

# Planning Committee

## Agenda 16 July 2021

10.00am

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

### Introduction

1. To receive apologies for absence
2. To receive declarations of interest
3. **To receive and confirm the minutes of the Planning Committee meeting held on 18 June 2021** (Pages 3-12)
4. To note whether any items have been proposed as matters of urgent business

### Matters for decision

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 Conduct for Planning Committee](#).
6. Request to defer applications include in this agenda and/or vary the order of the agenda
7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**  
There are no applications for consideration.

### Policy

8. **Greater Norwich Local Plan - update** (Pages 13-14)  
Report by Planning Policy Officer
9. **Beccles Neighbourhood Plan – proceeding to referendum** (Pages 15-18)  
Report by Planning Policy Officer
10. **East Suffolk Neighbourhood Plan Housing Methodology** (Pages 19-34)  
Report by Planning Policy Officer
11. **Consultation responses** (Pages 35-39)  
Report by Planning Policy Officer

12. **Local Plan Issues and Options Bite Size Pieces – July 2021** (Pages 40-68)  
Report by Planning Policy Officer

## Enforcement

13. **Enforcement update** (Pages 69-73)  
Report by Head of Planning
14. **Acle: Change of use of land to stationing and use of caravan for residential purposes**  
(Pages 74-78)  
Report by Head of Planning

## Matters for information

15. **Appeals to the Secretary of State update** (Pages 79-81)  
Report by Senior Planning Officer
16. **Decisions made by Officers under delegated powers** (Pages 82-86)  
Report by Senior Planning Officer
17. **To note the date of the next meeting – Friday 13 August 2021 at 10.00am**

# Planning Committee

## Minutes of the meeting held on 18 June 2021

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## **Present**

Melanie Vigo di Gallidoro – in the Chair, Harry Blathwayt, Stephen Bolt, Bill Dickson, Andrée Gee, Gail Harris, Tim Jickells, Bruce Keith, James Knight, Vic Thomson, Fran Whymark.

## **In attendance**

Natalie Beal – Planning Policy Officer, Cheryl Peel – Senior Planning Officer, Cally Smith – Head of Planning and Sara Utting – Governance Officer (minute taker)

## **Members of the public in attendance who spoke**

Rodney Hale-Sutton (agent) and Nick Mackmin (applicant) for item 7.1 – BA/2021/0067FUL – The Old Bridge Hotel site, Bridge Road, Potter Heigham

# **1. Apologies and welcome**

The Chairman welcomed everyone to the meeting.

**An apology** was received from Leslie Mogford.

## **Openness of Local Government Bodies Regulations 2014**

The Chairman explained that the meeting was being audio-recorded. All recordings remain 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.

# **2. Declarations of interest and introductions**

Prior to the introductions, the Chair reminded members that this was Bruce Keith's last Planning Committee meeting, as his appointment ended on 30 June, having served a four year term as a Secretary of State appointee. She described Bruce as a superb Vice-Chair who had supported her well, and all would miss his wisdom and wit. He had taken a leading role at meetings with Norfolk County Council on planning matters, drawing on his realm of understanding. She particularly appreciated him stepping up to chair a Planning Committee meeting at very short notice. Members endorsed these sentiments. In response, Bruce thanked the Chair for her very kind remarks. During his membership of the Planning Committee, he had experienced a range of cases from glamping, Listed Buildings and Tree Preservation Orders through to engineering works and moorings. He thanked his fellow members, particularly the Chair, and also the officers who he considered to be very professional and hard working.

Members and officers introduced themselves and, where applicable, members provided their declarations of interest as set out in Appendix 1 to these minutes and in addition to those already registered.

# **3. Minutes of last meeting**

The minutes of the meeting held on 21 May 2021 were approved as a correct record and would be signed by the Chairman.

## 4. Matters of urgent business

There were no items of urgent business.

## 5. Chair's announcements and introduction to public speaking

**Public Speaking:** The Chair stated that public speaking was in operation in accordance with the Authority's Code of Conduct for Planning Committee.

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

No requests to defer or vary the order of the agenda had been received. It was noted that item 10 had been deferred, as previously advised to members via email.

## 7. Application for planning permission

The Committee considered the following application submitted under the Town and Country Planning Act 1990 (also having regard to Human Rights), and reached the decision set out below. Acting under its delegated powers, the Committee authorised the immediate implementation of the decision.

The following minute relates to additional matters of information or detailed matters of policy not already covered in the officer's report, which were given additional attention.

(1) BA/2021/ 0067/FUL – The Old Bridge Hotel site, Bridge Road, Potter Heigham

**Erection of eight x 1 bedroom and four x 2 bedroom flats for holiday use, restaurant at ground floor level and associated car parking**

**Applicant: Nicholas Mackmin**

The Senior Planning Officer (SPO) provided a detailed presentation on the redevelopment of the site to create 12 holiday units, restaurant and parking at The Old Bridge Hotel site, Bridge Road in Potter Heigham. The site was formerly the location of the Bridge Hotel but in recent years had been used as a car parking area. In 1991, the hotel had burnt down and consent had been granted in 1993 for a replacement building, although no works had occurred since then and the site remained undeveloped.

In assessing the application, the SPO addressed the key issues of: the principle of development; flood risk; design of the new buildings and the impacts on the historic environment, trees, biodiversity, amenity and highways. She advised that the recommendation was that the application be refused.

A member queried if any pre-application advice had been sought. The SPO responded that an enquiry had been made in March 2019 regarding the previous permission to replace the former hotel and what would be allowed on site, and officers had provided very detailed advice. The conclusion was that, as the site was in Flood Zones 3a and b, a proposal for overnight accommodation would be unacceptable. A further enquiry had been made in January 2020, which referred to professional advice they had sought which stated that, as the Local Plan had now been adopted, it could be assumed the site was suitable for more

vulnerable development. In response, officers had commented that flood risk was still an issue and advice should be sought from the Environment Agency (EA) on what would be acceptable on site in respect of flood risk.

Another member referred to a comment made by the SPO that there were other buildings on this site which could be converted to other uses and, in response, the SPO clarified that these were not within the application site itself but within the area covered by Policy POT1 – such as the boatyard, restaurant/takeaway and amusement arcade, and were within different ownership(s).

A member asked whether, if the hotel had not burnt down in 1990 but remained in place, would redevelopment be permissible as in Flood Zone 3a. The SPO responded that planning permission had been granted in 1993, but expired in 1998 and had never been implemented. Permission for the car park had been granted in 1995 and renewed over time. As the hotel had now been demolished, the site was designated as Flood Zone 3b. Another member commented that the other buildings within site POT1 could not be converted to holiday accommodation and any application would need to be for demolition and rebuilding. The SPO responded that as no structural surveys had been provided of those buildings, there was no indication what they would be capable of.

Mr Hale-Sutton, the agent, provided a statement in support of the application, advising that he had first been instructed by his client in 2019 to prepare a scheme for old hotel site in Potter Heigham, with the first enquiry made to the Broads Authority in May 2019. Several months of negotiation had taken place, but the scheme had not been agreeable to the Broads Authority and so had been put to one side. In 2020, the scheme had been fully redesigned with the aim of meeting with the Authority's approval. He referred to an email from the Senior Planning Officer received in January 2021 which he described as "enthusiastic", quoting some of the comments made such as "a) the scale of development was now suitable; b) it reflected the development on the opposite bank and c) it did not encroach onto the landscape riverbank or the historic bridge". Consequently, a full application had been submitted on 26 February 2021. The agent referred to Policy POT1, stating that it supported recreational and tourism facilities and that new holiday accommodation may be permitted as part of a comprehensive scheme for the site. The Broads Authority was aware that the site was in Flood Zone 3b and therefore it was imperative that any holiday accommodation would have to be above the predicted flood levels so that occupants would be safe. Provision had been made to rescue the inhabitants should this become necessary. There would be an external staircase to the flats and the accommodation above the predicted flood level and in the event of any breach, there was further accommodation in the roof space. He assured the Committee that safety was the top priority. The recommendation of refusal had been a total shock to him and his client, and it seemed inconceivable that the Authority had spent time and money on producing a policy that could never be fully implemented. In 2009, he had designed a similar scheme at Martham Staithe, a Flood Zone 3a, which was actually built.

A member commended the agent for his enthusiasm but queried why, having received the pre-application advice in 2019 that the site was not suitable for overnight accommodation, he

had he gone this far with the application and also why had he not provided the outstanding information requested by officers. Mr Hale-Sutton responded that he had more of his statement which could partly answer these questions. He had had nothing further to add regarding the Heritage Statement and again referred to the comments made by the SPO that there would be no encroachment onto the landscape riverbank or the bridge. He had included a detailed landscaping scheme on the site layout plan and furthermore, the planting itself could have been dealt with through a condition added to any permission. In terms of the design, he referred to the pictures which he had provided (shown in the presentation) which illustrated a suitable form of roof. It had been established from the start that living accommodation was possible on this site otherwise they would not have gone ahead. The policy did state that living accommodation could be provided, so long as it was part of a mixed-use scheme and so they had provided a restaurant, with the living accommodation at first floor. The buildings had been designed by an engineer and flood risk advice had been taken. It was predicted the building would still be there even after the 1 in 100 and 1 in 200 years flood as the first floor had been designed sufficiently high. Refuge at other floor levels had been provided within the roof and could be accessed by helicopters and rescue boats etc so this had all been thought through. He concluded that they had never been discouraged from including the living accommodation.

A member asked the agent to clarify what had changed during the pre-application process – going from the development “not being acceptable” to the “encouraging” email from the SPO in January 2021. In addition, were the buildings to be built above the predicted flood levels. Mr Hale-Sutton responded that it had always been his client’s wish to get the scheme through. He quoted again from the email from the SPO, based on which they had proceeded with the scheme. His client had spent a lot of money on this planning application and, following the dealings with the planning department, felt confident it would be satisfactory and was disappointed to learn it had failed. In terms of the outstanding queries, they could submit another application within six months, with no application fees. This was a marvellous scheme and Potter Heigham desperately needed quality accommodation. In terms of the predicted flood levels, the floor level would be 3m high, with flooding predicted at 4m, based on advice received from their specialist. They were satisfied what they were doing was above the flood levels. This would be an unusual flood – higher than banks on east coast where breaches might occur.

A member commented that this was a fundamental point, referring to paragraph 6.3 of the report and the comments of the EA which stated that these were not suitable land uses in Flood Zone 3b.

The Head of Planning advised that the Authority provided a pre-application advice service free of charge, which people found to be a very useful and valuable service. The first issue to be considered was: is the principle of development acceptable and only then would officers move on to spending time on detailed matters such as scale, design and density. In this case, the flood risk was a clear constraint and so this had been advised at the outset. However, potential applicants could continue to discuss other matters and officers would advise but would always refer them back to the principle. In this case, officers were content with the

design and layout but the fundamental issue of the principle needed to be addressed. The SPO had referred to the principle being acceptable, as part of the presentation, with holiday accommodation and a retail/leisure use acceptable but the flood risk issue needed to be addressed. This fact had been communicated consistently to the applicant. In her view, it was unfortunate that some of the positive comments made by the SPO had been misinterpreted as more support for the scheme than existed.

