

Planning Committee

5 December 2025

Agenda item number 10

Local Plan for the Broads- Supporting material

Report by Planning Policy Officer

Summary

The report introduces and seeks endorsement of:

- The updated Local Development Scheme (LDS), which is the timeline for producing the Local Plan for the Broads.
- An updated Statement of Compliance with the Duty to Cooperate, which has been updated as the new Norfolk Strategic Planning Framework has been adopted around the county.

Recommendation

It is recommended that Members endorse the LDS and updated Duty to Cooperate Statement.

1. Introduction

- 1.1. This report introduces and seeks endorsement of the Local Development Scheme and Duty to Cooperate Statement.

2. Local Development Scheme – update

- 2.1. The Local Development Scheme (LDS) sets out the timeline for the various stages of Local Plan production. It needs to be kept up to date. This update reflects the second round of Regulation 19 consultation. It should be noted that the date for submission is not known at this stage, as we await any comments on the Local Plan and wait to see what they say. Also please note that the duration of the examination into the Local Plan, and therefore the timeline for submission, are not known at this stage. See Appendix 1 for the updated LDS.

3. Duty to Cooperate Statement of Compliance – update

- 3.1. Members will recall that the Norfolk Strategic Planning Framework has been updated. It has not been endorsed/adopted by all Norfolk Local Planning Authorities. It is therefore prudent to update the Duty to Cooperate Statement of Compliance. This is included at Appendix 2.

Author: Natalie Beal

Date of report: 11 November 2025

Appendix 1 – [Local Development Scheme \(December 2025\)](#)

Appendix 2 – [Duty to Cooperate Statement of Compliance \(December 2025\)](#)

Local Development Scheme

Timeline for producing the Local Plan for the Broads

Adopted December 2025

Local Plan for the Broads

	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	
Preparing REG19 Local Plan																								
Planning Committee to endorse first REG19 consultation						18																		
Broads Authority to endorse first REG19 consultation						25																		
First Submission version consultation (REG19)						8 weeks																		
Assess first REG19 consultation representations																								
Planning Committee to endorse REG19 consultation - reconsult										7														
Broads Authority to endorse REG19 consultation - reconsult										28														
Submission version consultation (REG19) - reconsult										7 weeks														
Assess second REG19 consultation representations																								
Submission to Planning Inspector																								
Examination																								
Adoption																

Please note that due to issues with the Sustainability Appraisal, a second REG19 consultation stage was held. The Local Plan itself did not change, just the Sustainability Appraisal.



**Duty to Cooperate Statement of
Compliance**

**Statement of Cooperation on Strategic
Planning Matters
In support of the Submission Broads Local
Plan**

December 2025

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1 Introduction

1.1 About this Duty to Cooperate Statement

The Localism Act 2011 imposes upon local planning authorities and others a ‘duty to cooperate’ on strategic planning matters (i.e. those that affect more than one planning authority area). The duty requires that a local planning authority engages constructively, actively and on an on-going basis with relevant or prescribed bodies in order to maximise the effectiveness of development plan preparation and strategic matters.

This statement summarises how the Broads Authority has met that requirement in terms of the activity of cooperation and the effectiveness of that cooperation insofar as it relates to the Proposed Local Plan for the Broads. This statement sets out how the Broads Authority has cooperated with the Prescribed Bodies as required by The Town and Country Planning (Local Planning) (England) Regulations 2012 (PART 2) Duty to co-operate as well as other National Parks and neighbouring District Councils. The prescribed bodies are:

- the Environment Agency;
- the Historic Buildings and Monuments Commission for England (known as Historic England);
- Natural England;
- the Mayor of London;
- the Civil Aviation Authority;
- the Homes and Communities Agency;
- each Primary Care Trust established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section;
- the Office of Rail Regulation;
- Transport for London;
- each Integrated Transport Authority;
- each highway authority within the meaning of section 1 of the Highways Act 1980 (20) (including the Secretary of State, where the Secretary of State is the highways authority)

The Statement of Consultation that accompanies the Local Plan should also be referred to. This sets out the stages of consultation, which of the bodies were consulted, what was said

and the Broads Authority's response to the representations and how the comments were taken on board.

Section 2 onwards discusses cooperation with the prescribed bodies.

1.2 Administrative Geography

The Broads is a national park equivalent protected landscape. The Broads Authority is a special statutory authority and the sole local planning authority for the Broads Authority Executive Area.

This designated area falls within the administrative area of six district level councils (Broadland, South Norfolk, North Norfolk, East Suffolk, Great Yarmouth Borough and Norwich City), and two county councils (Norfolk and Suffolk) (see [Appendix A](#)). The 'district' councils are local planning authorities only for the part of their respective administrative areas outside the Broads, but they are housing authorities, etc. for the whole of their district, including that within the Broads. Norfolk and Suffolk County Councils are the county and minerals and waste planning authorities for the whole of their respective counties, including the Broads.

A coastal part of the Broads is also within the Norfolk Coast National Landscape. The National Landscape does not have a separate statutory authority, unlike national parks and the Broads, but is managed by the constituent local authorities and Natural England through the Norfolk Coast partnership.

There are 92¹ civil parishes (and two unparished areas) in the Broads designated area. In every case the parish includes land both within and without the Broads boundary (i.e. in two local planning authorities' areas).

1.3 History of Cooperation.

Importantly the 1988 Broads Act Section 17a (as amended) makes it a general duty of all public bodies in exercising their functions to further all 3 of the Broads Authority's purposes. This duty means the Broads Authority has long established relationships with government departments and agencies and a range of other local and public bodies in delivering national park purposes.

1.4 The future of Cooperation

The Levelling up and Regeneration Act 2023 indicates that the Duty to Cooperate will be removed. However, no details as to what precisely will take its places have been provided at the time of writing.

¹ Oulton Broad Parish Council was formed in 2017.

2 Neighbouring Local Planning Authorities

2.1 The Broads and its surroundings generally

Particular considerations apply in the Norwich area, because of the large scale of growth planned there. These are dealt with in separate sections below.

At the eastern end of the Broads, the towns of Great Yarmouth and Lowestoft also have growth planned, but of a much smaller scale. Elsewhere, around the fringes of the Broads area is generally rural, and there is more incremental change planned, including in the towns and other developed areas such as Beccles, Bungay, Hoveton and Stalham. The cross-boundary issues generally tend to be very localised and specific.

The boundary of the Broads was determined in the light of its landscape, navigation and recreational value. The boundary largely follows the extent of the flood plain and typically it includes the river frontage parts of settlements where the greater part of the settlement lies outside the boundary and within the district/ borough council's planning area. In such cases, even if the settlement is identified by the council for some growth, this is usually best accommodated in that council's planning area, as the land within the Broads is constrained by the importance of conserving its nationally important landscape, navigation considerations, and is at a high risk of flooding.

Because the boundary runs through the heart of settlements, it is the case that sites, ownerships and functions may straddle the boundary, and there is sometimes a need to coordinate on not just wider, 'strategic' matters, but also more site-specific matters to ensure that development either side of the boundary is complementary.

