not appropriate for further development. A 2.4m setback for visibility splays is required which is not achievable to the east due to private hedge. Visibility to the west is likely to be impeded by signage and parking on a regular basis.</p>
Broads Authority Environment advisor	<p>SSSI and SPA next to the site. Would need to mitigate impacts.</p> <p>Nutrient Enrichment and scope for Nutrient Neutrality needs to be considered as there is a history of raw sewage spills from the Filby Café waste water storage tank.</p> <p>Mature trees on site connect to a wildlife corridor. Dark skies over grassland habitat provide bat foraging area that would be destroyed. Deciduous woodland borders site connection to the SSSI. May be on peat rich soil as close to the predicted margin, would need survey to determine where the boundary lies.</p>
Norfolk County Council – Lead Local Flood Authority.	<p>Any future planning application for residential development of this site likely to be a minor due to its scale and fall outside of the LLFA remit / consultation thresholds.</p> <ul style="list-style-type: none"> • The majority of the site lies within Flood Zone 2 and 3, with only a small area of the site within Flood Zone 1 (north-east corner adjacent to Broad Lane). • No on-site sewers – Foul sewers run along the boundary with Broad Lane and within the vicinity of the site. • Not located within a Source Protection Zone (SPPZ). • No flood records on-site. Off-site: Flood records within 500m. • On-site: No surface water issues identified. Off-site: Surface water flow paths and ponding and pooling in 0.1%, 1% and 3.33% AEP events within 500m of the site. • Site lies within Broads Internal Drainage Board.

Stakeholder	Comments
	<ul style="list-style-type: none"> No onsite watercourses, however ordinary watercourses (some within the IDB area) are located within 100m. LLFA Assessment: Whilst no major surface water issues / constraints identified, the majority of the site is located within Flood Zones 2 and 3 and as such will require further assessment by the Local Planning Authority (AMBER RAG)
Essex and Suffolk Water	<p>We do not appear to have any underground assets running through this land, but any future development would need to check this with us. The development site is very close to our land holding – Filby Broad. This is a SSSI and SAC site. As owners we are responsible for the designated features of the site and ensuring they are conserved. As such, any development this close to the protected site should be subject to the relevant environmental checks (for example, HRA) to ensure it would not be detrimental to the features of the site. Particularly relevant would be, how sewage is dealt with because the protected site already has elevated levels of N and P, and light/noise pollution which could affect bird populations. This is not an exhaustive list of considerations.</p>
Anglian Water Services	<p>Anglian Water is the sewerage undertaker for this location. The site is within the Caister-Pump Lane WRC catchment which has dry weather flow headroom to accommodate additional flows from this site.</p> <p>There is a foul sewer along Broad Lane to the northern boundary of the site. There are no AW assets within the site.</p>
Great Yarmouth Borough Council	<ul style="list-style-type: none"> Filby is a small village with a limited range of services and facilities (classed as a 'Secondary village' in our existing Local Plan). The site is within close walking distance of the primary school, shop, village hall. A public house is at the furthest extent of the village to the east, approximately 2km away. A number of bus services run along Main Road, very close to the site throughout the day and week. The close proximity of the site to the shop and school helps to reduce reliance upon the car, though access to employment opportunities (which are principally located within more higher order settlements such as Great Yarmouth or Acle are likely to mostly rely upon the car. The site falls within the Filby Primary School catchment. The latest pupil roll forecasting we have obtained from NCC indicates that the school will be over-capacity within the next five year when taking into account projected growth with no room to expand on the site. Over half of the size (along the western half and extending to the south-east corner) is indicatively in flood risk zone 3b. We would usually require further hydraulic modelling of the site to determine the actual level of flood risk.
Broads Authority Ecologist	<p>From aerial photographs the proposed development site appears to be a large area of undeveloped marsh, therefore there would be a loss of Section 41 priority habitat and associated species.</p>

Stakeholder	Comments
	<p>The site is less than 100 metres from Filby Broad, part of the Broads Special Area of Conservation, and within the SSSI impact zone of the Trinity Broads Site of Special Scientific Interest.</p> <p>The potential for nutrient issues to impact the nearby SAC.</p> <p>Existing hedgerows and trees are present on the site, and these should be conserved and enhanced.</p> <p>There should be no net loss of priority Section 41 habitats, therefore we do not support this site being developed.</p>

9.4. Site assessment

Planning history:

Application number	Description	Decision	Date
BA/2016/0129/FUL	Replacement of existing jetty with a purpose build jetty of similar size in the same location.	Approve Subject to Conditions	13 May 2016
BA/2021/0017/FUL	Enlargement of existing boat storage building and lean-to workshop.	Approve Subject to Conditions	06 Apr 2021

Site address: Land at Broad Lane, Filby	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites. No planning application history for the site.
Site Size (hectares)	0.39 hectares
Greenfield / Brownfield	Greenfield.
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)
National Nature Reserve	No
Ancient Woodland	No
Flood risk zone 3b	No – Some flood zone 1, most flood zone 2, indicative flood zone 3b according to SFRA but allocation could reflect this.
Scheduled Ancient Monument	No
Statutory Allotments	No
Locally Designated Green Space	No
At risk from Coastal Erosion	No

<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 4 dwellings initially, then 2 dwellings.		
Density calculator		5.13 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Lack of visibility splay possible with junction with Main Road. Broad Lane is private access. Broad Lane is un-made.
Accessibility to local services and facilities		The site is within close walking distance of the primary school, shop, bus stop with peak hour services to higher order settlement.
Utilities Capacity		Overhead Lines. There is a foul sewer along Broad Lane to the northern boundary of the site.
Utilities Infrastructure		There are cables overhead along the boundary of the site with the road.
Contamination and ground stability		
Flood Risk		Some flood zone 1, most flood zone 2, indicative flood zone 3b according to SFRA but allocation could reflect this. There may be a small pocket that has development potential in the northwest corner of the site, but otherwise this is a site that is susceptible to flooding and a caution should be exercised in terms of more vulnerable.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		May be potential for a maximum of two properties in order for development to be in accordance with both our Local Plan and the Filby Neighbourhood plan, both of which require that development should reflect the prevailing characteristics of the area. Any housing along the frontage and not a back-to-back arrangement. Could put a height restriction on if there is an issue with visibility.
Townscape		
Biodiversity and Geodiversity		SSSI, RAMSAR, SPA and SAC near to the site. The proposed development site appears to be a large area of undeveloped marsh, therefore there would be a

		<p>loss of Section 41 priority habitat and associated species.</p> <p>Existing hedgerows and trees are present on the site, and these should be conserved and enhanced.</p> <p>May be on peat rich soil as close to the predicted margin, would need survey to determine where the boundary lies.</p> <p>Nutrient Enrichment and scope for Nutrient Neutrality needs to be considered as there is a history of raw sewage spills from the Filby Café wastewater storage tank.</p> <p>Great Crested Newts: Amber zones contain main population centres for GCN and comprise important connecting habitat that aids natural dispersal.</p>
Historic Environment		Conditions for a programme of archaeological work starting with trial trenching.
Open Space		
Transport and Roads		Don't believe adequate visibility from Broad Lane onto the A1064 Main Road is achievable and therefore not appropriate for further development.
Compatibility with neighbouring / adjoining uses		The neighbouring uses are residential and agricultural.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 4 years to complete, so ½ a dwelling per year is presumed.
Comments	Agent says will take up to 4 years to complete.	
Achievability (including viability)		

Comments	Agent says 'the proposal will be rented providing long term accommodation for young families'.
Overcoming Constraints	
Comments	<ul style="list-style-type: none"> • Scheme would need to consider the woodland on the boundaries and on site. • Lack of visibility splay possible with junction with Main Road. • Overhead Lines. • There is a foul sewer along Broad Lane to the northern boundary of the site. • Conditions for a programme of archaeological work starting with trial trenching. • Some flood zone 1, most flood zone 2, indicative flood zone 3b according to SFRA but allocation could reflect this. There may be a small pocket that has development potential in the northwest corner of the site. • Development should reflect the prevailing characteristics of the area. Any housing along the frontage and not a back-to-back arrangement. Could put a height restriction on if there is an issue with visibility. • SSSI, RAMSAR, SPA and SAC near to the site. • The proposed development site appears to be a large area of undeveloped marsh, therefore there would be a loss of Section 41 priority habitat and associated species. • Existing hedgerows and trees are present on the site, and these should be conserved and enhanced. • Great Crested Newt amber zone. • May be on peat rich soil as close to the predicted margin, would need survey to determine where the boundary lies. • Nutrient Enrichment and scope for Nutrient Neutrality needs to be considered as there is a history of raw sewage spills from the Filby Café wastewater storage tank. • GI RAMS – payment likely. • BNG – on site or off site mitigation.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 4 years to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • The proposed development site appears to be a large area of undeveloped marsh, therefore there would be a loss of Section 41 priority habitat and associated species. • Existing hedgerows and trees are present on the site which could be at risk. • May be on peat rich soil as close to the predicted margin, would need survey to determine where the boundary lies. • Lack of visibility splay possible with junction with Main Road.

Conclusion (e.g., is included in the theoretical capacity)
According to the HELAA assessment, the site is not suitable for residential development.

10. The Old Boatyard, Whitlingham Lane, Trowse

10.1. Map of site

Call for sites - December 2024

The Old Boatyard, Whitlingham Lane, Trowse, NR14 8TR



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10.2. Photos of site

These photos were taken in January 2025. The site was closed and boats removed.



Showing the old boatyard and one of the accesses.



Taken from the footway along Whitlingham Lane



Showing the old rowing club and part of the boatyard.



Showing both buildings on site.

Please go to the [original HELAA](#) (September 2023) for more photos of the site taken when the boatyard was in operation.

10.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	Although appearing to be sited on the edge of Norwich its siting to the south of the River Yare means that there is a critical separation between the two areas, this is not a site that is well linked to the city and certainly does not meet the majority of sustainable location criteria. It may be close to the edge of a city, but the separation is enough to make it a case that we would hope residents would use bicycles and public transport, but I anticipate that a private vehicle, being a necessity for residents, would be the main form of transport used.

Stakeholder	Comments
	<p>On the plus side the site is large enough to accommodate 4 to 6 dwellings, although taking into account the density of residential plot development on this section of Whitlingham Lane, 4 may be more appropriate.</p> <p>The site is reasonably well screened from the Broad but the land does slope down towards the Broad so the siting, scale, and design of any new buildings would have to be well considered. In addition a suitable landscaping scheme could help lessen potential impacts.</p> <p>Until recently the main use of the site was as a boatyard which is within Use Class B2. Such uses are protected in the Local Plan and require a viability assessment and 12 months marketing of the site to demonstrate that employment uses are not viable and there is no interest in the site in its current use. This would need to be satisfied before any change of use is considered.</p> <p>A small part of the site is within flood zone 2 and there is even an area within flood zone 3. Built development should avoid these flood zones.</p>
<p>Broads Authority Heritage and Design</p>	<p>The site sits immediately to the north of the Crown Point Estate, a Registered Park and Garden and a designated heritage asset, the setting of which would need to be considered in any development. To the immediate west of the site are earthworks which are identified on the Norfolk HER (NHER 52118). These are not designated so should not necessarily be a constraint.</p> <p>Development along this part of Whitlingham Lane is predominantly characterised by detached and semi-detached cottages sitting parallel to the street on relatively substantial plots, with a degree of separation between them. Some of these former estate workers' cottages have been identified as locally identified heritage assets in the emerging Trowse Neighbourhood Plan. I therefore think that it is unlikely that a development of 8 units on this site would be appropriate as it would be contrary to the settlement pattern and established densities in the area and would therefore appear incongruous. This in turn would have a detrimental impact on the RPG and wider landscape area.</p> <p>The existing boatyard also contributes to the character of the area, reflecting the use of the site until recently as boat and water-related. As such, the preferred option would be for the existing buildings (at least the larger one to the west of the site) to be retained and converted and the boatyard character of the site to be retained in any future development.</p>
<p>Trowse with Newton Parish Council</p>	<p>The Council discussed the call for sites proposal at last night's meeting and it was thought that any development of that site should refer to our Neighbourhood Plan policies.</p>

Stakeholder	Comments
	<p>Section 4 of the Trowse with Newton Neighbourhood Plan discusses the housing type need in Trowse and therefore this should be considered when/if plans are submitted for the former boat yard site. This section also includes details on possible design codes for any developments.</p>
Norfolk County Council Heritage	<p>Conditions for a programme of archaeological work starting with trial trenching. Rates amber.</p>
Norfolk County Council Education	<p>General Comments, on sites of less than 20 proposed dwellings</p> <p>The other sites are deemed suitable to support the existing schools the communities serve and will promote and support the sustainability of the schools in close proximity. Consideration of the impact on walking and cycle routes should be achieved in order to support sustainable modes of transport and reduce families using their motor car where possible.</p> <p>Reducing the numbers on this site will not change our original response to the proposed site.</p>
Broads Authority Landscape Architect	<p>I have reviewed this site for potential for 8 dwellings, I have no objection in principle to the site being allocated for housing, in landscape terms this could help address some of the issues associated with the site and the negative impact its frontage has on Whitlingham Lane. Any development would need to protect and enhance the existing PROW to the east of the site, along with any landscape features deemed to be important (a survey would be required to determine this).</p> <p>I'm struggling to see how the site could support 8 dwellings, without using a cul-de-sac layout, which would not be in-keeping with the overall settlement pattern along Whitlingham Lane. If this allocation was to go forward then this needs some thought in order to guide an appropriate scale and form of development. I'm not sure I'm comfortable with 8 without some justification around how the site could accommodate this.</p> <p>Then asked about 4 to 6 dwellings:</p> <p>Thanks for reconsulting on this, as you know my previous concerns were over the density rather than use of the site. I would be much more comfortable with 4-6 dwellings, I would still encourage any site allocation (if it goes that way) to include guidance on the site layout to ensure best use of the area and to create a layout which is both informed by existing street pattern and the wider landscape setting. A further consideration if back to backs are being put forward that the orientation and aspect of any units is developed alongside consideration of appropriate use of boundary treatments – what I essentially mean is that we wouldn't want lots of close boarded fencing to boundaries that can be seen from public locations.</p>

Stakeholder	Comments
Norfolk County Council Highways	<p>No highway objection to the proposed allocation.</p> <p>These comments were made in relation to the proposed allocation for Class E uses:</p> <ul style="list-style-type: none"> a) The site is remote from local service and transport provision, but there are pedestrian links to such facilities, albeit the site is likely to be highly reliant on the private motor vehicle as a primary mode of transport. b) Having regard to existing use of the site, the proposed re-development of the site is unlikely to give rise to any specific highway safety concerns or have a severe detrimental residual effect on the highway network. c) c) Currently two points of vehicle access to Whitlingham Lane, it is considered that any development should rationalise to one point of access, along with appropriate parking, cycle and electrical vehicle charging, in accordance with current guidance. <p>Reducing the numbers on this site will not change our original response to the proposed site.</p>
Norfolk County Council – Lead Local Flood Authority.	<p>Any future planning application for residential development of this site likely to be a minor due to its scale and fall outside of the LLFA remit / consultation thresholds.</p> <ul style="list-style-type: none"> • The majority of the site lies within Flood Zone 1, however a small part of the site lies within Flood Zones 2 and 3. • No on-site sewers – Off-site: Foul sewers within 500m of the site. • Site lies within Source Protection Zone 2 (SPPZ). • No flood records on-site. Off-site: No flood records within 500m. • On-site: Small area of surface water ponding / pooling within 0.1% AEP event. Off-site: Surface water flow paths and ponding and pooling in 0.1%, 1% and 3.33% AEP events within 500m of the site. • Part of the site lies within Broads Internal Drainage Board. • No onsite watercourses, however ordinary watercourses (some within the IDB area) and EA main river (River Yare) are located within 100m. • LLFA Assessment: No major surface water issues / constraints identified (GREEN RAG) <p>Reducing the numbers on this site will not change our original response to the proposed site.</p>
Anglian Water Services	<p>This site is within the catchment for Whitlingham WRC. There is a growth scheme to increase dry weather flow headroom in AMP8 (2025-30) at Whitlingham identified in our Business Plan – we received final determination of our plan by Ofwat on 19 December 2024 – the date for Anglian Water’s formal response to the determination is 18th February 2025.</p>

Stakeholder	Comments
	<p>Factoring in existing commitments within the catchment, there is no available headroom at the WRC until the growth scheme is delivered and we would recommend a pre-occupancy clause is attached to any grant of permission to ensure development is not occupied until this time.</p> <p>The closest sewer is located over 200m away near Yare Cottages. A water main adjoins the southern boundary of the site along Whitlingham Lane.</p> <p>It is noted that Trowse Neighbourhood Plan was recently successful at referendum and therefore may have policy requirements in terms of proposed uses for the site.</p>
Broads Authority Ecologist	<p>The site is directly south of Whitlingham Little Broad a designated local nature reserve, with reedbed Section 41 habitats to the west and mature trees to the east</p> <p>The site is currently a small boat yard but contains trees and shrubs – these should be retained and enhanced.</p> <p>Likely to be water quality impacts and subject to nutrient neutrality.</p>

10.4. Site assessment

Please note that the site was assessed in the [original HELAA](#) (September 2023) for Class E uses. This assessment in this HELAA part 2 is for residential development.

Site address: The Old Boatyard, Whitlingham Lane, Trowse	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through first call for sites. Allocation for change in the Preferred Options. Suggested through December 2024 call for sites for dwellings.
Site Size (hectares)	0.49 hectares
Greenfield / Brownfield	Brownfield.
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)
National Nature Reserve	No
Ancient Woodland	No
Flood risk zone 3b	No
Scheduled Ancient Monument	No
Statutory Allotments	No
Locally Designated Green Space	No
At risk from Coastal Erosion	No
<i>If yes to any of the above, site will be excluded from further assessment.</i>	
Development Potential	

(number of dwellings, hectares of employment land or town centre use floor space):

Initially 8 dwellings. Then 4-6 dwellings.

Density calculator	16.33 dwellings per hectare	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Currently two points of vehicle access to Whitlingham Lane, it is considered that any development should rationalise to one point of access, along with appropriate parking, cycle and electrical vehicle charging, in accordance with current guidance.
Accessibility to local services and facilities		1km to village shop. 1km to bus stop.
Utilities Capacity		Factoring in existing commitments within the catchment, there is no available headroom at the WRC until the growth scheme is delivered and we would recommend a pre-occupancy clause is attached to any grant of permission to ensure development is not occupied until this time.
Utilities Infrastructure		There are cables overhead along the boundary of the site with the road. There is a utilities cabinet on the road frontage. A water main adjoins the southern boundary of the site along Whitlingham Lane.
Contamination and ground stability		Some industrial history that may need assessing. The agent says: ‘the site was formerly a fuel depot and latterly a commercial boatyard. Mindful of this, and notwithstanding the fact that the majority of the site is 'sealed' with hard surfacing, it is considered likely that some level of remediation work will be required to address historic contamination’.
Flood Risk		Very small part flood zone 2 and 3. Small pocket of surface water on site. Built development should avoid these flood zones.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Not likely the site could support 8 dwellings, without using a cul-de-sac layout, which would not be in-keeping with the overall settlement pattern along Whitlingham Lane. The preferred option would be for
Townscape		

		the existing buildings (at least the larger one to the west of the site) to be retained and converted and the boatyard character of the site to be retained in any future development. Any development would need to protect and enhance the existing PROW to the east of the site, along with any landscape features deemed to be important (a survey would be required to determine this). The site is reasonably well screened from the Broad but the land does slope down towards the Broad so the siting, scale, and design of any new buildings would have to be well considered. In addition a suitable landscaping scheme could help lessen potential impacts.
Biodiversity and Geodiversity		The site is directly south of Whitlingham Little Broad a designated local nature reserve, with reedbed Section 41 habitats to the west and mature trees to the east The site is currently a small boat yard but contains trees and shrubs – these should be retained and enhanced. Local nature reserve next door and on small part of site.
Historic Environment		The site sits immediately to the north of the Crown Point Estate, a Registered Park and Garden and a designated heritage asset, the setting of which would need to be considered in any development. Unlikely that a development of 8 units on this site would be appropriate as it would be contrary to the settlement pattern and established densities in the area and would therefore appear incongruous. This in turn would have a detrimental impact on the RPG and wider landscape area. Conditions for a programme of archaeological work starting with trial trenching.
Open Space		
Transport and Roads		No highway objection to the proposed allocation. Having regard to existing use of the site, the proposed re-development of the site is unlikely to give rise to any specific highway safety concerns or have a severe detrimental residual effect on the highway network.
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
Draft policy for continued boatyard use and if	POWHI2: Land at Whitlingham Lane	This is a draft policy in the Preferred Options version of the Local Plan, following a call for sites submission as part of the Issues and Options consultation.

meets tests, potentially Class E.		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):	Agent says will take up to 1 year to complete, so 8 dwellings per year is presumed.	
Comments	Agent says will take up to 1 year to complete.	
Achievability (including viability)		
Comments	Agent says 'The site is located on the edge of the popular village of Trowse. Recent large-scale residential development in the village has demonstrated a very strong demand for housing in this area. As a location where much of the land lies within the Broads Executive Area, and most of the land is on the ownership of a single estate, opportunities for residential development rarely come forward. This is a site in an excellent location (being on the doorstep of both the city and the Country Park, and within the Broads) and with convenient links to the local school, facilities and employment opportunities'.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • Reduce to one point of access • Factoring in existing commitments within the catchment, there is no available headroom at the WRC until the growth scheme is delivered and we would recommend a pre-occupancy clause is attached to any grant of permission to ensure development is not occupied until this time. • There are cables overhead along the boundary of the site with the road. • There is a utilities cabinet on the road frontage. • A water main adjoins the southern boundary of the site along Whitlingham Lane. • Some contaminated land remediation likely. • Very small part flood zone 2 and 3. Small pocket of surface water on site. Built development should avoid these flood zones. 	

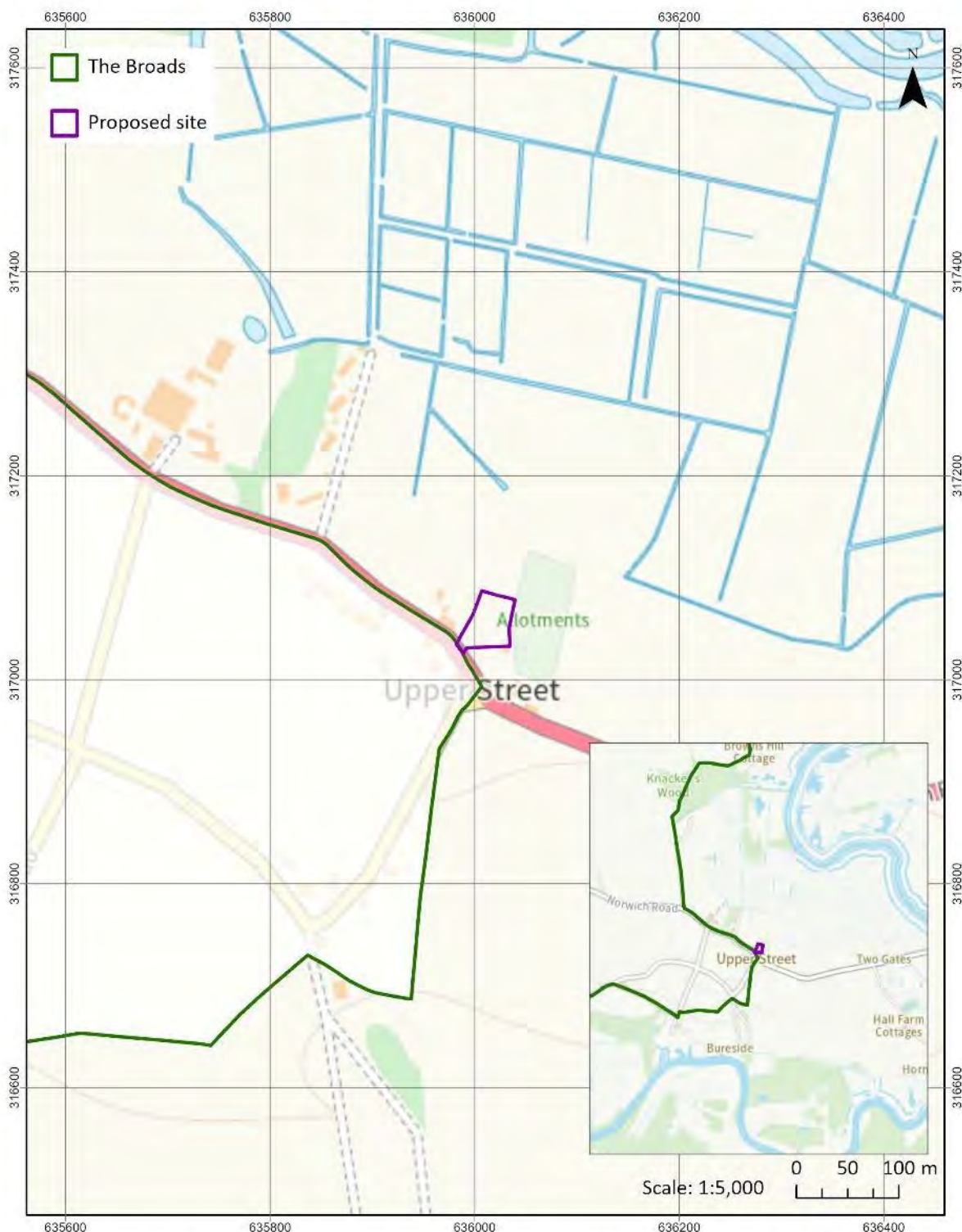
	<ul style="list-style-type: none"> • The preferred option would be for the existing buildings (at least the larger one to the west of the site) to be retained and converted and the boatyard character of the site to be retained in any future development. • Any development would need to protect and enhance the existing PROW to the east of the site, along with any landscape features deemed to be important (a survey would be required to determine this). • Trees and shrubs maintained • Designed to accommodate part of nature reserve on site. • The site is reasonably well screened from the Broad but the land does slope down towards the Broad so the siting, scale, and design of any new buildings would have to be well considered. In addition a suitable landscaping scheme could help lessen potential impacts. • The site sits immediately to the north of the Crown Point Estate, a Registered Park and Garden and a designated heritage asset, the setting of which would need to be considered in any development. • Conditions for a programme of archaeological work starting with trial trenching. • GI RAMS – payment likely. • BNG – on site or off-site mitigation. • Nutrient Neutrality.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	None related to the HELAA as the above could be addressed through the design and implementation of the scheme.
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is suitable for residential development.	