Mr Mackmin, the applicant, stated that a hotel and accommodation had been on that site for over 200 years. The hotel had burnt down in 1991 and as the SPO advised, permission had been granted to rebuild in 1995. When he purchased the land, he could have rebuilt the existing hotel but this would have been directly opposite and encroached on the historic bridge and so he had entered into pre-application discussions for a new scheme in 2019, resulting in two years and probably over 100 emails dealing with the Broads Authority. He did get the go ahead in principle as part of the POT1 scheme to provide accommodation but had not been told until two months ago that he could possibly do on other buildings. They were tin shacks and so would not be suitable for accommodation plus they were in different ownership. The hotel could have been rebuilt or converted to accommodation but this scheme was considered to be more appropriate. Four different schemes had been submitted over two years and Canham Consultants had been instructed on the flood risk work, liaising with the EA, on the basis of a risk of one in 100 and one in 1,000 years which were both acceptable in terms of the proposed height of the accommodation. Rather than waste all this time and money, he would have rebuilt the hotel in 2019.

In moving onto the debate, a member referred to Policy POT1 which covered the whole of the bridge area and included the site of the former hotel. New holiday accommodation would only be permitted as part of a comprehensive scheme for the site. In his view, as the Authority was aware of the Environment Agency's comments on Flood Zone 3b, it should not have included this policy in the Local Plan. This site had been vacant for 30 years since the hotel had gone, which he considered to be a disgrace and the Authority should have done more during that time but had now addressed this through Policy POT1. He questioned why this was now undeliverable. Furthermore, the EA was a statutory consultee and the Authority was the decision maker. He felt that the applicant had come up with something which he considered completely fitted the bill of the policy and the application should be supported.

Another member referred to the concerns expressed on the heritage impacts, particularly the bridge which was ancient and so iconic. She agreed with the concerns that the design of the buildings was not in harmony with the bridge and had a 1960's suburban housing style. Whilst not opposed on principle to redevelopment, she would prefer to see something more traditional like thatched roofs to harmonise with the bridge. The flood risk was also an issue.

A member stated that he had sympathy with the developer and also the arguments put forward by another member earlier in the debate. However, flooding was a major issue in this area – during Christmas 2020, holiday makers had to be evacuated from their chalets and this application would only add to the burden on the emergency services who had to put



themselves at risk. The “hole” left by the bridge hotel needed to be filled-in in some way but done more sympathetically and taking account of the ever increasing flood risk.

Harry Blathwayt proposed, seconded by Andrée Gee to refuse the application.

A member advised that the comments of the EA should not be dismissed lightly and the sequential test would have been applied. There were other areas which could be built on. He referred to the pumping station and asked if Anglian Water had made any comment, to which the SPO responded that no response had been received from AW.

Another member concurred with the comments raised above about over-burdening the emergency services and why this would not be a suitable site for overnight accommodation. It would be irresponsible for the Authority to proceed with this proposal. He also agreed with the comments made about the design.

In response, a member stated there were two issues for consideration – the acceptability and the appearance of the proposals. If they had been designed to be in keeping with the area, they would be low-lying shacks, which would be even worse from a flood risk perspective. They had been designed to deal with the fact that they were in Flood Zone 3b, with the accommodation above and car parking underneath. If the Authority now decided not to allow any development in areas within Flood Zone 3b because of the comments of the EA, vast swathes of the Authority’s Local Plan would be affected. It was well established that a Local Plan, based on sound policy making, assisted applicants. In his view, the application was policy compliant and he questioned what would be the repercussions for other applicants and sites if this application were to be refused.

It was suggested by a member that, only in the last two years, had the real risk of flooding become apparent, with unprecedented amounts of flooding which would only get worse and which could not have been foreseen when the Authority had adopted its Local Plan.

The Head of Planning referred to the application site, using the slide from the presentation to identify the area under consideration, an undeveloped area of land which was within Flood Zone 3b and comprised part of the former bridge hotel site, which was part of the area covered by Policy POT1, which was a much larger area. The whole area was within Flood Zone 3b but those parts of the site where there were existing buildings could be treated by the EA as being in Flood Zone 3a so residential development could potentially be considered as acceptable. She emphasised that it was not correct to say that this scheme was policy compliant or the Authority were unable to implement Policy POT1. A member commented that parts (d), (e) and (f) of the policy specifically referred to the “former bridge hotel site”.

In conclusion, members considered that the application to erect holiday accommodation in an area at a high level of flood risk was contrary to both national and local planning policies. Furthermore, the application failed to include sufficient information to be able to fully assess the impact on the historic environment, landscaping and existing vegetation. Accordingly

**It was resolved by 9 votes for and 2 against to refuse the application for the following reasons:**

- The application seeks permission for “more vulnerable” development in an area demonstrated to be Flood Zone 3b (the functional floodplain) which is not considered to be in accordance with Policy DM5 of the Local Plan for the Broads or the NPPF and NPPG guidance.
- Due to there being insufficient information about the impact of the proposed development on the historic environment, in particular on Potter Heigham Bridge, both a scheduled monument and a Grade II\* listed building, the application does not meet the requirements of the NPPF, in particular paragraphs 189, 193 and 194 and is contrary to Policy DM11 of the Local Plan for the Broads.
- The application fails to include an Arboricultural Impact Assessment and Landscape Scheme contrary to Policies DM16, DM43 and POT1 of the Local Plan for the Broads.

## 8. Enforcement update

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

**former Marina Keys, Gt Yarmouth:** The Section 106 Agreement had now been signed and planning permission issued so works were likely to commence shortly.

**land at the Beauchamp Arms:** Landowner had pleaded “not guilty” at the Hearing at Magistrates’ Court last week. Date set for trial at Gt Yarmouth Magistrates’ Court for 20 September.

**land at Thorpe next Haddiscoe:** site still not cleared so officers in discussion with operator on how to resolve.

## 9. Sustainability Appraisal Scoping Report – for technical consultation

The Planning Policy Officer (PPO) introduced the report, which proposed the endorsement of the Sustainability Appraisal (SA) Scoping Report for approval by the Broads Authority for technical consultation. This was one of the first tasks in producing the Local Plan for the Broads, setting the framework for assessing policy approaches as the Local Plan progressed. The SA Scoping Report would also set the framework for assessing the strategic objectives in the Broads Plan, which was under review in 2021/22. It was noted that the SA Scoping Report must be sent to the environment bodies for technical consultation (it was not subject to public consultation). However, under the auspices of the Duty to Co-operate, the Authority also consulted with its local authorities, MMO and the RSPB. The PPO advised that, since the report had been prepared, two more maps were to be added to the bundle (minerals & waste and flood risk) and these would be included in the report presented to the Broads Authority meeting in July for endorsement, following which there would be a five week consultation period. It was worth noting that whilst the Planning White Paper did propose the removal of

Sustainability Appraisals, this was not yet in place so the Authority had to continue with the work.

A member commended officers for producing the report, highlighting the scale of work involved. He referred to section 7 on the SA objectives, and how some of these could end up in conflict, eg economic growth versus biodiversity enhancement, and questioned how this would be resolved, as well as the relationship with the priorities in the Broads Plan. The PPO responded that the SA objectives stood apart from the Local Plan objectives and were used to assess policies. She concurred that there might well be conflict and drew attention to Appendix 6 which identified the compatibility of the SA objectives, with those shaded orange having some commentary on the following page. It would be a balancing act to rate the policies against the criteria.

Another member commented that it would be useful if officers held a workshop for members to provide an opportunity for a greater understanding of what was a very complex document.

**It was resolved unanimously to endorse the SA Scoping Report and recommend it to the Broads Authority for technical consultation.**

## **10. Beccles Neighbourhood Plan – proceeding to referendum**

The Chair reminded the Committee that, as previously notified by email, this item had been deferred as the Authority had very recently been advised that a number of amendments were being proposed to the Plan and these needed to be fully considered by both the Broads Authority and East Suffolk Council and approved for inclusion in the Referendum version of the Plan. The meeting of the Beccles Town Council Planning Committee at which these amendments would be considered was 28 June. Therefore, the item had been deferred to the July meeting of the Broads Authority Planning Committee.

## **11. Consultation documents – update and proposed response**

The Planning Policy Officer (PPO) introduced the report, which provided a proposed response to two planning policy consultations recently received, one from Winterton Parish Council on the Winterton on Sea Neighbourhood Plan and one from Suffolk County Council on the Developer's Guide to Infrastructure Contributions in Suffolk.

Regarding the Winterton NP, the PPO advised that experience had shown that it was necessary to make the comments related to Basic Conditions in order for them to be heard and considered at Examinations, otherwise Examiners would not necessarily address them, hence the main concerns were prefixed with the Basic Condition.

Andree Gee proposed, seconded by Fran Whymark and

**It was resolved unanimously to note the report and endorse the proposed responses.**

## 12. Appeals to the Secretary of State

The Committee received a schedule of appeals to the Secretary of State for June 2021. The SPO advised that the statement had been submitted for the appeal at Brograve Mill on 7 June and, since the report had been written, another appeal had been received, which also appeared on the list of decisions made by officers under delegated powers – advert consent for a solar powered totem at Morrisons supermarket in Beccles.

## 13. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 10 May to 6 June 2021 and any Tree Preservation Orders confirmed within this period.

In response to a query on what was a solar powered totem, the SPO advised it was a very tall sign. This was a resubmission of an earlier refusal, which had been refused on the grounds of its level of luminance and impact on the landscape. Although this latest application had reduced the level of luminance, there were still objections to its impact on the landscape.

## 14. Date of next meeting

The next meeting of the Planning Committee would be on Friday 16 July 2021 at 10.00am.

The meeting ended at 11.30am.

Signed by

Chairman

## Appendix 1 – Declaration of interests - Planning Committee, 18 June 2021

Member	Agenda/minute	Nature of interest
James Knight	3 relating to 7(1)	Referred to his declaration from the previous meeting when his application had been discussed.
Andrée Gee	12	Two of the appeals were within her Ward.

# Planning Committee

16 July 2021

Agenda item number 8

## Greater Norwich Local Plan – update

Report by Planning Policy Officer

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### Summary

The Greater Norwich Local Plan will be submitted to the Planning Inspector soon. This report is a short reminder of progress to date. A Greater Norwich Local Plan representative will be attending Planning Committee to present a more detailed update.

### Recommendation

To note the report.

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## 1. Background

- 1.1. The Greater Norwich Local Plan (GNLP) will supersede the current Joint Core Strategy for Greater Norwich and the Site Allocation Plans in each of the three districts.
- 1.2. The Greater Norwich Local Plan is ready for submission to the Planning Inspectorate for examination in public.
- 1.3. The [most recent version of the Greater Norwich Local Plan \(Regulation 19\)](#) was consulted on in February and March 2021. At the [February 2021 Planning Committee](#), Mike Burrell from the Greater Norwich Local Plan Team presented the Regulation 19 version of the Local Plan. The proposed officer [comments](#) were presented to and discussed at Planning Committee in March 2021 and subsequently submitted to the consultation.

## 2. Update

- 2.1. The Greater Norwich Local Plan Team have gone through all the comments and consider that their Local Plan can be submitted to the Planning Inspector (likely by the end of July). Mike Burrell will be at the July Planning Committee to provide an update on the process so far.
- 2.2. The GNLP team have published draft responses to comments and these can be found at the links below. These may be amended before they are submitted with the other submission documents. These are all the comments and as they are pdf documents, you can press ctrl f and search for the term Broads and our comments will come up.

