

Planning Committee

Agenda 5 December 2025

10.00am

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

John Packman, Chief Executive – Friday 28 November 2025

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

Introduction

1. To receive apologies for absence
2. To receive declarations of interest (see [Appendix 1](#) to the Agenda for guidance on your participation having declared an interest in the relevant agenda item)
3. **To receive and confirm the minutes of the Planning Committee meeting held on 7 November 2025** (Pages 4-10)
4. To note whether any items have been proposed as matters of urgent business
5. Chairman's announcements and introduction to public speaking
Please note that public speaking is in operation in accordance with the Authority's [Code of Practice for members of the Planning Committee and officers](#).
6. Request to defer applications included in this agenda and/or vary the order of the agenda

Planning and enforcement

7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**
 - 7.1. BA/2025/0238/FUL Land To West Of Clint Street, Ludham, Norfolk (Pages 11-22)
 - 7.2. BA/2023/0443/FUL Richardsons Boatyard, The Staithe, Stalham (Pages 23-41)
 - 7.3. BA/2025/0251/FUL Wayford Nurseries, Wayford Road, Wayford Bridge (Pages 42-50)
 - 7.4. BA/2025/0031/UNAUP2 Land On The West Side Of River Waveney, Beccles (Pages 51-59)

7.5. BA/2024/0045/UNAUP4 Land On The South-West Side Of Norwich Road, Gillingham
(Pages 60-70)

8. **Enforcement update** (Pages 71-79)
Report by Development Manager

Policy

9. **Consultation responses** (Pages 80-94)
Report by Planning Policy Officer

10. **Local Plan for the Broads - Supporting material** (Pages 95-138)
Report by Planning Policy Officer

Matters for information

11. **Appeals to the Secretary of State update** (Pages 139-140)
Report by Development Manager

12. **Decisions made by Officers under delegated powers** (Pages 141-144)
Report by Development Manager