11. Land at Half Moon Barn, Upper Street Horning

11.1. Map of site

Call for sites - December 2024

Land at Half Moon Barn, Upper Street Horning Norwich



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11.2. Photos of site



Looking north across the site.

See photos for the next site (land to the north of Upper Street) for the context of the site and the access to the site.

11.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	<p>This site is on the main road, but that does not make it a sustainable location and, beyond a potential for a reasonable bus service, it meets none of the basic criteria for a sustainable location and would not be supported on this basis.</p> <p>The site is used for arable farming and appears to be Grade 1 on the agricultural land classification so should be protected in its existing use.</p> <p>I was surprised to see that part of the larger site is partly in flood zone 3 which would limit development in that area.</p>
Broads Authority Heritage and Design	<p>The site has no particular heritage constraints although the settlement around Upper Street has quite a distinctive character with a number of historic buildings clustered in this area and this character would need to be respected. This particular site allows glimpsed views across the wider landscape and down to the river Ant and designated heritage assets such as the grade II listed Neave's Mill,</p> <p>I would suggest that any development should be towards the southern end of the site so that it more closely relates to the existing settlement and also thereby reducing any potential impact on the open countryside to the north, which slopes down towards the river Ant. The site could probably accommodate one unit, I am less convinced that two could be successfully accommodated on the site.</p>
Horning Parish Council	<p>The Council noted that there were no credible solutions regarding infrastructure at all in place and that the proposals were the result of a desk-exercise which was entirely untenable. The Council noted that the smaller plot could not be built on as</p>

Stakeholder	Comments
	there are rights of way over the proposed site. The Council also noted that the larger plot could not be built on the basis that there is a SSSI on it. The Council also noted that the issue with the drainage situation at Knackers Wood posed a significant issue. Council agreed to issue the strongest possible objection.
Norfolk County Council Education	The proposal will support the local school with current low numbers. This will provide much needed housing to support the pupil population, but it is not substantial enough to support long term the sustainability of the school. This could dependant on the mix of housing encourages families to select alternative schools in the surrounding villages of Ludham and Salhouse which may require some contribution to home to school transport.
Norfolk County Council Heritage	Based on currently available information would not ask for conditions for archaeological work.
Broads Authority Landscape Architect	I don't have any objection to this in principle, providing that a sensible boundary line can be chosen and the necessary guiding principles around use of boundary treatments and well-placed screening were to be utilised, along with appropriate use of building materials and heights – which should mitigate any issues resulting from any visual change.
Norfolk County Council Highways	Highway Objection to the proposed allocation. There is a lack of footway provision. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported.
Norfolk County Council – Lead Local Flood Authority.	<ul style="list-style-type: none"> • Located within Flood Zone 1. Flood Zones 2 and 3 lie to the north of the site. • No on-site sewers – Foul sewers run along boundary where the site accesses onto Upper Street. • Not located within a Source Protection Zone (SPZ). • No flood records on-site and no external and internal flood records within 500m. • On-site: None. Off-site Minor surface water flowpaths and small areas of surface water ponding / pooling in 0.1%, 1% and 3.33% AEP events. • Site lies outside of any Broads Internal Drainage Board area (IDB area lies to the north, east south and west). • On-site: None. Off-site: ordinary watercourses (some within IDB area) and drainage ditches located within 100m and EA main river more than 500m away. • LLFA Assessment: No major surface water issues / constraints identified (Green RAG) • The LLFA advise that we are aware of flooding issues associated with the village of Horning and the involvement in the area of the Norfolk Strategic Flooding Alliance (NSFA). Ferry Road in Horning (to the west of this site) is also identified on the NSFA Tranche List due to known flooding issues.

Stakeholder	Comments
Anglian Water Services	<p>The sites are within the Horning Knackers Wood WRC catchment that currently does not have dry weather flow headroom to accommodate growth in the catchment – for the reasons set out and according to our Statement of Fact.</p> <p>Whilst there is a growth scheme being delivered for Horning by the end of March 2025, to ensure it is operationally compliant with a revised dry weather flow permit; this is to allow for mass infiltration as a result of the high water table and river overtopping into our network. We would need to undertake a period of monitoring of incoming flows to be certain that the site will operate in accordance with the consented dry weather flow, before a decision could be made on whether additional growth could be accommodated and what quantum of growth would be sustainable over the longer term in combination with other environmental capacity constraints.</p> <p>For the larger site there is a sewer that runs along the southern and western boundaries of the site. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p>
Essex and Suffolk Water	<p>Again we do not supply water to customers in this area but we do have assets close by to the proposed areas. We have a pumping station at the River Bure in this location and some strategic mains in the locality. They do not seem to run through or adjacent to the fields proposed and we would always expect developers to contact us for up to date underground services maps, but worth you knowing that there are large pipes in the roadways and fields around this area.</p>
North Norfolk District Council	<p>Unless I am mistaken the two sites are fall into the wider NNDC district boundary but are adjacent to our LPA Area.</p> <p>Horning is considered a constrained small growth Village in our emerging local plan and as such no housing requirements can be attributed to the village. The surrounding area which abuts the site(s) would be considered to fall into the Countryside policy Area where development is restricted in line with policy SS2. Although the site(s) is outside the village and falls under the BA LPA it is expected that the same constraints would apply as it falls into the same catchment. Our inspector advised in his post hearing letter earlier this year that <i>there is no realistic prospect of the local water recycling centre meeting the required environmental standards in the foreseeable future...[examination ref EH006(h)]</i>. This was based on the known position which has not changed and statutory objections . And as such our Plan should be altered so as not to rely on any housing from this location . As the BA are fully aware development in Horning is subject to a joint position statement with NNDC , EA, and BA and an updated Statement of Fact from Anglian Water . Issues to Horning and the surrounding area relate to Water</p>

Stakeholder	Comments
	<p>Recycling Centre permit compliance, increased flows due to groundwater and surface water infiltration and nutrient loading. The Council is working jointly with the Broads Authority, the EA and Anglian Water to resolve this, however it is clear that given the deliverability issues no growth can or should be relied upon in local plans</p> <p>The 2017 joint position statement was updated in 2023 along with a separate updated statement of Fact by Anglian Water. Both can be accessed through our examination library ref EX012 and EX013 as attached for reference</p> <p>Our understanding in relation to Pins is that a new area of “pragmatism “ is being applied in response to the new Housing ministers request for PINS to focus their <i>time on plans that are considered are capable of being found sound.....in the exchange of letters which were made available to LPA</i> during July / August 2024 it states <i>Pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall”</i> it is considered unlikely that the issuing surrounding the WRC can be resolved in which as short period of time so our advice would not to rely on these sites</p>
Broads Authority Ecologist	<p>From the aerals, the site appears to be in arable use.</p> <p>The site has boundary trees and hedgerows which should be retained and enhanced. These are likely to support protected species, namely bats, birds, and reptiles. Also hedgehog and nesting skylark.</p> <p>Likely localised increase in recreational disturbance to designated sites.</p>

11.4. Site assessment

Planning history:

Application number	Description	Decision	Date
BA/2009/0267/CCP	Rural Demonstration Project - A1062 Self-Explaining road	No objections – neighbouring authority consultation.	21/10/2009

Site address: Land at Half Moon Barn, Upper Street Horning	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites.
Site Size (hectares)	0.215 hectares
Greenfield / Brownfield	Part brownfield and part greenfield.
Ownership (if known)	Private

(private/public etc.)		
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)	
National Nature Reserve	No	
Ancient Woodland	No	
NbeaFlood risk zone 3b	No - Flood zone 1 according to SFRA	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential		
(number of dwellings, hectares of employment land or town centre use floor space):		
2 dwellings.		
Density calculator	9.3 dwellings per hectare	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Access to site is near a bend in the road. Speed limit is national speed limit applies. Highway Objection to the proposed allocation. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported.
Accessibility to local services and facilities		Shop – 1.4km, no footways School 1.2km, no footways Bus stop, 150m, no footways
Utilities Capacity		In Horning Knackers Wood Water Recycling Centre catchment – no foul water capacity.
Utilities Infrastructure		Pumping station at the River Bure in this location and some strategic mains in the locality and there are large pipes in the roadways and fields around this area.
Contamination and ground stability		Agent says: 'The ground is stable and there are no known ground contamination issues'.
Flood Risk		In flood zone 1.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Development should be towards the southern end of the site so that it more closely relates to the existing settlement and also thereby reducing any potential

Townscape		impact on the open countryside to the north, which slopes down towards the river Ant. The site could probably accommodate one unit, I am less convinced that two could be successfully accommodated on the site. Views to the Broads. Guiding principles around use of boundary treatments and well-placed screening were to be utilised, along with appropriate use of building materials and heights should mitigate any issues resulting from any visual change. Part grade 1 agricultural land.
Biodiversity and Geodiversity		The site has boundary trees and hedgerows which should be retained and enhanced. These are likely to support protected species, namely bats, birds, and reptiles. Also hedgehog and nesting skylark.
Historic Environment		The site has no particular heritage constraints although the settlement around Upper Street has quite a distinctive character with a number of historic buildings clustered in this area and this character would need to be respected. This particular site allows glimpsed views across the wider landscape and down to the river Ant and designated heritage assets such as the grade II listed Neave's Mill.
Open Space		
Transport and Roads		Highway Objection to the proposed allocation. There is a lack of footway provision
Compatibility with neighbouring / adjoining uses		The neighbouring uses are residential and agricultural.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	

	Comments:
Estimated annual build out rate (including justification):	Agent says will take up to 1 year to complete, so 2 dwellings per year is presumed.
Comments	Agent says will take up to 1 year to complete.
Achievability (including viability)	
Comments	Agent says 'The site is located in a popular area close to Horning where there is demand for new housing. Development of the site is considered achievable due to the absence of abnormal constraints and presence of an existing access from Upper Street'.
Overcoming Constraints	
Comments	<ul style="list-style-type: none"> • Access to site is near a bend in the road. Speed limit is national speed limit applies. Highway Objection to the proposed allocation. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported. • Pumping station at the River Bure in this location and some strategic mains in the locality and there are large pipes in the roadways and fields around this area. • Upper Street has quite a distinctive character with a number of historic buildings clustered in this area and this character would need to be respected. • Views to the Broads. • Development not able to overcome access to services and facilities. • Scheme would need to consider the woodland and mature trees on the boundary with the road. • GI RAMS – payment likely. • BNG – on site or off site mitigation. • Part on grade 1 agricultural land. • Guiding principles around use of boundary treatments and well-placed screening were to be utilised, along with appropriate use of building materials and heights should mitigate any issues resulting from any visual change. • Two dwellings unlikely to be supported. • Horning Knacker's Wood Water Recycling Centre issues.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	<p>Access to services.</p> <p>Grade 1 agricultural land.</p> <p>Horning Knackers Wood Water Recycling Centre capacity issues.</p> <p>Highways objection.</p> <p>Adequate visibility from access is likely to be unachievable.</p> <p>New access onto a corridor of movement not supported.</p>
Conclusion (e.g., is included in the theoretical capacity)	

According to the HELAA assessment, the site is not suitable for residential development.

12. Land to the north of Upper Street Horning

12.1. Map of site

Call for sites - December 2024

Land to the north of Upper Street Horning Norwich



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12.2. Photos of site



Looking to the east.



Looking to the north.



Taken from the road, looking north



Showing the southern boundary of the site.

Photos showing the access to this site and the other site in Upper Street (Half Moon Barn)



Upper Street heading west.



Upper Street heading south



Looking south, taken from the junction



Showing the access

12.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	<p>This site is on the main road, but that does not make it a sustainable location and, beyond a potential for a reasonable bus service, it meets none of the basic criteria for a sustainable location and would not be supported on this basis.</p> <p>The site is used for arable farming and appears to be Grade 1 on the agricultural land classification so should be protected in its existing use.</p> <p>I was surprised to see that part of the larger site is partly in flood zone 3 which would limit development in that area.</p>
Broads Authority Heritage and Design	<p>The site contains earthworks of undated ditches and pits which are recorded on the Norfolk HER (NHER: 49282), which may be an archaeological constraint. The site is also in relatively close proximity to Grange Fram to the west, which is a grade II listed building although any impact on the immediate setting of the listed building is likely to be limited, due to the bend in the road and the wooded belt between the two sites. However, the listed farm and its curtilage listed structures and the historic buildings clustered to the south-east of the site do give a distinct character to the wider area within which the site is located.</p> <p>It is considered that part of this character is the gaps in the development along Upper Street, which emphasise the rural setting of the existing development. This particular site therefore contributes to the character of the area in its existing state and also allows glimpsed views across the wider landscape and down to the river Ant and designated heritage assets such as the grade II listed Neave's Mill, due to</p>

Stakeholder	Comments
	its raised position above the marshes located to the south. This gap site therefore enables a visual relationship between this area and the wider Broads' landscape beyond and I would therefore be reluctant to see any development onto this site.
Horning Parish Council	The Council noted that there were no credible solutions regarding infrastructure at all in place and that the proposals were the result of a desk-exercise which was entirely untenable. The Council noted that the smaller plot could not be built on as there are rights of way over the proposed site. The Council also noted that the larger plot could not be built on the basis that there is a SSSI on it. The Council also noted that the issue with the drainage situation at Knackers Wood posed a significant issue. Council agreed to issue the strongest possible objection.
Norfolk County Council Education	The proposal will support the local school with current low numbers. This will provide much needed housing to support the pupil population, but it is not substantial enough to support long term the sustainability of the school. This could dependant on the mix of housing encourages families to select alternative schools in the surrounding villages of Ludham and Salhouse which may require some contribution to home to school transport.
Norfolk County Council Heritage	Conditions for a programme of archaeological work starting with trial trenching.
Broads Authority Landscape Architect	I couldn't support this. It looks to be a very sensitive site, with strong intervisibility with the wider landscape to the north in particular. PROW at Horning FP13 and Ludham FP11 present a sensitivity in terms of visual receptors. The slightly rolling topography of the field is unusual and special within the area, marking a transition to the uplands, not to mention very beautiful, there are also some potentially valuable landscape features such as the groups of trees scrub and hedgerow which would no doubt be under pressure from any development if the site were allocated. If this site were to be allocated and developed it would result in the loss of visual openness, destruction of the field pattern and a loss or erosion of the ability to visually understand the transition between landscape types (low lying marshland to upland) in the area. All of this would be a great shame and could not be justified in terms of landscape considerations.
Norfolk County Council Highways	Highway Objection to the proposed allocation. There is a lack of footway provision. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported.
Norfolk County Council – Lead Local Flood Authority.	<ul style="list-style-type: none"> • Located mainly within Flood Zone 1 but Flood Zones 2 and 3 encroach into a small area to the north of the site. • On-site sewers – Yes - Foul sewers run along the south and west site boundaries. • Not located within a Source Protection Zone (SPZ).

Stakeholder	Comments
	<ul style="list-style-type: none"> • No flood records on-site and no external and internal flood records within 500m. • On-site: Yes – Small area of surface water ponding / pooling in 0.1% AEP event. Off-site: Minor surface water flowpaths and small areas of surface water ponding / pooling within 0.1%, 1% and 3.33% AEP events. • Site lies outside of any Broads Internal Drainage Board area (IDB area lies to the north, east south and west). • On-site: None. Off-site: ordinary watercourses (some within IDB area) and drainage ditches located within 100m and EA main river more than 500m away. • LLFA Assessment: No major surface water issues / constraints identified (Green RAG) • The LLFA advise that we are aware of flooding issues associated with the village of Horning and the involvement of the Norfolk Strategic Flooding Alliance (NSFA) in the area. Ferry Road in Horning (to the west of this site) is also identified on the NSFA Tranche List due to known flooding issues.
Anglian Water Services	<p>The sites are within the Horning Knackers Wood WRC catchment that currently does not have dry weather flow headroom to accommodate growth in the catchment – for the reasons set out and according to our Statement of Fact.</p> <p>Whilst there is a growth scheme being delivered for Horning by the end of March 2025, to ensure it is operationally compliant with a revised dry weather flow permit; this is to allow for mass infiltration as a result of the high water table and river overtopping into our network. We would need to undertake a period of monitoring of incoming flows to be certain that the site will operate in accordance with the consented dry weather flow, before a decision could be made on whether additional growth could be accommodated and what quantum of growth would be sustainable over the longer term in combination with other environmental capacity constraints.</p> <p>For the larger site there is a sewer that runs along the southern and western boundaries of the site. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p>
North Norfolk District Council	<p>Unless I am mistaken the two sites are fall into the wider NNDC district boundary but are adjacent to our LPA Area.</p> <p>Horning is considered a constrained small growth Village in our emerging local plan and as such no housing requirements can be attributed to the village. The surrounding area which abuts the site(s) would be considered to fall into the Countryside policy Area where development is restricted in line with policy SS2. Although the site(s) is outside the village and falls under the BA LPA it is</p>

Stakeholder	Comments
	<p>expected that the same constraints would apply as it falls into the same catchment. Our inspector advised in his post hearing letter earlier this year that <i>there is no realistic prospect of the local water recycling centre meeting the required environmental standards in the foreseeable future...[examination ref EH006(h)]</i>. This was based on the known position which has not changed and statutory objections . And as such our Plan should be altered so as not to rely on any housing from this location . As the BA are fully aware development in Horning is subject to a joint position statement with NNDC , EA, and BA and an updated Statement of Fact from Anglian Water . Issues to Horning and the surrounding area relate to Water Recycling Centre permit compliance, increased flows due to groundwater and surface water infiltration and nutrient loading. The Council is working jointly with the Broads Authority, the EA and Anglian Water to resolve this, however it is clear that given the deliverability issues no growth can or should be relied upon in local plans</p> <p>The 2017 joint position statement was updated in 2023 along with a separate updated statement of Fact by Anglian Water . Both can be accessed through our examination library ref EX012 and EX013 as attached for reference</p> <p>Our understanding in relation to Pins is that a new area of “pragmatism “ is being applied in response to the new Housing ministers request for PINS to focus their <i>time on plans that are considered are capable of being found sound.....in the exchange of letters which were made available to LPA during July / August 2024</i> it states <i>Pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall”</i> it is considered unlikely that the issuing surrounding the WRC can be resolved in which as short period of time so our advice would not to rely on these sites</p>
Essex and Suffolk Water	<p>Again we do not supply water to customers in this area but we do have assets close by to the proposed areas. We have a pumping station at the River Bure in this location and some strategic mains in the locality. They do not seem to run through or adjacent to the fields proposed and we would always expect developers to contact us for up to date underground services maps, but worth you knowing that there are large pipes in the roadways and fields around this area.</p>
Broads Authority Ecologist	<p>From the aerials, the site appears to be in arable use.</p> <p>The site has boundary trees and hedgerows which should be retained and enhanced. These are likely to support protected species, namely bats, birds, and reptiles. Also hedgehog and nesting skylark.</p> <p>Likely localised increase in recreational disturbance to designated sites.</p>

12.4. Site assessment

Site address: Land to the north of Upper Street Horning		
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites. No planning application history for this specific site.	
Site Size (hectares)	1.54 hectares	
Greenfield / Brownfield	Part brownfield and part greenfield.	
Ownership (if known) (private/public etc.)	Private	
Absolute Constraints Check		
Is the site in a ...		
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)	
National Nature Reserve	No	
Ancient Woodland	No	
Flood risk zone 3b	No – mostly flood zone 1, some 2 and 3 according to SFRA – but allocation could reflect the flood risk.	
Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
<i>If yes to any of the above, site will be excluded from further assessment.</i>		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 45 dwellings.		
Density calculator	29.22 dwellings per hectare	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Access to site is near a bend in the road. Speed limit is national speed limit applies. Highway Objection to the proposed allocation. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported.
Accessibility to local services and facilities		Shop – 1.4km, no footways School 1.2km, no footways Bus stop, 150m, no footways
Utilities Capacity		In Horning Knackers Wood Water Recycling Centre catchment – no foul water capacity.
Utilities Infrastructure		Essex and Suffolk Water have a pumping station at the River Bure in this location and some strategic mains in the locality. They do not seem to run through or adjacent to the fields proposed and we would always expect developers to contact us for up to date

		underground services maps, but there are large pipes in the roadways and fields around this area.
Contamination and ground stability		Agent says: 'The ground is stable and there are no known ground contamination issues'.
Flood Risk		In flood zone 1. Mostly flood zone 1, some 2 and 3 according to SFRA – but allocation could reflect the flood risk.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		It is considered that part of this character is the gaps in the development along Upper Street, which emphasise the rural setting of the existing development. This particular site therefore contributes to the character of the area in its existing state and also allows glimpsed views across the wider landscape and down to the river Ant and designated heritage assets such as the grade II listed Neave's Mill, due to its raised position above the marshes located to the south. This gap site therefore enables a visual relationship between this area and the wider Broads' landscape beyond.
Townscape		It looks to be a very sensitive site, with strong intervisibility with the wider landscape to the north in particular. The slightly rolling topography of the field is unusual and special within the area, marking a transition to the uplands, not to mention very beautiful, there are also some potentially valuable landscape features such as the groups of trees scrub and hedgerow which would no doubt be under pressure from any development if the site were allocated. If this site were to be allocated and developed it would result in the loss of visual openness, destruction of the field pattern and a loss or erosion of the ability to visually understand the transition between landscape types (low lying marshland to upland) in the area. Views to the Broads. Part grade 1 agricultural land.
Biodiversity and Geodiversity		The site has boundary trees and hedgerows which should be retained and enhanced. These are likely to support protected species, namely bats, birds, and reptiles. Also hedgehog and nesting skylark.