2.2 Cooperation mechanisms

- a) **Direct links at member level:** Each district and county council appoint one councillor to membership of the Broads Authority. Norfolk County Council has two appointed members while Suffolk County Council and the Districts have one each. A number of the Local Authority Appointed members sit on the Planning Committee. The Planning Committee's role relates to Development Management, Enforcement, Tree Protection Orders, Conservation Areas, Neighbourhood Planning and Local Plan issues. Each consultation stage of the production of the Local Plan was agreed by the Planning Committee as well as Full Authority. The Planning Committee's remit includes responses on consultations from the District councils, demonstrating co-operation works both ways.
- b) **Norfolk Strategic Planning Framework:** The purpose of the Norfolk Strategic Planning Framework (NSPF) is to produce a non-statutory framework for planning authorities across Norfolk about joint working. This ensures that the Duty to Cooperate is discharged and there is beneficial co-operation on strategic planning issues. This document will provide an overarching framework for strategic planning issues across the county, taking account of any key issues in neighbouring areas and beyond with an

emphasis on strategic land use issues with cross boundary implications. It is intended to support and inform the preparation of Local Plans produced by individual planning authorities. [The 2025 version of the NSPF can be found here](#). How the Local Plan meets or addresses the various agreements in the NSPF is assessed at [Appendix 2](#).

- c) **Joint Strategic Planning Member Group Meeting² – Norfolk**. This meets quarterly and cross boundary issues are discussed with the way forward recommended for each constituent LPA to then take forward.
- d) **Informal discussions and meetings** are held between planning policy officers on sites and issues with cross boundary implications, on occasions involving directors of planning and individual council or authority members. For example, a quarterly meeting is held between East Suffolk Council and Great Yarmouth Borough Council and the Broads Authority. There is also a bi-annual meeting with Norfolk County Council.
- e) **Ongoing engagement at officer level** (usually head of planning policy) takes place through the Norwich Strategic Planning Group (meeting monthly). There is a Suffolk equivalent which meets on an ad hoc basis.
- f) Joint working with relevant district councils takes place regarding the **Neighbourhood Plans³** that straddle both Local Planning Authority boundaries.
- g) **Specific discussions at officer level** occur on emerging cross boundary issues by telephone, email and meetings. For example, quarterly meetings with Norfolk and Suffolk Historic Environment officers.
- h) **Formal consultations** are undertaken on development plan documents, supplementary planning documents, and planning applications with potential cross-boundary implications.
- i) The Broads Authority is a member, and sits on the management group, of the **Norfolk Coast National Landscape Partnership**.
- j) The Broads Authority is a member of the **Norfolk Biodiversity Partnership** along with the relevant local authorities (Breckland, Broadland, Great Yarmouth, Kings Lynn and West Norfolk, North Norfolk, Norwich, South Norfolk), Natural England and the Environment Agencies, together with bodies not subject to the 'duty to cooperate', Anglian Water, British Trust for Ornithology, Royal Society for the Protection of Birds, Farming and Wildlife Advisory Group, Forestry Commission, Norfolk and Norwich Naturalists' Society, Norfolk Biodiversity Information Service, Norfolk Geodiversity Partnership, and Norfolk Wildlife Trust, University of East Anglia and Water Management Alliance.

² [Norfolk Strategic Planning Member Forum - Norfolk County Council](#)

³ [Neighbourhood planning \(broads-authority.gov.uk\)](#)

- k) The Broads Authority is a member of the ***Suffolk Biodiversity Partnership***, along with Suffolk County Council.
- l) There are arrangements with ***Norfolk and Suffolk County Councils*** for the provision of advice and services in relation to historic environment and archaeology advice.
- m) The Authority's remit differs from a local council; the Broads Authority is a local planning authority but does not have other ***statutory responsibilities*** in, for example; housing, economic development⁴, environmental health, education, and highways. The Authority works closely with these local authority departments in both plan-making and decision-taking to enable connections with other authorities at an officer level.
- n) ***Joint evidence base production.*** Some evidence base to support Local Plan production has been commissioned jointly, see the next section for detail. In general, where one of the Authority's constituent districts has commissioned evidence to support its Local Plan, it tends to cover the entire district, including that part of the district in the Broads Authority Executive Area.

2.3 Cooperation outcomes

Agreement or coordination on approach and issues relating to a range of sites either side of the Broads boundary. These relate to both cross-boundary planning issues and sites within the Broads where the Authority's role of local planning authority needs to be coordinated with the relevant council's other responsibilities. Examples include;

- Open space – assessed by the districts and the new Local Plan seeks to allocate these areas of open space.
- Norfolk and Suffolk County Council regarding safeguarded minerals sites.
- Masterplan and emerging SPD for East Norwich Strategic Regeneration Area. While this is mostly in Norwich it includes a piece of land which is in the Broads.
- Retail – working with East Suffolk and North Norfolk relating to a combined approach to joint areas of retail.
- Joint Supplementary Planning Document with Great Yarmouth, East Suffolk and North Norfolk Councils on Coastal Adaptation.
- Endorsing Great Yarmouth Open Space SPD and East Suffolk Open Space and Affordable Housing SPDs.

⁴ That being said, in undertaking its functions, the Broads Authority must have regard to the needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.

- Cross-boundary conservation areas, Conservation Area Appraisals and Article 4 directions with each of Broadland, Great Yarmouth, Norwich, North Norfolk, South Norfolk and East Suffolk Councils.
- Broads (and hinterland) Landscape Capacity Study Wind-Turbines, for Photo-Voltaics and Associated Infrastructure, with input from South Norfolk District and Great Yarmouth.
- With Neighbourhood Plans adopted and more being produced, joint working is required to assist in their production as well as ensure the regulatory steps are met.
- Broads Biodiversity Action Plan (2009), Broads Biodiversity Audit (2011), Broads Biodiversity and Water Strategy (2013); Norfolk Biodiversity Action Plan; Suffolk Biodiversity Action Plan (2012); Local Nature Recovery Strategy (in preparation); Broads Nature Recovery Strategy (2025).
- Officer level support in planning appeals where there are cross-boundary impacts, e.g. wind turbines in Hemsby (GYBC) and near Beccles (East Suffolk DC).

3 Greater Norwich (GN) Joint Local Plan

Norwich City, Broadland District, and South Norfolk District, working with Norfolk County Council, have combined as part of the Greater Norwich Growth Partnership (GNGP). They produced a Greater Norwich Local Plan. The Broads Authority is an active member of the GNGP with officers and members involved.

Although the western part of the Broads is within the general area of the Joint Local Plan, the Authority decided at an early stage to produce its own Local Plan for the Broads area separately. This is because of the very different issues and considerations applying in the Broads.

The growth is planned to take place entirely outside the Broads and within the GNGP Joint Local Plan area, but there are a range of cross boundary and complementary issues.

3.1 Cooperation mechanisms

The Broads Authority is an active member of the GNGP with Officers attending the working group meetings, Director attending the Director Board and Member attending the joint Member Group meetings.

The Broads Authority is part of the statutory consultations on the GNGP Joint Local Plan.

3.2 Cooperation Outcomes

The GNGP Local Plan covers the wider Norwich area (including beyond the boundaries of Norwich City Council) but excludes the Broads area.

The Broads is recognised by the GNGP for its national importance, and for its contribution to the economy, environment and quality of life of the sub-region. The identification of the potential for large scale growth in the wider Norwich area has been informed by the sensitivities and value of the Broads.

4 The Coast

The coast in the vicinity of the Broads is low lying and has been breached on a number of occasions and, separately, eroded significantly. The anticipated effects of climate change and other factors suggest a likely increase in frequency and severity of such events and processes.