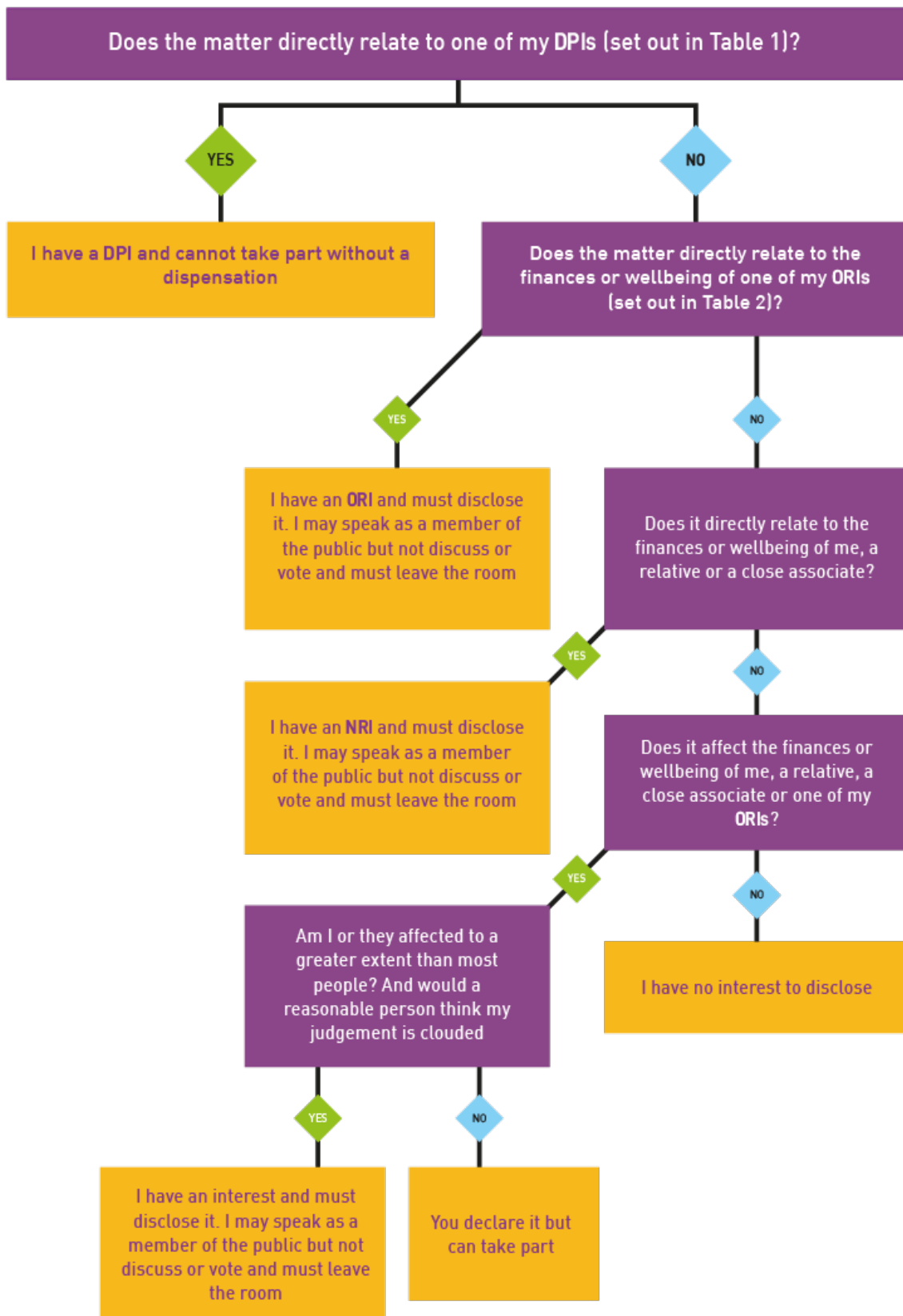
Other matters

13. Other items of business
Items of business which the chairman decides should be considered as a matter of urgency pursuant to Section 100B (4)(b) of the Local Government Act 1972

14. **To note the date of the next meeting – Friday 16 January 2026 at 10.00am at
The King’s Centre, 63-75 King Street, Norwich, NR1 1PH**

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

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



Planning Committee

Minutes of the meeting held on 7 November 2025

Contents

1.	Apologies and welcome	2
	Openness of Local Government Bodies Regulations 2014	2
2.	Declarations of interest and introductions	2
3.	Minutes of last meeting	2
4.	Matters of urgent business	2
5.	Chair's announcements and introduction to public speaking	2
6.	Requests to defer applications and/or vary agenda order	3
7.	Applications for planning permission	3
8.	Enforcement update	3
9.	Local Plan – Regulation 19 re-consultation	4
10.	Consultation responses	5
11.	Circular 28/83 Publication by Local Authorities of information about the handling of planning applications – Q3 (1 July to 30 September) 2025	6
12.	Appeals to the Secretary of State	6
13.	Decisions made by officers under delegated powers	6
14.	Other items of business	7
15.	Date of next meeting	7

Present

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

In attendance

Natalie Beal – Planning Policy Officer (items 9-10), Jason Brewster – Governance Officer, Steve Kenny – Development Manager, Ruth Sainsbury – Head of Planning and Rob Thomas – Head of Governance

Members of the public in attendance who spoke

No members of the public in attendance.

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

Apologies were received from Martyn Hooton, James Reeder and Fran Whymark

Openness of Local Government Bodies Regulations 2014

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

2. Declarations of interest and introductions

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

3. Minutes of last meeting

The minutes of the meeting held on 12 September 2025 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business

5. Chair's announcements and introduction to public speaking

No members of the public had registered to speak. The Chair noted the recent funeral for former Chair of the Planning Committee Melanie Vigo di Gallidoro which had been attended by a number of Authority Members. Melanie was a devoted public servant who worked

tirelessly on behalf of her constituents and the Broads Authority and did so with charm, compassion and consideration, she would be missed.

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

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

7. Applications for planning permission

There were no applications for consideration.

8. Enforcement update

Members received an update report from the Development Manager (DM) on enforcement matters previously referred to the Committee. Further updates were provided at the meeting for:

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

The DM confirmed that sentencing on 6 October 2025 had resulted in the operators of the site being fined £20,000 and the Authority being awarded costs of £48,650. The fine and costs would be collected by the High Court administrators. The site operators had six months to pay with the threat of a custodial sentence for non-payment. The site operators had indicated that the three static caravans would be removed the week commencing 10 November 2025 and the Planning Team would monitor progress.