		Deciduous woodland/hedges borders site. Mature trees.
Historic Environment		The site contains earthworks of undated ditches and pits which are recorded on the Norfolk HER (NHER: 49282), which may be an archaeological constraint. The site is also in relatively close proximity to Grange Fram to the west, which is a grade II listed building although any impact on the immediate setting of the listed building is likely to be limited, due to the bend in the road and the wooded belt between the two sites. However, the listed farm and its curtilage listed structures and the historic buildings clustered to the south-east of the site do give a distinct character to the wider area within which the site is located. Conditions for a programme of archaeological work starting with trial trenching
Open Space		
Transport and Roads		Highway Objection to the proposed allocation. New access onto a corridor of movement not supported.
Compatibility with neighbouring / adjoining uses		The neighbouring uses are residential and agricultural.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 2 years to complete, so 25 dwellings per year is presumed.
Comments	Agent says will take up to 2 years to complete.	
Achievability (including viability)		

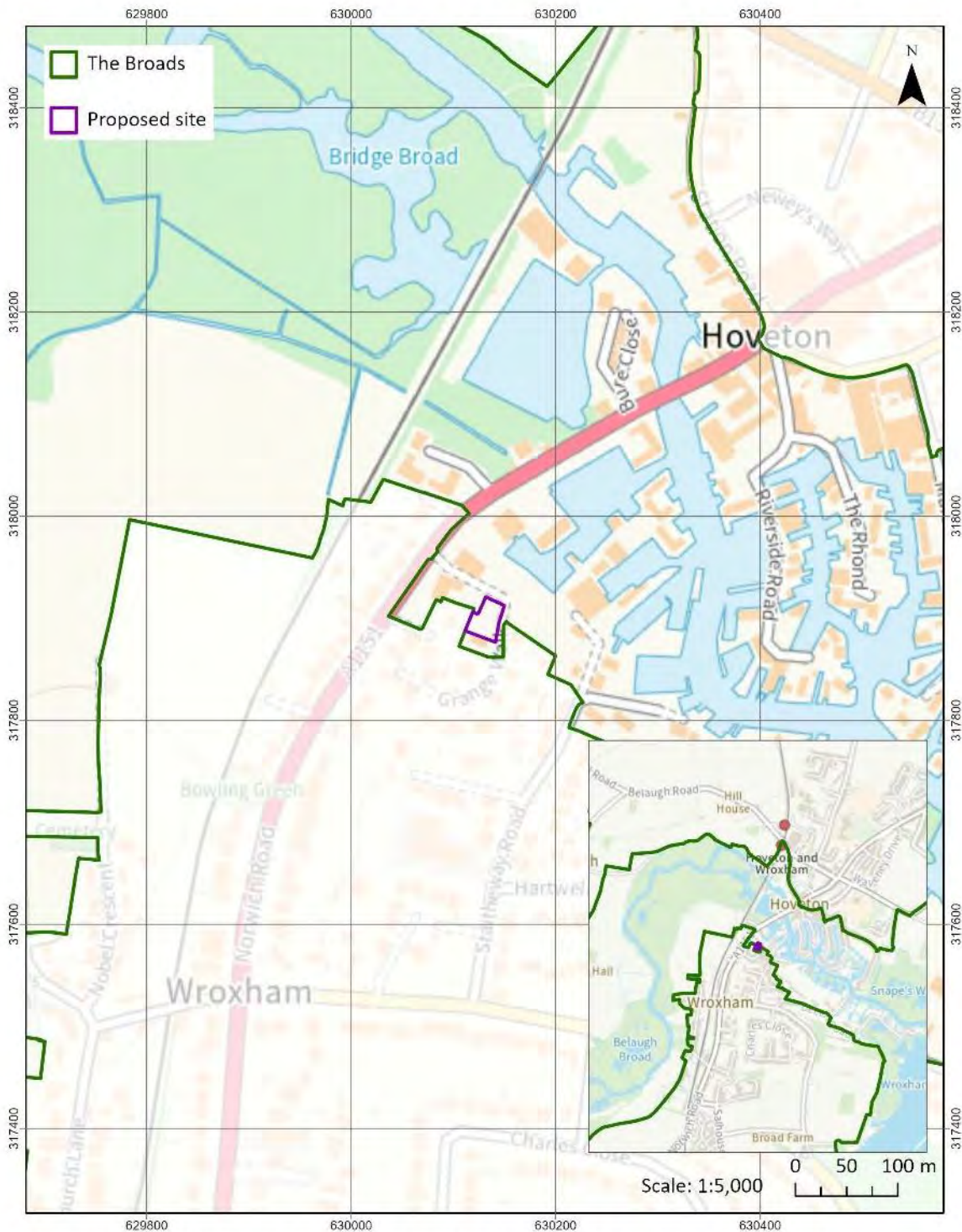
Comments	Agent says 'The site is located in a popular area close to Horning where there is demand for new housing. Development of the site is considered achievable due to the absence of abnormal constraints and presence of an existing access from Upper Street'.
Overcoming Constraints	
Comments	<ul style="list-style-type: none"> • Access to site is near a bend in the road. Speed limit is national speed limit applies. Highway Objection to the proposed allocation. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported. • Views to the Broads. • Conditions for a programme of archaeological work starting with trial trenching • Development not able to overcome access to services and facilities. • Scheme would need to consider the woodland and mature trees on the boundary with the road. • GI RAMS – payment likely. • BNG – on site or off site mitigation. • Part on grade 1 agricultural land. • Horning Knacker's Wood Water Recycling Centre issues. • Essex and Suffolk Water have a pumping station at the River Bure in this location and some strategic mains in the locality. • There are large pipes in the roadways and fields around this area. • In flood zone 1. Mostly flood zone 1, some 2 and 3 according to SFRA – but allocation could reflect the flood risk. • This gap site enables a visual relationship between this area and the wider Broads' landscape beyond • A very sensitive site, with strong intervisibility with the wider landscape to the north in particular • The site has boundary trees and hedgerows which should be retained and enhanced. These are likely to support protected species, namely bats, birds, and reptiles. • Heritage assets in area.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 2 years to develop.
Barriers to Delivery	
Comments	<p>Access to services.</p> <p>Grade 1 agricultural land.</p> <p>Horning Knackers Wood Water Recycling Centre capacity issues</p> <p>Landscape impact.</p> <p>Highway Objection to the proposed allocation.</p> <p>Adequate visibility from access is likely to be unachievable.</p> <p>New access onto a corridor of movement not supported.</p>
Conclusion (e.g., is included in the theoretical capacity)	

According to the HELAA assessment, the site is not suitable for residential development.

13. Car Park at former Windboats site, Grange Walk, Norwich Road, Wroxham

13.1. Map of site

Call for sites - December 2024
Car Park at former Windboats site, Grange Walk,



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13.2. Photos of site



Showing the car park site



Looking north to the river and boatyards



Showing the southern boundary



Showing the western boundary

See photos for the next site (Former Windboats site) regarding the access to the sites.

13.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	There is recent history at this site, issues raised regarding the need to market the site in accordance with local plan policy for employment sites, and the restrictive nature of the access which Highways have cited previously. It may be that the 2-dwelling proposal would be acceptable in highway terms as it is a low-level provision, but I would anticipate an objection to 15 dwellings. The marketing side would need to be satisfied.
Broads Authority Heritage and Design	The site sits just outside the Wroxham Conservation Area and immediately to the east / south-east of the Grade II listed The Grange, and as such, the setting of the listed building will need to be considered in any proposal. However, the primary elevation of The Grange addresses Norwich Road and as such the principle of appropriately designed and scaled development here may be acceptable. In terms

Stakeholder	Comments
	of the character of the area, the site is somewhat transitional in that it sits between boatyards to the north and residential to the west and south and so the design of any proposals here would need to reflect that transitional character.
Wroxham Parish Council	Wroxham Parish Council support these sites for residential development. They are in a prominent location in the village, perfect for residential dwellings with pedestrian access to shops and services. The sites complement the Wroxham Neighbourhood Plan (WNP) policy HBE1. The Parish Council would very much like the site to be developed with housing for older people in mind, as per policy HBE2 of the WNP.
Norfolk County Council Education	<p>General Comments, on sites of less than 20 proposed dwellings</p> <p>The other sites are deemed suitable to support the existing schools the communities serve and will promote and support the sustainability of the schools in close proximity. Consideration of the impact on walking and cycle routes should be achieved in order to support sustainable modes of transport and reduce families using their motor car where possible.</p>
Broads Authority Landscape Architect	No objection to an allocation for this in principle, providing that building heights would be informed by consideration of potential visibility from within the immediate area. If allocated some guidance or restrictions should be placed upon the use of boundary treatments to ensure they include soft treatments and avoid close boarded fencing in the more visible areas.
Norfolk County Council Highways	Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
Norfolk County Council Heritage	Based on currently available information would not ask for conditions for archaeological work.
Norfolk County Council – Lead Local Flood Authority.	<ul style="list-style-type: none"> • Located within Flood Zone 1. Flood Zones 2 and 3 lie to the north and east of the site. • On-site sewers – Foul sewers run across the site and along part of the boundary. • Located within Source Protection Zone 2 (SPZ). • No flood records on-site. External and internal flood records within 500m. • On-site: Surface water flowpath in all three AEP events encroaches the site and passes across the site access (Grange Walk). Off-site Significant surface water flow paths and areas of surface water ponding / pooling in 0.1%, 1% and 3.33% AEP events. • Small part of site to north and access road falls within Norfolk Rivers Internal Drainage Board area. • On-site: None. Off-site: ordinary watercourses (some within IDB area) and drainage ditches located within 100m and EA main river more than 500m away.

Stakeholder	Comments
	<ul style="list-style-type: none"> LLFA Assessment: Moderate surface water / flooding constraints identified (which will require further assessment by the Local Planning Authority (AMBER RAG))
Anglian Water Services	<p>The sites are within the Belaugh WRC catchment and there is dry weather flow headroom available to accommodate the growth arising from these proposed sites.</p> <p>There are AW assets within the proposed sites – comprising foul sewers. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p>
Broads Authority Ecologist	<p>From the aerials the site has boundary trees and hedges, these should be retained and enhanced. The site could support protected species, namely bats and birds, possibly reptiles and hedgehog.</p> <p>The site is within the SSSI impact zone.</p> <p>Possible water quality issues due to the close location to a River Bure boat yard.</p>

13.4. Site assessment

BA/2019/0214/FUL | Erection of two dwellings | Redundant Car Park Serving Former Windboats Marine Site Grange Walk Wroxham Norfolk. Refused. 21 Aug 2019. Main reason: not marketed.

Appeal Ref: APP/E9505/W/19/3237552 13 January 2020. The development proposed is the redevelopment of a redundant car park site to provide two new dwellings. The appeal is dismissed: ‘the proposed development would lead to the unacceptable loss of the commercial use of the site contrary to Policies SP11, DM26 and DM28 of the Local Plan’.

Site address: Car Park at former Windboats site, Grange Walk, Norwich Road, Wroxham	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites. See above for planning history.
Site Size (hectares)	0.0957 hectares
Greenfield / Brownfield	Brownfield – car park.
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)
National Nature Reserve	No
Ancient Woodland	No

Flood risk zone 3b		No - Flood zone 1 according to SFRA
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
If yes to any of the above, site will be excluded from further assessment.		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 2 dwellings.		
Density calculator		20.83 dwellings per hectare
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
Accessibility to local services and facilities		Site is within the development boundary. Bus stop: 200m Train station: 904m Roys: 525m Primary school: 1km GP: 1.6Km Secondary school: 1.2km
Utilities Capacity		
Utilities Infrastructure		There are cables overhead. There are AW assets within the proposed sites – comprising foul sewers. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.
Contamination and ground stability		Use as car park likely means limited potential for contamination.
Flood Risk		In flood zone 1. Some surface water flooding on boundary.
Coastal Change		
Market Attractiveness		Has potential to be attractive as a place to visit and live as it is an area in the Broads. Potential concern regarding bringing residential
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		The building heights would need to be informed by consideration of potential visibility from within the immediate area. If allocated some guidance or

Townscape		restrictions should be placed upon the use of boundary treatments to ensure they include soft treatments and avoid close boarded fencing in the more visible areas. In terms of the character of the area, the site is somewhat transitional in that it sits between boatyards to the north and residential to the west and south and so the design of any proposals here would need to reflect that transitional character.
Biodiversity and Geodiversity		The site has boundary trees and hedges, these should be retained and enhanced. The site could support protected species, namely bats and birds, possibly reptiles and hedgehog.
Historic Environment		Listed building around close to the site. Near to a conservation area.
Open Space		
Transport and Roads		<p>Agent says: 'As a commercial site both of these accesses would have dealt with reasonably high levels of traffic and the vehicle movements associated with the proposed residential redevelopment of the site must be considered in the context of this recent historical use. Pre-application discussions with NCC have been carried out (see submitted pre-a for details) and, based on the outcome of these discussions, it is not considered that highways represents a significant constraint in the development of this site'.</p> <p>Will closing two car parks result in illegal or inconsiderate parking by those visiting the site?</p>
Compatibility with neighbouring / adjoining uses		<p>Whilst holiday homes exist a similar distance to the boatyards in the area, this would be bringing permanent residential nearer to a working boatyard.</p> <p>Asked Agent regarding loss of car park spaces and potential for illegal/inconsiderate parking in the area as a result. Agent says 'There are no staff as the car park served the former Windboats sheds - these have been demolished. The car park is occasionally used as overflow by Norfolk Broad Direct, however that is an ad hoc and occasional use and represents a very low value use of a well-located site'.</p>
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		

Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No. Agent says: 'The site was marketed in 2018 for a period of circa 6 months, being made available as general employment land. After a marketing campaign lasting 6 months (comprising 2 months of targeted approaches to prospective purchases by the applicants, and 4 months of wider marketing through Arnolds, the agent) there were no viable enquiries made in respect of the site. The site has subsequently lain empty and largely unused, and the landowner has received no enquiries over this further period'.	
When might the site be available for development (tick as appropriate)	Immediately	When might the site be available for development (tick as appropriate)
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 1 year to complete, so 15 dwellings per year is presumed.
Comments	Agent says will take up to 1 year to complete.	
Achievability (including viability)		
Comments	Agent says 'The demand for smaller, high quality housing to address the desire for residents in the village to 'downsize' to is well established (see, for example, the supporting text to the Wroxham Neighbourhood Plan policy HBE2). Given the recent issues with nutrient neutrality, there has been a dearth of viable, sustainably located smaller sites for SME developers to bring forward. This site could help to address this demand'.	
Overcoming Constraints		
Comments	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable. • Will closing two car parks result in illegal or inconsiderate parking by those visiting the site? • Amenity concerns by bringing residential dwellings near to a boatyard. • Concern re impact of closing both car parks. • Scheme would need to address overhead lines. • Scheme would need to consider the surface water issues. • There are AW assets within the proposed sites – comprising foul sewers. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary. 	

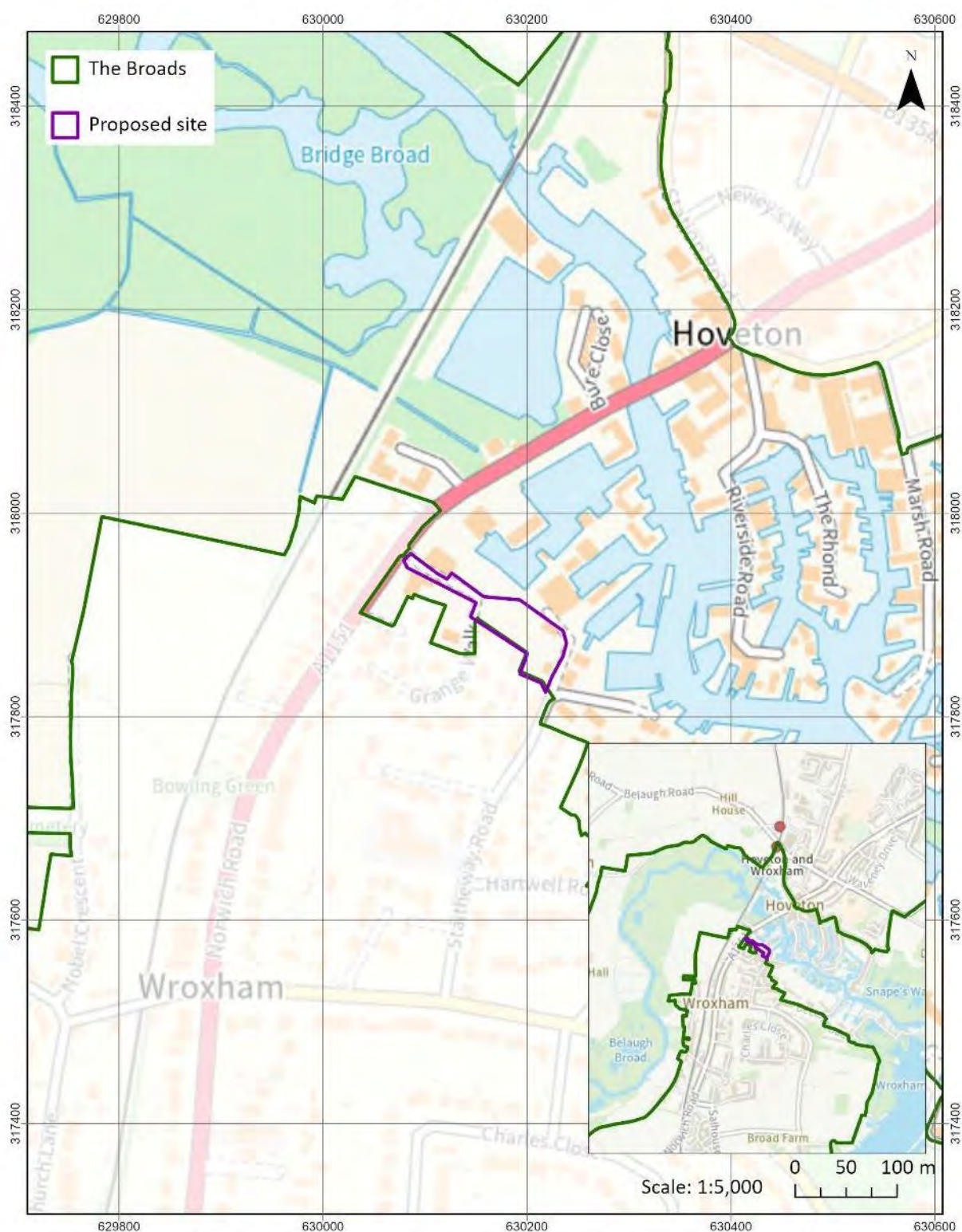
	<ul style="list-style-type: none"> • The building heights would need to be informed by consideration of potential visibility from within the immediate area. • If allocated some guidance or restrictions should be placed upon the use of boundary treatments to ensure they include soft treatments and avoid close boarded fencing in the more visible areas. In terms of the character of the area, the site is somewhat transitional in that it sits between boatyards to the north and residential to the west and south and so the design of any proposals here would need to reflect that transitional character. • The site has boundary trees and hedges, these should be retained and enhanced. • The site could support protected species, namely bats and birds, possibly reptiles and hedgehog. • Listed building around close to the site. Near to a conservation area. • GI RAMS – payment likely. • BNG – on site or off-site mitigation. • Nutrient enrichment mitigation.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable. • Will closing two car parks result in illegal or inconsiderate parking by those visiting the site?
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

14. Former Windboats Site, Grange Walk, Norwich Road, Wroxham

14.1. Map of site

Call for sites - December 2024

Former Windboats Site, Grange Walk, Norwich Road,



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14.2. Photos of site



Looking across the site from the north east corner.



Looking at the site from the car park site.



Showing the white building on site.



Near the eastern corner of the site.



Showing the mobile building to the east of the site.



Showing the car park to the east of the site.



Utilities infrastructure on the right



Looking north at the buildings on the site



Showing the footpath to the south of the site.

Showing the access to this site and the Car Park Site:



Grange Walk



Staithe Way Road



Grange Walk to Norwich Road

14.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	There is recent history at this site, issues raised regarding the need to market the site in accordance with local plan policy for employment sites, and the restrictive nature of the access which Highways have cited previously. It may be that the 2 dwelling proposal would be acceptable in highway terms as it is a low level

Stakeholder	Comments
	provision, but I would anticipate an objection to 15 dwellings. The marketing side would need to be satisfied.
Broads Authority Heritage and Design	<p>The eastern end of the site is immediately adjacent to the Wroxham Conservation Area, whilst The Grange which is grade II listed sits at the western end of the site. Any development would have the potential to affect the setting of these two designated heritage assets as well as that of the locally identified heritage assets at 35-37 Staitheway Road. The setting of these heritage assets will therefore need to be considered.</p> <p>The principle of development on the site is likely to be acceptable but the scale and design will need to be appropriate to the transitional character of the area (sitting between the boatyards and residential area) and the predominant scale of development at the northern end of Staitheway Road, within the conservation area.</p> <p>A previous pre-app (BA/2021/0321/PREAPP) provides more detailed comments on the application submitted at that time. It is noted that we raised concerns regarding the 9 flats for older people which were to be accommodated in a four-storey block, the scale of which was considered to be excessive and incongruous in this location. It is noted that 15 units are now proposed and if a similar form of development is still proposed I would therefore suggest that this is potentially too many.</p>
Wroxham Parish Council	Wroxham Parish Council support these sites for residential development. They are in a prominent location in the village, perfect for residential dwellings with pedestrian access to shops and services. The sites complement the Wroxham Neighbourhood Plan (WNP) policy HBE1. The Parish Council would very much like the site to be developed with housing for older people in mind, as per policy HBE2 of the WNP.
Norfolk County Council Education	<p>General Comments, on sites of less than 20 proposed dwellings</p> <p>The other sites are deemed suitable to support the existing schools the communities serve and will promote and support the sustainability of the schools in close proximity. Consideration of the impact on walking and cycle routes should be achieved in order to support sustainable modes of transport and reduce families using their motor car where possible.</p>
Broads Authority Landscape Architect	Somewhat it depends upon the type of development, which we have no details of. Officers assume it couldn't be 15 larger detached dwellings for example simply due to space. Hopefully design/heritage have provided some guidance on what might be appropriate if anything, in particular given the proximity to the row of historic cottages on Staitheway Rd. Landscape thoughts are that development of this larger area would need to be led by consideration of the immediately adjacent characters which are quite varied, for example the resi areas to the south east are quite green,

Stakeholder	Comments
	cohesive and positive. The transition between resi and the commercial boating area would need some careful thought, so again boundary treatments and frontages would need consideration and probably some guiding principles written in. In terms of visibility, this is already a very active and visually 'busy' area, some consideration would be needed in terms of visibility from the water itself, along with the wider surroundings to guide building heights. Though generally speaking some resi development on this site could address the unsightly nature of the land and create a better transition between land uses than there is currently – providing that materials, building heights and overall massing is correctly guided.
Norfolk County Council Highways	Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
Norfolk County Council – Lead Local Flood Authority.	<ul style="list-style-type: none"> • Located within Flood Zone 1. Flood Zones 2 and 3 lie directly to the north and east of the site. • On-site sewers – Foul sewers run along part of the boundaries. • Located within Source Protection Zone 2 (SPZ). • No flood records on-site. External and internal flood records within 500m. • On-site: Surface water flowpath in 0.1% and 1% AEP events crosses the site and part of the site access (Grange Walk). Off-site Significant surface water flow paths and areas of surface water ponding / pooling in 0.1%, 1% and 3.33% AEP events. • Site lies within Norfolk Rivers Internal Drainage Board area. • On-site: None. Off-site: ordinary watercourses (some within IDB area) and drainage ditches located within 100m and EA main river more than 500m away. • LLFA Assessment: Major surface water issues / constraints identified which will require further assessment by LPA (Red RAG)
Norfolk County Council Heritage	Based on currently available information would not ask for conditions for archaeological work.
Anglian Water Services	<p>The sites are within the Belaugh WRC catchment and there is dry weather flow headroom available to accommodate the growth arising from these proposed sites.</p> <p>There are AW assets within the proposed sites – comprising foul sewers. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.</p>
Broads Authority Ecologist	From the aerials the site appears to be mainly hard standing to the west with a brown field site to the east.

Stakeholder	Comments
	<p>The site could support protected species namely bats and birds, possibly reptiles and hedgehog.</p> <p>The site is within the SSSI impact zone.</p> <p>Possible water quality issues due to the close location to a River Bure boat yard.</p>

14.4. Site assessment

Planning history:

Application number	Description	Decision	Date
BA/2018/0477/PN	Notification for Prior Approval for a proposed change of use of a building from Office Use (Class B1(a)) to a to single dwellinghouse (Class C3)	Prior Approval Granted	22 Jan 2019
BA/2018/0397/DEM	Demolition of former Windboats office building, factory and workshops	Prior Approval not Required	05 Nov 2018
BA/2008/0364/FUL	Alteration and extension to existing building including partial demolition of existing	Approve Subject to Conditions	25 Feb 2009
BA/2008/0278/FUL	Demolition of existing buildings. Erection of extension and alterations to remaining buildings	Approve Subject to Conditions	10 Oct 2008
BA/2007/0123/ADV	Proposed erection of company name sign to front elevation of building	Approve Subject to Conditions	03 Sep 2007
BA/2000/4144/HISTAP	Non-illuminated fascia sign	Approve Subject to Conditions	01 Jun 2000

Former Windboats Site, Grange Walk, Norwich Road, Wroxham	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites. See above.
Site Size (hectares)	0.50 hectares
Greenfield / Brownfield	Brownfield (buildings have been demolished) and car park. Some buildings: office, mobile building and house. Office has prior approval for residential.
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No (SSSI Impact Zone)
National Nature Reserve	No
Ancient Woodland	No

Flood risk zone 3b		No – Mostly flood zone 1 according to SFRA, with the area around the office building flood zone 2.
Scheduled Ancient Monument		No
Statutory Allotments		No
Locally Designated Green Space		No
At risk from Coastal Erosion		No
If yes to any of the above, site will be excluded from further assessment.		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 15 dwellings.		
Density calculator		30 dwellings per hectare – apartments.
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable. Footpath runs along the southern boundary of the site.
Accessibility to local services and facilities		Site is within the development boundary. Bus stop: 200m Train station: 904m Roys: 525m Primary school: 1km GP: 1.6Km Secondary school: 1.2km
Utilities Capacity		
Utilities Infrastructure		There are cables overhead along the boundary of the site. Substation on site. There are AW assets within the proposed sites – comprising foul sewers. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary.
Contamination and ground stability		Agent says: ‘As a former commercial/industrial site it is likely that a degree of ground remediation would be required prior to residential redevelopment’.
Flood Risk		In flood zone 1 mainly. Area around office is flood zone 2. Major surface water issues / constraints identified which will require further assessment.
Coastal Change		

Market Attractiveness		Has potential to be attractive as a place to visit and live as it is an area in the Broads. Potential concern regarding bringing residential
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		Development would need to be led by consideration of the immediately adjacent characters which are quite varied, for example the resi areas to the southeast are quite green, cohesive and positive. The principle of development on the site is likely to be acceptable but the scale and design will need to be appropriate to the transitional character of the area (sitting between the boatyards and residential area) and the predominant scale of development at the northern end of Staithe Way Road, within the conservation area. The transition between resi and the commercial boating area would need some careful thought, so again boundary treatments and frontages would need consideration and probably some guiding principles written in. Some consideration would be needed in terms of visibility from the water itself, along with the wider surroundings to guide building heights. Materials, building heights and overall massing will need to be correctly guided. 15 apartments could be of a scale and massing that is excessive and incongruous in this location. 15 units could be too many.
Townscape		
Biodiversity and Geodiversity		The site could support protected species namely bats and birds, possibly reptiles and hedgehog.
Historic Environment		Any development would have the potential to affect the setting of two designated heritage assets as well as that of the locally identified heritage assets at 35-37 Staithe Way Road. The setting of these heritage assets will therefore need to be considered. Borders a conservation area.
Open Space		
Transport and Roads		Agent says: 'As a commercial site both of these accesses would have dealt with reasonably high levels of traffic and the vehicle movements associated with the proposed residential redevelopment of the site must be considered in the context of this recent historical use. Pre-application discussions with NCC have been carried out (see submitted pre-a for details) and, based on the outcome of these discussions, it is not considered that

		highways represents a significant constraint in the development of this site’.
		Will closing two car parks result in illegal or inconsiderate parking by those visiting the site?
Compatibility with neighbouring / adjoining uses		Whilst holiday homes exist a similar distance to the boatyards in the area, this would be bringing permanent residential nearer to a working boatyard. Asked Agent regarding loss of car park spaces and potential for illegal/inconsiderate parking in the area as a result. Agent says ‘There are no staff as the car park served the former Windboats sheds - these have been demolished. The car park is occasionally used as overflow by Norfolk Broad Direct, however that is an ad hoc and occasional use and represents a very low value use of a well-located site’.
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No. The site was marketed in 2018 for a period of circa 6 months, being made available as general employment land. After a marketing campaign lasting 6 months (comprising 2 months of targeted approaches to prospective purchases by the applicants, and 4 months of wider marketing through Arnolds, the agent) there were no viable enquiries made in respect of the site. The site has subsequently lain empty and largely unused, and the landowner has received no enquiries over this further period.	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 1 year to complete, so 15 dwellings per year is presumed.
Comments	Agent says will take up to 1 year to complete.	
Achievability (including viability)		
Comments	Agent says ‘The demand for smaller, high quality housing to address the desire for residents in the village to 'downsize' to is well established (see, for example, the supporting text to the Wroxham Neighbourhood Plan policy HBE2). Given the recent issues with nutrient neutrality, there has been a	

	dearth of viable, sustainably located smaller sites for SME developers to bring forward. This site could help to address this demand’.
Overcoming Constraints	
Comments	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable. • Major surface water issues / constraints identified which will require further assessment • There are AW assets within the proposed sites – comprising foul sewers. There are easements for many of our underground assets, and the design and layout should ensure that these assets are within public open space or roads and not built over or in private gardens, so that maintenance and repairs can be carried out when necessary. • Development would need to be led by consideration of the immediately adjacent characters which are quite varied • The scale and design will need to be appropriate to the transitional character of the area (sitting between the boatyards and residential area) and the predominant scale of development at the northern end of Staitheway Road, within the conservation area. • The transition between resi and the commercial boating area would need some careful thought, so again boundary treatments and frontages would need consideration and probably some guiding principles written in. • Some consideration would be needed in terms of visibility from the water itself, along with the wider surroundings to guide building heights. • Materials, building heights and overall massing will need to be correctly guided. • 15 apartments could be of a scale and massing that is excessive and incongruous in this location. 15 units could be too many • The site could support protected species namely bats and birds, possibly reptiles and hedgehog. • Any development would have the potential to affect the setting of two designated heritage assets as well as that of the locally identified heritage assets at 35-37 Staitheway Road. The setting of these heritage assets will therefore need to be considered. • Borders a conservation area. • Design will need to consider and enhance the footpath that runs along the southern boundary of the site. • Amenity concerns by bringing residential dwellings near to a boatyard. • Concern re impact of closing both car parks. • Likely need to address contaminated land. • Scheme would need to address overhead lines and substation. • Scheme would need to consider the surface water issues.