From a Broads Authority point of view, officers will assess the responses and consider options for our approach during the examination.

- Comments on the [Strategy](#)
- Comments on the [Sites Plan](#)
- Comments on the [Evidence](#)

### 3. Next steps

- 3.1. Once submitted, the Planning Inspectorate will lead on an examination in public to ascertain the soundness of the Plan. It is fairly usual that Plans are found sound with modifications, and those modifications are consulted on. Consultation responses are considered by the Inspector who then issues their report, and then potential adoption by the Greater Norwich Authorities.
- 3.2. The area covered by the GNLP does not include the Broads. But, the Broads needs to be, and through close working is, an important consideration in this Plan.

Author: Natalie Beal

Date of report: 01 July 2021

# Planning Committee

16 July 2021

Agenda item number 9

## Beccles Neighbourhood Plan – proceeding to referendum

Report by Planning Policy Officer

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### Summary

The Beccles Neighbourhood Plan and the representations received on the submitted Plan during the publication stage have been subject to an independent examination by a suitably qualified individual who endorsed the Plan, with some changes, for referendum.

### Recommendations

1. To support the Examiner's report and support the Beccles Neighbourhood Plan proceeding to referendum.
  2. To endorse the further changes proposed by Beccles Town Council.
  3. That Planning Committee support the result of the referendum being reported directly to Broads Authority at the next available meeting, likely to be on 24<sup>th</sup> September.
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## 1. Introduction

- 1.1. The submitted Beccles Neighbourhood Plan was approved by the Broads Authority at Planning Committee in December 2020. This was followed by a statutory publication period between 14 December 2020 and 8 February 2021 in which the Plan and its supporting documents were made available to the public and consultation bodies via:

- East Suffolk Council website  
(<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/beccles-neighbourhood-area/>)
- Hard copies were available at Beccles Town Hall by appointment only.

- 1.2. During the publication period, representations from 28 different organisations/ individuals were received. The representations can be viewed here:  
<https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Beccles/Responses-to-Beccles-Neighbourhood-Plan-Regulation-16-excluding-late-representations.pdf>

and the late representations here:

[https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-](https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Beccles/Responses-to-Beccles-Neighbourhood-Plan-Regulation-16-excluding-late-representations.pdf)

[Neighbourhood-Areas/Beccles/Responses-to-Beccles-Neighbourhood-Plan-Regulation-16-late-representations.pdf](#).

- 1.3. These representations were submitted, along with the Neighbourhood Plan and supporting information, to the independent Examiner, Mr Nigel McGurk. The examination was conducted via written representations during March/April 2021 (the Examiner deciding that a public hearing would not be required).
- 1.4. Legislation directs that an Examiner considers whether:
  - a) the draft plan meets the ‘basic conditions’<sup>1</sup> of a Neighbourhood Development Plan,
  - b) the draft plan complies with the definition of a Neighbourhood Development Plan and the provisions that can be made by such a plan,
  - c) the area for referendum should extend beyond the neighbourhood area, and
  - d) the draft plan is compatible with the Convention rights.
- 1.5. Planning legislation states that once a local planning authority has been issued with an Examiner’s report, they must consider the recommendations. If the authority is satisfied with the Examiner’s recommendations then any specified modifications should be made before the Plan proceeds to referendum.
- 1.6. If the Broads Authority and East Suffolk Council are satisfied then they will need to publicise their decision (a decision statement) and move to a referendum (should that be what the examiner recommends). If they are not satisfied, then they must refuse the plan proposal and publicise their decision. This decision would be subject to a further six-week consultation, with a possibility of a further independent examination.

## 2. The Examiner’s report

- 2.1. The Examiner’s report concludes that, subject to amendments (as set out in the report), the Neighbourhood Plan can proceed to referendum. The Examiner also concluded that the area of the referendum does not need to be extended beyond Beccles. The report can be found here: <https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Beccles/Beccles-Neighbourhood-Plan-Examiners-Report.pdf>
- 2.2. Whilst it is disappointing that the Examiner did not take forward our comments<sup>2</sup> on the Plan, the changes proposed by the Examiner seem reasonable and are useful.
- 2.3. **It is therefore recommended that Planning Committee support the Examiner’s report and support the Beccles Neighbourhood Plan proceeding to referendum.**

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<sup>1</sup> <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

<sup>2</sup> [https://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0021/374007/Consultation\\_Responses\\_January-2021.pdf](https://www.broads-authority.gov.uk/_data/assets/pdf_file/0021/374007/Consultation_Responses_January-2021.pdf)



### 3. Further changes propped by the Town Council

- 3.1. On receiving the Examiner's report, and the changes proposed by the Examiner, Beccles Town Council are proposing some more amendments to the Beccles Neighbourhood Plan. These are set out in the following table, with commentary.

Part of Neighbourhood Plan	Proposed amendment	Commentary
Para 4.20	It should be noted that Beccles Quay is within the Broads Authority area and therefore any proposals must also take account of the policies in its Local Plan, including policies <a href="#">DM31</a> , <a href="#">DM33</a> and Policy BEC2 on residential moorings.	A factual change that refers to policies of the Local Plan for the Broads that will be relevant. Change supported as it is not considered a material change.

- 3.2. **It is recommended that this change, proposed by Beccles Town Council, is supported and made to the final Neighbourhood Plan.**

### 4. Next steps

- 4.1. Should the Examiner's recommendations be met with full approval by East Suffolk Council and the Broads Authority, then a decision statement will then be produced which will be published, along with the Examiner's report, on the Broads Authority and East Suffolk Council's website and made available in the other locations. Beccles Town Council will make the appropriate amendments to the plan as set out in the Examiner's Report (and as set out in section 3 of this report).
- 4.2. Should the recommendation be to proceed to a referendum, then the next steps will involve East Suffolk Council publishing information and giving at least 28 days' notice of the referendum (not including weekends and Bank Holidays). Again, this information will be made available on the East Suffolk Council and Broads Authority websites and likely made available by Beccles Town Council.
- 4.3. The referendum is set for 16<sup>th</sup> September.
- 4.4. If more than half of the people who vote in this referendum vote in favour of the proposal then East Suffolk Council and Broads Authority must adopt/make the Neighbourhood Plan as soon as reasonably practicable, unless it considers that this would breach or be incompatible with any EU obligation or the Human Rights Convention.
- 4.5. This means that, should the referendum result support the Neighbourhood Plan, then the Plan would be subject to East Suffolk Council and the Broads Authority ratification

before it is 'made', although the NPPG says that 'A neighbourhood plan comes into force as part of the statutory development plan once it has been approved at referendum'.

- 4.6. Should the local planning authority propose to make a decision that differs from the Examiner's recommendations (and the reason for the difference is wholly or partly as a result of new evidence or a new fact or a different view taken by the authority about a particular fact) then they:
  - 4.6.1. Are required to notify all those identified in the consultation statement about this position and invite representations;
  - 4.6.2. May refer the issue to an independent examination if they think it appropriate.
- 4.7. The Beccles Neighbourhood Plan is due to be the subject of a referendum on 16th September 2021. Due to the legislation and regulations that guide the production of Neighbourhood Plans, and the programme of Authority meeting it may be difficult to bring the result of the referendum to Planning Committee prior to a Broads Authority meeting for adoption. **As a pragmatic approach, it is recommended that Planning Committee support the following approach: that the result is reported directly to the next appropriate Broads Authority meeting, likely to be on 24<sup>th</sup> September. If more than 50% of votes cast support the Neighbourhood Plan, the recommendation to Broads Authority would be to make/adopt the Beccles Neighbourhood Plan.** Whilst this is not the usual process for such reports (with the usual process being to go to Planning Committee prior to Broads Authority), this approach seems pragmatic given the required timescales. If the threshold of 50% is not reached, the report will be not be taken to the Broads Authority meeting and we will liaise with Beccles Town Council and East Suffolk about the next steps.

## 5. Financial Implications

- 5.1. Officer time in assisting East Suffolk Council with the Neighbourhood Plan process. Referendum and examination costs have been borne by East Suffolk Council.

Author: Natalie Beal

Date of report: 02 July 2021

# Planning Committee

16 July 2021

Agenda item number 10

## East Suffolk Neighbourhood Plan Housing Methodology

Report by Planning Policy Officer

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### Summary

This report introduces the proposed approach to providing an indicative housing requirement to those Qualifying Bodies (Neighbourhood Groups, usually Parish or Town Councils) who wish to plan for housing in their Neighbourhood Plans beyond that which is planned for in the Local Plan, and who ask East Suffolk Council for an indicative housing requirement.

### Recommendation

That Planning Committee endorse the approach for calculating an indicative housing requirement for Neighbourhood Plans in East Suffolk to be provided to those who ask for such a requirement.

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## 1. Introduction

- 1.1. This report introduces the proposed approach to providing an indicative housing requirement to those Qualifying Bodies (Neighbourhood Groups, usually Parish or Town Councils) who wish to plan for housing in their Neighbourhood Plans beyond that which is planned for in the Local Plan, and who ask East Suffolk Council for an indicative housing requirement. The methodology in the note will also apply to the full extent of a Neighbourhood Area where it extends into the Broads Executive Area, within which the Broads Authority is the local planning authority. This methodology has been produced with input from the Broads Authority.

## 2. National Policy context

- 2.1. In relation to establishing housing requirements in Neighbourhood Plans, paragraphs 65 and 66 of the National Planning Policy Framework (NPPF) state:

65. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once

the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

66. Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

- 2.2. Where a housing requirement for a Neighbourhood Area has not been set in the Local Plan, paragraph 66 is relevant.

### 3. Methodology

- 3.1. There is no nationally set methodology for assessing indicative housing requirements for Neighbourhood Plan areas. East Suffolk Council and the Broads Authority have therefore considered practice from elsewhere, and relevant parts of the NPPF, Planning Policy Guidance (PPG) and Local Plan policies in developing a methodology. The process is not solely a calculation as there are a range of factors to consider, in accordance with the NPPF and the PPG.
- 3.2. The methodology and further background information is at Appendix 1. To summarise, the following considerations will help inform an indicative housing requirement for Neighbourhood Areas if they ask for a housing figure:
- Growth identified in Local Plan
  - Percentage of total growth above based on Local Plan contingency
  - Position in Settlement Hierarchy
  - Local Plan Strategy
  - Population of the Neighbourhood Area
  - Current Local Housing Need figure
  - Local needs for housing identified through a local housing need assessment where relevant
  - Environmental designations and assets
  - Infrastructure capacity
  - Other issues and local information

Author: Natalie Beal

Date of report: 28 June 2021

Appendix 1 – East Suffolk Council, Neighbourhood Plans – Indicative Housing Requirements, Methodology, June 2021 (Draft)

# Neighbourhood Plans – Indicative Housing Requirements

## Methodology

June 2021 (Draft)

### Background

This note sets out the Council's approach to providing an indicative housing requirement to those Qualifying Bodies who wish to plan for housing in their Neighbourhood Plans, beyond that which is planned for in the Local Plan, and who ask the Council for an indicative housing requirement. The methodology in the note will also apply to the full extent of a Neighbourhood Area where it extends into the Broads Executive Area, within which the Broads Authority is the local planning authority. This methodology has been produced with input from the Broads Authority.