Land at the Beauchamp Arms Public House (Unauthorised operation development comprising erection of workshop, kerbing and lighting)

The DM explained that the site operators had agreed to remove the kerbs and lighting and add cladding to the workshop to make the structure acceptable. A Member welcomed the removal of the lights adding that the reduction in light pollution would aid navigation along the adjacent river after dark. The DM reported that the lights installed on the public house under permitted development rights were more harmful to dark skies than the unauthorised lighting and the Authority would liaise with the operators to mitigate this continuing form of light pollution.

In response to a question the DM confirmed that the removal of the unauthorised lighting was not a matter for South Norfolk Council's Environmental Health Team despite the site operator's assertions to the contrary.

Land at Loddon Marina, Bridge Street, Loddon (Unauthorised static caravans)

The DM confirmed that the site operators, who were also responsible for the Beauchamp Arms Public House, had proceeded to take action to comply with the Enforcement Notice. They had commenced the process to remove the occupants of one of the unauthorised static caravans in preparation for its subsequent removal from the site. The other unauthorised static caravan was being used as accommodation for an employee at the site and the Authority would consider whether this use could be authorised.

9. Local Plan – Regulation 19 re-consultation

The Planning Policy Officer (PPO) presented the report which contained the Publication version of the Local Plan ready for a second consultation, the supporting consultation material (Sustainability Appraisal and Habitats Regulation Assessment) and the proposed consultation approach.

The PPO explained that the Sustainability Appraisal (SA), that was issued as part of the first Local Plan Regulation 19 consultation conducted during the summer, had omitted some required sections which rendered the appraisal incomplete. This omission, if not resolved, could provide an opportunity for a legal challenge of the Local Plan. The SA had been updated to include the required sections and the PPO had also taken the opportunity to refresh the SA content and improve its cross-referencing to the constituent Local Plan policies. A further consultation of the Regulation 19 version of the Local Plan and its supporting documents was proposed to commence before the end of November with the consultation period being for 7 weeks due to its inclusion of the holiday season. The consultation responses previously received would remain valid and would be logged and responded to over the coming weeks. The equivalent work associated with upcoming consultation was expected to be reduced as larger stakeholders, such as the Environment Agency and Natural England, had previously contributed. The anticipated reduction in new comments would aid a quick turnaround in the Local Plan ready for submission to the Planning Inspectorate.

As a means of mitigating any further delay which might preclude endorsement and approval for the submission via both the Planning Committee and Broads Authority, the recommendation included a scenario where the submission would be delegated. The PPO confirmed that delegating submission was very much a fallback position and, if possible, would be avoided.

In response to a question the PPO confirmed that the consultation comments and resulting Authority responses would be reported to the committee and that there would be some changes required to reflect the representations made. Some of the comments received had been constructive although there were also a few topics where objections had been raised.

Biodiversity Net Gain (BNG) and the Authority's proposed 20% target was an area where the viability of the increased target over the mandated 10% minimum had been questioned. The Authority's BNG consultants had provided a detailed response to address this challenge. The PPO added that Great Yarmouth's Local Plan, which was currently being examined, also included a 20% BNG target which had attracted similar consultation feedback. In the case of Great Yarmouth, the Planning Inspector was favouring a viability clause that supported 20% BNG unless it was proven to not be viable. The PPO said that given the protected nature of the Broads the Planning Inspector, who will examine the Local Plan, may well support the 20% BNG in the Local Plan for the Broads.

Another subject that had attracted several objections related to a particular area of settlement fringe, a category of landscape character used to denote an area at the edge of a settlement, where it meets the countryside. Some businesses and residents of the specified

settlement fringe had objected, although these objections appeared to stem from a misunderstanding of the terminology used rather than a substantive consideration. The PPO was working in conjunction with the Heritage and Design Manager and the Authority's Landscape Consultant to draft an appropriate response.

The final area of note related to objections from Anglian Water, Essex and Suffolk Water and the Environment Agency who all requested that the Authority adopt a more stringent water usage target of 90 litres per head per day. This figure was significantly below the current 110 litres per head per day stated in the Local Plan and the 125 litres per head per day mandated by Building Regulations. The proposed figure also differed to the 95 litres per head per day being considered in the context of proposed improvements to the Building Regulations being consulted on as per item 10 of this agenda. The PPO would liaise with these three organisations to agree a response.

A Member welcomed the inclusion of the non-technical summary describing it as a helpful addition.