	<ul style="list-style-type: none"> • GI RAMS – payment likely. • BNG – on site or off-site mitigation. • Nutrient enrichment mitigation.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 1 year to develop.
Barriers to Delivery	
Comments	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable. • Will closing two car parks result in illegal or inconsiderate parking by those visiting the site?
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	

15. Land at Marlpit House, Belaugh Green Lane, Coltishall

15.1. Map of site

Call for sites - December 2024

Land at Marlpit House Belaugh Green Lane Coltishall



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15.2. Photos of site



Looking along the drive to the road access



Showing the house, parking area and garden.



Looking to the eastern part of the garden in front of the house



Looking to the north west of the site.



Showing the western boundary of the site



Looking north, showing the house and parking area



Looking south from the house/parking area



Looking east

15.3. Stakeholder comments

Stakeholder	Comments
Broads Authority Development Management Team	This site is reasonably well located in relation to Coltishall so may be acceptable on that basis. The trouble is the site features a fairly sizeable property on a site that has many trees, with the property appearing to be roughly in the middle, and the provision of open amenity space suiting the size of the dwelling. To allow further development on this site would be detrimental to the appearance of the site and its contribution to the character and appearance of the surrounding area, street scene, and adjacent conservation area. Officers do not think this is the kind of application we should be supporting.
Broads Authority Heritage and Design	The site sits immediately adjacent to the grade II listed Coltishall Hall to the west and the Coltishall Conservation Area on two side (the west and south) – both designated heritage assets the setting of which will need to be considered. The site contains a large detached house sitting on a substantial plot, which is characteristic of the area. It also enjoys good tree cover with a number of mature trees.

Stakeholder	Comments
	It may be possible to accommodate a limited amount (one unit) of additional residential accommodation on the site but I would have concerns that two units would be over-development and may also be hard to achieve without damage to the trees which contribute to the character of the area.
Norfolk County Council Heritage	Based on currently available information would not ask for conditions for archaeological work.
Coltishall Parish Council	It was AGREED there are no suitable sites for residential development, gypsy/traveller sites or residential moorings and caravans in the conservation area of Coltishall.
Norfolk County Council Education	<p>General Comments, on sites of less than 20 proposed dwellings</p> <p>The other sites are deemed suitable to support the existing schools the communities serve and will promote and support the sustainability of the schools in close proximity. Consideration of the impact on walking and cycle routes should be achieved in order to support sustainable modes of transport and reduce families using their motor car where possible.</p>
Broads Authority Landscape Architect	Landscape thoughts are that I wouldn't support it, as although the site and this part of the character area generally is relatively enclosed within mature landscape (and therefore few views are possible), I couldn't support division of the plot. These large plots are characteristic of settlement in the area, and I consider this one is particularly important as its on the edge of the settlement fringe and it does not make sense to further densify urbanisation in this location. I'm aware there are a couple of newer developments in this location to the east beyond Abbey Court along Wroxham Rd and at Llawhaden House (outside the BA administrative area I believe), I believe allocating any sites in this area would lead to later pressure for infill development which would be damaging to the setting of Coltishall.
Norfolk County Council Highways	Highway Objection to the proposed allocation. There is a lack of footway provision. Adequate visibility from access is likely to be unachievable.
Norfolk County Council – Lead Local Flood Authority.	<ul style="list-style-type: none"> • Located within Flood Zone 1 but FZ2 and FZ3 lie in close proximity to the west of the site. • No on-site sewers. Off-site: Foul sewers run along White Lion Road. • Located within Source Protection Zone 3 (SPPZ). • No flood records on-site. Off-site: Flooding records within 500m. • On-site: None. Off-site Surface water flow paths and areas of surface water ponding / pooling within 0.1%, 1% and 3.33% AEP events within 500m of site. • Site lies outside of the Norfolk Rivers Internal Drainage Board area. • No onsite watercourses, however ordinary watercourses (some within the IDB area) and an EA main river located within 100m. • LLFA Assessment: No major surface water issues / constraints identified (Green RAG)

Stakeholder	Comments
Anglian Water Services	<p>The site is within the Belaugh WRC catchment which has dry weather flow headroom available to accommodate the proposed site subject to this being within a reasonable distance to connect to the public sewer.</p> <p>There are no AW assets within the site.</p>
Essex and Suffolk Water	<p>This site is upstream of our water abstraction point at Belaugh and so we would be keen to see careful consideration for water quality in the Bure, with any development proposal. We do not supply water to customers in this area.</p>
Broads Authority Ecologist	<p>From the aerial photos significant mature trees are present on site – these trees and the hedgerows present should be retained and enhanced.</p> <p>The site is likely to support protected species, namely roosting and commuting bats, and nesting birds. Reptiles and hedgehog may also be present.</p> <p>A county wildlife site is less than 100 metres to the south.</p> <p>The site is less than 100 metres from the River Bure, possible water quality issues may arise.</p>

15.4. Site assessment

Planning history:

Application number	Description	Decision	Date
BA/2024/0265/HOUSEH	New vehicular entrance and driveway to existing dwelling. Formalising of entrance with hedging, gates and fence	Approve Subject to Conditions	14 Oct 2024

Site address: Land at Marlpit House, Belaugh Green Lane, Coltishall	
Current planning status e.g., with permission, allocated, suggested through the Call for Sites etc.	Suggested through December 2024 call for sites.
Site Size (hectares)	1.31 hectares
Greenfield / Brownfield	Garden land and trees
Ownership (if known) (private/public etc.)	Private
Absolute Constraints Check	
Is the site in a ...	
SPA, SAC, SSSI or Ramsar	No
National Nature Reserve	No
Ancient Woodland	No
Flood risk zone 3b	No - Flood zone 1 according to SFRA

Scheduled Ancient Monument	No	
Statutory Allotments	No	
Locally Designated Green Space	No	
At risk from Coastal Erosion	No	
If yes to any of the above, site will be excluded from further assessment.		
Development Potential (number of dwellings, hectares of employment land or town centre use floor space): 2 dwellings.		
Density calculator	1.53 dwellings per hectare	
Suitability Assessment		
Constraint	Score red/amber/green	Comments
Access to site		Vehicles currently access the site from Belaugh Green Lane down a long driveway. Highway Objection to the proposed allocation. There is a lack of footway provision. Adequate visibility from access is likely to be unachievable.
Accessibility to local services and facilities		1.6km to GP and school. 1.5km to shop. 600m to bus stop, but no peak hour services. No footway for entire length to these services.
Utilities Capacity		Generally acceptable although detail regarding sewerage disposal required. This site is upstream of an Essex and Suffolk water abstraction point at Belaugh and so we would be keen to see careful consideration for water quality in the Bure, with any development proposal.
Utilities Infrastructure		
Contamination and ground stability		
Flood Risk		In flood zone 1. Some surface water flood risk on site.
Coastal Change		
Market Attractiveness		Other than limited services and facilities nearby, has potential to be attractive as a place to visit and live as it is an area in the Broads
Impact	Score red/amber/green	Comments
Nationally and Locally Significant Landscapes		To allow further development on this site would be detrimental to the appearance of the site and its contribution to the character and appearance of the surrounding area, street scene, and adjacent conservation area. Site enjoys good tree cover with a number of mature trees. These large plots are
Townscape		

		characteristic of settlement in the area, and this one is particularly important as its on the edge of the settlement fringe and it does not make sense to further densify urbanisation in this location.
Biodiversity and Geodiversity		The site is likely to support protected species, namely roosting and commuting bats, and nesting birds. Reptiles and hedgehog may also be present. Mature trees.
Historic Environment		The site sits immediately adjacent to the grade II listed Coltishall Hall to the west and the Coltishall Conservation Area on two side (the west and south) – both designated heritage assets the setting of which will need to be considered.
Open Space		
Transport and Roads		
Compatibility with neighbouring / adjoining uses		
Local Plan Designations (add further lines as required)		
Designation	Policy reference	Comments
None		
Availability Assessment (will require liaison with landowners)		
Is the site being marketed? Add any detail as necessary (e.g., where, by whom, how much for etc.)	No	
When might the site be available for development (tick as appropriate)	Immediately	✓
	Within 5 years	✓
	5-10 years	
	10-15 years	
	15-20 years	
	Comments:	
Estimated annual build out rate (including justification):		Agent says will take up to 2 years to complete, so 1 dwelling per year is presumed.
Comments	Agent says will take up to 2 years to complete.	
Achievability (including viability)		
Comments	Agent says: 'The delivery of two self-build plots on the site is achievable for the following reasons: - - Proactive single ownership of land on property that already has residential land use in place; - Self-build plots are highly	

	sought after within the Broads Local Area; - Coltishall achieves high market value and interest and as such will ensure upmost economic viability’.
Overcoming Constraints	
Comments	<ul style="list-style-type: none"> • Highway Objection to the proposed allocation. There is a lack of footway provision. Adequate visibility from access is likely to be unachievable. • To allow further development on this site would be detrimental to the appearance of the site and its contribution to the character and appearance of the surrounding area, street scene, and adjacent conservation area. • The site is likely to support protected species, namely roosting and commuting bats, and nesting birds. Reptiles and hedgehog may also be present. • Mature trees. • Address setting of heritage assets. • GI RAMS – payment likely. • BNG – on site or off site mitigation. • Nutrient enrichment mitigation required. • Some surface water flood risk on site. • No key services.
Trajectory of development	
Comments	Delivered after around 5 years, but taking 2 years to develop.
Barriers to Delivery	
Comments	<p>Access to services.</p> <p>Landscape/townscape impact.</p> <p>Highways objection.</p> <p>Adequate visibility from access is likely to be unachievable.</p>
Conclusion (e.g., is included in the theoretical capacity)	
According to the HELAA assessment, the site is not suitable for residential development.	



Broads Authority

From the Housing and Economic Land Availability
Assessment to the Local Plan.

Part 2

February 2025

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1. Introduction

1.1. About this document

The purpose of this document is to log how each site assessed in the [HELAA \(part 2\)](#) has been considered as an allocation in the Local Plan. This document also discusses how the residential moorings and residential dwellings need will be met. It also includes a housing and residential moorings trajectory (in table form). Finally, if a site has not been included in the Local Plan, the sustainability appraisal for that site is included at the end of this document.

This is additional to the September 2023 document of the same name that can be found here: [From the Housing and Economic Land Availability Assessment to the Local Plan](#). The HELAA part 2 and From HELAA to Local Plan part 2 assess the sites that came forward as part of the December 2024 call for sites.

It is important to note that the HELAA is a piece of evidence. It may conclude that some sites are suitable for the development proposed, but there are other considerations to take account of. For example, the grade of agricultural land is not specifically part of the HELAA methodology, although it is mentioned in the HELAA. Another consideration includes whether sites have been marketed or not. Finally, whilst the HELAA may conclude that a site rates 'amber' as there are between 1 and 3 key services within walking distance, the Authority does not consider that one key service within walking distance makes a sustainable development and as such, sites with only one key service are not taken forward for allocation.

2. Land south of Marsh Road, Halvergate

- According to the HELAA, the site was deemed not suitable for 43 dwellings.
- This is because of:
 - Lack of services and facilities within a walking distance from the site (only a bus service)
 - Landscape and townscape impacts.
 - There is also a Highways objection.
- **The site will not be allocated for 43 dwellings.**

- According to the HELAA, the site was deemed not suitable for 4 dwellings.
- This is because of
 - Lack of services and facilities within a walking distance from the site (only a bus service).
 - There is also a Highways objection.
- **The site will not be allocated for 4 dwellings.**

3. Land north of Thrigby Road, Filby

- According to the HELAA, the site was deemed not suitable for 5 dwellings.
- This is because of:
 - Eroding gap between Thrigby and Filby.
 - Would put development pressure on the site opposite, in GYBC planning area.
 - Conflict between removal of hedge for visibility and need to retain hedge for townscape/landscape purposes.
 - Access on a bend where national speed limits apply.
 - Highway objection to the proposed allocation. There is a lack of footway provision, the access would require significant tree removal and there is insufficient forward visibility to form a safe access.
- Also of relevance is that the site is on grade 1 agricultural land.
- **The site will not be allocated for 5 dwellings.**

4. Land at Ivy Lane, Oulton Broad

- According to the HELAA, the site was deemed not suitable for 15 residential moorings
- This is because of:
 - Peat excavation.
 - Settlement fringe area.
 - Changing character of the area.
 - Mature hedgerow at risk in order to accommodate road and footway.
 - Development would likely result in loss of biodiversity.
 - Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic.
- **The site will not be allocated for 15 residential moorings.**
- According to the HELAA, the site was deemed not suitable for 250 residential caravans.
- This is because of:
 - Settlement fringe area.
 - Changing character of the area.
 - Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic.
 - Development would likely result in loss of biodiversity.
 - Setting of Ivy Farm
 - Mature hedgerow at risk in order to accommodate road and footway.
 - Concern re impact on mature trees on site.
- **The site will not be allocated for 250 residential caravans.**
- According to the HELAA, the site was deemed not suitable for 80 residential dwellings.
- This is because of:

- Settlement fringe area.
- Changing character of the area.
- Assessment required regarding capacity of bridge to accommodate more traffic and construction traffic.
- Development would likely result in loss of biodiversity.
- Setting of Ivy Farm
- Mature hedgerow at risk in order to accommodate road and footway.
- Concern re impact on mature trees on site.
- **The site will not be allocated for 80 residential dwellings.**

5. Land at Home Farm, The Street, Thurne

- According to the HELAA, the site was deemed not suitable for 3 dwellings.
- This is because of:
 - Lack of access to key services.
 - There are trees and hedgerow on the southern boundary which would not need to be removed as part of the proposal.
 - This site has high biodiversity value.
- Also of note, the site has not been marketed in accordance with policy, and this is one of the reasons a previous scheme had been refused in the past.
- Also, the site is on grade 2 agricultural land.
- **The site will not be allocated for 3 dwellings.**

It should be noted that the site at Hedera House was included in the Sites Specifics Local Plan (2014) by the Inspector because of the deemed need for replacement holiday accommodation in the area. That site has permission and at the time of writing is being built.

6. Land off Hall Lane, Postwick

- According to the HELAA, the site was deemed not suitable for 5 dwellings.
- This is because of
 - Lack of access to key services.
 - Highways objection.
 - Landscape impact.
- Also, the Parish Council say that the development is in conflict with the emerging Neighbourhood Plan of which the draft has been recently submitted.
- **The site will not be allocated for 5 dwellings.**

7. Land north of Marsh Road, Tunstall

- According to the HELAA, the site was deemed not suitable for 3 dwellings.
- This is because of:

- Highway Objection to the proposed allocation.
- No key services.
- Negative impact on landscape character.
- Negative impact on church and setting.
- Also, the site is on grade 2 agricultural land
- **The site will not be allocated for 3 dwellings.**

8. Land south of Marsh Road, Tunstall

- According to the HELAA, the site was deemed not suitable for 4 dwellings.
- This is because of:
 - Highway Objection to the proposed allocation.
 - No key services.
- Also, the site is on grade 2 agricultural land.
- Also of note, the site has not been marketed in accordance with policy
- **The site will not be allocated for 4 dwellings.**

9. Land at Broad Lane, Filby

- According to the HELAA, the site was deemed not suitable for 4 dwellings.
- This is because of:
 - flood risk.
 - Highways objection, mainly relating to visibility with the main road.
 - Near to peat and so a survey would be needed.
 - Loss of marsh and habitat.
- **The site will not be allocated for 4 dwellings.**
- According to the HELAA, the site was deemed not suitable for 2 dwellings.
- This is because of:
 - Highways objection, mainly relating to visibility with the main road.
 - Near to peat and so a survey would be needed.
 - Loss of marsh and habitat.
- **The site will not be allocated for 2 dwellings.**

10. The Old Boatyard, Whitlingham Lane, Trowse

- According to the HELAA, the site was deemed not suitable for 8 dwellings.
- This is because of:
 - Townscape character
- **The site will not be allocated for 8 dwellings.**
- According to the HELAA, the site was deemed suitable for 4 dwellings.

- However, the site will not be allocated for 4 dwellings because of the site has not been marketed in accordance with policy.
- **The site will not be allocated for 4 dwellings.**

11. Land at Half Moon Barn, Upper Street, Horning

- According to the HELAA, the site was deemed not suitable for 2 dwellings.
- This is because of:
 - lack of services and facilities within a walking distance from the site
 - the site being with Horning Knackers Wood Water Recycling Centre catchment
 - Highways objection.
 - Adequate visibility from access is likely to be unachievable.
 - New access onto a corridor of movement not supported.
- Also, the site is on grade 1 agriculture land
- **The site will not be allocated for 2 dwellings.**

12. Land to the north of Upper Street, Horning

- According to the HELAA, the site was deemed not suitable for 45 dwellings.
- This is because of:
 - lack of services and facilities within a walking distance from the site
 - the site being with Horning Knackers Wood Water Recycling Centre catchment
 - landscape and townscape impacts
 - Highways objection.
 - Adequate visibility from access is likely to be unachievable.
 - New access onto a corridor of movement not supported.
- Also, the site is on grade 1 agriculture land
- **The site will not be allocated for 45 dwellings.**

13. Car Park at former Windboats site, Grange Walk, Norwich Road, Wroxham

- According to the HELAA, the site was deemed not suitable for 2 dwellings.
- This is because of lack of:
 - Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
 - Will closing two car parks result in illegal or inconsiderate parking by those visiting the site?
- Also of note, the site has not been marketed in accordance with policy
- **The site will not be allocated for 2 dwellings.**

14. Former Windboats site, Grange Walk, Norwich Road, Wroxham

- According to the HELAA, the site was deemed not suitable for 15 dwellings.
- This is because of lack of:
 - Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
 - Will closing two car parks result in illegal or inconsiderate parking by those visiting the site?
- Also of note, the site has not been marketed in accordance with policy
- **The site will not be allocated for 15 dwellings.**

15. Land at Marlpit House Belaugh, Green Lane, Coltishall

- According to the HELAA, the site was deemed not suitable for 2 dwellings.
- This is because of
 - lack of services and facilities within a walking distance from the site
 - landscape and townscape impacts.
 - Highways objection.
 - Adequate visibility from access is likely to be unachievable.
- **The site will not be allocated for 2 dwellings.**

16. Total number of residential dwellings

The need to be addressed in the Local Plan is 358 dwellings. Please note that permissions granted since April 2021 will count towards the need and this totals 49 dwellings. The Local Plan will not allocate new sites for residential dwellings as no suitable sites have come forward through the three calls for sites. Housing is a potential use for the Utilities Site in Norwich, but the policy is not an allocation for housing. The Authority will need to liaise with our District Councils, under the Duty to Cooperate, regarding any unmet need.

17. Total number of residential moorings

The following table shows the sites that are intended to be allocated for residential moorings – from both HELAAs (although no new sites from the HELAA part 2 are taken forward in the Local Plan). It shows a total of 43 residential moorings would be allocated. The need to be addressed in the Local Plan is 48 residential moorings.

Site	Number of residential moorings
Brundall Gardens Marina – small marina	2
Brundall Gardens Marina – large marina	6
Greenway Marine, Chedgrave	5
Hipperson’s Boatyard, Gillingham	5
Somerleyton Marina	15
Richardson’s Boatyard, Stalham Staithe	10
Total:	43

18. Housing Trajectory

Please note that THU1 and OUL2 already have planning permission and were not assessed in the HELAA but will still be included in the Local Plan until they are built out. This table sets out the estimated trajectory for the sites that are to be included in the Local Plan. Please also note that the trajectory does not include the Utilities Site as that is not an allocation for housing specifically. If the Utilities Site were to come forward for housing, that would be much later in the plan period.

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
THU1		16															
OUL2			15	15	15	15	16										
Total		16	15	15	15	15	16										

19. Residential moorings trajectory

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
Brundall Gardens Marina – small marina			2														
Brundall Gardens Marina – large marina			8														
Greenway Marine, Chedgrave			5														
Hipperson's Boatyard, Gillingham						5											
Somerleyton Marina								15									
Richardson's Boatyard, Stalham Staithe								10									
Total			15			5		25									

20. Sustainability Appraisals of sites

The following tables set out the sustainability appraisals of the sites **not taken** forward in the Local Plan.