### National Policy Context

In relation to establishing housing requirements in Neighbourhood Plans, paragraphs 65 and 66 of the National Planning Policy Framework (NPPF) state:

65. *Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.*

66. *Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.*

Where a housing requirement for a Neighbourhood Area has not been set in the Local Plan, paragraph 66 is relevant. The East Suffolk Council - Suffolk Coastal Local Plan (September 2020) sets housing requirements for a number of Neighbourhood Areas that were designated at the time of plan preparation. This note applies to requests for housing numbers for other Neighbourhood Areas.

The [Planning Practice Guidance on Neighbourhood Planning](#)<sup>1</sup> (PPG) provides further guidance (see Appendix 1 to this note).

Whilst guidance is contained in the PPG, there is no nationally set methodology for identifying indicative housing requirements for Neighbourhood Plan areas.

Neighbourhood Plans are not required to plan for housing, however when doing so Qualifying Bodies<sup>2</sup> may request a housing figure from the Council. Where this figure has not been set in a strategic policy in an adopted Local Plan, this requirement is 'indicative' and will need to be tested at the Neighbourhood Plan Examination. It is therefore crucial that any indicative housing requirement is fully justified.

Whilst the local planning authority could choose to not provide a Qualifying Body with a housing requirement, the Council has a statutory duty to support the production of Neighbourhood Plans and also considers it is good practice to provide a housing requirement figure where this is requested. As well as supporting Qualifying Bodies, this also enables a consistent approach across East Suffolk.

Plan-area-wide housing requirements for the Suffolk Coastal and Waveney Local Plan areas have been established through the Local Plans. Housing requirements for the part of the Broads within the former Waveney district have also been established within the Broads Local Plan.

Where a Neighbourhood Plan chooses to plan for additional housing growth, the indicative housing requirement does not need to be met in total through allocations, and policies which support windfall housing development could form part of the approach in a Neighbourhood Plan. It should be noted however that where Neighbourhood Plans look to benefit from paragraph 14 of the NPPF in terms of housing land supply they will be expected to include allocations in accordance with the NPPF and the PPG.

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<sup>1</sup> <https://www.gov.uk/guidance/neighbourhood-planning--2>

<sup>2</sup> I.e. Town or Parish Councils or Neighbourhood Forums.

The purpose of this methodology paper is to set out how the Council will assess an indicative housing requirement for Neighbourhood Plan areas, when asked to do so.

## Adopted Local Plans

The East Suffolk Council - Suffolk Coastal Local Plan was adopted on 23<sup>rd</sup> September 2020 and the East Suffolk Council - Waveney Local Plan was adopted on 20<sup>th</sup> March 2019. The Broads Local Plan was adopted on 17<sup>th</sup> May 2019.

The East Suffolk Local Plans contain strategies to meet the housing requirements identified for the Plan period, and both contain contingencies (i.e. allocate more housing than is needed) to provide confidence that the housing requirements will be met. However, Town and Parish Councils may aspire for growth above that which the Local Plan expects to come forward within their communities and both the Suffolk Coastal and Waveney Local Plans provide some specific scope for additional growth to come forward.

The Suffolk Coastal Local Plan sets out housing requirements for the plan period (2018-2036) for those areas with a designated Neighbourhood Plan area at the time of production of the Final Draft Local Plan (which was approved by the former Suffolk Coastal District Council in January 2019 for publication and submission). Housing requirements for these areas are set out in Policy SCLP12.1 Neighbourhood Plans of the adopted Local Plan, as shown in Appendix 2 to this note. Policy SCLP12.1 also acknowledges that other Neighbourhood Areas will be designated and states “Where new Neighbourhood Plan areas are designated, minimum housing requirements will be based on a range of factors including the location of the settlement in relation to the strategy of the Local Plan, the position of the settlement in the settlement hierarchy and any known significant constraints to development.”

The Waveney Local Plan, having been prepared prior to the publication of the 2019 NPPF, does not set out housing requirements for designated neighbourhood areas. However, the Plan is supportive of the production of Neighbourhood Plans and is supportive in principle of Neighbourhood Plans planning for housing growth. Policy WLP1.1 Scale and Location of Growth states “Neighbourhood Plans can allocate additional growth to meet local needs at a scale which does not undermine the overall distribution strategy.” Policy WLP1.2 Settlement Boundaries states “Neighbourhood Plans can make minor adjustments to settlement boundaries and allocate additional land for residential, employment and town centre development providing that the adjustments and allocations do not undermine the overall distribution strategy outlined in Policy WLP1.1 and would not be contrary to the other policies of this Local Plan.”

For Neighbourhood Areas in the ‘countryside’, the strategies of the Local Plans expect limited growth to come forward and as such the indicative housing requirement for these areas will be zero, unless there are specific local factors that warrant an alternative

approach. Policies may set out local support for housing development that is in general conformity with the policies for housing in the countryside.

The Broads Local Plan was also prepared prior to the 2019 NPPF and does not contain housing requirements for Neighbourhood Areas. It is not expected that additional new housing will be planned for within the Broads through Neighbourhood Plans. This is because the more rural parts of a parish tend to be within the Broads. There are also constraints such as landscape impact, distances from services and flood risk.

Neighbourhood Plans are required to be in general conformity with the strategic policies of the relevant Local Plan in order to meet the basic conditions and proceed to referendum.

It is advised that early discussion takes place between the Qualifying Body and the Council to discuss the aims of planning for housing and the issues the Qualifying Body are seeking to address.

## Methodology

There is no nationally set methodology for assessing indicative housing requirements for Neighbourhood Plan areas. East Suffolk Council and the Broads Authority have therefore considered practise from elsewhere, and relevant parts of the NPPF, PPG and Local Plan policies in developing a methodology.

The following table sets out the considerations and assessments that will be made when the Council is asked to provide an indicative housing requirement to a Qualifying Body. The process is not solely a calculation as there are a range of factors to consider, in accordance with the NPPF and the PPG.

The Planning Practice Guidance states that the local authority's 'local housing need' can form the starting point, however due to the recent adoption of Local Plans which contain strategies to meet housing requirements and set out, in policy, the overall approach to additional growth in Neighbourhood Areas, the Local Plan strategy is considered to form an appropriate starting point. However, the authority's local housing need, as calculated through the Government's standard methodology, will change over time and could be a factor that needs to be considered through the production of the Neighbourhood Plan. The reference to current local housing need figures is therefore included in the methodology table alongside the housing requirement that the Local Plans are planning for, for reference.

In order to identify an initial starting point which reflects the strategy of the Local Plan, a proportionate increase on the level of growth already planned for in the Neighbourhood Area should be calculated. This is to be done through reference to the contingency provided for in either the Suffolk Coastal Local Plan or the Waveney Local Plan. The contingency is the level of growth planned for in the Local Plans over and above the housing requirement. It is important to note that this is a starting point, and the methodology allows for



consideration of other local issues or the aspirations of the Town/Parish Council in arriving at an indicative figure.

The contingency provided for by housing allocations in the Suffolk Coastal Local Plan is 16.5% and in the Waveney Local Plan is 12%, before windfall is factored in<sup>3</sup>. Although the contingency itself represents growth that is already allocated, applying this percentage increase acts as a reasonable starting point for identifying a level of additional growth that would be consistent with the strategy of the Local Plan. This will provide a figure which can then be ‘tested’ against a range of considerations and revised and refined accordingly as necessary.

As an example of using this as a starting point, if a Neighbourhood Area in Waveney is anticipated to deliver 100 dwellings in the Local Plan period (based on completions since the start of the Plan period, existing permissions, and allocations as set out in the Local Plan) the starting point for an indicative housing requirement for the Neighbourhood Plan would be 12 dwellings as this is 12% more.

To test whether this figure is appropriate or should be increased or decreased, a number of qualitative factors should be considered. This approach reflects paragraphs 101 and 102 of the PPG (see Appendix 1) which advocates an approach of balancing needs with protection and taking into consideration spatial policies. The focus is on whether this level of growth is likely to be able to be accommodated and whether it is appropriate, i.e. are there any ‘showstoppers’ or absolute constraints. Considerations around mitigating impacts and identifying appropriate locations for growth are the remit of preparing the Neighbourhood Plan, and therefore it is expected that the considerations set out in the table, such as environmental constraints and infrastructure, would be revisited in the preparation of the Plan including in cases where no ‘showstopper’ constraints have been identified.

Whilst it is for Qualifying Bodies to choose whether to plan for housing or not, the PPG (paragraph 103) states that neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. As the Local Plans contain strategies to meet, and exceed, the housing requirements for the Local Plan areas, the provision of additional housing figures to Neighbourhood Plan areas should be seen as providing an opportunity for an appropriate level of additional growth. In this respect the figures are not intended as minimums or maximums but as an indication of the level of the approximate level of growth that could be planned for. The Council will however expect Qualifying Bodies who have asked for an indicative housing requirement to take a positive approach towards planning for it. For Qualifying Bodies who wish to meet the requirements of paragraph 14b) of the NPPF, indicative housing requirements need to be met in full and Neighbourhood Plans will need to include allocation(s), although a policy on windfall allowance may form a part of the approach.

Engagement between the Council and Qualifying Bodies will be vital during the process of establishing the indicative housing requirement, and the Council would like this to be a two-

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<sup>3</sup> The Broads Local Plan also contains a contingency, of 10.5%

way process with the Qualifying Body inputting on local information / matters that may be relevant.

Legislation requires that Neighbourhood Plans are screened for Strategic Environmental Assessment and Appropriate Assessment during their preparation. Should these assessments indicate constraints on planning for the indicative housing requirement, if necessary the indicative housing requirement could be revisited as a result.

A proforma is contained in Appendix 3. The Council will use the proforma to assess an indicative housing requirement for a Neighbourhood Plan area when asked to do so.

Criteria and considerations to be applied in identifying an indicative housing requirement	
Local Plan Strategy	
Growth identified in Local Plan	The Local Plans set out how much growth is expected to come forward in each settlement over the plan period. In the Suffolk Coastal Local Plan this is set out in Table 3.5. In the Waveney Local Plan this is set out for each of the towns and the Larger Villages and Smaller Villages.
Percentage of total growth above based on Local Plan contingency	For Neighbourhood Areas in Suffolk Coastal Local Plan area multiply figure above by 1.165 (16.5%) For Neighbourhood Areas in Waveney Local Plan area (including those that fall within the Broads) multiply figure above by 1.12 (12%)
Position in Settlement Hierarchy	Consideration should be given to what type of contribution to the housing requirement the Neighbourhood Area will be expected to make in terms of its position in the Settlement Hierarchy.  For Neighbourhood Areas in the 'countryside', the Local Plans expect limited growth to come forward and as such the housing requirement for these areas will be zero, unless there are specific local factors that warrant an alternative approach. Policies may set out local support for housing development that is in general conformity with the policies for housing in the countryside.
Local Plan Strategy	What is the overall strategy of the Local Plan for the Neighbourhood Plan area (or a wider area in which it sits)? This should be a detailed explanation with reference to specific policies.
Population of the Neighbourhood Area	Population of the Neighbourhood Area taken from the latest ONS population projections, as a percentage of the Local Plan area population. This will not directly inform the figure but can form part of the consideration of the requirement in the conclusions below.
Current Local Housing Need figure	Include most recent local housing need figure for the Local Plan area, as calculated under the national standard methodology, alongside housing requirement of the relevant Local Plan for reference.