The Broads' ecological, economic, community and landscape values and qualities are highly vulnerable to the effects of any future breach or over-topping of the coast, both in the vicinity of any breach and far inland. As well as the flooding likely to result, the incursion of salt seawater would seriously affect internationally protected habitats and species, as well as the Broads ecology more generally.

The coast is also a key part of the Broads landscape, and well-loved for its accessible but remote feeling beach and dunes, distinct habitats and species associated with the sea face of the coast, the brackish waters and soils on its landward side, and the intervening dunes. The combination of sensitive nature and visitor pressures (for instance, viewing of seals and their pups on the beach in the winter is extremely popular) requires careful management.

4.1 Cooperation mechanisms

The Authority has been involved in the development of the adopted shoreline management plan (SMP) for the area, and the action planning to implement this and inform future plans. Recently, a group of coastal authorities (Norfolk and Suffolk Planning Policy Officers) has produced a joint [Coastal Adaptation SPD](#).

4.2 Cooperation outcomes

The Shoreline Management Plan 6 (Kelling Hard to Lowestoft Ness) provides for intervention to hold the current line of the coast of the Broads for the medium term, while investigating the long-term sustainability of this option.

A widening appreciation of the political, technical and community challenges in facing coastal change and other potential climate change impacts.

Increasing recognition by the coastal defence community that changes in this particular part of the coast could have a wide range of major impacts on the Broads stretching far inland, and of a need to further investigate and understand the risks and opportunities, including those further inland than the coastal strip itself.

Increased understanding of potential climate change effects on the area and the identification of a range of trial potential adaption measures.

An adopted Coastal Adaptation SPD.

5 National Parks family

Strategic planning matters – those that affect more than one planning area - are not limited to those areas which are contiguous. The Broads is part of the UK family of national parks, and for all their differences there are many issues which affect them jointly. They are largely rural areas with the highest status of protection and a national role in recreation and tourism, dependent on fragile ways of life and communities to maintain their distinctive landscapes, under great housing pressure for second homes and retirement, and highly vulnerable to erosion of their special qualities through incremental change. As such they need special treatment. National planning policies conceived primarily with urban and suburban areas of growth and regeneration in mind can be highly inappropriate. Special care and creativity are needed to ensure both that the national parks and the Broads are suitably conserved and developed, and to ensure that they make their full contribution to the quality of life and the economy of the areas around them and the nation more generally.

5.1 Cooperation mechanisms

The Broads Authority works closely at both officer and member level with the national park authorities, which are each the local planning authority for their national park area, to address emerging issues and share best practice.

Of particular relevance to the planning of the national parks and the Broads are the following standing officer working groups;

- Chief Executives
- Heads of Planning Policy
- Heads of Planning
- Historic Environment Officers
- England Agriculture and Rural Development
- Landscape
- Ecologists
- Recreation and Tourism

The National Parks also submit joint representations in response to Government consultations including on planning policy and have ongoing dialogue with DEFRA, DCLG, the Planning Inspectorate, etc. evidence to national commissions and enquiries (e.g. Rural Affordable Housing Commission).

5.2 Cooperation outcomes

Continuation of the special treatment of national parks and the Broads in the National Planning Policy Framework.

Enhanced policies and approaches to issues such as affordable housing, accommodation of housing growth, climate change mitigation and adaption, wind farms and other renewable generation, contribution of development to landscape, wildlife, cultural heritage and recreation.

6 The Environment Agency

Long standing close working arrangements (including joint projects) between the organisations on a range of issues, especially on planning policies for flood risk zones (a major issue in the Broads), flood defences, Shoreline Management Plan, water quality and resources, navigation matters, recreation, etc. Previous and current joint projects including EA/BA funding of a Catchment Officer. Statutory consultations, including on preparation of the Local Plan. The EA is also involved in the Norfolk Strategic Planning Officers Group and the production of the Norfolk Strategic Planning Framework and on the Member Forum.

7 Historic England

General consultation on planning documents. Liaison regarding the way forward with regard to the Broads and Archaeology. Historic England are also standing invitees and regularly attend the Norfolk Conservation Officers meetings and Suffolk Conservation Officers Forum meetings. Discussion over projects such as the Water Mills and Marshes (a Heritage Lottery Funded scheme which delivered landscape scale benefits) and specific historic buildings and conservation areas.

8 Natural England

Long-standing close working arrangements (including joint projects) between the organisations on a range of issues around land and water management including Biodiversity Action Plans, climate change. Previous joint projects including NE/BA funding of an officer to work on non-native species issues. Statutory consultations, including on the Local Plan.

9 Mayor of London

While not directly relevant to the Broads area, work has been ongoing in relation to cooperating over the wider Southeast of England. Members have attended some meetings. Norfolk County Council Officers and South Norfolk District Council Leader (in his role as chair of the Norfolk Strategic Framework) have represented Norfolk in meetings.

10 Civil Aviation Authority

No relevant strategic issues have arisen during the review period. The Authority has previously commented on consultation documents from Norwich International Airport, and drawn its attention to the issue of tranquillity in the Broads area as a matter for consideration in planning the airport's use of its controlled airspace.

11 Office of Rail Regulation

No relevant strategic issues have arisen during the period. The Authority is a signatory to the East Anglia Rail Prospectus. It has also had extensive involvement with Network Rail in relation to issues around the maintenance, operation and any potential replacement of the

aged swing and lifting rail bridges across the Broads' rivers (which affect navigation as well as rail services and passengers, and the accessibility of the area to visitors) at all levels from navigation rangers and rail bridge operators to BA Chief Executive and NR Directors.

12 National Highways

No relevant strategic issues have arisen during the review period. It is noted that there are intentions to improve the Acle Straight and roundabouts in Great Yarmouth and there is a policy that emphasises the issues to consider when producing the scheme. National Highways is supportive of this policy.

13 Homes England

No relevant strategic issues have arisen during the review period.

14 Integrated Care Systems and National Health Service Commissioning Board

No relevant strategic issues have arisen during the review period. The small scale development in the Broads area is unlikely to affect healthcare planning. As set out in the [Local Infrastructure Study](#), NHS England is not currently aware of a specific need for additional health facilities within the Broads Executive Area. There is currently sufficient capacity to cope with the existing populations in the area. Additionally there is not at present, due to capacity reasons, a need to expand the health facilities outside the Broads Executive Area into the Broads Executive Area.

15 Transport for London

Not relevant to the Broads area.

16 Integrated Transport Authorities

None relevant to the Broads area.

17 Marine Management Organisation

Formal consultations between the Authority and the MMO, including on the Broads Local Plan. An assessment of the Local Plan against the East Onshore and Offshore Marine Plan is included at [Appendix 3](#).

18 LEP and LNPs

The funding for these ended in 2023.

19 Housing need in the Broads

19.1 Background

Despite undertaking three calls for sites (one at each of the Local Plan consultation stages and one in December 2024) no new suitable residential dwelling sites came forward for allocation in the review of the Local Plan.

The Local Plan will include two sites allocated for residential dwellings, these already have planning permission and have commenced but are not yet built out. They are THU1 (16 dwellings) and OUL3 (76 dwellings). NOR1 Utilities Site in Norwich is a very constrained site and is allocated for mixed use which could include around 250 dwellings, although this is not considered a housing allocation.