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

21. Assessment of sites not being taken forward to the Local Plan

		Land north of Thrigby Road, Filby – 5 dwellings	Ivy Lane, Oulton Broad – 15 residential moorings	Ivy Lane, Oulton Broad – 250 residential moorings	Ivy Lane, Oulton Broad – 80 residential moorings	Land at Home Farm, The Street, Thurne – 3 dwellings	Land off Hall Lane, Postwick - 5 dwellings	Land north of Marsh Road, Tunstall - 3 dwellings	Land south of Marsh Road, Tunstall – 4 dwellings
ENV1	-	Highways objection to access and visibility splays as site is near bend and in a National Speed Limit area.	? Impacts on junction unknown. Impacts on rail bridge of more traffic unknown.	? Impacts on junction unknown. Impacts on rail bridge of more traffic unknown.	? Impacts on junction unknown. Impacts on rail bridge of more traffic unknown.	? Potential impact when combined with development next door.	- Highway Objection to the proposed allocation. The highway network is not of a standard to support further development.	- Highway Objection to the proposed allocation.	- Highway Objection to the proposed allocation.
ENV2									
ENV3	-	Mature trees and hedgerows at risk – loss of habitat. Likely affect biodiversity.	- Would result in peat being excavated and loss of habitat. Mature trees and hedgerows at risk.	- Mature trees and hedgerows at risk – loss of habitat.	- Mature trees and hedgerows at risk – loss of habitat.	- Mature trees and hedgerows at risk – loss of habitat. Likely affect biodiversity.	- Mature trees and hedgerows at risk – loss of habitat. Likely affect biodiversity.	? Ecological appraisal would need to be carried out.	? Ecological appraisal would need to be carried out. Potential for impact on barn owls and bats.
ENV4			- Would impact on the character of the area.	- Would impact on the character of the area.	- Would impact on the character of the area.		- Would impact on the character of the area.	- Would impact on the character of the area	
ENV5									
ENV6	?	Some surface water issues on the boundary which could be addressed as part of the scheme. Design could reflect this.	? Residential moorings would be on the water. There will be flood risk considerations if a scheme were to be brought forward.	? At risk of tidal flooding with allowance for climate change. Design could reflect this.	? At risk of tidal flooding with allowance for climate change. Design could reflect this.	? Access is flood zone 3 and a small part to the west is flood zone 2. Design could reflect this.	? Some elements of surface water flood risk along the eastern boundary. Drainage ditch nearby. Design could reflect this.	? Some surface water issues on the boundary which could be addressed as part of the scheme. Design could reflect this.	
ENV7	-	Greenfield land and grade 1 agricultural land.	- Greenfield land	- Greenfield land	- Greenfield land	- Part greenfield land	- Greenfield land	- Greenfield land	- Greenfield land
ENV8									
ENV9			- Impact on conservation area. Other heritage concerns, but they could potentially be addressed.	- Impact on setting of Ivy Farm. Other heritage concerns, but they could potentially be addressed.	- Impact on setting of Ivy Farm. Other heritage concerns, but they could potentially be addressed.	? Potential impact on setting of church.	- Impact on setting of church.	? Need to consider impact on setting of church, conservation area and other heritage assets.	
ENV10									
ENV11									
ENV12									
SOC1									

	Land north of Thrigby Road, Filby – 5 dwellings		Ivy Lane, Oulton Broad – 15 residential moorings		Ivy Lane, Oulton Broad – 250 residential moorings		Ivy Lane, Oulton Broad – 80 residential moorings		Land at Home Farm, The Street, Thurne – 3 dwellings		Land off Hall Lane, Postwick - 5 dwellings		Land north of Marsh Road, Tunstall - 3 dwellings		Land south of Marsh Road, Tunstall – 4 dwellings	
SOC2																
SOC3																
SOC4	+	If allocated, this would provide housing.	+	If allocated, this would provide residential moorings.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.
SOC5																
SOC6									-	Key services not within walking distance.	-	Key services not within walking distance.	-	Key services not within walking distance.	-	Key services not within walking distance.
SOC7																
ECO1									-	Farm barns would be lost.					-	Farm barns would be lost.
ECO2																
ECO3																

	Land at Marlpit House Belaugh, Green Lane, Coltishall – 2 dwellings		Land at Half Moon Barn, Upper Street, Horning – 2 dwellings		Land to the north of Upper Street, Horning – 45 dwellings		Land south of Marsh Road, Halvergate – 4 dwellings		Land at Broad Lane, Filby – 2 dwellings.		The Old Boatyard, Whitlingham Lane, Trowse – 4 dwellings		Car park at former Windboats site, Grange Walk, Wroxham – 2 dwellings		Former Windboats Site, Grange Walk, Wroxham – 15 apartments	
ENV1	-	Highway Objection to the proposed allocation. There is a lack of footway provision. Adequate visibility from access is likely to be unachievable.	-	Highway Objection to the proposed allocation. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported.	-	Highway Objection to the proposed allocation. Adequate visibility from access is likely to be unachievable. New access onto a corridor of movement not supported.	-	This is because of lack of services and facilities within a walking distance from the site (only a bus service). There is also a Highways objection.					-	Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.	-	Highway Objection to the proposed allocation. Adequate visibility from existing access to the south on A1151 Norwich Road is likely to be unachievable.
ENV2			-	Horning Knackers Wood Water Recycling issues	-	Horning Knackers Wood Water Recycling issues					?	Whitlingham Water Recycling Centre issues – development could be phased.				
ENV3	-	Mature trees and hedgerows at risk – loss of habitat.					-	Mature trees and hedgerows at risk – loss of habitat.	-	Mature trees and hedgerows at risk – loss of habitat. Potential for peat to be on site.						
ENV4	-	Would impact on the character of the area.	-	Would impact on the character of the area.	-	Would impact on the character of the area.	-	Would impact on the character of the area.							?	15 units could be out of keeping with the area.
ENV5																
ENV6	?	In flood zone 1. Some surface water flood risk on site. Design could reflect this.			?	Mostly flood zone 1, some 2 and 3 according to SFRA. Design could reflect this.	?	Some surface water issues on the boundary which could be addressed as part of the scheme. Design could reflect this.	?	Indicative flood zone 3b nearby. Design could reflect this.	?	Very small part flood zone 2 and 3. Small pocket of surface water on site. Design could reflect this.		Some surface water flooding on boundary. Design could reflect this.	?	Area around office is flood zone 2. Major surface water issues / constraints identified which will require further assessment. Design could reflect this.
ENV7	-	Greenfield land	-	Greenfield land	-	Greenfield land	-	Greenfield land	-	Greenfield land						
ENV8																
ENV9																
ENV10																
ENV11																

	Land at Marlpit House Belaugh, Green Lane, Coltishall – 2 dwellings		Land at Half Moon Barn, Upper Street, Horning – 2 dwellings		Land to the north of Upper Street, Horning – 45 dwellings		Land south of Marsh Road, Halvergate – 4 dwellings		Land at Broad Lane, Filby – 2 dwellings.		The Old Boatyard, Whitlingham Lane, Trowse – 4 dwellings		Car park at former Windboats site, Grange Walk, Wroxham – 2 dwellings		Former Windboats Site, Grange Walk, Wroxham – 15 apartments	
ENV12																
SOC1																
SOC2																
SOC3																
SOC4	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.	+	If allocated, this would provide housing.
SOC5																
SOC6	-	Key services not within walking distance.	-	Key services not within walking distance.	-	Key services not within walking distance.	-	Only one key service within walking distance.								
SOC7																
ECO1											-	Boatyard would be lost.	-	Loss of commercial site.	-	Loss of commercial site.
ECO2																
ECO3																

Planning Committee

04 April 2025

Agenda item number 11

Consultation responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed response.

1. Introduction

- 1.1. Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. The Committee's comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 19 March 2025

Appendix 1 – Planning Policy consultations received

Appendix 1 – Planning Policy consultations received

Postwick with Witton Parish Council

Document: Postwick with Witton Neighbourhood Plan [Postwick with Witton Neighbourhood Plan | Broadland and South Norfolk](#)

Due date: 02 May 2025

Status: Regulation 16

Proposed level: Planning Committee endorsed

Notes

This Neighbourhood Plan provides an opportunity for the residents of Postwick with Witton to shape future development of the parish. The plan identifies a shared vision and objectives for the area and a series of planning policies that will help move the parish towards this. The plan also contains a number of community actions that are not planning related but capture the parish's collective ambitions and activities that will be undertaken by the Parish Council and local residents.

Proposed response

Summary of response

The Neighbourhood Plan is welcomed. Some comments are proposed. The comments seek clarity. The Design Code comments are the same as we made at regulation 14 as they have not been addressed.

Comments on Neighbourhood Plan

Date needed on front of plan

Para 4 River Yare

Images need alt text to comply with accessibility requirements.

Vision

There are many elements that appear to be missing from the vision:

- refer to habitats as well as the built, farming and landscape elements. Suggest including hedgerow, wildlife-rich dykes, woodland and grazing marshes.
- Add to vision 'biodiversity and wildlife connectivity' as this is listed as one of the Key Development Priorities
- Add something like: Enable multiple benefits on land, targeted according to opportunity, societal needs (such as the health benefits of walking/cycling routes), and environmental pressures (such as reducing pollution).
- There is no mention of quiet and dark spaces in the vision yet there are policies and a priority around this in the document

- There is no mention of water control and flood protection – is this considered to be external to the Plan?

Add reference to deep peat soils in the parish and the carbon emissions from drainage and maintaining low water tables in the summer.

Para 19 says 'Proposals in this area would also have an impact on local traffic using the A1042, including residents of Postwick Village' – the second part about residents, not sure how that fits with this sentence and not sure what it is trying to say.

Policy PW2 – the second para starts by saying commercial development south of the A47 will not be supported ~~where~~ (while?) there are employment sites available in designed (designated?) employment sites in the GNLP. What sites does this relate to? Sites allocated for employment development in the future, or sites protected as employment sites that are there currently? Does that need clarifying? Here are some suggested amendments to this part of the policy:

To retain the setting and tranquillity of Postwick Village, Witton and the Broads, proposals for commercial development south of the A47 will not be supported ~~where~~ while there are employment sites available within the ~~designed~~ designated/allocated employment locations identified within the Greater Norwich Local Plan.

Policy PW2 – second para, sentences 2 and 3 seem to be a separate part of the policy. Also, it is not clear what you mean by 'under these circumstances' – you do not say what 'these circumstances' are. Does this bit refer to any proposals that come forward outside of employment areas? Or does this refer to those that meet the part of the policy about coming forward as part of employment areas? Are you trying to have a sequential policy – first in employment areas and then if cannot come forward there and come forward outside of employment areas, you set out tests proposals need to address...?

Para 25 is incorrect as written 'Development in the Broads Authority area is not subject to CIL ~~as they have their own charging schedule~~'.

Para 55 says 'Biodiversity should be considered at all levels of planning. It plays an important component of the green infrastructure of a local area, along with footpaths, allotments, and green open space'. Biodiversity includes species and habitats... I am not sure what you mean by linking biodiversity with GI in the way you do.

Para 55 onwards - Priority D Policy Context add ref to [Broads Nature Recovery Strategy 2024-29](#) and existing map of Areas of Particular Importance for Biodiversity [The Broads](#)

PW11 talks about 5 views, but six are listed.

PW12 – second part needs to talk about the design of lighting as that is very important.

PW13 says: 'For all new development it must be demonstrated how water management solutions have been considered at an early stage of the planning process'. What are 'water management solutions'? What is water management in this instance?

Para 76 onwards - Green Corridors – add reference to retain low or no light in these corridors

Para 93 needs to talk about the dark skies policy of the Local Plan for the Broads.

Figure 16 – for accessibility reasons, copy the text over rather than using a screen shot.

Para 106 – not all planning applications need a design and access statement, so how do you want schemes that do not submit such a statement to evidence how the design codes have been considered?

Planning Committee

04 April 2025

Agenda item number 12

Local Plan- Preparing the Publication Version

Report by Planning Policy Officer

Summary

This report introduces some updated evidence that will support the next version of the Local Plan: Housing Needs Assessment addendum and Affordable Housing Topic Paper. There are also two amended policies: safety by the water and, rural enterprise dwellings.

Recommendation

To endorse:

- i. the Housing Needs Assessment addendum as evidence to support the Local Plan and
 - ii. the “safety by the water” and “rural enterprise dwellings” policies for inclusion in the Local Plan.
-

1. Introduction

- 1.1. This report introduces some updated evidence that will support the next version of the Local Plan: Housing and Economic Land Availability Assessment part 2 (HELAA) and From HELAA to Local Plan part 2. There are also two amended policies: safety by the water and rural enterprise dwellings.

2. Safety by the water policy

- 2.1. The new NPPF has introduced a requirement to consider developments near to open water. Paragraph 102b says: The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development. A draft policy that seeks to address this requirement is included at [Appendix 1](#).

3. Rural enterprise dwellings

- 3.1. It is proposed to amend the current draft policy, that sets out requirements for any proposals for rural enterprise dwellings, to require temporary accommodation (such as caravans) first rather than a dwelling straight away (amended policy in [Appendix 2](#)).

4. Local Housing Needs Assessment - addendum

- 4.1. Members will recall that around Autumn 2022, a Housing Needs Assessment was completed for the Local Plan for the Broads. This original Assessment used population projection data to inform its findings. The December 2024 NPPF and updated NPPG now point to the use of housing stock data. We commissioned an addendum to the original Assessment which is included at [Appendix 3](#). The change to the methodology means that our housing need has tripled. It should be noted that our need is part of the need for the six constituent districts and not additional to that need.

5. Affordable Housing Topic Paper

- 5.1. Members will recall that we are proposing a commuted sum (off-site contribution) towards the provision of affordable housing from development as follows:
- i. Brownfield schemes located on the waterfront: 3-9 dwellings
 - ii. Other brownfield schemes: 5-9 dwellings
 - iii. Greenfield schemes: 3-9 dwellings.
- 5.2. The Affordable Housing Topic Paper ([Appendix 4](#)) has been produced to justify that approach.

Author: Natalie Beal

Date of report: 10 March 2025

Appendix 1 – [Safety by the water policy](#)

Appendix 2 – [Rural enterprise dwellings policy](#)

Appendix 3 – [Local Housing Needs Assessment Update 2025](#)

Appendix 4 – [Affordable Housing Topic Paper](#)

Appendix 1 – Safety by the water policy

Policy PUBDMxx: Safety by the water

1. Proposals that increase the number of people accessing the water or facilitate the enjoyment of land adjacent to the water or increase the difficulty of getting out of the water must address water safety.
2. For such developments, a Water Safety Plan must be produced by a suitably qualified consultant, experienced in producing and helping to deliver water safety measures. The Water Safety Plan must consider and address the following:
 - a) What are the risks of someone falling into the water, and who is likely to be exposed to the risk as a direct result of the proposed development?
 - b) How is this risk to be minimised?
 - c) What is the water depth and speed of flow?
 - d) What design and safety features will be incorporated into the development to ensure that anyone in the water can get out safely? Consideration must be given to the landscape impact and the impact on any Heritage Asset of any water safety feature to be used.
 - e) How will the safety features be maintained?

Reasoned Justification

Being a primarily water-based area that people enjoy for recreation, safety in the Broads is an important issue. Sadly on occasion people die in the water, and many more fall in. On a hot day, the cool water may attract those wanting a quick swim, and the hazards are not always recognised or considered. The area is also popular for organised wild and open water swimming groups, and people sail on the Broads using stand-up paddle boards, canoes, sailing boats and motorised cruisers. Others enjoy walking beside the waterways and visiting the nearby open spaces, pubs and cafes, and there are many other waterside buildings including boatyards and homes.

Easily accessible safety equipment like lifebuoys, throw lines and ladders are essential in helping someone in trouble get out of the water. There were 236 drownings and water-related deaths from accidents or natural causes across the UK in 2023. As in previous years, more than half of the deaths (140) were in inland waters such as tidal and freshwater rivers, lakes and reservoirs. In the Broads, over the last 15 years there have been on average 5 deaths per year; 34 related to boating and 43 non-boating related. It should be noted that some of these deaths were not accidental, and this policy seeks to influence accidental water related incidents. There are also near drownings or people falling in (without intending to) – the incidences of near drownings or people falling in are often not reported.

The National Water Safety Forum has produced the UK Drowning Prevention Strategy¹ which aims to reduce accidental drowning fatalities in the UK by 50% by 2026, and reduce risk amongst the highest risk populations, groups and communities. A target of the Strategy that is particularly relevant to this policy is to increase awareness of everyday risks in, on and around the water. The strategy asks communities to develop a risk assessment for the area and to put in place Water Safety Plans at a community level. The NPPF 2024 (at paragraph 102) says ‘the safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development’.

Policy implementation

While this policy refers to proposals that increase the number of people accessing or being by the water and those that make it harder for people to get out of the water, there may be other development where it is appropriate to consider safety by the water.

Relevant applications need to assess, address and then implement appropriate safety by the water features. Applicants need to engage the assistance of a suitable qualified organisation to do this. The measures, assessment etc need to be proportionate to the scheme and any risk identified.

Applicants will be required to consider the risks of people falling into the water and put in place means to help people while in the water and a safe way for them to get out. The safety of those involved in the construction of the scheme should also be an important consideration for the Water Safety Plan.

For development near to Heritage Assets or in Conservation Areas, measures such as bright plastic covers on life rings may detract from the scenery or setting. Less visually intrusive, but equally effective forms of safety equipment can be provided in such locations.

There are many guides in place that may be of relevance. These include:

- [Managing safety at inland waters - RoSPA](#)
- [PRE decision tree | National Water Safety Forum](#)
- [Inland and Coastal Water - Essential Water Safety Guidance | Royal Life Saving Society UK \(RLSS UK \)](#)
- The Broads Authority’s Mooring Design Guide has some practical considerations that may be relevant to schemes: [Practical considerations](#).

¹ Drowning Prevention Strategy: <https://www.nationalwatersafety.org.uk/media/1005/uk-drowning-prevention-strategy.pdf>

SA Objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.

- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

SA Assessment

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. With much of the Broads being open water or near to open water, it seems prudent to have a policy.		
ENV2				
ENV3				
ENV4	?		+ Policy refers to impact of proposals on the character of the area.	+ Policy refers to impact of proposals on the character of the area.
ENV5				
ENV6				
ENV7				
ENV8				
ENV9			+ Policy refers to impact of proposals on the character of the area.	+ Policy refers to impact of proposals on the character of the area.
ENV10				
ENV11				
ENV12				
SOC1	?		+ Water safety measures will help people who are in the water to get out.	+ Water safety measures will help people who are in the water to get out.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3	?		+ People use the water and are near to water for work or enjoyment and the policy seeks to ensure their safety.	+ People use the water and are near to water for work or enjoyment and the policy seeks to ensure their safety.

Appendix 2 – Rural enterprise dwellings policy

Policy PUBDM47: Permanent and temporary dwellings for rural enterprise workers

1. Development of a new dwelling or a residential mooring for rural enterprise workers will only be permitted outside the defined development boundaries (or other locational criteria if for a residential mooring) if:
 - a) For the first 3 years the accommodation has been provided by a caravan or other temporary accommodation/residential mooring (see section xxx of this policy relating to temporary accommodation).
 - b) Satisfactory evidence is submitted that demonstrates an existing essential need for full-time worker(s) to be available on site or nearby at all times for the enterprise to function properly;
 - c) The need is arising from a worker employed either full-time or primarily in the Broads in a rural enterprise;
 - d) Evidence is submitted that demonstrates that the business has been established for at least three years, has been profitable for at least one of them, is currently financially sound and has a clear prospect of remaining so;
 - e) The functional need cannot be met by an existing dwelling on the site or nearby, and there has been no sale on the open market of another dwelling on the site that could have met the needs of the worker in the past three years;
 - f) Where appropriate, consideration has first been given to the conversion of an existing building;
 - g) The dwelling is commensurate in size and scale with the needs of the enterprise and the cost would be viable in relation to the finances of the enterprise;
 - h) The dwelling is sited to meet the identified functional need and is well related to any existing buildings of the enterprise;
 - i) The proposal would not adversely affect the historic environment, landscape character or protected species or habitats (see section on HRA); and
 - j) The scheme provides biodiversity net gain (in line with national policy and [PUBDM16](#)).

Temporary accommodation (for example caravan, residential mooring)

2. Such temporary accommodation will be supported only where:
 - a) residential occupation would be for a period of up to three years;
 - b) the proposal satisfies criteria b) and c), e) and g) to j) in part 1 of this policy;
 - c) the application is supported by clear evidence of a firm intention and ability to develop the enterprise concerned (for example significant investment in building(s) on site); and
 - d) the application is supported by clear evidence that the proposed enterprise has been planned on a sound financial basis and has a good prospect of becoming a viable long-term business.

- e) In relation to temporary caravans and mobile homes, the proposed temporary dwelling would not be located in Flood Risk Zone 3; and
 - f) The temporary structure can be easily dismantled or taken away.
3. Any planning permission granted will specify the period for which the temporary permission is granted, and the date by which the temporary dwelling/mooring will have to be removed. If there is no planning justification for a permanent dwelling, then the mobile home or caravan must be removed or, for a residential mooring, the vessel's residential use must cease. Successive extensions to a temporary permission will rarely be justifiable unless material considerations indicate otherwise².

Occupancy condition

4. Should a new permanent or temporary dwelling/caravan or other temporary accommodation/residential mooring be permitted under this policy, the Authority will impose a condition restricting its occupation to a person (and their immediate family) solely or mainly employed in agriculture, forestry or a Broads related rural enterprise, as appropriate.

Removal of occupancy condition

5. The removal of an occupancy condition will only be permitted in exceptional circumstances where it can be demonstrated that:
- a) There is no longer a long-term need for the dwelling on the particular enterprise on which the dwelling is located; and
 - b) Unsuccessful attempts have been made to sell or rent the dwelling at a price that takes account of the occupancy condition.

Design

6. Proposals shall be of a layout, form and design which strengthens the rural character and its location in a National Park equivalent area, and which reinforce local distinctiveness and landscape character and take into consideration the setting and significance of nearby listed buildings and is in conformity with the Broads Authority Design Guide/code SPD³ (or successor document).

Habitats Regulations Assessment and biodiversity net gain

7. Proposals may need a project level Habitats Regulation Assessment and depending on the location, may need to mitigate recreation impacts (through the Norfolk or Suffolk Coast GI

² The NPPG ([Use of planning conditions - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/use-of-planning-conditions)) says 'It will rarely be justifiable to grant a second temporary permission (except in cases where changing circumstances provide a clear rationale, such as temporary classrooms and other school facilities). Further permissions can normally be granted permanently or refused if there is clear justification for doing so. There is no presumption that a temporary grant of planning permission will then be granted permanently'.

³ The Design Guide SPD is being finalised at the time of writing.

RAMS tariff or equivalent mitigation) and may need to mitigate the impact of nutrient enrichment.

Reasoned Justification

The erection of dwellings outside defined development boundaries has the potential to have a negative impact on the openness and special character of the Broads. Rural enterprise dwellings outside development boundaries will require special justification for planning permission to be granted. The NPPF states one such example as accommodation required to enable agricultural, forestry and certain other full-time rural workers to live at or nearby their place of work.

Delivery and implementation of the policy

For the purposes of this policy, the term 'rural enterprise workers' relates to those who work in agriculture, horticulture, forestry, tourism and boatyards and other enterprises that require a rural location. Any application would need to fully justify why it considers the dwellings to be linked to a rural enterprise.

Proposals that support the proper functioning of rural enterprises will be supported where there is a demonstrable need for a full-time worker to live at or very close to the site of their work, and this functional need cannot be met by an existing dwelling on the site or in the locality. This is because of the contribution such enterprises make to the local economy. As well as considering the issue of dwellings isolated from services and facilities, rural enterprise worker dwellings will only be permitted where the landscape character of the Broads is protected.

When assessing locality, the Authority will consider the requirement of the business for an employee to live nearby, and a reasonable distance to travel to the business. This will vary on a case-by-case basis, and an application should explain what distance is appropriate and why.

To make sure the demand for a dwelling is likely to be sustained, applications must be accompanied by evidence to demonstrate that the business has been established for at least three years, profitable for at least one of them, currently financially sound and with a clear prospect of remaining so. A business plan for the subsequent three years will assist in assessing the future prospects.

When a new dwelling is proposed, this shall be first through a temporary accommodation. Temporary accommodation could include residential mooring or a caravan. The policy includes specific issues that need to be addressed for any temporary accommodation used to provide a rural enterprise dwelling.

It may be that an enterprise is not able to demonstrate long term financial viability at the point of an application. As such, there could be the opportunity to provide a rural enterprise dwelling on a temporary nature, in line with the requirements of the policy that relate to temporary accommodation.

Proposals to convert buildings to a rural enterprise dwelling (criterion e) will be considered against the conversion policies in the Local Plan. When looking at dwellings that already exist nearby (criterion d), properties available for rent need to be considered as well as those available to buy, and it should be demonstrated what price the enterprise can reasonably afford. Properties that are outside of the Broads Authority Executive Area (but nearby) will also need to be considered.

Any new dwelling permitted under this policy will be restricted in size and scale to one which is commensurate with the needs of the enterprise, so that the proposal does not have an unacceptable impact on the special landscape character of the Broads. The cost of constructing the dwelling in relation to what can be afforded by the enterprise is an important consideration, as the erection of a dwelling should not affect the finances such that the enterprise would no longer be financially viable. Permitted development rights for future extensions and alterations may be removed to maintain control over the size of the dwelling, and in the interests of protecting the landscape and local character.

If a proposal is considered in the context of this policy to potentially have an effect on a habitat site, it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken. The policy raises recreation impacts and nutrient enrichment as two issues which may need mitigation, depending on the location. For both nutrient enrichment and recreation impact, given the small-scale nature of rural enterprise dwellings, this may be mitigated through the RAMS payments that are in place as well as through nutrient neutrality mitigation schemes.

Applicants should be aware that the Authority will use appropriate external expertise when necessary to assess the more technical information needed to accompany proposals. The independent review shall be carried out entirely at the applicant's expense - the applicant will need to meet the cost of this.

Where a new dwelling is permitted, the occupancy will be restricted by condition to ensure that it is occupied by a person, or persons currently or last employed working in local agriculture, horticulture, forestry and other rural activities, or their surviving partner or dependant(s).

Because of changing farm practices, the vulnerability of the agricultural sector and potential decline in other rural businesses, there may be instances where a dwelling or mooring for a rural worker is no longer needed. The Authority will only consider favourably applications to

remove occupancy conditions where it can be demonstrated that there is no longer a need for the dwelling on the particular enterprise on which the dwelling is located, either due to changes in the nature of the business or because the business is no longer viable. Applications for the removal of occupancy conditions will also need to be accompanied by robust information to demonstrate that unsuccessful attempts have been made, for a continuous period of at least 12 months, to sell or rent the dwelling at a reasonable price. This should take account of the occupancy condition, including offering it to a minimum of three local Registered Social Landlords operating locally on terms which would prioritise its occupation by a rural worker as an affordable dwelling, and that option has been refused. With regard to criterion [j5b](#)), unless there are special circumstances to justify restricting the dwelling to the particular enterprise where the dwelling is located, an occupancy condition is likely to allow occupation by other workers in the locality. In this case it should be considered whether there is other demand locally, not just whether the demand for this particular enterprise has ceased.

Proposals for a temporary mobile home or residential mooring for rural workers will only be permitted for a period of up to three years. To protect the landscape character of the Broads, a planning condition will be attached to any permission to ensure that any mobile home or vessel is removed at the end of this three-year period.

The NPPG categorises caravans and mobile homes intended for permanent residential use as ‘highly vulnerable’ development. As per national policy, any development in Flood Zone 3 is not permitted. Development in Flood Zone 2 is only allowed when both the Sequential Test and the Exception Test have been successfully passed. As stated in Footnote 63 of the National Planning Policy Framework (NPPF), a site-specific Flood Risk Assessment is required in Flood Zone 2 and Flood Zone 1 in specific cases. See related policy, [PUBDM8](#) (development and flood risk).