Local needs	
Local needs for housing identified through a local housing need assessment where relevant	A local housing needs survey may have been undertaken by the Qualifying Body. This may contain evidence of needs for specific types of housing or for the quantum of housing in the Neighbourhood Area. This should be considered in view of the information identified in terms of the Local Plan's strategy for the area – is there likely to be a need that will not be met through the Local Plan policies?
Constraints	
Environmental designations and assets	<p>Environmental designations include:</p> <ul style="list-style-type: none"> <li>• Special Protection Areas and Special Areas of Conservation (note a Habitats Regulations Assessment carried out as part of the production of the Neighbourhood Plan would consider potential harm to the integrity of these sites – for the purposes of establishing an indicative housing requirement consideration should be given to the location of these sites and any relevant conclusions in the HRA for the Local Plan).</li> <li>• Sites of Special Scientific Interest (SSSIs)</li> <li>• The Broads</li> <li>• Areas of Outstanding Natural Beauty</li> <li>• Scheduled monuments</li> <li>• Listed Buildings</li> <li>• Conservation Areas</li> <li>• Listed Parks and Gardens</li> <li>• National Nature Reserves</li> </ul> <p>The purpose of considering these is not to identify every possible impact but to consider whether the nature, location or scale of any designations or assets is likely to impact on the scale of growth that could be achieved.</p> <p>Consideration to be given to the extent and location of any areas of flood zone 2 and 3 and whether this is likely to have an impact on the scale of growth that could be achieved. Coastal erosion should also be considered for coastal Neighbourhood Areas.</p>
Infrastructure capacity	<p>Consideration to be given to infrastructure which may present an absolute constraint on development for the plan period, or would require a scale of growth inconsistent with the strategy of the Plan to address issues.</p> <p>This will require consultation with the relevant infrastructure providers where other up to date evidence is not available or existing evidence needs to be verified. This could include:</p> <ul style="list-style-type: none"> <li>• Highways capacity (Suffolk County Council)</li> <li>• Education (Primary, Secondary, Further) and Early Years provision (Suffolk County Council)</li> <li>• Water supply and waste water treatment (Anglian Water and Essex and Suffolk Water)</li> </ul>

	<p>Other infrastructure which may be less likely to present an absolute constraint on growth, but which may nevertheless require consideration in the preparation of a Neighbourhood Plan, includes:</p> <ul style="list-style-type: none"> <li>• Health</li> <li>• Utilities</li> <li>• Police</li> <li>• Libraries</li> <li>• Community Centres</li> <li>• Household Waste Recycling Centres</li> <li>• Green Infrastructure</li> </ul> <p>Where constraints exist but these are thought to be possible to overcome through mitigation the housing requirement will not need to be adjusted.</p> <p>Through the production of the Neighbourhood Plan the Qualifying Body will be expected to engage further with infrastructure providers where relevant in relation to the site assessment and the identification of any infrastructure requirements.</p>
Other issues and local information	<p>Opportunity for Qualifying Body to identify any relevant information on aspirations, local issues or other factors that could be taken into account.</p> <p>Any other identified constraints. This may include the supply of suitable sites if a robust site assessment process has already been carried out as part of the production of the Plan, however site assessment should be viewed as a separate exercise and be informed by the indicative housing requirement.</p>
<b>Conclusions</b>	
Indicative Housing Requirement	Based upon the above a qualitative and quantitative reasoning should be provided.

Net housing permissions granted since the date of the data contained in the adopted Local Plans, that is not on an allocated site, can be counted towards meeting the requirement. This figure will be provided by the Council.

## How the Council will apply this approach

- The Council will provide an indicative housing requirement to a Qualifying Body, upon request.
- The Council will apply the methodology set out in this Note when assessing a housing requirement. The Council will liaise with the Broads Authority where a Neighbourhood Area falls partly within the Broads.
- The Council will usually provide a draft figure within 6 weeks of a request, and will keep the Neighbourhood Plan group informed of any deviation from this.

- The Council will discuss the draft figure with the Qualifying Body.
- The Council will support the Qualifying Body in any consideration of the housing requirement through the Examination process as appropriate.
- The Council, with relevant stakeholders, will keep the methodology under review, in particular to reflect any Examiner's conclusions and changes in national policy or guidance.

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## Appendix 1 – Extract from Planning Practice Guidance

### ***Can a neighbourhood plan come forward before an up-to-date local plan or spatial development strategy is in place?***

*Extract...*

*Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement ([paragraph 65](#) of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an [indicative figure, if requested to do so by the neighbourhood planning body](#), which [will need to be tested](#) at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.*

*Paragraph: 009 Reference ID: 41-009-20190509*

### ***How should a housing requirement figure be set for designated neighbourhood areas?***

*The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies. While there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the [Housing and economic land availability assessment](#), and the characteristics of the neighbourhood area, including its population and role in providing services. In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in [paragraph 11, footnote 6](#)), which may restrict the scale, type or distribution of development in a neighbourhood plan area.*

*Within the administrative area of a National Park, the Broads Authority or a Development Corporation (where planning powers are conferred), each local planning authority should set a housing requirement figure for the proportion of the designated neighbourhood area which is covered by their administration.*

*Paragraph: 101 Reference ID: 41-101-20190509*

### ***How should local planning authorities identify indicative housing requirement figures for designated neighbourhood areas, when these are needed?***

*Where an indicative housing requirement figure is requested by a neighbourhood planning body, the local planning authority can follow a similar process to that for providing a housing requirement figure. They can use the authority's local housing need as a starting point,*

*taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area.*

*Proactive engagement with neighbourhood plan-making bodies is important as part of this process, in order for them to understand how the figures are reached. This is important to avoid disagreements at neighbourhood plan or local plan examinations, and minimise the risk of neighbourhood plan figures being superseded when new strategic policies are adopted.*

*Paragraph: 102 Reference ID: 41-102-20190509*

***How should neighbourhood planning bodies use a housing requirement figure that has been provided to them?***

*Where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocations that they wish to make.*

*Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows plans to remain up to date over a longer time scale. Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general conformity with the strategic policies. For example, whether the scale of proposed increase has a detrimental impact on the strategic spatial strategy, or whether sufficient infrastructure is proposed to support the scale of development and whether it has a realistic prospect of being delivered in accordance with development plan policies on viability. Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information.*

*When strategic housing policies are being updated, neighbourhood planning bodies may wish to consider whether it is an appropriate time to review and update their neighbourhood plan as well. This should be in light of the local planning authority's reasons for updating, and any up-to-date evidence that has become available which may affect the continuing relevance of the policies set out in the neighbourhood plan.*

*Paragraph: 103 Reference ID: 41-103-20190509*

***Are housing requirement figures for neighbourhood areas binding?***

*The scope of neighbourhood plans is up to the neighbourhood planning body. Where strategic policies set out a housing requirement figure for a designated neighbourhood area,*



*the neighbourhood planning body does not have to make specific provision for housing, or seek to allocate sites to accommodate the requirement (which may have already been done through the strategic policies or through non-strategic policies produced by the local planning authority). The strategic policies will, however, have established the scale of housing expected to take place in the neighbourhood area.*

*Housing requirement figures for neighbourhood plan areas are not binding as neighbourhood planning groups are not required to plan for housing. However, there is an expectation that [housing requirement figures will be set in strategic policies, or an indicative figure provided on request](#). Where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan. Where it is set as an indicative figure, it will need to be tested at examination.*

*Paragraph: 104 Reference ID: 41-104-20190509*

***What happens if the local planning authority does not provide a housing requirement figure for a designated neighbourhood area that wishes to plan for housing?***

*Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The [neighbourhood planning toolkit on housing needs assessment](#) may be used for this purpose. Neighbourhood planning bodies will need to work proactively with the local planning authority through this process, and the figure will need to be tested at examination of the neighbourhood plan, as neighbourhood plans must be in general conformity with strategic policies of the development plan to meet the [‘basic conditions’](#).*

*Paragraph: 105 Reference ID: 41-105-20190509*



## Appendix 2 – Housing requirements under Policy SCLP12.1 of the Suffolk Coastal Local Plan

### Policy SCLP12.1: Neighbourhood Plans

The Council will support the production of Neighbourhood Plans in identifying appropriate, locally specific policies that are in general conformity with the strategic policies of this Local Plan.

Where Neighbourhood Plans seek to plan for housing growth, they will be expected to plan for the minimum housing requirements set out below:

Neighbourhood plan area	Minimum number of dwellings <sup>4</sup>
Aldringham cum Thorpe	Existing Local Plan allocation of 40 dwellings, plus small scale additional development and windfall
Bredfield	20
Earl Soham	25
Easton	20
Framlingham	100 in addition to allocations in 'made' neighbourhood plan
Great Bealings	Housing development as per countryside policies
Kelsale cum Carlton	20
Kesgrave	20
Leiston	100 in addition to allocations in 'made' neighbourhood plan
Martlesham	20. This is in addition to allocation Policy SCLP12.25.
Melton	Existing Neighbourhood Plan allocation of 55, plus windfall
Playford	Housing development as per countryside policies
Rendlesham	Existing Local plan allocations of 100, plus windfall
Saxmundham	Small scale additional development and windfall. This is in addition to Local Plan allocation Policy SCLP12.29 which allocates land for the South Saxmundham Garden Neighbourhood which will deliver approximately 800 dwellings <sup>5</sup> .
Wenhaston with Mells Hamlet	25
Wickham Market	70 This is in addition to Local Plan allocation Policy SCLP12.60 (in Pettistree Parish, adjoining Wickham Market)

Where new Neighbourhood Plan areas are designated, minimum housing requirements will be based on a range of factors including the location of the settlement in relation to the strategy of the Local Plan, the position of the settlement in the settlement hierarchy and any known significant constraints to development.

Should the housing growth identified for Neighbourhood Plans not be delivered, the Council will address this through a future Local Plan review.

<sup>4</sup> In addition to existing permissions, allocations and dwellings with resolution to grant (as at 31.3.18). See Table 3.5.

<sup>5</sup> The South Saxmundham Garden Neighbourhood is within the Benhall Parish and Saxmundham.

## Appendix 3 – Proforma for assessing the housing requirement for a Neighbourhood Area

<b>Neighbourhood Area</b>	
Name of Neighbourhood Area	
Area covered by Neighbourhood Area	<i>XX Parish</i>
Neighbourhood Plan period	<i>This is relevant to determining the proportionate number of years for a housing requirement.</i>
Relevant Local Plan	<i>Waveney or Suffolk Coastal Broads Local Plan for any that are partly within the Broads</i>
<b>Local Plan Strategy</b>	
Growth identified in Local Plan	<i>Enter figures below</i>
Completions (within plan period, as set out in Local Plan)	
Permissions as at start of plan period	
Allocations in Local plan	
Total	
Percentage of total growth above based on Local Plan contingency	<i>In Suffolk Coastal this is 16.5% In Waveney this is 12%</i>
Position in Settlement Hierarchy	<i>Taken from the relevant Local Plan</i>
Population of the Neighbourhood Area	<i>Taken from the latest Census, as a percentage of plan area population</i>
Current Local Housing Need figure	<i>For relevant Local Plan area, as calculated using the standard method</i>
<b>Local needs</b>	
Local needs for housing identified through a local housing need assessment where relevant	<i>Where evidence of local housing need has been undertaken as part of the preparation of the Neighbourhood Plan, consider whether there are likely to be local needs that would not be met through the Local Plan.</i>
<b>Constraints</b>	
Environmental designations	<i>Explain whether and how this would affect achievement of the figure identified above Include flood risk</i>
Infrastructure capacity	<i>Explain whether and how this would affect achievement of the figure identified above</i>
Other local issues and information	<i>Explain whether and how this would affect achievement of the figure identified above</i>
<b>Conclusions</b>	
Indicative Housing Requirement	<i>Housing requirement as a figure, proportionate to the Neighbourhood Plan period. Provide justification based upon the evidence above.</i>
Permissions granted since base date of data in Local Plans on unallocated sites	<i>This will count towards meeting the housing requirement</i>

# Planning Committee

16 July 2021

Agenda item number 11

## Consultation responses

Report by Planning Policy Officer

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### 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.