The housing numbers as set out in the submitted version of the Local Plan are as follows:

The Objectively Assessed Housing Need for the Broads is as follows:

District	Objectively Assessed Housing Need	Annual average from 2021 to 2042 (22 years)
Broadland	316	14.37
North Norfolk	293	13.32
Norwich	17	0.77
South Norfolk	204	9.27
Great Yarmouth	177	8.05
East Suffolk	70	3.18
Total:	1,077	49

For the avoidance of doubt, each element of the Broad's Objectively Assessed Need identified in the table above for each of the six districts also forms part of each district's objectively assessed need and is not in addition to.

Completions and permissions between April 2021 and April 2025 as well as allocations in this Local Plan (that have not commenced). This shows a residual need of 1,034 dwellings.

It should be noted that before the Local Plan is adopted, there will be at least one more monitoring period, and any completions or permissions in those monitoring periods will be deducted from the residual need.

19.2 Duty to Cooperate with Norfolk LPAs

As mentioned previously in this document (section 2.2 a and b), Norfolk LPAs worked together to produce the Norfolk Strategic Planning Framework. Two agreements are relevant to meeting the housing need of the Broads and these are copied below.

Agreement 10 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.

Agreement 11 - South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Effectively, as Agreement 10 is not met, Agreement 11 comes into force.

~~The NSPF was being updated at the time of writing this Duty to Cooperate Statement, but the agreements are still to be included, and South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils have agreed to meet the housing need of the Broads Authority.~~

19.3 Duty to cooperate with East Suffolk Council

East Suffolk Council is not part of the Norfolk Strategic Planning Framework and so has confirmed how we cooperate through a Duty to Cooperate Letter that is at [Appendix 4](#). That is if the Broads Authority is unable to meet the need for 70 dwellings in the East Suffolk part of the Broads, East Suffolk will take on meeting the need. It acknowledges that the need for the Broads part of East Suffolk is part of East Suffolk’s need and not additional to it. The letter goes on to say that further Duty to Cooperate discussions will occur when East Suffolk produce its new Local Plan.

20 Gypsy and Traveller need in Great Yarmouth Borough

20.1 Background

The need for the Broads Authority comes from the Great Yarmouth Borough part of the Broads. The need for the next five years is 12 pitches, and future need is 5 pitches. In terms of the 5 pitch future needs, this is addressed through a Development Management policy.

20.2 Duty to Cooperate with Great Yarmouth Borough Council

Despite undertaking three calls for sites (one at each of the Local Plan consultation stages and one in December 2024) no Gypsy and Traveller sites came forward for allocation in the Local Plan.

In terms of the need for 12 pitches over the next 5 years, we will continue to work with Great Yarmouth Borough Council.

21 Other Cross Boundary strategic issues relevant to the Duty to Cooperate and Local Plan

21.1 Nutrient Enrichment

Alongside all other local planning authorities in Norfolk, the Broads Authority received a letter dated 16 March 2022 from Natural England concerning nutrient pollution in the protected habitats of the Broads Special Area of Conservation (SAC) and Ramsar site. This letter advised that new development comprising overnight accommodation located within the catchment of these Habitats Sites has the potential to cause adverse impacts on site integrity due to nutrient pollution.

Nutrient pollution in rivers, lakes and estuaries has an adverse effect by causing eutrophication and algal blooms, harming delicate ecosystems and resulting in unfavourable conditions. The majority of nutrient pollution from residential properties enters waterbodies via treated discharges from wastewater treatment works (WWTW).

The policy applies to residential developments leading to overnight stays and non-residential development that, by virtue of its scale, may draw people from outside the catchments of the SACs and/or generate unusual quantities of surface water and/or (by virtue of the processes undertaken) contain unusual pollutants within surface water run-off. It only applies to certain areas of Norfolk and not, at the time of writing, any of Suffolk. It applies to development within the nutrient neutrality catchment of the Broads SAC and Broadland Ramsar.

Potential mitigation measures are detailed in this [report](#). At the time of writing [Norfolk Environmental Credits](#) has been set up to invest in local environmental schemes which will provide nutrient neutrality mitigation and generate credits for development to demonstrate that nutrients can be offset. Part 7 of the Levelling Up and Regeneration Act (2023) places a duty on water companies discharging to affected catchment areas to upgrade those WWTW defined by the LURA amendments to the Water Industry Act, that are identified as nutrient significant plants within the designated sensitive catchments, serving a population equivalent of 2,000 to achieve the highest technological levels for nutrient removal by 1 April 2030. In addition, the Natural England-led Nutrient Mitigation Scheme is progressing and will allow developers to purchase nutrient credits to demonstrate nutrient neutrality.

21.2 Recreation Impacts

Increased recreational pressure at Habitats Sites can result in damage to habitats through erosion and compaction, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, dog fouling, tree climbing etc. Typically, disturbance of habitat and species is the unintentional consequence of people's presence which can impact distribution of habitat types and breeding success and survival. Increased development has the potential to increase recreational pressures on Habitat Sites which are accessible to the public.

The [Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy \(RAMS\)](#) and the [Norfolk Recreation Avoidance and Mitigation Strategy \(RAMS\)](#) aim to reduce the impact of increased levels of recreational use on Habitat Sites (also often called European Sites), due to new residential development in Norfolk and the Suffolk Coast area, and to provide a simple, coordinated way for developers to deliver mitigation for their developments. The RAMS project allows for a strategic approach to mitigating the in-combination effects of development on these designated areas and allows mitigation to be delivered across the project area. The tariffs increase each year with inflation; for the most up to date information see [here](#).

The Norfolk Local Planning Authorities have worked together in relation to the Norfolk RAMS scheme and the relevant Suffolk Local Planning Authorities have worked together in relation to the Suffolk Coast RAMS scheme.

21.3 Water quality

What happens upstream, can affect downstream regardless of local planning authority areas. To some extent, water quality is addressed through nutrient enrichment. There is also the [Broadland Catchment Partnership](#). The Broads Authority and Norfolk Rivers Trust co-host the Broadland Catchment Partnership to help co-ordinate joined up and targeted water and land management. The partnership is involving local people, organisations and businesses in developing and carrying out actions. Partners are making the most of existing funding, seeking more innovative sources, and highlighting incentives to encourage best practice across all sectors.

21.4 Water supply

The east is an area of water stress. The Local Plan for the Broads has a policy that seeks 110 l/h/d use for new residential dwellings and seeks other buildings to be water efficient. The approach to 110 l/h/d is a county-wide approach that is part of the Norfolk Strategic Framework.

21.5 The Broads itself

The Broads is a protected landscape and is part of 6 district council areas. The Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, amended Section 17A of the Norfolk and Suffolk Broads Act 1988. Section 17A creates a general duty of public bodies and this was amended to replace 'shall have regard to' with 'must seek to further' the purpose of 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.