The policy highlights the need for the scheme to ensure Biodiversity Net Gain in line with national policy and policy [PUBDM16](#). The design of the development shall meet the requirements of the Broads Authority Design Guide/code SPD and design policy [PUBDM52](#).



The Broads Authority:

Local Housing Needs Assessment Update 2025

Report of Findings

March 2025



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Executive Summary

Summary of Key Findings and Conclusions

Introduction

1. Opinion Research Services (ORS) was commissioned in 2022 by Great Yarmouth Borough Council and the Broads Authority to prepare a Local Housing Needs Assessment (LHNA) for the period 2021-2041 to identify the size, type and tenure of homes that will be needed in the future, and the housing needs of different groups, including affordable housing.
2. The previous Government's policy approach to planning for housing need in National Parks and associated areas such as the Broads Authority was different to that of other Local Planning Authorities. Planning Practice Guidance (PPG) on Housing and Economic Needs at paragraph 14 stated that an area such as the Broads Authority could identify its own housing needs based upon local evidence, rather than follow the national standard method for Local Housing Need set out for local authority areas.
3. The current Government published an updated version of the NPPF in December 2024. PPG continues to state that an area such as the Broads Authority is not covered by the standard method for local housing need and that they can consider using a local determined housing need figure. However, it now suggests that the Broads Authority may wish to consider an overall needs figure based upon the current size of its dwelling stock and the median workplace affordability ratio for the local authorities which it covers.
4. Applying this figure as an adjustment factor yields an overall housing need of 51.3 dwellings per annum. Therefore, for this study, we have used an overall housing need for the Broads Authority of 51.3 dwellings per annum for the period 2021-2042. This gives a total dwelling need of 1,077 dwellings over the 21-year period.

Establishing Current Unmet Need for Affordable Housing

5. To assess the current need for affordable housing, we initially calculated the number of households in the Broads Authority who are not suitably housed and who are unable to afford market housing. These include; all households that are currently homeless, those who currently housed in temporary accommodation, concealed families living as part of another household, households overcrowded in social or private rent, and people otherwise not counted who are in a reasonable preference category on the housing register.
6. The Broads Authority is not a housing authority, so does not collect information on current housing needs. Therefore, we have apportioned need from the 6 local authorities who include part of the Broads Authority. This shows 62 households currently unsuitably housed and needing to move, with a net need for 40 households.

Future Need for Affordable Housing

7. In addition to those who cannot currently afford market housing, it is also necessary to consider those households who will arise in the future; and households that can afford market rents but aspire to home ownership. The following tables (Figure 1) summarises the overall impact for those who cannot afford market rents of:
- » New households adding to housing need,
 - » The households no longer present reducing housing need and
 - » The changes in circumstances impacting existing households.

Figure 1: Summary annual components of Household Growth in The Broads Authority 2021-42 (Source: ORS Housing Model)
Note: Figures may not sum due to rounding)

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs
All new households	480	372	107
All households no longer present	436	349	88
Change in existing households	-	9	-9
Future affordable housing need 2021-42 (Annual average)	43	32	11

8. Overall reviewing the contribution of each element amounts to an additional 11 households needing affordable housing in the Broads Authority annually over the 21-year period 2021-42.

Needs of Households Aspiring to Home ownership

9. Based on an analysis of English Housing Survey and local level household data, we can estimate that there is a total of around 240 households currently resident in the Broads Authority who cannot afford to own their own home but would aspire to do so. In addition to the current need, it is also important to consider new households that are projected to form over the period 2021-2042. Through combining this data with the aspiration data from the EHS, we can conclude that it is likely that there would be a further 161 households that form over the 21-year period who will be able to afford to pay market rent but unable to afford to own, despite that being their aspiration.
10. The below Figure 2 bring together the information on assessing the unmet need for affordable housing in 2021 together with the future need for affordable housing and those aspiring to home ownership arising over the 21-year period 2021-42. It can be noted that this assessment has no regard for whether those aspiring can access affordable home ownership options.

Figure 2: Total need for affordable housing 2021-2042 – The Broads Authority (Source: ORS Housing Model)

The Broads Authority	Affordable Housing Need Households unable to afford	Affordable Housing Need Households aspiring to home ownership	Overall Affordable Housing Need
Current housing need in 2021	40	240	280
Future housing need 2021-42	221	161	382
TOTAL HOUSING NEED	261	401	662

11. Neither the NPPF or PPG identify that any affordability criteria should be applied to those households who aspire to home ownership but cannot afford to buy their own home. However, it is appropriate to consider the extent to which these households could plausibly afford affordable home ownership products.
12. Given this context, we assessed affordability for households that both have sufficient income and savings to purchase an open market property but nonetheless choose to rent, those households with income that would be insufficient to afford 70% of newbuild prices at the lower quartile for the local area, and those households with savings of less than £5,000. After all these households have been discounted from the 401 previously identified there are only 59 households in the Broads Authority who:
 - » Aspire to home ownership but cannot afford to purchase on the open market;
 - » Have incomes sufficient to afford a property at 70% of market value;
 - » Have at least £5,000 in savings.
13. Figure 3 provide a breakdown of the total affordable housing on this basis.

Figure 3: Overall need for Affordable Housing 2021-42 in The Broads Authority, including aspiring households able to access affordable home ownership, by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

The Broads Authority	Affordable Housing Need Households unable to afford	Affordable Housing Need Households aspiring to home ownership	Affordable Housing (Households)
1 bedroom	18	7	25
2 bedrooms	109	20	129
3 bedrooms	117	26	143
4+ bedrooms	18	7	25
TOTAL HOUSING NEED	261	59	321

14. For the Broads Authority, the LHNA identifies an overall affordable housing need from 321 households over the 21-year period 2021-42 (15 per annum).

Local Housing Need

15. Overall, there is a need for 1,077 dwellings over the 21 year period, or 51.3 dwellings per annum. This is the total need for housing, with the final affordable housing need being 325 dwellings over the 21 year period.

Figure 4: Overall need for Market and Affordable Dwellings (including affordable home ownership products) by property size in The Broads Authority (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

The Broads Authority	Unable to afford market rents	Unable to afford market ownership but able to afford 70% DMS	Affordable Housing	Total Market Housing	Total Housing
1 bedroom	19	7	25	22	47
2 bedrooms	110	20	130	94	224
3 bedrooms	118	26	144	500	644
4+ bedrooms	18	7	25	136	161
DWELLINGS	265	60	325	752	1,077

1. Introducing the Study

Background to the Project and Wider Policy Context

Introduction

- 1.1. Opinion Research Services (ORS) was commissioned in 2022 by Great Yarmouth Borough Council and the Broads Authority to prepare a Local Housing Needs Assessment (LHNA) for the period 2021-2041 to identify the size, type and tenure of homes that will be needed in the future, and the housing needs of different groups, including affordable housing.
- 1.2. The 2019 National Planning Policy Framework (NPPF) required local planning authorities to inform strategic policy making with a local housing needs assessment. A Local Housing Needs Assessment (LHNA) was required to be prepared which established a minimum Local Housing Need (LHN) figure, which in turn was set by a Standard Method formula issued by MHCLG. As of late 2021, this gave a figure of 353 dwellings per annum for Great Yarmouth.
- 1.3. The previous Government's policy approach to planning for housing need in National Parks and associated areas such as the Broads Authority was different to that of other Local Planning Authorities. Planning Practice Guidance (PPG) on Housing and Economic Needs at paragraph 14 stated that an area such as the Broads Authority could identify its own housing needs based upon local evidence, rather than follow the national standard method for Local Housing Need set out for local authority areas. As a result, the Broads Authority commissioned ORS to calculate the need for the entire area of the Broads, breaking it down into its 6 constituent districts.
- 1.4. The final outcome of this process was that a 5-year migration trend model was derived which showed a need for 358 dwellings over the 20 year period, or 17.9 dwellings per annum was the best model for the Broads Authority. This is the total need for housing, with the affordable housing need being 153 dwellings over the 20 year period, or 7.6 dwellings per annum.

Government Policy December 2024

- 1.5. The current Government published an updated version of the NPPF in December 2024. In terms of overall housing need, paragraph 62 still states that:

62. 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 practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

National Planning Policy Framework, December 2024

- 1.6. However, PPG has been updated to derive a new methodology for local authority areas based upon their existing number of dwellings and the ratio of median house prices to median incomes in the area. Therefore, the methodology for calculating housing need at a local authority area has been updated.

- 1.7. Importantly, an addition has been made to paragraph 14 of PPG for Housing and Economic Needs Assessment covering National Parks and the Broads Authority:

Where strategic policy-making authority boundaries do not align with local authority boundaries, or data is not available, should the standard method be used to assess local housing need?

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, or local authority areas where the samples are too small, an alternative approach may have to be used.

Such authorities may continue to identify a housing need figure using a method determined locally. In doing so authorities should take into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability. In the absence of other robust affordability data, authorities should consider the implications of using the median workplace-based affordability ratio for the relevant wider local authority area(s).

For local authorities whose boundaries cross National Parks or Broads Authority areas, the proportion of the local authority area that falls within and outside the National Park or Broads Authority area should also be considered – for example where only a minimal proportion of the existing housing stock of a local authority falls within the National Park or Broads Authority area it may be appropriate to continue to use the local housing need figure derived by the standard method for the local authority area.

Paragraph: 014 Reference ID: 2a-014-20241212

- 1.8. Therefore, PPG continues to state that an area such as the Broads Authority is not covered by the standard method for local housing need and that they can consider using a local determined housing need figure. However, it now promotes that the Broads Authority should use an overall needs figure based upon the current size of its dwelling stock and the median workplace affordability ratio for the local authorities which it covers.
- 1.9. In terms of the new methodology, the baseline housing need figure in is derived using the following formula, set out at paragraph 4 of PPG for Housing and Economic Needs Assessment.

How is a minimum annual local housing need figure calculated using the standard method

The standard method calculates a minimum annual local housing need figure as follows:

Step 1 - Setting the baseline – 0.8% of existing housing stock for the area

Set the baseline using the value of existing housing stock for the area of the local authority. The baseline is 0.8% of the existing housing stock for the area, and the most recent data published at the time should be used.

Step 2 - An adjustment to take account of affordability

The housing stock baseline figure (as calculated in step 1) is then adjusted based on the affordability of the area.

The affordability data used is the median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level. The mean average affordability over the five most recent years for which data is available should be used.

No adjustment is applied where the ratio is 5 or below. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%. An authority with a ratio of 10 will have a 95% increase on its annual housing stock baseline.

Where an adjustment is to be made, the precise formula is as follows:

For values of 'five year average affordability ratio' above 5; otherwise zero.

Adjustment Factor = ((five year average affordability ratio-5)/5)×0.95 + 1

Paragraph: 004 Reference ID: 2a-004-20241212

- 1.10. For the Broads Authority, our estimate for the current dwelling stock is 3,775 properties based upon the postal address file and the share of the Broads Authority's dwelling contained within the Census Output Areas covering it. 0.8% of 3,755 is 30.2 dwellings and this is the baseline need.
- 1.11. Taking a weighted average of the 5 year average affordability ratio gives a figure of 8.683. Applying this figure as an adjustment factor yields an overall housing need of 51.3 dwellings per annum.
- 1.12. Therefore, for this study, we have used an overall housing need for the Broads Authority of 51.3 dwellings per annum for the period 2021-2042¹. This gives a total dwelling need of 1,077 dwellings over the 21-year period.
- 1.13. From a plan-making perspective, housing need has to be assessed independently of any constraints. However, the final housing requirement and plan target for the Broads Authority may well be different due to constraints, and the previous 17.9 dwellings per annum figure was already challenging in the context of the Broads Authority's overarching statutory duties to protect the area. It is important to note that the housing need that is identified in this report is part of and not additional to the housing need identified for the Broads Authority's 6 constituent districts.
- 1.14. The remainder of this report explores the impact of a total dwelling need of 1,077 on the need for affordable housing need of the Broads Authority. Much of the Great Yarmouth and Broads Authority LHNA 2022 still remains valid and has not been updated in this report. This report is effectively an addendum to the original report.

¹ The LHNA 2022 study looked to 2041, but given the time that has passed, in order to ensure the plan period is 15 years on adoption, it has been extended to 2042.

2. Demographic Projections

The starting point for establishing Local Housing Need

Demographic Analysis for the Broads Authority

- 2.1. As noted above, the LHNA 2022 included household projections for the Broads Authority. The new standard method introduced in December 2024 does not include any direct input from population or household projections. However, to allow the modelling of affordable housing need it is necessary to develop household projections for the different types of households who are projected to reside in the Broads Authority.
- 2.2. The changes from an overall need from a need on 17.9 dwellings per annum to one with 51.3 dwellings represent a very large step up on the number of households. The LHNA 2022 considered the affordable need based upon the existing population and migration flows to the Broads Authority. If more homes are assumed to be delivered then this will allow more households to form in the area and also more households to migrate into the area. Our modelling in the LHNA 2022 already allowed for future household formation, so our updated modelling in this report assumes higher levels of in-migration to the area.

Projected Household Age Profile

- 2.3. Figure 5 show the net change in projected household numbers for The Broads Authority between 2021 and 2042 based on the trend-based projections by household type and age. This data relates to all households, not just those in affordable housing need and it shows how households are likely to change by type and age over the next 21 years. The data is then used to underwrite the modelling of housing need set out below.
- 2.4. Given the overall size of the population for the Broads Authority, the numbers in some categories are small, but overall trends are clear. This shows a growing number of single person households in the area, but also a growth in 'Other' households, some of which are likely to represent adult children of any age living at home with their parents who may be above retirement age.

Figure 5: Summary of 21-year change by household type and age of household representative for the Broads Authority (Note: Figures may not sum due to rounding. Source: ORS Model)

Age of Household Representative	15-24	25-34	35-44	45-54	55-64	65-74	75-84	85+	TOTAL
Single person	-2	8	18	19	4	-25	50	118	191
Couple without children	-3	8	13	-3	28	61	140	104	347
Families with child(ren)	8	47	29	53	24	2	2	4	169
Other households	9	0	3	0	6	9	65	64	156
TOTAL CHANGE	13	64	62	68	62	47	257	290	862
% of Total Change²	1%	7%	7%	8%	7%	5%	30%	34%	100%

² Percentage change in households in the age group in the column heading

3. Affordable Housing Need

Identifying households who cannot afford market housing

Introduction

- 3.1. The definition of affordable housing was changed by the NPPF 2019, with a specific emphasis now placed on affordable home ownership. This was retained in the NPPF December 2024 update. Annex 2 of the Revised NPPF now defines affordable housing as being:

Affordable housing

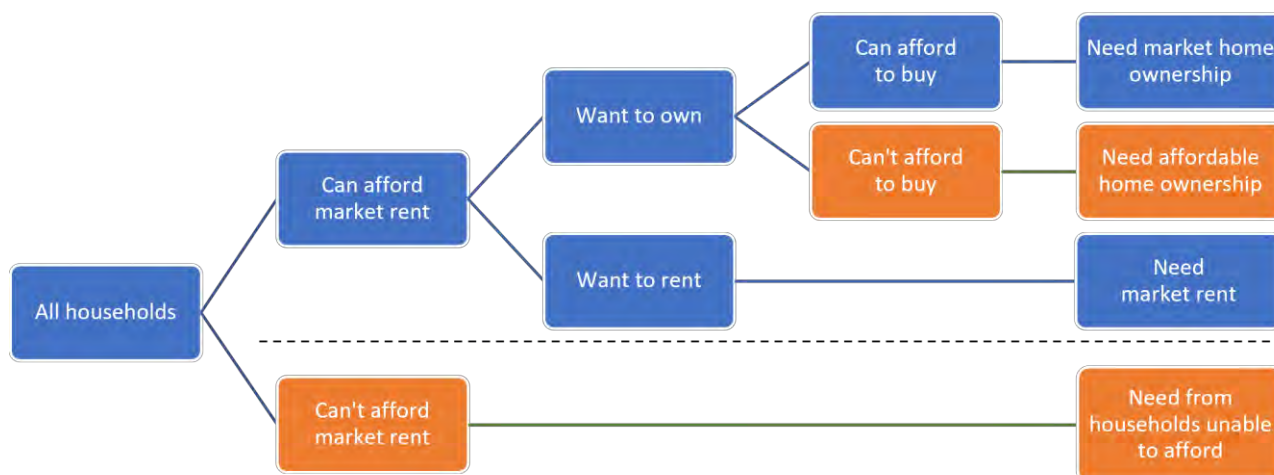
Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)

NPPF December 2024, Annex 2

- 3.2. To reflect this change, paragraphs of PPG were updated in February 2019. These were further updated with a new set of guidance on “Housing needs of different groups” published on 22nd July 2019³. Further guidance to reflect the need to consider First Homes was then added on May 24th 2021.
- 3.3. On this basis, it is clear that the assessment of affordable housing need must now consider those households who would like to own but are unable to do so, in addition to those households unable to afford to own or rent which have formed the longstanding basis for assessing affordable housing needs.
- 3.4. Figure 6 illustrates the different groups of households that must now be considered when assessing the need for affordable housing. The needs of those households that can’t afford market rent need to be added to the needs of those that can afford market rent but who want to own but can’t afford to buy.

³ <https://www.gov.uk/guidance/housing-needs-of-different-groups#affordable-housing>

Figure 6: Establishing the need for market and affordable housing



Affordable Housing Need: Households Unable to Afford

- 3.5. PPG notes that affordable housing need is based on households “*who lack their own housing or who cannot afford to meet their housing needs in the market*” [ID 67-006-20190722]; though goes on to say that this should include the needs of those that can afford market rent but who want to own but can’t afford to buy. Given this context, the following section firstly considers the needs of those households who cannot afford to meet their housing needs, either through buying or renting. The additional needs of those who can afford to rent but who want to own will be considered in the next section.
- 3.6. PPG sets out the framework for this calculation, considering both the current unmet housing need and the projected future housing need in the context of the existing affordable housing stock:

Current Unmet Need for Affordable Housing

- 3.7. In terms of establishing the **current** unmet need for affordable housing, the PPG draws attention again to those types of households considered to be in housing need; whilst also emphasising the need to avoid double-counting and including only those unable to afford their own housing. The PPG guidance continues:

How can the current unmet gross need for affordable housing be calculated?

Strategic policy-making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market.

...

Care should be taken to avoid double-counting, which may be brought about with the same households being identified on more than one transfer list, and to include only those households who cannot afford to access suitable housing in the market

Planning Practice Guidance, ID: 2a-020-20190220

Establishing Current Unmet Need for Affordable Housing for Households Unable to Afford

- 3.8. Households assumed to be unable to afford housing include:
- » All households that are currently homeless;
 - » All those currently housed in temporary accommodation; and
 - » People in a reasonable preference category on the housing register, where their needs have not already been counted.
- 3.9. Given this context, our analysis counts the needs of all these households when establishing the need for affordable housing at a base date of March 31st 2021.
- 3.10. The analysis counts the needs of all households living in overcrowded rented housing when establishing the need for affordable housing, (which could marginally overstate the affordable housing need) but it does not count the needs of owner occupiers living in overcrowded housing (which can be offset against any previous over-counting). Student households are also excluded, given that their needs are assumed to be transient and do not count towards the need for affordable housing.
- 3.11. The analysis does not count people occupying insanitary housing or otherwise living in unsatisfactory housing conditions as a need for additional affordable housing. These dwellings would be unsuitable for any household; and enabling one household to move out would simply allow another to move in – so this would not reduce the overall number of households in housing need. This housing need should be resolved by improving the existing housing stock.
- 3.12. Concealed families are defined as, “family units or single adults living within other households, who may be regarded as potential separate households which may wish to form given appropriate opportunity”⁴. When considering concealed families, it is important to recognise that many do not want separate housing. Concealed families with older family representatives will often be living with another family, perhaps for cultural reasons or in order to receive help or support due to poor health. However, those with younger family representatives are more likely to experience affordability difficulties or other constraints (although not all will want to live independently).
- 3.13. Concealed families in a reasonable preference category on the housing register will be counted regardless of age, but our analysis also considers the additional growth of concealed families with family representatives aged 18-54 years (even those not registered on the housing register) and assumes that all such households are unlikely to be able to afford housing (otherwise they would have found a more suitable home). The needs of these households are counted when establishing the need for affordable housing.
- 3.14. The Broads Authority is not a housing authority, so does not collect information on current housing needs. Therefore, we have apportioned need from the 6 local authorities who include part of the Broads Authority. Figure 7 sets out the assessment of current affordable housing need for The Broads Authority, which shows 62 households currently unsuitably housed and needing to move, with a net need for 40 households.

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6338/1776873.pdf

Figure 7: Assessing current unmet gross need for affordable housing – The Broads Authority (Sources: CLG P1E returns; Census 2001, 2011 and 2021; English Housing Survey; DWP Housing Benefit; CLG Local Authority Housing Statistics)

Current unmet need classification	Current status	Affordable Housing Gross Need	Affordable Housing Supply	Affordable Housing Net Need
Homeless households in priority need [Source: CLG P1E returns]	Currently in temporary accommodation in communal establishments (Bed and breakfast or Hostels)	1		1
Homeless households in priority need [Source: CLG P1E returns]	Currently in temporary accommodation in market housing (Private sector leased or Private landlord)	1		1
Homeless households in priority need [Source: CLG P1E returns]	Currently in temporary accommodation in affordable housing (Local Authority or RSL stock)	0	0	0
Homeless households in priority need [Source: CLG P1E returns]	Households accepted as homeless but without temporary accommodation provided	2		2
Concealed households [Source: Census 2001 and 2011]	Growth in concealed families with family representatives aged under 55	11		11
Overcrowding based on the bedroom standard [Source: Census 2011 and English Housing Survey]	Households living in overcrowded private rented housing	13		13
Overcrowding based on the bedroom standard [Source: Census 2011 and English Housing Survey]	Households living in overcrowded social rented housing	21	21	0
Other households living in unsuitable housing that cannot afford their own home [Source: CLG LAHS]	People who need to move on medical or welfare grounds, including grounds relating to a disability	13	1	12
Other households living in unsuitable housing that cannot afford their own home [Source: CLG LAHS]	People who need to move to a particular locality in the borough of the authority, where failure to meet that need would cause hardship	0	0	0
TOTAL		62	22	40

Projected Future Affordable Housing Need

- 3.15. In terms of establishing **future** projections of affordable housing need, the PPG draws attention to new household formation (in particular the proportion of newly forming households unable to buy or rent in the market area) as well as the number of existing households falling into need.
- 3.16. The ORS Housing Mix Model considers the need for market and affordable housing on a longer-term basis that is consistent with household projections and the LHN. The Model uses a range of secondary data sources to build on existing household projections and profile how the housing stock will need to change in order to accommodate the projected future population. The Model provides robust and credible evidence about the required mix of housing over the full planning period, and recognises how key housing market trends and drivers will impact on the appropriate housing mix.
- 3.17. Whilst PPG identifies that “Projections of affordable housing need will have to reflect new household formation, the proportion of newly forming households unable to buy or rent in the market area, and an estimate of the number of existing households falling into need.” [ID: 2a-021-20190220], the Model recognises

that the proportion of households unable to buy or rent in the market area will not be the same for all types of household, and that this will also differ by age. Therefore, the appropriate proportion is determined separately for each household type and age group.

- 3.18. The affordability percentages in Figure 8 are calculated using detailed information on existing households living in the local authorities covering the Broads Authority from the 2021 Census alongside data published by DWP about housing benefit claimants. For each type of household in each age group, the table identifies the percentage of households unable to afford their housing costs. The defining factor here is whether a household can pay for their housing without requiring affordable housing or housing benefit. Therefore, this is the proportion of households in each age and household composition group that either occupy affordable housing or receive housing benefit to enable them to afford market housing.

Figure 8: Assessing affordability by household type and age for Broads Authority (Source: Census 2011 and DWP)

Percentage unable to afford market housing in The Broads Authority	Under 25	25-34	35-44	45-54	55-64	65+
Single person household	23%	10%	23%	23%	22%	21%
Couple family with no dependent children	21%	7%	10%	9%	8%	13%
Couple family with 1 or more dependent children	67%	33%	20%	13%	13%	28%
Lone parent family with 1 or more dependent children	76%	78%	53%	43%	37%	73%
Other household type	24%	49%	34%	23%	20%	11%

Establishing the Future Affordable Housing Need for Households Unable to Afford

- 3.19. When considering the number of newly arising households likely to be in affordable housing need, the PPG recommends a “*gross annual estimate*” [ID 2a-021-20190220] suggesting that “*the total need for affordable housing should be converted into annual flows*” [ID 2a-024-20190220].
- 3.20. Together with information on household type, this provides a framework for the model to establish the proportion of households who are unable to afford their housing costs. The following tables look at the impact of different types of household over the longer period of 2021-2042.

Figure 9: Newly forming and in-migration: Annual components of Household Growth 2021-42 in The Broads Authority (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Newly forming households	139	102	36	26%
Households migrating into the area	341	270	71	21%
All new households	480	372	107	22%

- 3.21. The ORS Model identifies 139 new households projected to form in the Broads Authority each year, of which 26% will be unable to afford their housing costs. This amounts to 36 households each year.
- 3.22. The model also considers new households migrating to the area. The projection is for 341 households per annum of which 21% (71 households) will be unable to afford their housing costs. Migrating households are less likely to be in housing need because they typically have higher incomes and equity from property elsewhere.
- 3.23. **This results in a total of 107 new households in need of affordable housing per annum in the Broads Authority.**

- 3.24. PPG identifies that “there will be a current supply of housing stock that can be used to accommodate households in affordable housing need” and that it is necessary to establish “the number of affordable dwellings that are going to be vacated by current occupiers that are fit for use by other households in need” (ID 2a-022).