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## 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: 01 July 2021

Appendix 1 – Planning Policy consultations received

# Appendix 1 – Planning Policy consultations received

## South Norfolk District Council

**Document:** South Norfolk Village Clusters Housing Allocations Plan.

<https://www.southnorfolkandbroadland.gov.uk/emerging-local-plan/south-norfolk-village-clusters-housing-allocations-plan>

**Due date:** 02 August 2021

**Status:** Draft Local Plan – Regulation 18 version

**Proposed level:** Planning Committee endorsed

### Notes

The South Norfolk Village Clusters Housing Allocations Plan (The Village Clusters Plan) aims to deliver sustainable growth within the villages of South Norfolk. The Village Clusters Plan is being developed alongside the Greater Norwich Local Plan (GNLP) and in accordance with Government's national planning policies and guidance. The main aim of the Plan is to allocate a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total. The Plan also defines the Settlement Limits for the villages within these clusters, making provision for further smaller sites and incorporating revisions to reflect development that has occurred, or has been permitted since the boundaries were last updated.

### Summary of response

Generally, there are no major concerns about the plan or the sites allocated at the moment. There seems to be good acknowledgement of the Broads and its setting in general. There are some comments that seek clarification as well as suggesting better reference to the Broads in some areas.

### Proposed comments

#### **SNVC Objective 3 - Protect the character of villages and their settings**

- As written, no objectives refer to the protection of the environment. At the very least, number 3 should be expanded to include not just protecting the setting of the village, but setting of other assets in the area like heritage and protected landscapes.

#### **Policy SNVC2 – Design**

- 'However, **the** many of these Preferred sites'
- Not just the SNDC landscape character assessment, but please consider ours: [Landscape Character Assessment \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk/landscapes/landscape-character-assessment)

## Assessment of sites

- Why has the Norfolk HELAA been amended? The whole point was to ensure a sustainable pattern of development across Norfolk. You may want to thoroughly explain why such changes to the Norfolk-wide approach have been made.
- What extra distances have you used?
- Also, when you say 'safe and convenient access to those services', what mode of travel is that by? How has the quality of the route and likelihood of someone using the route in all weather, at all times of the year been assessed?

## Gillingham, Geldeston, and Stockton

- 'with a further cluster of development at west Kings Dam' – do you mean along Kings Dam to the west? As written, it does not seem to read well.
- It is not clear if a settlement limit alteration is made for Gillingham. There is a question asking for views, but the text is not clear and a dashed red line is not obvious on the map. It does not say 'no alteration to the settlement limit is made' like in other places.

## Langley with Hardley

- 'Development within the parish has been concentrated into **tree** small groups at Langley Green' – think this should say 'three'

## Kirby Cane and Ellingham

- Ellingham is near to the Broads – you might want to mention that. See next comments in particular.
- Site: SN0305, Land South of Mill Road, Ellingham  
The site would extend the edge of the settlement towards the BA area to approximately 400m from BA boundary. Visual receptors: Footpath leading from centre of village in a south-westerly direction connects to Lane almost on BA boundary. Site may be visible to users of this path. In addition this National Cycle Route 1(NCR1) follows Geldeston Road to the south and Church Road west of the site - 200m at closest point. Due to a lack of screening vegetation the site is clearly visible from the road. There is some intervening vegetation between the site and the BA area but fields to south have little or no vegetation along boundaries. The immediate area is quite flat and open. The site is unlikely to be visible from River Waveney although it should be borne in mind that water based recreation is popular in this character area, due to the existence of Waveney canoe access agreements which permit canoeing upstream of Ellingham Sluice to Diss. The valley here is fairly narrow and the southern side rises relatively high so there may be distant views of the site from the Shipmeadow/Mettingham area.

When writing the policy, please add:

- development of the site needs to include adequate screening

- reference to the proximity and sensitivity of the Broads and NCR1 in the allocation policy.
- Site: SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane  
The site is more distant from the BA area with the settlement of Kirby Cane largely intervening. It is at the foot of the northern valley slope (around 5m) and at the north-western end of a small tributary valley which extends down to Geldeston. However, from Geldeston it does not seem possible to view the site. The side valley has a patchwork of small fields with trees along field boundaries which provide screening. There are also blocks of woodland. In potential views from the Broads which are probably very limited and distant, the site has an advantage of a backdrop of the northern valley side which is wooded in this location. There don't appear to be any sensitive visual receptors in the vicinity. The valley sides, the ridgelines of which lie in the main beyond the Broads area, form prominent skylines to this character area and are relatively undeveloped. However neither of these 2 sites would impact ridge or skylines.

When writing the policy, please add the following (or similar) from the BA landscape character assessment:

- New large scale development within the valley floor or on the valley side needs careful assessment of the potential effects on the local landscape character and adverse landscape effects mitigated.
- Care needs to be taken in relation to development proposals within these areas which form the landscape setting to the Broads. It would help if such requirements were set out in the allocation policy.

### **Rockland St Mary**

- Site: SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary  
The site extends beyond the eastern extent of the main village and is fairly prominent being on a ridge, and is only approx. 150m from BA boundary. Also close by are RSPB Rockland Marshes, Rockland Staithe and visitor car park. Wherryman's Way runs close to the site (closest point 10- 20m). National Cycle Route 1 follows New Inn Hill Rd and Green lane close to the site, and a footpath runs through the field to the east. There is a possibility the development could break the skyline in views from the Broads area - the skylines in views out of the area are remarkably free of development of any form adding to the sense of isolation. Much of the land within this area is subject to many nature conservation designations covering most of the area.

Comments on this site:

- Taking these factors together suggests that this site has some potential to adversely affect the local landscape character and the setting of the Broads. Therefore we ask that the allocation policy includes a requirement for Landscape

& Visual Impact Assessment and that the Broads Authority are consulted on the selection of viewpoints.

- SN2007 says 'Whilst the site extends beyond the eastern extent of the main village and is fairly prominent as it is on a ridge, the precedent for development has been established by the adjoining Eel Catcher Close development'. I don't think that conclusion can be reached. You could say that about any settlement fringe site – that because there is development there already, and a site may be adding onto that, development is ok. The proposed site is further east and further south than the existing development.
- The policy is called SN2007, but the text refers to SN0531 and the map shows the sites joined. This could do with being a bit clearer. Either call the policy both site numbers or delineate the two sites and say that they will be considered as one.
- Says 'appears to offer the potential for an additional footway access back to the main village' – so will it or won't it? Will that requirement be part of the policy wording?

### **Thurlton**

- 'Beccles Road provides a relatively a good link to Beccles and the A143 to the south' – two 'a' in the sentence.

### **Wheatacre & Burgh St Peter**

- Part of the parish is the Broads – you might want to mention that.

### **Throughout**

- Throughout, in the form and character sections, you talk about having links to various other places /being well served. Is this a road link, pedestrian link, public transport? It might be an idea to say what mode the link relates to. The commentary seems all about the car at the moment.
- Do you need to summarise access to the various services in the main document?
- Did you want to say where the bus goes to and if there is a peak hour trip?

### **Maps**

- The legend says that blue is rejected sites and sites being assessed in Neighbourhood Plans (NP). Are all blue sites doing both things? Could a site just be rejected and not be assessed in a NP? If a site is being rejected by the Local Plan, how can it then be successfully included in a NP?
- Should you plot on the maps where the services are?

# Planning Committee

16 July 2021

Agenda item number 12

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

Report by Planning Policy Officer

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### Summary

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

### Recommendation

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

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## 1. Introduction

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



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

Author: Natalie Beal

Date of report: 28 June 2021

Appendix 1 – United Nations Sustainable Development Goals

Appendix 2 – Vision and objectives

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

Appendix 4 – About the Broads

Appendix 5 – Local Green Space



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

**Introducing the United Nations Sustainable Development Goals (UN SDGs)**

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

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

**2. What are the Goals?**

The following image shows the 17 Goals.

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



### 3. Relevance to planning and Local Plans

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

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

## 2. Achieving sustainable development

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

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

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

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

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



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

**Vision and Objectives**

**1. Introduction**

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

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

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

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

**2. Current vision**

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

**Table 1**

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

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

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

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

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

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

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

## 2. Potential changes to the vision

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

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

## 3. Current objectives

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

**Table 2**

Local Plan for the Broads - objectives

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

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

#### 4. Potential changes to the objectives

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

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

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

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

Table 3  
Local Plan objectives and UN Sustainable Development Goals

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

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



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

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

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

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

**A. Electric vehicle charging points**

Issue

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

Approaches elsewhere

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

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

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



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

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

\* part provision rounded up

All EVCPs should be at least 32 Amps

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

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

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

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

#### Options

The options therefore seem to be as follows:

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

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

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

### Issue

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

### Approaches elsewhere

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

### Current approach

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

### Options

The options therefore seem to be as follows:

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

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

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

#### Issue

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

#### Approaches elsewhere

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

#### Current approach

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

#### Options

The options therefore seem to be as follows:

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

## D. Biodiversity/Environment net gain

### Issue

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

### Approaches elsewhere

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

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

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

### Current approach

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

### Options

The options therefore seem to be as follows:

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

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

## **E. Accessible Homes**

### Issue

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

### Approaches elsewhere

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

### Current approach

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

### Options

The options therefore seem to be as follows:

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

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

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



**Local Plan for the Broads - Review  
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**About the Broads**

## **6.1 Introduction**

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

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

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

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

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

## **6.3 The Broads Authority**

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

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

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

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

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

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

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

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

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

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

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



**Map 1: Broads Authority Executive Area**

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Ordnance Survey  
100021573



## 6.5 The landscape of the Broads

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

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

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

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

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

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

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

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

## 6.6 The economy of the Broads

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

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

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

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

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

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

## 6.7 The Natural Environment of the Broads

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

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

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

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

## 6.8 Historic environment and culture of the Broads

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

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

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

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

## 6.9 Navigating the Broads

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

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

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

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

## 6.10 The boats and people who sail them

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

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

## 6.11 The Community of the Broads

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

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

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

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

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

### 6.12 Pressure on the Broads

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

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

### 6.13 Access and Recreation

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

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

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

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

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



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



Add table of parishes - to follow





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**Local Green Space**

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

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

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

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

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

The NPPF also says;

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

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

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

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

## Appendix x: Local Green Space Nomination Form

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

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

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

**Your name:**

**Your email address:**

**Your phone number:**

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

- **Have you included a map?**

**Yes      No**

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

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

**Yes      No**

Please answer these questions:

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

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

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

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

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

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Please note that:

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

You can find more information on Local Green Space here:

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

# Planning Committee

16 July 2021

Agenda item number 13

## Enforcement update – July 2021

Report by Head of Planning

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### 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.