Matthew Shardlow proposed, seconded by Harry Blathwayt

It was resolved unanimously to endorse the following and recommend to the Broads Authority to do the same:

- **The Local Plan for the Broads, Habitats Regulations Assessment and Sustainability Appraisal for consultation**
- **The consultation approach**
- **Delegate any minor changes or amendments to the Head of Planning and Director of Delivery**
- **The fallback position, if required, for submitting the Local Plan to the Planning Inspectorate to be delegated to the Chief Executive in consultation with the Chair of the Broads Authority, Chair of Planning Committee, the Director of Delivery and Head of Planning.**

10. Consultation responses

The Planning Policy Officer (PPO) introduced the report, which documented the responses to the draft Transport strategy for Great Yarmouth issued by Norfolk County Council and a review of Water Efficiency Standards in the Building Regulations 2010 issued by Defra. The PPO proposed to discuss each section of the report in turn and welcomed members' feedback on the draft responses.

Great Yarmouth Transport Strategy

The Transport strategy for Great Yarmouth was focused on improvements for transport users in these areas. The consultation response sought clarification on a number of points including references to Great Yarmouth, were these referring to the town or the borough, and highlighting the omission of references to the Broads.

A Member asked whether this document should include references to Electric Vehicles (EVs) and their associated charging infrastructure required to support EV use when travelling to the Broads. The PPO confirmed that this topic was not included in the document although standards for EV charging points were covered by Building Regulations and some parking standards issued by Norfolk County Council.

Water Efficiency Standards in the Building Regulations 2010

Defra's review of Water Efficiency Standards in the Building Regulations was intended to improve water efficiency on a national scale. In conjunction to seeking clarifications on a number of points the draft response asked, given the variance in water stress across different regions, whether there was scope for Local Plan policies to adopt water usage targets beyond the proposed national target.

Harry Blathwayt proposed, seconded by Andrée Gee

It was resolved unanimously to endorse the nature of the proposed responses to the Norfolk County Council consultation on the Great Yarmouth Transport Strategy and the Defra review of Water Efficiency Standards in the Building Regulations 2010.

11. Circular 28/83 Publication by Local Authorities of information about the handling of planning applications – Q3 (1 July to 30 September) 2025

The Development Manager (DM) introduced the report, which provided the development management statistics for the quarter ending 30 September 2025. The DM highlighted that all minor and other applications had been determined within statutory timescales or within an agreed extension of time as shown in table 2 (of the report) and exceeded the national performance indicators as shown in table 3 (of the report). These results were noteworthy given the complicated nature of some of the applications, the new working practices regarding Biodiversity Net Gain that were still being bedded in and were testament to the Planning Team's hard work.

The report was noted.

12. Appeals to the Secretary of State

The Committee received a schedule of appeals to the Secretary of State since the last meeting. The Head of Planning indicated that of the four outstanding appeals two had been lodged with the Planning Inspectorate for over a year. It was agreed that the Authority would contact the Planning Inspectorate to remind them of these two appeals.

13. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 1 September to 23 October 2025 and any Tree Preservation Orders confirmed within this period.

14. Other items of business

There were no other items of business.

15. Date of next meeting

A Member asked if a site visit could be considered for BA/2025/0289/FUL Whiteslea, Deep Dyke and Deep Go Dyke mooring locations, Heigham Sound, Hickling.

The next meeting of the Planning Committee would be on Friday 5 December 2025 at 10:00am at The King's Centre, 63-75 King Street, Norwich.

The meeting ended at 10:44am.

Signed by

Chair

DRAFT

Planning Committee

5 December 2025

Agenda item number 7.1

BA/2025/0238/FUL Land To West Of Clint Street, Ludham, Norfolk

Report by Planning Officer

Proposal

Installation of a 4 metre wind pump at northeast corner of site to lift water from IDB drain to facilitate rewetting.