Figure 10: Dissolution and out-migration: Annual components of Household Growth in The Broads Authority 2021-42 (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Household dissolutions following death	192	159	33	17%
Households migrating <u>out</u> of the area	245	190	54	22%
All households no longer present	436	349	88	20%

- 3.25. In the Broads Authority, the model identifies 192 households are likely to dissolve following the death of all household members. Many of these households will own their homes outright however, 33 of these are likely to have been unable to afford market housing, with many living in social rented housing.
- 3.26. In addition, some households that are unable to afford housing will migrate away from the area, so their needs should be discounted to ensure consistency with the household projections. The model identifies that in the Broads Authority 245 households will migrate out of the area each year, including 54 households who are unable to afford their housing costs. A proportion of these will vacate rented affordable housing (which will become available for another household) whereas others that have not yet been allocated an affordable home will reduce the number of households waiting. (It should be noted that some might have chosen to stay if housing costs were cheaper or more affordable housing was available).
- 3.27. Altogether, there are 88 households per annum who will vacate affordable dwellings or will no longer be waiting for a home in the Broads Authority.
- 3.28. PPG also identifies that it is important to estimate “the number of existing households falling into need” (ID 2a-021). Whilst established households that continue to live in the local authorities will not contribute to household growth, changes in household circumstances (such as separating from a partner or the birth of a child) can lead to households who were previously able to afford housing falling into need. The needs of these households are counted by the model by considering changes in affordable housing and housing benefit uptake between cohorts in the population, and it is estimated that 17 established households in the Broads Authority will fall into need each year.
- 3.29. However, established households’ circumstances can also improve. For example:
- » When two single person households join together to form a couple, pooling their resources may enable them to jointly afford their housing costs (even if neither could afford separately).
 - » Households also tend to be more likely to afford housing as they get older, so young households forming in the early years of the projection may be able to afford later in the projection period.
- 3.30. These improved circumstances can therefore reduce the need for affordable housing over time. The model identifies that the circumstances of 25 in the Broads Authority will improve such that they become able to afford their housing costs having previously being unable to afford. This is again calculated by analysing flows of households moving into affordable housing and housing benefit claimants between different cohorts in the population.

Figure 11: Existing households: Annual components of Household Growth in The Broads Authority 2021-42 (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs	% unable to afford housing costs
Existing households falling into need	-	-17	17	100%
Existing households climbing out of need	-	25	-25	0%
Change in existing households	-	9	-9	-

3.31. The following tables (Figure 12) summarise the overall impact of:

- » New households adding to housing need;
- » The households no longer present reducing housing need; and
- » The changes in circumstances impacting existing households.

Figure 12: Summary annual components of Household Growth in The Broads Authority 2021-42 (Source: ORS Housing Model Note: Figures may not sum due to rounding)

The Broads Authority	All households	Households able to afford housing costs	Households unable to afford housing costs
All new households	480	372	107
All households no longer present	436	349	88
Change in existing households	-	9	-9
Future affordable housing need 2021-42 (Annual average)	43	32	11

3.32. Overall reviewing the contribution of each element amounts to an additional 11 households needing affordable housing in the Broads Authority annually over the 21-year period 2021-42.

Overall Affordable Housing Need for Households Unable to Afford

3.33. Below, Figure 13 brings together the information on assessing the unmet need for affordable housing in 2021 and the associated impact on market housing, together with the future need for market and affordable housing arising over the 21-year period 2021-42.

Figure 13: Assessing total need for market and affordable housing for The Broads Authority ((Source: ORS Housing Model.
Note: Figures may not sum due to rounding)

The Broads Authority	Housing Need (households) Market housing	Housing Need (households) Affordable housing	Overall Housing Need
Unmet need for affordable housing in 2021 (see Figure 7)			
Total unmet need for affordable housing (a)	-	62	62
Supply of housing vacated (b)	26	22	48
Current housing need (c) = (a) - (b)	-26	40	14
Projected future housing need 2021-42 (see Figure 12)			
Average annual housing need (d)	32	11	43
Future housing need (e) = (d) x 21	642	221	862
Total need for market and affordable housing (f) = (c) + (e)	615	261	876
Average annual household growth (g) = (f) / 21	31	13	44
Proportion of overall need for market and affordable housing	70.2%	29.8%	100.0%

- 3.34. In the Broads Authority, there is a need to provide affordable housing for 261 households unable to afford to rent or buy over the Plan period 2021-42 (30% of the projected growth) which equates to **13 households per year**.
- 3.35. These levels would provide for the current unmet needs for affordable housing in addition to the projected future growth in affordable housing need, but any future losses from the current stock (such as demolition, or sales through Right to Buy) would increase the number of affordable dwellings needed by an equivalent amount.

Needs of Households Aspiring to Home Ownership

- 3.36. Through combining data on the number of households of each type in each age group living in private rented housing and paying their own rent with the aspiration data from the EHS 2013-14, Figure 14 establishes the number of existing households likely to aspire to home ownership that have not been counted in the affordable housing need. It is important to recognise that all of these households are able to meet their own housing costs in the private rented sector, when they find a dwelling that suits them, so would typically not be considered for social or Affordable Rent.

Figure 14: Households currently living in the Private Rented Sector in the Broads Authority and paying their own rent that aspire to home ownership by Age of Household Representative (Note: Figures may not sum due to rounding)

Household Type	15-24	25-34	35-44	45-54	55-64	65+	TOTAL
Single person	5	26	20	12	8	8	78
Couple without children	4	24	11	18	17	8	81
Families with child(ren)	2	28	26	14	0	0	70
Other households	7	0	1	2	1	0	11
Total Volume	17	78	57	45	26	16	240
Percentage of households	7%	33%	24%	19%	11%	7%	100%

- 3.37. Based on this analysis, we can estimate that there is a total of around 240 households currently resident in the Broads Authority who cannot afford to own their own home but would aspire to do so.
- 3.38. In addition to the current need, it is also important to consider new households that are projected to form over the period 2021-2042. Through combining this data with the aspiration data from the EHS, we can

conclude that it is likely that there would be a further 161 households that form over the 21-year period who will be able to afford to pay market rent but unable to afford to own, despite that being their aspiration. **Overall, in the Broads Authority there are likely to be 401 households who aspire to home ownership but who cannot afford to buy their own home over the period 2021-42, a net annual need of 19 per year.**

- 3.39. In the LHNA 2022, the then government policy for affordable home ownership focused upon a housing product entitled First Homes, which are properties to be sold with at least a 30% discount to first-time buyers. However, the current government have removed the promotion of First Homes as a key policy and have allowed areas to consider a wider range of affordable home ownership products such as Shared Ownership and Discount Market Sales. For this report, we have consider Discount Market Sales with a 30% reduction from market pricing, which is consistent with First Homes. We would note that using Shared Ownership or a different level of discount does not impact significantly on the conclusions.
- 3.40. While the figure of 401 households who aspire to home ownership in the Broads Authority sets an upper threshold for the number who could seek to access Discount Market Sales, it would still be the case that these households would require a deposit and to be able to afford to service the cost of a mortgage. We explore the importance of this point below.

Identifying the Overall Affordable Housing Need

- 3.41. Below, Figure 15 brings together the information on assessing the unmet need for affordable housing in 2021 together with the future need for affordable housing and those aspiring to home ownership arising over the 21-year period 2021-42. All data relates to households and this will be converted to dwellings when we add a vacancy rate in the next chapter. It can be noted that this assessment has no regard for whether those aspiring can access affordable home ownership options; some may be able to afford home ownership but have not found a suitable property yet.

Figure 15: Total need for affordable housing 2021-2042 – The Broads Authority (Source: ORS Housing Model)

The Broads Authority	Affordable Housing Need Households unable to afford	Affordable Housing Need Households aspiring to home ownership	Overall Affordable Housing Need
Current housing need in 2021	40	240	280
Future housing need 2021-42	221	161	382
TOTAL HOUSING NEED	261	401	662

- 3.42. In the Broads Authority we can conclude that the overall need for affordable housing would comprise a total of 662 households over the 21-year period 2021-2042, equivalent to an average of 32 per annum.
- 3.43. Given that the need for affordable housing and affordable home ownership in particular is very high, it is necessary to consider how this need can be addressed within the overall need established.
- 3.44. It will be important to plan for the needs of **all** households unable to afford to rent or own market housing if they are going to avoid the number of housing benefit claimants living in private rented housing increasing.
- 3.45. It is important to recognise that the figures for those who aspire to home ownership are based upon those households who currently can afford market rent. But these households would not necessarily choose new build Affordable Home Ownership if it was available, as some may prefer to secure full ownership in the less expensive second-hand housing market. Similarly, some households may not ultimately need affordable home ownership if their circumstances change to such a degree that they are eventually able to buy without

financial assistance. It is also important to recognise that the identified demand could only be realised if Affordable Home Ownership products can be delivered at prices that are truly affordable in the area, in line with local house prices and incomes.

- 3.46. Neither the NPPF nor PPG identify that any affordability criteria should be applied to those households who aspire to home ownership but cannot afford to buy their own home. However, it is appropriate to consider the extent to which these households could plausibly afford affordable home ownership products if they were provided. Whilst a range of affordable home ownership products are available, each with different costs and eligibility criteria, we have considered Discount Market Sales at 70% of market prices.
- 3.47. Given this context, Figure 16 identifies those households with income that would be insufficient to afford 70% of newbuild prices at the lower quartile for the local area, those households with savings of less than £5,000, and those households that both have sufficient income and savings to purchase an open market property but nonetheless choose to rent. This is based on further analysis of the EHS data which considers the income distribution and savings data for households that rent privately but aspire to home ownership. This data has been updated to reflect current income levels and scaled for each local area using indices from the ONS gross disposable household income (GDHI) tables.

Figure 16: Affordable home ownership housing mix by household affordability in the Broads Authority 2021-2042 (Source: ORS Housing Model)

The Broads Authority	All households aspiring to home ownership	MINUS households able to afford market home ownership	Households unable to afford market home ownership	MINUS households unable to afford 70% of newbuild LQ	Households able to afford 70% of newbuild LQ	MINUS households with savings of less than £5,000	Households able to afford and have savings of £5,000 or more
1 bedroom	44	11	33	8	25	19	7
2 bedrooms	153	27	126	34	92	72	20
3 bedrooms	174	22	152	39	113	87	26
4+ bedrooms	30	3	27	11	16	9	7
TOTAL	401	63	338	92	246	187	59

- 3.48. On this basis, 59 dwellings are needed for households that aspire to home ownership but cannot afford it, who also have at least £5,000 in savings and incomes above the relevant threshold. This is 15% of the total that was originally identified.
- 3.49. Whilst it will be a policy decision as to how much of the additional need for affordable home ownership from households able to afford market rent should be provided, in the Broads Authority, it would seem appropriate to only plan for the needs of those 59 households likely to form an effective demand (i.e. those able to afford the various products that will potentially be available) in addition to the 261 households unable to afford to rent or own market housing.

Figure 17: Overall need for Affordable Housing 2021-42 in The Broads Authority, including aspiring households able to access affordable home ownership, by property size (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

The Broads Authority	Affordable Housing Need Households unable to afford	Affordable Housing Need Households aspiring to home ownership	Affordable Housing (Households)
1 bedroom	18	7	25
2 bedrooms	109	20	129
3 bedrooms	117	26	143
4+ bedrooms	18	7	25
TOTAL HOUSING NEED	261	59	321

- 3.50. For the Broads Authority, the LHNA identifies an overall affordable housing need from **321 households⁵** over the 21-year period 2021-42 (15 per annum).

⁵ 151 households, before converting the need to 153 dwellings in Figure 18.

4. Overall Housing Need

Local Housing Need based on the Standard Method

Establishing the Housing Target

- 4.1. The overall housing need of 1,077 dwellings provides the starting point for establishing the final housing requirement which will be planned for through strategic policies. This is confirmed by PPG at the outset of the section on assessing housing and economic development needs:

Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.

Planning Practice Guidance, ID 2a-001-20190220

- 4.2. In determining the local plan housing target, it will be necessary for the Broads Authority to consider whether or not the housing need can be met within their area, taking account of any constraints on land availability.
- 4.3. Where planning authorities are unable to meet their LHN in full, it will be necessary for them to engage with neighbouring authorities through the Duty to Cooperate discussion. This should establish if any of the identified housing need that isn't able to be delivered locally (the "unmet need") could be provided for in other areas. It is important to note that the housing need that is identified in this report is part of and not additional to the housing need identified for the Broads Authority's 6 constituent districts.

The Broads Authority: Overall Housing Need for 2021-42

- 4.4. Previously, Figure 17 set out the affordable housing need growth for the Broads from 2021-42. To convert this to dwellings requires the application of a vacancy and second homes dwelling rate to allow for the fact that at any one time some properties will be empty. A low rate of 1.5% has been allowed for in the affordable housing sector to reflect the low rates of vacancies in this stock. In the LHNA 2022, we allowed a rate of 18.9% in the market sector to allow for the high rate of second and vacant homes and this has been repeated in this study.
- 4.5. Overall, there is a need for 1,077 dwellings over the 21 year period, or 51.3 dwellings per annum. This is the total need for housing. The affordable housing need is 325 dwellings over the 21 year period, or 15.5 dwellings per annum. The figure of 325 dwellings includes all of the backlog of current affordable need, newly arising need and any need for affordable home ownership. This figure is consistent with the standard method for Local Housing Need for the 6 local authorities covering the Broads Authority, but allows for the differences in population structure between the Broads Authority and the wider local authorities.
- 4.6. We would note that the Broads Authority have regard to the affordable housing policies of the relevant district. The Broads Authority currently seek off-site affordable housing contributions for schemes of 6-9 dwellings, but are seeking to lower the threshold in their emerging plan.

4.7. Figure 18 and Figure 19 shows the data for the Broads Authority.

Figure 18: Overall need for Market and Affordable Dwellings (including affordable home ownership products) by property size in The Broads Authority (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

The Broads Authority	Unable to afford market rents	Unable to afford market ownership but able to afford 70% DMS	Affordable Housing	Total Market Housing	Total Housing
1 bedroom	19	7	25	22	47
2 bedrooms	110	20	130	94	224
3 bedrooms	118	26	144	500	644
4+ bedrooms	18	7	25	136	161
DWELLINGS	265	60	325	752	1,077

Figure 19: Overall need for Market and Affordable Dwellings as percentages of the LHN (including affordable home ownership products) by property size in the Broads Authority (Source: ORS Housing Model. Note: Figures may not sum due to rounding)

The Broads Authority	Unable to afford market rents	Unable to afford market ownership but able to afford 70% DMS	Affordable Housing	Total Market Housing	Total Housing
1 bedroom	1.7%	0.7%	2.4%	2.0%	4.4%
2 bedrooms	10.2%	1.8%	12.1%	8.7%	20.8%
3 bedrooms	11.0%	2.5%	13.4%	46.4%	59.8%
4+ bedrooms	1.7%	0.7%	2.3%	12.7%	15.0%
DWELLINGS	24.6%	5.6%	30.1%	69.9%	100.0%

4.8. It is also possible to calculate the housing need for the Broads Authority by local authority area. Figure 20 shows the distribution of the housing need by local authority area. Taking an example of North Norfolk, 293 dwellings identified are being needed in the Broads Authority within North Norfolk over the period 2021-42. This is a total figure, not an annual rate which is 14 dwellings per annum. It is also part of the existing total for North Norfolk, which is currently 932 dwellings per annum under the December 2024 standard method figures, and should not be added to figures calculated earlier. Therefore, it is clear that the housing need for the Broads is very small and has only a marginal impact on meeting the needs of local authorities in the area.

Figure 20: Projected Dwellings needed for the Broads by Local Authority (Note: Dwelling numbers derived based on proportion of dwellings without a usually resident household in the 2021 Census. Note: figures may not sum due to rounding)

The Broads Authority	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
Overall need 2021-2042	316	293	17	204	177	70
Annual average need	15	14	1	10	8	3

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Appendix B

Glossary of Terms

Definitions

Affordability is a measure of whether housing may be afforded by certain groups of households.

Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. For the purpose of this report we have used the definition in the Revised NPPF, which specifies the main categories of affordable housing to be: affordable housing for rent; starter homes; discounted market sales housing (sold at a discount of at least 20% below market value); shared ownership, relevant equity loans, other low cost homes for sale and rent to buy.

Affordable Rent is provided by social landlords and rented for less than would be paid if renting privately. It must be at least 20% cheaper than the equivalent private rent in the area and must also be below the value of the Local Housing Allowance in the area.

Census Output Area is the smallest area for which UK Census of Population statistics are produced. Each Census Output Area had a population of around 250 people with around 100 dwellings at the time of the 2011 Census.

Concealed families are defined as; *“family units or single adults living within other households, who may be regarded as potential separate households which may wish to form given appropriate opportunity”*⁶.

Discount Market Sales are discounted market sale units which must be sold with at least a 20% discount in perpetuity.

First Homes are discounted market sale units which must be sold with either a 30%, 40% or 50% discount in perpetuity to a person or persons meeting the First Homes eligibility criteria.

Headship rates are defined by CLG as: *“the proportion of people in each age group and household type who are the ‘head’ of a household”*⁷

A household is one person living alone, or two or more people living together at the same address who share at least one meal a day together or who share a living room.

Household formation refers to the process whereby individuals in the population form separate households. ‘Gross’ or ‘new’ household formation refers to households that form over a period of time, conventionally one year. This is equal to the number of households existing at the end of the year that did not exist as separate households at the beginning of the year (not counting ‘successor’ households, when the former head of household dies or departs). ‘Net’ household formation is the net growth in households resulting from new households forming less the number of existing households dissolving (e.g. through death or joining up with other households).

Housing demand is the quantity of housing that households are willing and able to buy or rent.

⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6338/1776873.pdf

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/182427/MethodologyFinalDraft.pdf

Household income includes all salaries, benefits and pensions, before deductions such as tax and National Insurance.

Housing need is the quantity of housing required for households who are unable to access suitable housing without financial assistance.

Housing requirements encompasses both housing demand and housing need, and is therefore the quantity of housing necessary for all households to have access to suitable housing, irrespective of their ability to pay.

Housing type refers to the type of dwelling, for example, flat, house, specialist accommodation.

Low cost home ownership or **Shared ownership** is intermediate affordable housing designed to help people who wish to buy their own home, but cannot afford to buy outright (with a mortgage). Through this type of scheme you buy a share in the property with a Housing Association or other organisation.

Lower quartile means the value below which one quarter of the cases falls. In relation to house prices, it means the price of the house that is one-quarter of the way up the ranking from the cheapest to the most expensive.

Market housing is private housing for rent or for sale, where the price is set in the open market.

Migration is the movement of people between geographical areas. In this context it could be either local authority districts, or wider housing market areas. The rate of migration is usually measured as an annual number of individuals, living in the defined area at a point in time, who were not resident there one year earlier. Gross migration refers to the number of individuals moving into or out of the authority. Net migration is the difference between gross in-migration and gross out-migration.

A projection of housing needs or requirements is a calculation of numbers expected in some future year or years based on the extrapolation of existing conditions and assumptions. For example, household projections calculate the number and composition of households expected at some future date(s) given the projected number of residents, broken down by age, sex and marital status, and an extrapolation of recent trends in the propensity of different groups to form separate households.

Secondary data is existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Census, national surveys).

Shared ownership see Low Cost Home Ownership.

Social rented housing is provided by social landlords and rented for less than would be paid if renting privately. It typically has lower rents than Affordable Rent.

Acronyms and Initials

BRMA	Broad Rental Market Area
CLG	Department for Communities and Local Government (now MHCLG)
DWP	Department of Work and Pensions
LA	Local Authority
LHA	Local Housing Allowance
LHN	Local Housing Need
LHNA	Local Housing Needs Assessment
MHCLG	Ministry for Housing, Communities and Local Government
NPA	National Park Authority
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
ORS	Opinion Research Services
PPG	Planning Practice Guidance
RSL	Registered Social Landlord
SHMA	Strategic Housing Market Assessment

Local Plan for the Broads

Affordable Housing Topic Paper

March 2025

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1: Introduction

The current Local Plan for the Broads includes a policy that seeks off-site affordable housing contributions from schemes between 6 and 9 dwellings. The proposed policy in the emerging Local Plan seeks to continue off-site affordable housing contributions from schemes of fewer than 10 dwellings, but changes the threshold (see section 3). This Topic Paper seeks to justify the proposed approach.

2: Current policy

The current adopted affordable housing policy in the [2019 Local Plan](#) is policy DM34. This says:

Developments of 6-9 dwellings will be required to contribute a commuted sum (off-site contribution) towards the provision of affordable housing. This contribution will be calculated in accordance with the full requirements of the adopted standards and policies of the relevant District Councils. The commuted sum will be calculated in relation to thresholds and proportion of dwellings which should, subject to viability, be affordable. The commuted sum should reflect the subsidy required to deliver the affordable housing requirement off site (to include the cost of land and construction).

3: Proposed policy

The proposed affordable housing policy in the emerging Local Plan continues the approach of seeking off-site affordable housing contributions, but changes the threshold as follows:

- Sites on brownfield land, off-site contributions sought on schemes of 5 to 9 dwellings inclusive.
- Sites on waterfront brownfield land, off-site contributions sought on schemes of 3 to 9 dwellings inclusive.
- Sites on greenfield land, off-site contributions sought on schemes of 3 to 9 dwellings inclusive.

4: Justification for proposed policy

4.1 Average size of permissions

The Broads Authority has permitted the following numbers of net new dwellings over the last ten years (from 2014 to 2024). This data excludes holiday homes and replacements dwellings.

Table key:

Waterfront brownfield	Brownfield	Greenfield
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Application Number	Proposal	Net New
BA/2015/0148/FUL	Change of use of outbuilding to residential dwelling	1
BA/2015/0246/FUL	Proposed conversion of part of a redundant barn complex to form 2no dwellings.	2
BA/2015/0277/FUL	Demolition of detached bungalow and garage and construction of 4 no. Dwellings, associated car parking bays and associated works.	4
BA/2016/0065/FUL	New dwelling.	1
BA/2016/0408/FUL	Demolition of two existing buildings and erection of a new detached dwelling	1
BA/2017/0103/OUT	Outline application to redevelop Hedera House to form 6 residential dwellings and 10 new holiday cottages.	6
BA/2017/0151/FUL	Single storey dwelling and associated garden and walls.	1
BA/2017/0191/FUL	The conversion of a redundant agricultural building to a single dwelling, including associated building and landscaping works and the change of use of an existing dwelling to provide a dedicated tourism use.	1
BA/2017/0474/FUL	2 new dwellings and associated hard & soft landscaping	2
BA/2018/0248/FUL	Replace cottage with new dwelling and holiday unit.	1
BA/2018/0359/FUL	Demolition of shed, erect timber clad boat workshop, 3 residential dwellings, car park, flood defence wall and landscaping	3
BA/2018/0374/FUL	New dwelling.	1
BA/2019/0018/FUL	Conversion of 1 x 4-bed flat to 1 x 2-bed and 1 x 1-bed flats. Replace 3 windows, install 3 rooflights (retrospective).	1
BA/2019/0112/FUL	Erection of 3 terraced houses and associated parking & storage	3
BA/2019/0118/FUL	Erection of 7 residential dwellings, 12 permanent residential moorings, 9 resident moorings, 10 visitor moorings, 1 mooring for Broads Authority, the redevelopment of the Marina building as offices & storage with associated landscaping & parking	7
BA/2020/0053/FUL	Demolition of former marina building & erection of 2 residential dwellings with parking & residential moorings.	2
BA/2020/0408/FUL	Demolition of existing dwelling (Westerley) & erection of replacement dwelling and erection of new dwelling on neighbouring plot (The Moorings).	1
BA/2021/0084/FUL	Sub-divide shop into 2 units, new shop fronts and 1x flat to the rear	1
BA/2021/0181/FUL	Residential development of 2no. semi-detached townhouses and 2no. detached houses	4
BA/2021/0233/FUL	Three bedroom detached bungalow.	1

The total number of net new dwellings is: 44 dwellings

The total number of applications for net new dwellings is: 21 applications

The average size of schemes for net new dwellings that came forward over the last ten years in the Broads is: 2.10 dwellings.

The most common size of schemes that come forward in the Broads is: 1 dwelling.

The largest scheme for net new dwellings that has come forward in the last ten years is: 7 dwellings.

The number of schemes for net new dwellings, permitted over the last ten years, that could have resulted in off-site affordable housing contributions, if the proposed policy had have been in place is set out in the following table. Please note that one of the waterfront brownfield schemes did result in an off-site affordable housing contribution using the currently adopted threshold (see section 4.3).

Location	Number of schemes
Waterfront brownfield	2
Greenfield	2
Brownfield	1

The data shows that there are some schemes of 3 dwellings and above that have come forward over the last ten years, even though the most common scheme size for net new dwellings is 1 dwelling. The current threshold of 6-9 dwellings resulted in 1 scheme providing off-site affordable housing contribution. The proposed thresholds would have resulted in 5 schemes providing off-site affordable housing contributions.