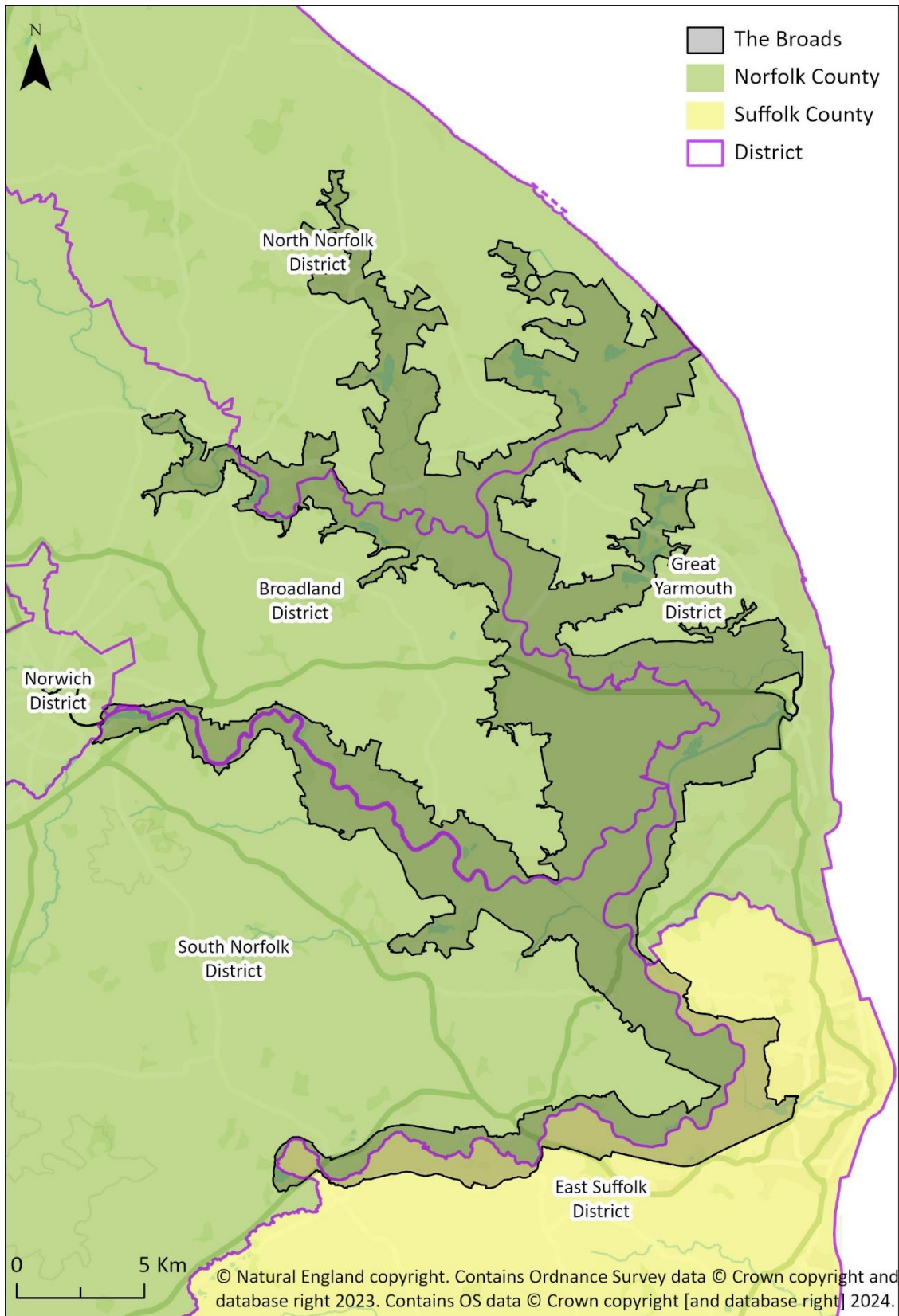
21.6 Flood Risk

Approximately 82.46% of the Broads Authority Executive Area is covered by flood zone 3 (3, 3a & 3b). This equates to 24,894.6 hectares. The Broads Authority boundary is tightly drawn around the edge of the floodplain. The extent and nature of flood risk, with significant areas

of 'functional floodplain', mean that flood risk is a major constraint on development in the Broads.

The Broadland Futures Initiative (BFI) was established in 2019 as a partnership between the Broads Authority, Broadland District Council, East Suffolk Council, Great Yarmouth Borough Council, Norfolk County Council, North Norfolk District Council, Norwich City Council, South Norfolk Council and Suffolk County Council. Supported by the Environment Agency and others the partnership is modelling the potential impacts of climate change and sea level rise on the region over the next 100 years, to establish how best the area can meet the future needs of the inhabitants, nature and businesses. This project will help to shape and coordinate the plans and policies of all the partner councils.

Appendix 1: The Broads Executive Area, District Boundaries and County Boundaries.



Appendix 2: Assessment of Local Plan against the Norfolk Strategic Framework Agreements (2021)

Agreement	How the Local Plan addresses this
<p>Agreement 1 - That when preparing new Local Plans, the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2041</p>	<p>The local housing need, residential moorings need and Gypsy and Traveller need is to 2042.</p>
<p>Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.</p> <p>By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life and Health for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.</p>	<p>The Local Plan includes policies relating to the economy, air quality, greenhouse gas emissions, housing need, health and biodiversity.</p>
<p>Agreement 3 - By the end of the local plan period, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):</p> <ul style="list-style-type: none"> • To realise the economic potential of Norfolk and its people • To reduce Norfolk’s greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change • To address housing needs in Norfolk • To improve the quality of life and health for all the population of Norfolk • To improve and conserve Norfolk’s rich and biodiverse environment 	

Agreement	How the Local Plan addresses this
Agreement 4 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.	No action for the Local Plan for the Broads.
Agreement 5 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will implement the Greater Norwich Local Plan (adopted March 2024) and various other existing Local Plan documents in this area, whilst also considering how best to address national changes to local plan making.	No action for the Local Plan for the Broads.
Agreement 6 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.	A Local Plan for the Broads is being produced.
Agreement 8 – Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan	Generally, the Broads Authority has done this, but 5 years on, this may be out of date.
Agreement 7 - The list of locations in section 5 are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors and protected from loss to other uses.	These do not fall within the Broads Authority Executive Area.
<p>Agreement 8- The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions in section 5.4.</p> <p>The role of Greater Norwich</p> <p>Cambridge to Norwich Technology Corridor</p> <p>A47 Corridor</p> <p>Offshore Energy Sector / Ports of Great Yarmouth & Lowestoft</p> <p>Norfolk Coast, the Broads and the Brecks</p> <p>A10 corridor</p> <p>King's Lynn to Cambridge Corridor</p>	<p>The Local Plan for the Broads has a policy relating to work on the A47 as it runs through the Broads (Acle Straight).</p> <p>As set out in this Statement, the Broads Authority have been and will continue to be involved in Greater Norwich.</p>

Agreement	How the Local Plan addresses this
<p>Agreement 9 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver <u>at least</u> the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2041 2036.</p>	<p>The Local Plan does not allocate residential dwellings. The need for the Broads is part of, not additional to, the need of the districts.</p> <p>The Local Plan allocates sites for residential moorings.</p> <p>The Local Plan does not meet the Gypsy and Traveller need. We will work with Great Yarmouth Borough Council in meeting this need.</p>
<p>Agreement 10 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.</p>	<p>The Local Plan does not allocate residential dwellings. The need for the Broads is part of, not additional to, the need of the districts.</p>
<p>Agreement 11 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan</p>	<p>Districts have agreed to do this.</p>
<p>Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.</p>	<p>No action for the Local Plan for the Broads.</p>

Agreement	How the Local Plan addresses this
<p>Agreement 12 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs</p>	<p>This need was not broken down to a need for the Broads Authority.</p> <p>The Local Plan does not allocate residential dwellings.</p> <p>The need for the Broads is part of, not additional to, the need of the districts.</p> <p>There is a development management policy in the Local Plan to help determine such schemes.</p>
<p>Agreement 13 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology</p>	<p>Completed.</p>
<p>Agreement 14 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:</p> <ul style="list-style-type: none"> • Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development. • Clear evidence and demonstration of ability to deliver development will be required <u>prior</u> to the allocation of larger sites for development. 	<p>The Local Plan does not allocate residential dwellings.</p> <p>There are policies in the Local Plan relating to housing mix.</p>