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Committee date	Location	Infringement	Action taken and current situation
31 March 2017	Former Marina Keys, Great Yarmouth	Untidy land and buildings	<ul style="list-style-type: none"> <li>Authority granted to serve Section 215 Notices.</li> <li>First warning letter sent 13 April 2017 with compliance date of 9 May.</li> <li>26 May 2017: Some improvements made, but further works required by 15 June 2017. Regular monitoring of the site to be continued.</li> <li>Monitoring 15 June 2017. Further vandalism and deterioration.</li> </ul>

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> <li>• Site being monitored and discussions with landowner.</li> <li>• Landowner proposals unacceptable. Further deadline given.</li> <li>• Case under review.</li> <li>• Negotiations underway.</li> <li>• Planning Application under consideration December 2018.</li> <li>• Planning application withdrawn and negotiations underway regarding re-submission.</li> <li>• Works undertaken to improve appearance of building.</li> <li>• Revised planning application submitted 1 April 2019.</li> <li>• Planning Committee 19 July 2019: Resolution to grant planning permission.</li> <li>• Arson at building, with severe damage 18 August 2019.</li> <li>• Discussions around securing building and partial demolition 19 August 2019.</li> <li>• Pre-demolition surveys almost completed and works commence thereafter 24 October 2019.</li> <li>• Works underway to secure and commence agreed demolition. 16 December 2019.</li> <li>• Site now sold. New landowner intends to build out with some amendments to be agreed.</li> <li>• New owner asked to demolish building as does not propose conversion 12 February 2020.</li> <li>• Application received to demolish building (and other amendments to scheme) 20 February 2020.</li> </ul>

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> <li>• Application approved and demolition almost complete. 24 September 2020.</li> <li>• Demolition completed and site almost cleared. November 2020</li> <li>• Final inspection needed.</li> <li>• Final minor clearance required. Likely to coincide with implementation of redevelopment consent. May 2021</li> </ul>
14 September 2018	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravans	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Site being monitored.</li> <li>• Planning Contravention Notices served 1 March 2019.</li> <li>• Site being monitored 14 August 2019.</li> <li>• Further caravan on-site 16 September 2019.</li> <li>• Site being monitored 3 July 2020.</li> <li>• Complaints received. Site to be visited on 29 October 2020.</li> <li>• 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.</li> <li>• Incomplete response to PCN received on 10 December. Landowner to be given additional response period.</li> </ul>

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> <li>• Authority given to commence prosecution proceedings 5 February 2021</li> <li>• Solicitor instructed 17 February 2021</li> <li>• Hearing date in Norwich Magistrates Court 12 May 2021</li> <li>• Summons issued 29 April 2021</li> <li>• Adjournment requested by landowner on 4 May and refused by Court on 11 May</li> <li>• Adjournment granted at Hearing on 12 May.</li> <li>• Revised Hearing date of 9 June 2021</li> <li>• <b>Operator pleaded 'not guilty' at Hearing on 9 June. Trial scheduled for 20 September at Great Yarmouth Magistrates Court.</b></li> </ul>
8 November 2019	Blackgate Farm, High Mill Road, Cobholm	Unauthorised operational development – surfacing of site, installation of services and standing and use of 5 static caravan units for residential use for purposes of a private travellers' site.	<ul style="list-style-type: none"> <li>• Delegated Authority to Head of Planning to serve an Enforcement Notice, following liaison with the landowner at Blackgate Farm, to explain the situation and action.</li> <li>• Correspondence with solicitor on behalf of landowner 20 November 2019.</li> <li>• Correspondence with planning agent 3 December 2019.</li> <li>• Enforcement Notice served 16 December 2019, taking effect on 27 January 2020 and compliance dates from 27 July 2020.</li> <li>• Appeal against Enforcement Notice submitted 26 January 2020 with a request for a Hearing. Awaiting start date for the appeal. 3 July 2020.</li> <li>• Appeal start date 17 August 2020.</li> </ul>



Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> <li>Hearing scheduled 9 February 2021.</li> <li>Hearing cancelled. Rescheduled to 20 July 2021.</li> </ul>
4 December 2020	Land to east of North End, Thorpe next Haddiscoe	Unauthorised change of use to mixed use of a leisure plot and storage.	<ul style="list-style-type: none"> <li>Authority given for the service of Enforcement Notices.</li> <li>Section 330 Notices served 8 December 2020.</li> <li>Enforcement Notice served 12 January 2021 with compliance date 12 February 2021.</li> <li>Some clearance commenced. Three month compliance period</li> <li>Site to be checked for progress.</li> <li>Progress being monitored. May 2021</li> <li>Site not cleared by deadline. Operator given a further period</li> <li><b>Negotiations underway</b></li> </ul>
8 January 2021	Land east of Brograve Mill, Coast Road, Waxham	Unauthorised excavation of scrape	<ul style="list-style-type: none"> <li>Authority given for the service of Enforcement Notices.</li> <li>Enforcement Notice served 29 January 2021</li> <li>Appeal against Enforcement Notice received 18 February 2021</li> </ul>

Author: Cally Smith

Date of report: 28 June 2021

# Planning Committee

16 July 2021

Agenda item number 14

## Acle: Change of use of land to stationing and use of caravan for residential purposes

Report by Head of Planning

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### Summary

A caravan has been located on land in Acle and is being occupied for residential purposes without planning permission.

### Recommendation

That an Enforcement Notice is served requiring the cessation of the residential use and removal of the caravan.

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## 1. Site location

- 1.1. The site comprises an area of land in Acle located to the north of Damgate Lane, which is to the south of the village. Damgate Lane has a mixed character, with residential dwellings at its western end, further dwellings and open space in the central section and an established industrial estate at its eastern end, culminating in a small sewage treatment works set in a large separate plot at the end of the lane. The Norwich – Great Yarmouth train line lies directly to the north and the A47 Acle Straight further north beyond that. To the north, south and east the land opens out into agricultural and grazing land, with long views to Halvergate marshes to the east.
- 1.2. The Broads Authority boundary runs to the rear of the residential gardens on the north side of Damgate Lane, excluding the industrial estate but including the sewage treatment site. The subject site is within that part of Damgate Lane where the sewage treatment plant is located, but is actually in separate ownership.
- 1.3. The site is not within a development boundary.

## 2. The unauthorised development

- 2.1. The unauthorised development comprises the change of use of a parcel of land for the residential use of a caravan.
- 2.2. It is understood that the caravan was brought onto the site in late 2020 and has been in occupation since. There are no mains services connected to the caravan.

- 2.3. Officers have met with the occupant of the caravan and explained that there is no planning permission for this use here and that the use is contrary to planning policy. The occupier has indicated that he does not intend to move the caravan. The matter has also been referred to Broadland District Council, as the local Housing Authority and they have engaged with the occupier.

### 3. The planning issues

- 3.1. The planning issues relate to the change of the use of the land to a residential purpose, without planning permission.
- 3.2. Both national and local planning policies seek to locate new residential development within development boundaries, where there is good access to facilities and services and to protect the countryside, including settlement fringe locations, for its own value. This is set out in the adopted Local Plan for the Broads (2019) at policy DM35 'Residential development within defined Development Boundaries'. There are specified exceptions, but none of these apply here. Where development is permitted, it is required to be of a good standard of design and appropriate for the location. This is set out in the adopted Local Plan for the Broads (2019) at policy DM43 'Design'.
- 3.3. There is not a development boundary for Acle in the adopted Local Plan for the Broads (2019), so it has been assessed as not suitable for further residential development in that part of the parish in the Broads. There are three allocated sites in the adopted Broadland District Council Local Plan (2016) and these are west of the school for 120 – 150 homes (ACL1), south of the railway station for 20 homes (ACL2) and an infill plot to the west of A1064 for 30 homes (ACL4). No additional housing development is proposed in the adopted Neighbourhood Plan (2015), but Policy 5 seeks, inter alia, to improve links from Damgate Lane to the wider countryside to the east and beyond.
- 3.4. It is, of course, appreciated that the unit which is the subject of this report is not a dwelling in the conventional sense, and that the matter under consideration relates to an existing situation (where a unit has been placed on land as a consequence of a related ownership) rather than a planning application for a dwelling, however the principle is the same. The caravan is being lived in and in planning terms it is therefore a use of land for residential purposes and the planning policies which relate to housing apply.
- 3.5. The caravan on the site is a standard unit. It is not connected to services, so water and gas are provided in bottles stored externally, and the area around the unit is used for parking and storage. Whilst not readily visible from outside the site, the development does not meet the design standards of the adopted policies and has an adverse impact on the character and appearance of the area.

## 4. Enforcement action

- 4.1. The Broads Authority has a Local Enforcement Plan, which was adopted on 8 July 2016 and reviewed in December 2020. It sets out the Authority's approach to dealing with enforcement matters.
- 4.2. At paragraph 3.7 it states that "...Whilst the law gives a Local Planning Authority strong legal powers to deal with breaches of planning control, in most cases the first choice of approach is to use negotiation to reach a satisfactory resolution in a timely manner. The negotiations would aim to achieve one of the following outcomes:
  - To apply for retrospective planning permission if the development is acceptable and would have got planning permission in the first place; or
  - To amend the development so it is acceptable and then apply for retrospective planning permission if the development is capable of being acceptable; or
  - To amend the development so it is in accordance with the approved plans if the amendments are acceptable; or
  - To remove the unauthorised development or cease the unauthorised use if the development is unacceptable and incapable of being made acceptable".
- 4.3. In this case, the development is outside of any development boundary so residential development is therefore unacceptable in principle. As outlined at 3.5 above, it also fails to maintain the acceptable appearance of the area and conflicts therefore with development plan policies. The development is therefore unacceptable due to conflict with adopted policies DM35 and DM43 and, for reasons of conflict with principle, incapable of being made acceptable. The approach of the Enforcement Plan therefore requires the cessation of the unauthorised use and the removal of the unit.
- 4.4. Prior to taking formal enforcement action, however, the Local Planning Authority (LPA) must be satisfied that, first, the development being enforced against is unacceptable and, second, that enforcement action is expedient having regard to harm, proportionality and consistency.
- 4.5. In terms of the unacceptability of the development, this has been set out at 4.3 above.
- 4.6. Considering expediency, the unauthorised development is unacceptable in principle and it therefore follows that it harms interests of acknowledged importance, including the objectives of the Local Plan for the Broads and the integrity of the planning system, which the LPA should seek to protect. It is considered that the service of an Enforcement Notice, which is a simple remedy which would require the cessation of the use and removal of the unit, would not be a disproportionate approach in planning terms. It is acknowledged that this would be a significant impact for the occupier – requiring him to find alternative accommodation, as well as somewhere to put the caravan. The alternative option of allowing the continuation of a residential use in an area where it would not otherwise be permitted would, in effect, be putting private

interest over a public interest, and is not justified. Furthermore, it is noted that the occupier has previously been offered (but not taken) housing support by the local Housing Authority and he could choose to access this. Overall it is considered that the private benefits should not override the public benefits and that enforcement action to secure the cessation of the unauthorised development is proportionate. In terms of consistency, a comparable approach has been taken in respect of the unauthorised residential use of caravans at Blackgate Farm in Great Yarmouth. It is concluded that enforcement action is expedient and justified.