4.2 Viability

The [Viability Assessment](#) of the emerging Local Plan assessed the proposed threshold for off-site affordable housing. The study concludes that: *‘An affordable contribution of at least 33% is achievable on most typologies across the Broads Authority, including on those of fewer than 10 dwellings. The clear exceptions to this in viability terms are developments of 1-unit on any site type and older persons housing apart from on waterfront sites. For the typologies of 3-units a contribution is realistic on waterfront sites and greenfield sites – on general (inland) brownfield sites collection is still feasible but could be compromised if there are additional development cost pressures such as higher environmental costs’.*

The Viability Assessment of the Local Plan concluded that with all the policy requirements, the policy thresholds as set out in section 3 were viable (giving headroom to mitigate for nutrient enrichment).

4.3 Success of current policy

Since 2019, the current policy has been used at one site. Two applications were combined to give a total of 9 new dwellings which triggered the 6-9 dwelling threshold for a commuted sum and affordable housing contributions were secured.

Planning Application	Location	Description of development	Amount
BA/2019/0118/FUL	Port Of Yarmouth Marina, Caister Road, Great Yarmouth, NR30 4DL	Erection of 7 residential dwellings, 12 permanent residential moorings, 9 resident moorings, 10 visitor moorings, 1 mooring for Broads Authority, the redevelopment of the Marina building as offices & storage with associated landscaping & parking	£39,000
BA/2020/0053/FUL	Port Of Yarmouth Marina, Caister Road, Great Yarmouth, NR30 4DL	Demolition of former marina building & erection of 2 residential dwellings with parking & residential moorings.	£3,788

The current policy has delivered some off-site affordable housing contributions.

4.4 Support from previous Inspector

The [Report](#) (page 13) by the Inspector who examined the current 2019 Local Plan concluded the following in relation to policy DM34 seeking off-site affordable housing contributions for schemes of 6 to 9 dwellings: ‘overall I am satisfied that, in the case of the Broads, the proposal to seek commuted sums towards affordable housing from schemes of 6-10 dwellings is justified’. The following are the relevant paragraphs from the Report.

57. Policy PUBDM33 specifies that developments of 6 to 10 dwellings in the Broads are required to contribute a commuted sum towards affordable housing. This is Broads Authority Local Plan, Inspector’s Report 15 April 2019 14 lower than the national threshold for seeking affordable housing, as established in the Written Ministerial Statement dated 28 November 2014. However, most development in the Broads is likely to be relatively small scale and opportunities for development are limited due to the National Park equivalent status of the Broads. In this context such sums, although modest in scale, would be proportionally significant and would make an important contribution towards additional affordable housing in the Broads.

58. The viability evidence shows that schemes of 6+ dwellings could support affordable housing contributions, based on a percentage of 33% as established in the Greater Norwich Core Strategy, and the policy allows flexibility to deal with circumstances where viability is an issue. The Greater Norwich rate falls within the range of different percentages sought by other districts, albeit towards the upper end. As such it represents a reasonable basis for assessment. North Norfolk is a designated rural area, and therefore lower thresholds may be explored through the review of the North Norfolk Local Plan. Overall I am satisfied that, in

the case of the Broads, the proposal to seek commuted sums towards affordable housing from schemes of 6-10 dwellings is justified. The Authority has proposed that the commuted sum threshold should be adjusted to align with the amended threshold of 10+ for seeking affordable housing, as set out in the NPPF 2019. Although the Plan is being examined under transitional arrangements and against the 2012 NPPF, I consider this approach provides clarity and is justified. The policy as modified in M52 therefore seeks commuted sums from schemes of 6-9 units.

59. I have amended M52 as published to clarify that commuted sums from schemes of 6-9 units will be sought consistently across the Broads Executive Area. This reflects the approach specified in the supporting text, the table in Policy PUBDM33 and in the Authority's evidence base, and removes the inconsistent and unclear text relating to North Norfolk.

M52 can be found here: [Broads-Local-Plan-SCHEDULE-OF-Main-Modifications.pdf](#).

The Inspector who examined the current Local Plan for the Broads was supportive of a threshold for off-site affordable housing lower than national policy. She acknowledged that most development in the Broads is likely to be relatively small scale and opportunities for development are limited due to the National Park equivalent status of the Broads. These circumstances have not changed and are relevant for this emerging Local Plan.

4.5 Affordable housing need

PPG notes that affordable housing need is based on households “who lack their own housing or who cannot afford to meet their housing needs in the market” [ID 67-006-20190722]; though goes on to say that this should include the needs of those that can afford market rent but who want to own but can't afford to buy.

The **Local Housing Need Assessment** for the Broads identifies an affordable housing need of 15.5 dwellings per year for the period 2021 to 2042.

The data in section 4.1 shows that larger schemes are very rare. Without the off-site threshold being lower than national policy, given the very small size of permissions for net new dwellings in the Broads it is unlikely that any affordable housing will come forward in the Broads between 2021 and 2042 and therefore the identified need will not be met.

4.6 Future supply of housing

With much of the Broads Authority Executive Area covered by nutrient enrichment constraints, applications for net new dwellings have been lower than would have been expected, even given the erratic nature of windfall in the Broads. With more nutrient enrichment mitigation schemes coming into place (through Norfolk Environment Credits as well as potentially through Natural England), more schemes for net new dwellings could come forward.

Whilst there are no projections for what windfall over the coming years could be, the Authority considers there may be opportunities for schemes of three or more dwellings to come forward through the plan period.

4.7 Holiday Homes

The Broads Authority has permitted (2014 to 2024) 33 holiday homes as part of 14 planning applications for holiday homes or second homes (excluding camping and glamping sites).

The high demand for holiday homes inflates land and property prices and provides a disincentive for the provision of lower cost housing.

5: Policies of our Districts

The Local Plan for the Broads has regard to/defers to the affordable housing policies of the 6 districts/borough/city councils (the Districts). This is a long accepted approach and reflects that the Districts are the Housing Authority for the Broads and it is logical to have a consistent policy approach across a District, regardless of whether a scheme is in the District or the Broads for planning purposes.

Five of the six districts do not have policies that seek affordable housing below the NPPF threshold. North Norfolk District Council's emerging Local Plan seeks affordable housing on schemes fewer than 9 dwellings however, as some of their area, including parts of the Broads in North Norfolk, are Designated Rural Areas.

Given the justification set out in section 4 of this report, and to reflect that 5 out of 6 Districts do not have policies for less than 9 dwellings, it is prudent to have wording in our Affordable Housing policy to reflect the stance set out in this Topic Paper.

In practice, both our policy and the policy of the District's Local Plan will be used to determine the off-site contribution, working with the relevant Housing Team and their rates, thresholds and guidance.

6: Summary and conclusion

The 2024 NPPF says that *'Provision of affordable housing should not be sought for residential developments that are not major developments other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)'*.

However, there is a very limited supply of any suitable sites in the Broads for housing to meet local affordable housing need due to the protected landscape of the area, and to the extent and severity of flood risk. The opportunities for schemes of 9+ dwelling are significantly diminished by the rural character of the area and the environmental constraints. In addition, the high demand for second/holiday homes inflates land and property prices and provides a disincentive for the provision of lower cost housing.

In recent years (between 2014 and 2024), applications for dwellings have been on average 2.10 dwellings per application¹ (according to an assessment of the Authority's planning applications). Presuming that this size of windfall housing applications continues it is unlikely that any affordable housing will be delivered.

There is a clear need for affordable housing in the Broads and all possible reasonable measures should be taken to address the deficiency. It is acknowledged that the policy goes further than the NPPF by requiring off-site contributions to affordable housing for schemes of fewer than 9 dwellings. Five of the districts relevant to the Broads do not seek affordable housing on schemes of 9 or below and their policies reflect this, but North Norfolk's emerging Local Plan does seek affordable housing on schemes below 9 dwellings to reflect it part of the area being a Designated Rural Area. The Viability Study that assessed the Local Plan has concluded that the proposed policy approach to seeking off-site affordable housing contributions in the Broads is viable.

The Broads Authority will use the relevant council's methodology for the calculation of affordable housing contributions figure. The Authority will liaise with the relevant council to prioritise spend which will be first in the parish which generated the commuted sums, then to the adjoining parishes, and then to anywhere in the council area and the Authority/District will have ten years to spend or commit the monies. The Authority will however have regard to the approach of the relevant council in where the money is spent and for how long the money is held.

¹ Since April 2019, there have been 37 net new market dwellings permitted in 17 applications.

Heritage Asset Review Group

Notes of the meeting held on 21 March 2025

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Present

Harry Blathwayt – in the Chair, Mark Collins, Peter Dixon, Andrée Gee, Tony Grayling, Tim Jickells and Melanie Vigo di Gallidoro

In attendance

Jason Brewster – Governance Officer, Kayleigh Judson – Heritage and Design Planning Officer and Kate Knights – Heritage and Design Manager

1. Notes of HARG meeting held on 13 December 2024

The notes of the meeting held on 13 December 2024 were received. These had been submitted to the Planning Committee on 10 January 2025.

2. Historic Environment Team progress report

The Heritage and Design Manager and the Heritage and Design Planning Officer presented the report providing an update on progress with key items of work by the Heritage and Design Team between the end of 14 December 2024 and 21 March 2025.

Conservation areas – update

Neatishead Conservation Area

The Heritage and Design Manager (HDM) provided an update on the Neatishead Conservation Area Appraisal (appendix 2.2 of the report) and the inclusion of a number of buildings of local interest to the Local List (appendix 2.4 of the report). The HDM presented a map of the

Neatishead Conservation Area (CA) which demonstrated the demarcation between the eastern part of the CA bounded by Hall Road to the north, The Street to the west and Irstead Round to the south all located within the Broads Executive Area and the remainder, dwellings to the west of Street Hill, The Street and Smallburgh Road and an area of dwellings south of Irstead Road, within the executive area of North Norfolk District Council. The previous Neatishead CA Appraisal was completed in 2011 and it was agreed with North Norfolk District Council (NNDC) that the Authority would take the lead on the current appraisal with input from the district council. The CA Appraisal sought to characterise the main characteristics of the area and the HDM presented slides to illustrate some of the distinct areas within the CA. The village was characterised by long terraces of red brick or painted brick dwellings with red pantile roofs and distinct chimney stacks. To the north, on Smallburgh Road, was Iken Cottage a small scale traditional brick and pantile cottage with catslide dormers, which, was almost hidden by tree planting. To the east the open farmland to the north of Hall Road provided a more rural setting to the detached houses set within a wooded area leading to Limekiln Dyke. This characterisation was mirrored to the south on Irstead Road, which formed the CA's southern boundary.

The CA Appraisal contained a Management Plan and Enhancements section that suggested some possible improvements which included:

- The general maintenance of The Staithe to reduce visual clutter.
- The introduction of heritage interpretation in a discrete and appropriate fashion such as using quick response (QR) codes to enable digital access to the relevant heritage information.
- Restoring front hedge boundaries to properties especially along Hall Road. Front boundaries were being replaced by large open parking areas which was impacting the enclosed nature of the properties that had previously characterised the area.
- The retention or reinstatement of timber windows to halt and reverse the proliferation of uPVC windows within the CA.
- The rationalisation of overhead lines and wires. The Heritage and Design Team had considered removing this item from the appraisal however it received some support during the consultation. The Authority would liaise with UK Power Networks to determine opportunities to remove overhead power lines.

During the appraisal the local listing was reviewed to ensure that those buildings within the Broads Executive Area, listed previously in 2011, remained valid and to ensure there were no omissions. A few properties had been deemed no longer worthy of local listing and had been proposed for removal from the listing. A number of objections had been received and considered resulting in only one property being removed from the local listing.

The HDM confirmed that the Neatishead Conservation Area Appraisal was nearly complete and it would be presented for endorsement by the Planning Committee on 2 May 2025.

Coltishall and Horstead Conservation Area

The HDM explained that the Coltishall and Horstead CA was last appraised in 1983. Broadland District Council would ordinarily take the lead on the appraisal of the Coltishall and Horstead CA however they did not have the capacity. Given the length of time since the previous appraisal the Authority had agreed to lead on this appraisal with input from the district council. This work would commence in June once the Neatishead CA had been completed.

Beccles Article 4 Direction

The HDM provided an update on the work associated with East Suffolk Council's (ESC's) review of their Article 4 Directions (A4D) required to ensure they were up to date, appropriate and applied to the correct locations. An A4D provided a mechanism for restricting permitted development rights on residential properties in the context of particular sites and/or areas and, in the context of a Conservation Area, could be used to restrict works that may otherwise be detrimental to the amenity of an area.

ESC had reviewed the A4D associated with Beccles, which bordered the Broads Executive Area, and the Authority had a corresponding A4D for the relevant parts of Beccles within the Broads Executive Area. The Authority had reviewed its corresponding A4D for Beccles and proposed to reduce the area covered by its A4D and to update its restrictions to ensure that they were consistent with the updated ESC equivalent. The reduction in area would see the removal of the southern part of Puddingmoor from the Article 4 (a map was presented illustrating the amended A4D area). The wording of the restrictions associated with painting the exterior of a residential dwelling meant that any painting would require permission. This restriction would be removed as it was felt that requiring householders to secure planning permission to paint their properties was too onerous. The installation of satellite dishes would also be removed from the A4D. The likelihood of satellite dishes being installed on properties had considerably diminished since this restriction was introduced in 1997 given the proliferation of alternative, less obtrusive broadcasting technologies. The HDM presented some images of properties on the western side of Northgate, to indicate the relevance of the A4D and noted that none of the properties shown, which contributed greatly to the local character, were nationally listed. In response to a question the HDM confirmed that, in order to propose a property for national listing, the Authority would have to conduct an assessment of both the interior and exterior of the building and Historic England would require strong evidence before considering it for inclusion on the national list. The Heritage and Design Team would monitor the properties on Northgate with the intention of considering them for national listing when they were next marketed for sale.

The HDM confirmed that the revised A4D would be presented for endorsement by the Planning Committee on 4 April 2025.

Listed buildings

Quinquennial Survey

The Heritage and Design Manager (HDM) and Heritage and Design Planning Officer (HDPO) gave updates on properties surveyed since December 2024 as part of the Authority's ongoing review of listed buildings.

Church of St Michael, Irstead – A Grade II* listed parish church with a tower, nave and continuous chancel dating from the 14th century, south nave aisle in the 15th century and significant restoration during the Victorian period. The building was found to be in quite sound condition; the thatched roof required some repair or replacement of which the church diocese were aware. The HDM provided example images of wooden bench and pew ends that featured decorative carvings that the church was noted for.

Wherry Barn/Cottage, Irstead – A Grade II listed mid-19th century two-storey brick building with pantile roof with a central arch over dyke to shelter wherry. This building had been heavily restored with the windows on the north elevation, not present when originally built, dating from the 1980s. Some brickwork repair was required.

Barn at Hall Fen Farm, Irstead – A Grade II listed brick and cut flint barn with thatched roof dating from the mid-17th century. The thatch was found to be in poor repair particularly on the northern elevation where the fillet, a waterproofing layer between the edge of the thatch and the brick parapet, had completely gone. The Heritage and Design Team had begun to talk with the owner to protect the structure if not restore the thatch given the cost of sourcing this material and the availability of thatchers.

The Nebb, Flixton-by-Lowestoft – A recently listed, December 2020, Grade II vernacular farmhouse dating from the first half of the 16th century, extended in the mid-18th century and altered again in the early 1800s. This was the first survey of this building that had been extensively restored and was in very good condition.

Bradwell Hall Farm and Barn, Bradwell – A Grade II listed farmhouse dating from 1731 and noted for the multi-phased development from the mid-1700s, the late 1700s and the 1830s. The building was in fair condition with the owner undertaking some re-pointing and repair works to the windows/doors when the Heritage and Design Team visited. The brick and pantile roofed barn dating from 1731 had its own discrete Grade II listing. When last surveyed in 2009, the barn was found to be in very poor condition. The most recent owners had restored the building securing it for the foreseeable future and it was currently used as a holiday let.

Vauxhall Bridge, Great Yarmouth – A Grade II listed twin-track railway and footpath bridge over River Bure connecting Great Yarmouth railway station to North Quay. A rare survival of a wrought-iron railway bridge that was built by Norfolk Railway in the 1850s. In the 1900s the bridge carried rail, tram and pedestrian traffic and from 1931 it also carried road traffic. It fell into disuse in the 1980s and in 2008, when it was last surveyed, it was on the Buildings at Risk Register. Subsequently it had been partly restored in 2013 by Great Yarmouth Borough Council and the Great Yarmouth Preservation Trust. The latest survey confirmed that the

pedestrian bridge restoration was still outstanding although there were plans to complete this work and re-open the whole bridge to pedestrians.

Enforcement

The Heritage and Design Planning Officer (HDPO) indicated that a Listed Building Enforcement Notice had been served at Holly Lodge, Coltishall requiring the removal and replacement of the existing uPVC windows which had been installed without listed building consent. The owner had subsequently lodged an appeal and the Authority was putting together information for the Planning Inspectorate.

Matters for information

Mettingham House, Mettingham, BA/2024/0247/HOUSEH and BA/2024/0248/LBC approved under delegated powers

The Heritage and Design Planning Officer (HDPO) presented an approved application, under delegated powers, at the Grade II listed Mettingham House (listed as The Red House), Mettingham for the internal and external alterations to the northwest range including alterations to fenestration, addition of portico over door, rearrangement of internal walls, and demolition and replacement of lean-to on the east elevation. The presentation included a location map, an aerial photograph of the site, a photograph of the front elevation, a photograph of the west elevation and a diagram of the proposed plan for the west elevation, a photograph of the east elevation and a diagram of the proposed plan for the east elevation and a historic development plan of the ground floor.

The property, located on the road between Bungay and Beccles at Mettingham was a very handsome Grade II listed house dating from the early 18th century with later editions. The proposal for the west elevation of the building was to add a small portico type porch to the main door, to remove another door and replace with two timber windows and convert another doorway into a window. The proposal for the east elevation was to replace an existing lean to with an equivalent structure in materials to match that extended further along the elevation.

The applicants had submitted a Heritage Statement that provided a summary of the development history of the building including a historic development plan of the ground floor. This demonstrated the expansion of the building over time starting with the fairly formal and symmetrical rooms in the 18th century. Further alterations were made in the mid to late 19th century, the early 20th century and then the 21st century.

The original application proposed the removal of a secondary stairway that related to service quarters created by the alterations in the mid to late 19th century. This stairway, although not significant in architectural terms, was considered to be an important part of the building's history and should be retained. The applicants subsequently decided to withdraw the removal of the stairway from the application which enabled the application to be approved, as the remaining development was deemed appropriate.

3. Any other business

No other items of business were raised.

4. Date of next meeting

The next HARG meeting would be held on Friday 13 June 2025; the Heritage and Design Manager indicated that there would be a site visit after this meeting and more information would be provided nearer the time.

The meeting ended at 10:51am.

Signed by

Chair

Planning Committee

04 April 2025

Agenda item number 14

Appeals to the Secretary of State update

Report by Development Manager

Summary

This report sets out the position regarding appeals against refusals of planning permission by the Broads Local Planning Authority.

Recommendation

To note the report.

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2023/0002/ENF BA/2023/0003/ENF BA/2023/0004/UNAUP2 APP/E9505/C/23/3322890 and APP/E9505/C/23/3322949	Jeanette Southgate and Mr R Hollocks	Appeals received by the BA on 24 and 26 May 2023 Appeals start dates 27 and 29 June 2023	Berney Arms Inn	Appeal against enforcement notice - occupation of caravan	Committee decision 31 March 2023 LPA Statements submitted 9 August and 11 August 2023

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2023/0291/TPOA BA/2023/0002/REF APP/TPO/E9505/9846	Mr J Calver	Appeal received by the BA on 23 August 2023 Appeal start date 2 July 2024	River Green Yarmouth Road Thorpe St Andrew	Appeal against refusal to grant permission for works to TPO tree: T1: Horse Chestnut - Reduce primary stems by approximately 6m & reduce limb at 5.5m.	Delegated decision 11 August 2023 Fast track appeal so no LPA Statement required Site Visit date TBC
BA/2024/0091/HOUSEH BA/2024/0003/HHAPP APP/E9505/D/24/3349349	Mr P Albon	Appeal received by the BA on 8 August 2024 Appeal start date 10 September 2024	Hill Crest, The Hill, Shipmeadow	Horizontal cladding attached to exterior wall surfaces of dwelling (retrospective)	Delegated decision 10 May 2024 Fast track appeal so no LPA Statement required
BA/2024/0092/FUL BA/2024/0002/REF APP/E9505/W/24/3353862	Mr P Albon	Appeal received by the BA on 16 October 2024	Hill Crest, The Hill, Shipmeadow	Erection of storage barn (retrospective)	Delegated decision 10 May 2024 LPA Statement submitted

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2024/0032/CLEUD BA/2024/0001/REF APP/E9505/X/24/3350415	Mr John Atkins	Appeal start date 26 November 2024	Driftwood, 104 Lower Street, Horning, Norfolk	Lawful Development Certificate for 10 years use as holiday accommodation	Delegated decision 8 May 2024
BA/2024/0212/FUL BA/2025/0001/REF APP/E9505/W/25/3359289	Mrs Kate Gabriel	Appeal start date 6 February 2025	Manor Gates Garden, Staithe Road, Ludham, Norfolk. NR29 5AB	Boat cover over existing mooring cut (retrospective)	Delegated decision 19 July 2024
BA/2022/0007/UNAUP2 APP/E9505/F/25/3361103 BA/2025/0001/ENF	Mr Richard Howlett	Appeal start date 19 March 2025	Holly Lodge Church Loke, Coltishall, NORWICH, NR12 7DN	Appeal against Listed building enforcement notice - Installation of UPVC windows	Committee Decision 2 February 2024

Author: Steve Kenny

Date of report: 24 March 2025

Background papers: BA appeal and application files

Planning Committee

04 April 2025

Agenda item number 15

Decisions made by officers under delegated powers

Report by Development Manager

Summary

This report sets out the delegated decisions made by officers on planning applications from 21 February 2025 to 20 March 2025 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Barsham And Shipmeadow Parish Council	BA/2024/0450/LBC	Barsham Barn Church Lane Barsham Suffolk NR34 8HB	Helen Preston	Installation of flood protection measures	Approve Subject to Conditions
Barsham And Shipmeadow Parish Council	BA/2024/0449/LBC	2 Old Hall Church Lane Barsham Suffolk NR34 8HB	Graham Elliott	Installation of flood protection measures	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Barsham And Shipmeadow Parish Council	BA/2024/0448/LBC	1 Old Hall Church Lane Barsham Suffolk NR34 8HB	Jane Elliott	Installation of flood protection measures	Approve Subject to Conditions
Beccles Town Council	BA/2025/0021/FUL	Beccles Lido Puddingmoor Beccles Suffolk NR34 9PL	Beccles Lido Ltd	Erection of pergola	Approve Subject to Conditions
Fritton With St Olaves Parish Council	BA/2025/0030/LBC	The Priory Beccles Road St Olaves Fritton And St Olaves Norfolk NR31 9HE	Mr Alastair Harvey	Replacement and reinstatement of rainwater goods and installation of Heritage Slimline glazing within 7 existing windows.	Approve Subject to Conditions
Horning Parish Council	BA/2025/0019/APPCON	Waters Edge Ferry View Estate Horning Norfolk NR12 8PT	Plans4Homes	Details of Conditions 4: pollution prevention, and 5: External Materials, raised terrace, decking and balustrading of permission BA/2023/0262/FUL	Approve
Horning Parish Council	BA/2025/0008/HOUSEH	Cresta Cottage Ferry View Estate Horning Norfolk NR12 8PT	Mr E Neville	Replacement of 115m of existing timber quay heading like for like and enlarge existing boat dock.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Horning Parish Council	BA/2024/0451/FUL	Bureside Estate, Plot 85 Crabbetts Marsh Horning Norfolk NR12 8JP	Mr Timothy Marshall	Replacement, re-located boathouse with the addition of solar panels	Approve Subject to Conditions
Horning Parish Council	BA/2024/0455/HOUSEH	Birchwood Lower Street Horning Norfolk NR12 8PF	Mr A Fuller	Replace 302m of timber quay heading with 283m in plastic, and 19m in timber on the river front, including double timber waling and timber capping.	Approve Subject to Conditions
Horning Parish Council	BA/2025/0020/HOUSEH	1 Bittern Island, Silver Birches Lower Street Horning Norfolk NR12 8PF	Miss Joanna Cottrell	Renew & extend decking to perimeter of property. Replace single glass window with French doors.	Approve Subject to Conditions
Horning Parish Council	BA/2024/0243/FUL	Bunbury Horning Reach Horning Norfolk NR12 8JR	Mr Julian Blake	Demolition of existing dwelling and erection of new dwelling	Approve Subject to Conditions
Hoveton Parish Council	BA/2024/0430/FUL	Unit 3 Church Road Hoveton NR12 8UG	DPSK Ltd	Change of use from a vacant retail unit (Class E) to hot food takeaway (sui generis) with installation of extraction and ventilation equipment and minor external alterations.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Upton With Fishley Parish Council	BA/2024/0256/FUL	Bridgecraft Acle Bridge Upton Norfolk NR13 3AS	Bridgecraft Ltd	Demolition existing dry boatshed and erection of a new steel framed dry boatshed.	Approve Subject to Conditions
Wroxham Parish Council	BA/2024/0411/FUL	Burewood House Beech Road Wroxham Norwich Norfolk NR12 8TP	Mrs Sarah Davies	Replace 167.9m of timber quay-heading with galvanised steel piling with double and single waling and timber capping and part replacement of timber decking with plastic decking.	Approve Subject to Conditions

Tree Preservation Orders confirmed by officers under delegated powers

Parish	Address	Reference number	Description
N/A	N/A	N/A	N/A

Author: Steve Kenny

Date of report: 21 March 2025