Agreement	How the Local Plan addresses this
<p>Agreement 15 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity and fully integrated these into a potential Norfolk wide design guide and local design codes (which will inform planning application decisions, local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.</p>	<p>The Local Plan for the Broads has a policy on health.</p>
<p>Agreement 16 - Norfolk authorities agree to endorse updates to the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments.</p>	<p>The Broads Authority have endorsed this and there is a related policy in the Local Plan.</p>
<p>Agreement 17 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to give consideration to the approaches in the NSPF Climate Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.</p>	<p>The Local Plan includes policies to address climate change.</p>
<p>Agreement 20 - Norfolk Planning Authorities agree to work together to investigate the production of a county wide climate change best practice guide/design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles.</p>	<p>The Local Plan includes policies to address climate change.</p>
<p>Agreement 18 - Norfolk Authorities have agreed to become will remain members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.</p>	<p>Broads Authority is heavily involved in WRE. Water is a key issue that the Local Plan seeks to address.</p>

Agreement	How the Local Plan addresses this
<p>Agreement 19 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) or lower for residential development.</p>	<p>Policy requiring 110 l/h/d included in the Local Plan.</p>
<p>Agreement 20 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites</p>	<p>HRA produced. AWS and E and S Water involved in the Local Plan throughout its production.</p>
<p>Agreement 24 – To support the high-speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.</p>	<p>The new Local Plan will include a draft policy, but this issue may not be addressed through Building Regulations.</p>
<p>Agreement 21 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.</p>	<p>There is a policy relating to this in the Local Plan.</p>
<p>Agreement 22: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places. This includes making provision for those with Special Educational Needs (SEND), providing land for school expansion or new schools and/or where no suitable solution for sustainable access to schools exists, appropriate contributions for home to school transport. S106 and / or Community Infrastructure Levy funds will be used to deliver additional school places and/or contributions to home to school transport, where appropriate. The County Council’s Planning Obligations Standards will be used to inform any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure. The authorities agree to support Norfolk County Council in securing contributions towards infrastructure where justified and, in</p>	<p>No need has been identified by Norfolk County Council to reflect the allocations in the Local Plan.</p>

Agreement	How the Local Plan addresses this
<p>the case of planning obligations, suitably evidenced as being in compliance with S122 of the Community Infrastructure Levy Regulations 2010. and land for school expansion or new schools and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.</p>	
<p>Agreement 23 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues: • Aquaculture • Biodiversity • Cabling • Climate change • Coastal erosion and coastal change management • Coastal management, including defence, inundation, and Coastal Change Management Areas • Co-existence • Defence • Displacement • Dredging and disposal • Energy – offshore wind and oil and gas • Fishing • Governance • Heritage • Historic environment • Infrastructure • Landscapes and seascapes • Marine aggregates • Marine and coastal employment • Marine Litter • Marine net gain • Marine protected areas • Marine related renewable energy • Natural capital • Non-native species • Oil and Gas • Port and marine infrastructure and employment • Sustainable fisheries and aquaculture in small harbour towns • Sustainable port development • Tidal Energy • Tourism and recreation • Underwater noise • Water quality/water supply and sewerage</p>	<p>See Appendix 3</p>
<p>Agreement 24: In recognition of: a) the importance the Brecks, the Broads and the Norfolk Coast National Landscape Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; b) the pressure that development in Norfolk could place on these assets; and c) the importance of ecological connections between habitats. Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and</p>	<p>Policy in the Local Plan relating to GI. Policy in the Local Plan relating to GI RAMS.</p>

Agreement	How the Local Plan addresses this
<p>Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.</p>	
<p>Agreement 25: It is agreed that: 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand. 2) As the Mineral Planning Authority, Norfolk County Council will plan for steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand as well as allocating sites and providing a criteria-based policy to assess applications to meet the forecast need for silica sand in the Norfolk Minerals and Waste Local Plan. 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development. 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy. 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period. 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk’s urban areas and main towns using criteria-based policies. Priority for the location of new waste management facilities will be given to the re-use of previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages. 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals</p>	<p>The Local Plan refers to minerals and waste as required.</p>

Agreement	How the Local Plan addresses this
development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.	
Agreement 26: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.	We continue to work together and jointly fund work as required.
Agreement 27: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.	The Broads Authority will do this.