## 5. Conclusion and recommendations

- 5.1. The Local Enforcement Plan explains that where an unauthorised development is unacceptable and cannot be made acceptable, the LPA should seek to negotiate a solution. The occupier has indicated that he does not wish to move and there is no realistic prospect of a negotiated solution here.
- 5.2. It is recommended that an Enforcement Notice is served requiring the cessation of the residential use and the removal of the unit. The occupant is able to engage with the local Housing Authority in respect to his housing need, either now or after the service of an Enforcement Notice. A compliance period of 4 months would be appropriate, to avoid immediate hardship to the occupant.

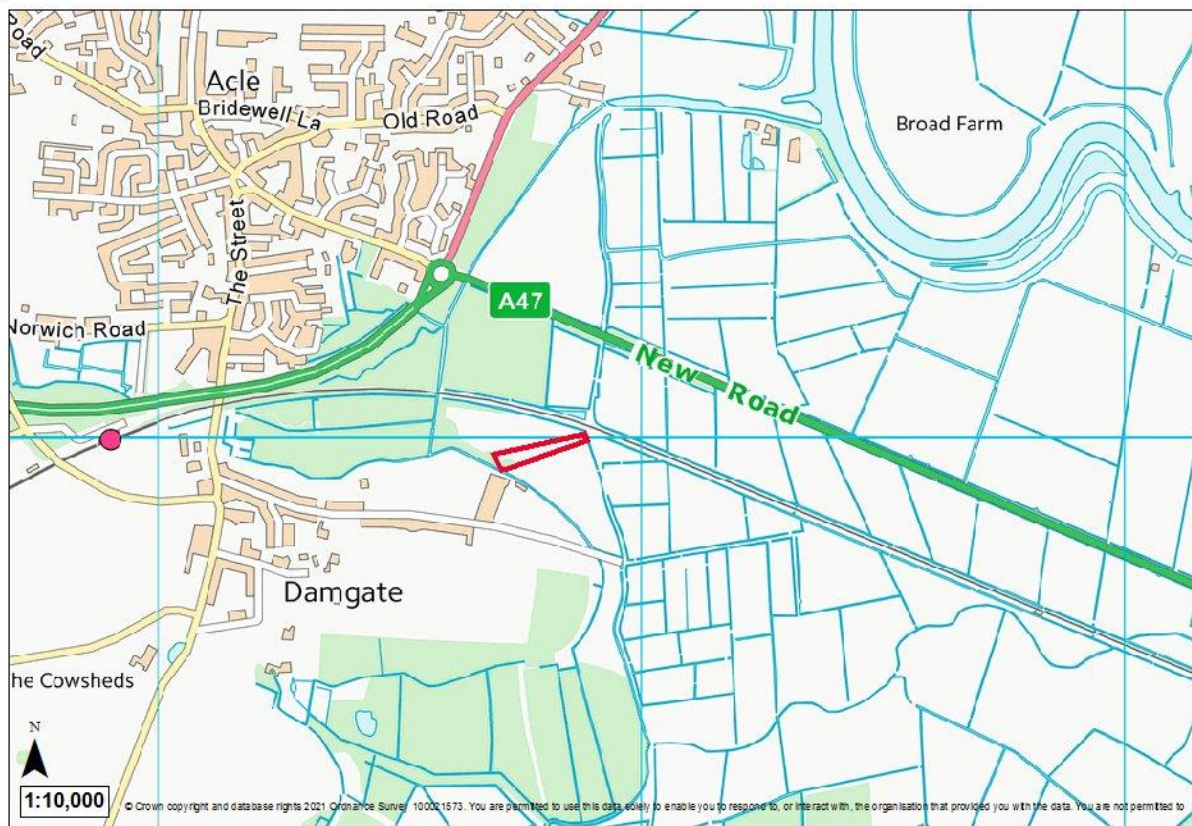
Author: Cally Smith

Date of report: 02 July 2021

Appendix 1 – Location Plan

## Appendix 1 – location plan

BA/2020/0048/INFENF Land Off Damgate Lane, Acle



# Planning Committee

16 July 2021

Agenda item number 15

## Appeals to the Secretary of State update – July 2021

Report by Senior Planning Officer

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### Summary

This report sets out the position regarding appeals against the Authority.

### Recommendation

To note the report.

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Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
<b>APP/E9505/C/20/3245609</b> BA/2017/0024/UNAUP2	Mr L Rooney	Appeal received by BA on 26 January 2020  Start date 17 August 2020	Blackgate Farm, High Mill Road, Cobholm Great Yarmouth	Appeal against Enforcement Notice	Committee decision 8 November 2019  Hearing date confirmed as 20 July 2021

<b>Application reference number</b>	<b>Applicant</b>	<b>Start date of appeal</b>	<b>Location</b>	<b>Nature of appeal/ description of development</b>	<b>Decision and dates</b>
<b>APP/E9505/W/21/3267755</b> BA/2020/0138/FUL	Mr Keith Wheeler	Appeal received by BA on 27 January 2021  Start date 23 April 2021	39 Riverside Estate Brundall Norwich NR13 5PU	Appeal against conditions imposed on planning permission.	Delegated Decision 14 August 2020  Questionnaire submitted 30 April 2021  LPA statement submitted 28 May 2021
<b>APP/E9505/C/21/3269284</b> BA/2017/0035/UNAUP3	Mr Henry Harvey	Appeal received by BA on 18 February 2021  Start date 26 April 2021	Land East Of Brograve Mill Coast Road Waxham	Appeal against Enforcement Notice	Committee Decision 8 January 2021  LPA Statement submitted 7 June 2021
<b>APP/E9505/C/21/ 3276150</b> BA/2020/0453/FUL	Mr & Mrs Thompson	Appeal received by BA on 31 May 2021  Awaiting Start Date	Ye Olde Saddlery The Street Neatishead	Appeal against refusal of planning permission: Change of use of outbuilding to cafe (Class E(b)) & pizza takeaway (Sui Generis)	Delegated Decision 8 February 2021



Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
<b>APP/E9505/Z/21/3276574</b> BA/2021/0118/ADV	Morrisons Supermarket	Appeal received by BA on 7 June 2021  Awaiting start date	Morrisons Superstore, George Westwood Way, Beccles	Appeal against refusal of advertisement consent for a solar powered totem sign.	Delegated Decision 4 June 2021

Author: Cheryl Peel

Date of report: 29 June 2021

Background papers: BA appeal and application files

# Planning Committee

16 July 2021

Agenda item number 16

## Decisions made by officers under delegated powers – July 2021

Report by Senior Planning Officer

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### Summary

This report sets out the delegated decisions made by officers on planning applications from 07 June 2021 to 02 July 2021 and Tree Preservation Orders confirmed within this period.

### Recommendation

To note the report.

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Parish	Application	Site	Applicant	Proposal	Decision
Barton Turf And Irstead Parish Council	BA/2021/0130/FUL	Wherry Arch Hall Road Irstead NR12 8XP	Ms Rosemarie Hutchinson	Erection of a wooden landing stage, for mooring a boat, on the bank of the dyke. The landing stage would replace an existing unsafe landing stage 25 foot south of the proposed new one.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Beccles Town Council	BA/2021/0120/LBC	St Peters House Old Market Beccles NR34 9AP	Mr Lyall Thow	Repair & replace roofing & guttering. Reinstatement of rooflight. Replace defective bricks & repair render on south elevation. Replace mirrored plate to staircase hall laylight with semi-transparent glass.	Approve Subject to Conditions
Beccles Town Council	BA/2021/0119/HOUSEH	St Peters House Old Market Beccles NR34 9AP	Mr Lyall Thow	Repair & replace roofing & guttering. Reinstatement of rooflight. Replace defective bricks & repair render on south elevation. Replace mirrored plate to staircase hall laylight with semi-transparent glass.	Approve Subject to Conditions
Bramerton Parish Council	BA/2021/0129/HOUSEH	2 Hill Cottage Mill Hill Bramerton NR14 7EN	Mr & Mrs S & S Holmes	Two storey side extension and single storey rear extension, replacing existing single storey rear extension, and air source heat pump to front elevation.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Cantley, Limpenhoe And Southwood PC	BA/2021/0144/HOUSEH	Belmont Marsh Road Limpenhoe Norwich Norfolk NR13 3HU	Mr P Dunthorne	Single storey extensions to west, east and north elevations and re-positioning of external walls.	Approve Subject to Conditions
Haddiscoe And Toft Monks PC	BA/2021/0149/APPCON	Hunters Lodge Church Road Thorpe Next Haddiscoe NR14 6SJ	Mr Stephen Necker	Details of Conditions 3: land quality investigation and risk assessment, 6: external surfaces details of permission BA/2020/0324/FUL	Approve
Horning Parish Council	BA/2021/0188/NONMAT	3 Bureside Estate Crabbetts Marsh Horning Norfolk NR12 8JP	Mr Brian Hutchinson	Additional window to the north elevation of the extension, non-material amendment to permission BA/2020/0389/COND	Approve
Hoveton Parish Council	BA/2021/0018/HOUSEH	Bay Tree Lodge Meadow Drive Hoveton NR12 8UN	Mrs S Huckle	Demolition of existing boathouse and proposed extension and link.	Approve Subject to Conditions
Martham Parish Council	BA/2021/0111/LBC	Martham Mill Riverside Martham Norfolk NR29 4RG	Mrs Jan Withers	Part retrospective: replacement of windmill cap, board walk, fan frame and top window.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Martham Parish Council	BA/2020/0240/HOUSEH	Foxgloves M6 Riverside Martham Norfolk NR29 4RG	Mrs Amanda Brundell	Rear extension to existing building including an amended roof design and an increase in floor level.	Approve Subject to Conditions
Mettingham Parish Council	BA/2021/0117/FUL	Green Valley Farm Low Road Mettingham NR35 1TP	Mrs Holly & Mr Matthew Raven	Erection of farmhouse with agricultural occupancy condition	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2021/0159/FUL	Plot 6 Boathouse Lane Lowestoft Suffolk	Mr Lee Hood	Install floating pontoon	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2021/0121/HOUSEH	The Cottage Borrow Road Lowestoft Suffolk NR32 3PW	Mr & Mrs Elliston	Pitched roof to existing rear extension. Demolition of existing outbuilding and erection of a replacement outbuilding to the side of the dwelling	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2021/0169/HOUSEH	1 Waveney Hill Lowestoft NR32 3PR	Mr M Cole	Demolish & replace porch with single storey extension, new entrance door on north elevation	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Repps With Bastwick Parish Council	BA/2021/0165/LBC	Bastwick Tower House Tower Road Bastwick Repps With Bastwick NR29 5JN	Mr Luke Christodoulides	Relocation of font & cross base	Approve Subject to Conditions
Somerton Parish Council	BA/2021/0176/HOUSEH	Cherry Trees Common Road West Somerton Somerton Norfolk NR29 4DN	Mr Brett Hurrell	Render front of property	Approve Subject to Conditions
Thurne Parish Council	BA/2021/0115/HOUSEH	Staithe House The Staithe Thurne NR29 3BU	Mr Simon Peck	Works to south side facia of outbuilding. To include the replacement of two windows and one access door, and cladding of one sliding garage door and panel.	Approve Subject to Conditions

Author: Cheryl Peel

Date of report: 05 July 2021