Appendix 3: Assessment of Local Plan against Marine Plans

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-AGG-3	Aggregates	Within defined areas of high potential aggregate resource, proposals should demonstrate in order of preference: that they will not, prevent aggregate extraction how, if there are adverse impacts on aggregate extraction, they will minimise these how, if the adverse impacts cannot be minimised, they will be mitigated the case for proceeding with the application if it is not possible to minimise or mitigate the adverse impacts.	Aggregate areas seem to be offshore. Not relevant to Local Plan.
E-AQ-1	Aggregates	Within sustainable aquaculture development sites (identified through research), proposals should demonstrate in order of preference: that they will avoid adverse impacts on future aquaculture development by altering the sea bed or water column in ways which would cause adverse impacts to aquaculture productivity or potential how, if there are adverse impacts on aquaculture development, they can be minimised how, if the adverse impacts cannot be minimised they will be mitigated the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	Aquaculture seems to be more of an offshore issue. Local Plan has policies that would guide development proposals.
E-BIO-1	Environment (96)	Appropriate weight should be attached to biodiversity, reflecting the need to protect biodiversity as a whole, taking account of the best available evidence including on habitats and species that are protected or of conservation concern in the East marine plans and adjacent areas (marine, terrestrial).	Local Plan has policies relating to biodiversity. No obvious conflict.
E-BIO-2	Environment (96)	Where appropriate, proposals for development should incorporate features that enhance biodiversity and geological interests.	Local Plan seeks 20% net gain as well as biodiversity enhancements. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-CAB-1	Subsea Cables (196)	Preference should be given to proposals for cable installation where the method of installation is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant.	Relates only to areas of open sea, not relevant. Local Plan has policies that would guide development proposals.
E-CC-1	Climate Change (56)	Proposals should take account of how they may be impacted upon by, and respond to, climate change over their lifetime and how they may impact upon any climate change adaptation measures elsewhere during their lifetime Where detrimental impacts on climate change adaptation measures are identified, evidence should be provided as to how the proposal will reduce such impacts.	The Local Plan has policies relating to climate change. No obvious conflict.
E-CC-2	Climate Change (56)	Proposals for development should minimise emissions of greenhouse gases as far as is appropriate. Mitigation measures will also be encouraged where emissions remain following minimising steps. Consideration should also be given to emissions from other activities or users affected by the proposal.	The Local Plan has policies relating to climate change. No obvious conflict.
E-CCS-2	Carbon Capture and Storage (51)	Carbon Capture and Storage proposals should demonstrate that consideration has been given to the re-use of existing oil and gas infrastructure rather than the installation of new infrastructure (either in depleted fields or in active fields via enhanced hydrocarbon recovery).	Not specifically covered in the Local Plan. Local Plan has general policies that would guide development proposals. No obvious conflict.
E-DD-1	Dredging and Disposal	Proposals within or adjacent to licensed dredging and disposal areas should demonstrate, in order of preference: that they will not adversely impact dredging and disposal activities how, if there are adverse impacts on dredging and disposal, they will minimise these how, if the adverse impacts cannot be minimised they will be mitigated the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	The Broads Authority undertakes dredging. Local Plan has general policies that would guide development proposals. No obvious conflict.
E-EC-1	Economic (86)	Proposals that provide economic productivity benefits which are additional to Gross Value Added currently generated by existing activities should be supported.	The Local Plan has economy policies. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-EC-2	Economic (86)	Proposals that provide additional employment benefits should be supported, particularly where these benefits have the potential to meet employment needs in localities close to the marine plan areas.	The Local Plan has economy policies. No obvious conflict.
E-EC-3	Economic (86)	Proposals that will help the East marine plan areas to contribute to offshore wind energy generation should be supported.	Local Plan has policies for onshore wind. Local Plan has general policies that would guide on shore development proposals. No obvious conflict.
E-ECO-1	Environment (96)	Cumulative impacts affecting the ecosystem of the East marine plans and adjacent areas (marine, terrestrial) should be addressed in decision-making and plan implementation.	Local Plan has general policies that would guide development proposals. No obvious conflict.
E-FISH-1	Fisheries (111)	Within areas of fishing activity, proposals should demonstrate in order of preference: that they will not prevent fishing activities on, or access to, fishing grounds how, if there are adverse impacts on the ability to undertake fishing activities or access to fishing grounds, they will minimise them how, if the adverse impacts cannot be minimised, they will be mitigated the case for proceeding with their proposal if it is not possible to minimise or mitigate the adverse impacts	Seems to refer mainly to fishing activities offshore. Not relevant to Local Plan.
E-FISH-2	Fisheries (111)	Proposals should demonstrate, in order of preference: that they will not have an adverse impact upon spawning and nursery areas and any associated habitat how, if there are adverse impacts upon the spawning and nursery areas and any associated habitat, they will minimise them how, if the adverse impacts cannot be minimised they will be mitigated the case for proceeding with their proposals if it is not possible to minimise or mitigate the adverse impacts	The Local Plan for the Broads has relevant policies – see the Natural Environment section.
E-GOV-1	Governance (126)	Appropriate provision should be made for infrastructure on land which supports activities in the marine area and vice versa.	Local Plan has general policies that would guide development proposals. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-GOV-2	Governance (126)	Opportunities for co-existence should be maximised wherever possible.	Local Plan has general policies that would guide development proposals. No obvious conflict.
E-GOV-3	Governance (126)	Proposals should demonstrate in order of preference: a) that they will avoid displacement of other existing or authorised (but yet to be implemented) activities b) how, if there are adverse impacts resulting in displacement by the proposal, they will minimise them c) how, if the adverse impacts resulting in displacement by the proposal, cannot be minimised, they will be mitigated against or d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts of displacement	Local Plan has general policies that would guide development proposals. No obvious conflict.
E-MPA-1	Environment (96)	Any impacts on the overall Marine Protected Area network must be taken account of in strategic level measures and assessments, with due regard given to any current agreed advice on an ecologically coherent network.	The Local Plan seeks to protect protected sites. No obvious conflict.
E-OG-1	Oil and Gas	Proposals within areas with existing oil and gas production should not be authorised except where compatibility with oil and gas production and infrastructure can be satisfactorily demonstrated.	Oil and gas infrastructure seem to be offshore. Not relevant to Local Plan. Local Plan has general policies that would guide on shore development proposals. No obvious conflict.
E-OG-2	Oil and Gas	Proposals for new oil and gas activity should be supported over proposals for other development.	Oil and gas infrastructure seem to be offshore. Not relevant to Local Plan. Local Plan has general policies that would guide on shore development proposals. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-PS-2	Ports and Shipping	Proposals that require static sea surface infrastructure that encroaches upon important navigation routes should not be authorised unless there are exceptional circumstances. Proposals should: be compatible with the need to maintain space for safe navigation, avoiding adverse economic impact, anticipate and provide for future safe navigational requirements where evidence and/or stakeholder input allows and account for impacts upon navigation in-combination with other existing and proposed activities	Sea surface infrastructure seems to be offshore. Relates only to areas of open sea, not relevant.
E-PS-3	Ports and Shipping	Proposals should demonstrate, in order of preference: that they will not interfere with current activity and future opportunity for expansion of ports and harbours how, if the proposal may interfere with current activity and future opportunities for expansion, they will minimise this how, if the interference cannot be minimised, it will be mitigated the case for proceeding if it is not possible to minimise or mitigate the interference	Local Plan has general policies that would guide development proposals. No obvious conflict.
E-SOC-1	Social and Cultural	Proposals that provide health and social well-being benefits including through maintaining, or enhancing, access to the coast and marine area should be supported.	Local Plan has policies relating to health and wellbeing. No obvious conflict.
E-SOC-2	Social and Cultural	Proposals that may affect heritage assets should demonstrate, in order of preference: a) that they will not compromise or harm elements which contribute to the significance of the heritage asset b) how, if there is compromise or harm to a heritage asset, this will be minimised c) how, where compromise or harm to a heritage asset cannot be minimised it will be mitigated against or d) the public benefits for proceeding with the proposal if it is not possible to minimise or mitigate compromise or harm to the heritage asset	Local Plan has policies relating to the historic environment/heritage assets. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-SOC-3	Social and Cultural	Proposals that may affect the terrestrial and marine character of an area should demonstrate, in order of preference: a) that they will not adversely impact the terrestrial and marine character of an area b) how, if there are adverse impacts on the terrestrial and marine character of an area, they will minimise them c) how, where these adverse impacts on the terrestrial and marine character of an area cannot be minimised they will be mitigated against d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	Local Plan has policies relating to landscape character. No obvious conflict.
E-TIDE-1	Offshore Wind Renewable Energy Infrastructure	In defined areas of identified tidal stream resource, proposals should demonstrate, in order of preference: a) that they will not compromise potential future development of a tidal stream project b) how, if there are any adverse impacts on potential tidal stream deployment, they will minimise them c) how, if the adverse impacts cannot be minimised, they will be mitigated d) the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	This analysis identified areas of tidal stream resource off the coast of Norfolk and to the north of the Humber Estuary so does not affect the Local Plan.
E-TR-1	Tourism and recreation	Proposals for development should demonstrate that during construction and operation, in order of preference: they will not adversely impact tourism and recreation activities how, if there are adverse impacts on tourism and recreation activities, they will minimise them how, if the adverse impacts cannot be minimised, they will be mitigated the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	Local Plan has policies relating to protecting amenity. No obvious conflict.
E-TR-2	Tourism and recreation	Proposals that require static objects in the East marine plan areas, should demonstrate, in order of preference: that they will not adversely impact on recreational boating routes how, if there are adverse impacts on recreational boating routes, they will minimise them how, if the adverse impacts cannot be minimised, they will be mitigated the case for proceeding with the proposal if it is not possible to minimise or mitigate the adverse impacts	Local Plan has policies that protect navigation. No obvious conflict.

Policy code	Sector	East Inshore and Offshore Marine Plan policy wording	Relevance/how reflected in Local Plan for the Broads
E-TR-3	Tourism and recreation	Proposals that deliver tourism and/or recreation related benefits in communities adjacent to the East marine plan areas should be supported.	Local Plan has a section relating to tourism. No obvious conflict.
E-WIND-1	Offshore Wind Renewable Energy Infrastructure	Developments requiring authorisation, that are in or could affect sites held under a lease or an agreement for lease that has been granted by The Crown Estate for development of an Offshore Wind Farm, should not be authorised unless they can clearly demonstrate that they will not compromise the construction, operation, maintenance, or decommissioning of the Offshore Wind Farm the lease/agreement for lease has been surrendered back to The Crown Estate and not been re-tendered the lease/agreement for lease has been terminated by the Secretary of State in other exceptional circumstances	Local Plan has policies for onshore wind. Local Plan has general policies that would guide on shore development proposals. No obvious conflict.

Appendix 4: East Suffolk Council Duty to Cooperate Letter May 2025



Natalie Beal

Date: 19th May 2025

By email only: natalie.beal@broads-authority.gov.uk

Please ask for: Dickon Povey

Direct dial: 01502 523043

Email: dickon.povey@eastsuffolk.gov.uk

Dear Natalie Beal,

The Local Plan for the Broads Review – Housing need

This letter is provided to set out East Suffolk Council's position in relation to the Broads Authority's housing need in the context of the preparation of the Broads Local Plan.

By way of context, East Suffolk Council has two Local Plans – the Waveney Local Plan (March 2019) and the Suffolk Coastal Local Plan (September 2020). The Waveney Local Plan covers the former Waveney District, excluding the part within the Broads. The Broads Local Plan defers to/has regard to the open space, retail and affordable housing policies of the Waveney Local Plan for the parts of the Broads in East Suffolk. The Suffolk Coastal Local Plan covers the former Suffolk Coastal District, which the Broads does not overlap with. East Suffolk Council was formed in April 2019, comprising the former Council areas of Waveney District and Suffolk Coastal District.

We reviewed the Waveney Local Plan, under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, in March 2024 which concluded that an update was not required. Following the Government's introduction of the revised standard method in December 2024, and resulting increase in housing number for East Suffolk, an addendum to the Waveney Local Plan review assessment was produced in March 2025 which concludes that the plan does need to be updated. The assessment and addendum can be read here: www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/.

[The Council aims to act positively around having up to date plans in place. In the context of](#)

[recent reforms to the plan-making process, our March 2025 Local Development Scheme](#) envisages commencing formal stages of preparation of a new Local Plan for East Suffolk outside of the Broads from later in 2025. However, early preparations for commencing a review are set out to take place in the short term during 2025/26, including evidence scoping / gathering and early engagement. The next Local Plan is anticipated to be an East Suffolk Local Plan (i.e. covering the areas currently covered by the Waveney Local Plan and Suffolk Coastal Local Plan). This is set out in the Council's Local Development Scheme which is available here: www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/statement-of-community-involvement-and-local-development-scheme/

The five year housing land supply for the Waveney Local Plan area of East Suffolk is 3.33 years as at March 2025 following publication of the Interim Housing Position Statement which can be viewed here: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/>. The Interim Housing Position Statement updated the land supply calculations set out in the latest Statement of Housing Land Supply (November 2024) which is available here: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/>

A statement of Common Ground between the Broads Authority and the (then) Waveney District Council in relation to housing need and delivery was signed in January 2018. This letter does not replace that Statement of Common Ground, which relates to the current adopted 2019 Broads Local Plan and the current adopted 2019 Waveney Local Plan. This letter relates to the review of the Local Plan for the Broads which, at the time of writing, was approaching Regulation 19 consultation stage.

Based upon the evidence contained in the Broads Authority: Local Housing Needs Assessment Update (2025) we are comfortable with the 70 dwellings housing requirement proposed for the East Suffolk part of the Broads over the plan period 2021 to 2042, as identified in the Local Housing Needs Assessment 2025 Update for the Broads. We understand that this makes up part of the housing requirement for East Suffolk, and is not additional to it, although some of this need goes beyond the Waveney Local Plan period which ends in 2036. This is as set out on page 183 of the Broads Preferred Options Local Plan (February 2024) which states "For the avoidance of doubt, each element of the Broad's Objectively Assessed Need identified in the table above for each of the six districts also forms part of each district's objectively assessed need and is not additional to."

We are aware that the Broads Authority as a Local Planning Authority take decisions to permit housing development. Where these are in the East Suffolk part of the Broads, these will continue to count towards meeting the housing requirement in the Waveney / East Suffolk area, and permissions in the Broads will similarly continue to be accounted for in the Waveney / East Suffolk Housing Land Supply.

It is understood that the need of 70 dwellings is net of permissions in place prior to 1st April 2021. However, completions arising from permissions in place prior to 1st April 2021 will

nevertheless also make up part of meeting the housing requirement for Waveney / East Suffolk.

You have undertaken three 'call for sites' to help identify suitable sites for housing, including a call for sites undertaken during November / December 2024. It is understood that through the third 'call for sites' undertaken in December 2024 no sites suitable for development came forward in the East Suffolk area of The Broads and none are therefore proposed for allocation.

The Broads status is equivalent to a National Park, plus constraints such as sensitive landscapes and geography which is susceptible to flooding, act as constraints to the delivery of your housing requirement. We recognise that the vast majority of the East Suffolk area of The Broads is in Flood Zone 3, has landscape and heritage sensitivity or is unsuitable for allocations to accommodate 70 dwellings.

Your Preferred Options plan includes only one allocation for mixed use development that could include housing (the Utilities Site in Norwich), which will come forward later in the plan period.

We acknowledge that the 2024 National Planning Policy Framework states inter alia at para. 61: *"The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community."* East Suffolk Council expects that all efforts are made to accommodate the Broads Authority's housing need in the Broads area. However, it is acknowledged that as housing completions and supply in the East Suffolk part of the Broads contribute towards meeting the housing requirement for East Suffolk (the Waveney Local Plan requirement), if the full residual need of 62 dwellings cannot be met through completions in the Broads, then housing completions in East Suffolk outside of the Broads would be needed to ensure that the East Suffolk requirement is met. It is expected that this will be more formally established as part of Duty to Co-operate discussions with East Suffolk Council to inform the preparation of the East Suffolk Local Plan.

You have confirmed that there will be one more year of monitoring housing permissions and completions in the Broads Authority area before the Local Plan is adopted, and that this is expected to slightly reduce the residual housing need number for the remainder of the plan period.

This letter represents the Council's position based on the current national and local planning policy context.

In summary:

- East Suffolk Council are comfortable with the 70 dwellings housing requirement proposed for the East Suffolk part of the Broads over the plan period 2021 to 2042. We understand that this makes up part of the housing requirement for East Suffolk, and is not additional to it, although some of this need goes beyond the Waveney Local Plan

period which ends in 2036.

- East Suffolk Council expects the Broads Authority will make all efforts to accommodate the Broads' housing needs, however it will meet any residual housing need for the East Suffolk part of the Broads that is not addressed within the Broads Authority Executive Area during the plan period, if needed.
- In our future Local Plan review, should it be evident that this residual need still exists in the East Suffolk part of the Broads, we may look to identify opportunities close to the Broads, taking account of the role of settlements in this part of East Suffolk in meeting local housing needs alongside constraints presented such as flood risk.

I trust the above is of assistance and we are committed to working with you in future under the Duty to Cooperate.

Yours sincerely,

**Ben Woolnough | Head of Planning, Building Control and Coastal
Management**
East Suffolk Council