Applicant

Broads Authority

Recommendation

Approve, subject to conditions

Reason for referral to committee

The applicant is the Broads Authority

Application target date

5 November 2025

Contents

1.	Description of site and proposals	2
2.	Site history	3
3.	Consultations received	3
	Parish Council	3
	Environment Agency	4
	Natural England	4
	Broads Internal Drainage Board	4
	BA Landscape	6
	BA Historic Environment Manager	6
4.	Representations	7
	Planning Committee, 5 December 2025, agenda item number 7.1	1

	Broads Society	7
5.	Policies	7
6.	Assessment	7
	Principle of development	8
	Impact upon the landscape	8
	Impact on ecology	8
	Design – impact on heritage assets	9
	Flood Risk	9
	Other issues	10
7.	Conclusion	10
8.	Recommendation	10
9.	Reason for recommendation	10
	Appendix 1 – Location map	12

1. Description of site and proposals

- 1.1. The site is located to the west of the village of Ludham, on the southern side of the River Ant. The site is within an area of marshes measuring approximately 25.6Ha and forms part of the Buttles Marsh Norfolk County Wildlife Site.
- 1.2. To the north of the site lies the environmentally designated area of How Hill Nature Reserve, which is a Broadland Special Protection Zone, a Broadland RAMSAR, part of The Broads Special Area of Conservation and the Ant Broads and Marshes SSSI.
- 1.3. The proposed location of the wind pump is in the northern part of the Buttle Marsh site in closer proximity to the grade II* listed Turf Fen Mill and How Hill House which is grade II listed.
- 1.4. To the north, east and south of the site are public footpaths Ludham FP11, Ludham FP12 and Ludham FP10 respectively. Ruther to the northwest is Barton Turf FP9.
- 1.5. The aims of the proposals are for the relocation of a single wind pump which originally gained planning permission as part of application reference BA/2023/0320/FUL, approved in November 2023. The proposal serves the same fundamental purpose, which is to facilitate the rewetting of Buttle Marsh and restore suitable peat building conditions.
- 1.6. The proposed works include the installation of a 4 metre high windpump at the north-west corner of Buttle Marsh to lift water from the adjacent IDB drain, to supply additional water to the site to achieve peat forming conditions.

- 1.7. The windpump is a Bosman windpump, and consists of a precast concrete base, and a metal tower to which the sales are attached. The precast concrete base contains the pump, which is a small Archimedes screw. This Wind Pump has been used in other developments in the Broads, including at the Calthorpe Broad Nature Reserve.
- 1.8. The base will be set into the toe of the bund, directly facing the water. An eel screen will be installed between the IDB drain and the pump, in line with the Environment Agency conditions for the abstraction licence. The top of the concrete base will be no higher than the existing bund that keeps water in buttle marsh. Pipes will be installed through the bund, to feed water into the drainage channels opposite the installation site.
- 1.9. The aim is for water to flow along this channel to the catch dyke, which runs along the toe of the adjacent hill, and disperse across the site along the old drainage channels. This will allow the water to spread evenly across the site, whilst minimising losses through the bund around the outer edge of the site.

2. Site history

- 2.1. BA/2003/1514/HISTAP. Engineering operations to create wet reed-bed habitat. Withdrawn.
- 2.2. BA/2003/1492/HISTAP. Engineering operations to create wet reed-bed habitat. Approved.
- 2.3. BA/2004/1363/HISTAP. Flood defence improvement works comprising set back and strengthening of floodbank, soke dyke excavation, temporary site compound and access. Approved.
- 2.4. BA/2014/0347/FUL. To extend the existing Scrape by excavating some of the lower areas along two edges of the Compartment which would be a mixture of peat and clay, to be used to renovate the existing track access to the site, giving essential access for vehicles and personnel, to carry out the various land management operations. Approved.
- 2.5. BA/2023/0320/FUL. Engineering works to re-wet Buttle Marsh and restore sustainable peat building conditions. Approved.

3. Consultations received

Parish Council

- 3.1. The Parish Council support this application.

To minimise light pollution, the Parish Council recommends that any outdoor lights associated with this proposed development should be:

1. fully shielded (enclosed in full glass cut-off fitments)
2. directed downwards (mounted horizontally to the ground and not tilted upwards)

3. switched on only when needed (no dusk to dawn lamps)
4. white light low energy lamps (Philips Cosmopolis or fluorescent) and not orange or pink sodium sources)

- 3.2. In order to encourage biodiversity, the Parish Council encourages a suitable planting plan to support biodiversity. In order to encourage biodiversity, the Parish Council encourages all applicants to consider sustainability, environmental impact and biodiversity when making decisions.

Environment Agency

- 3.3. No objection. The EA have reviewed the submitted Flood Risk Assessment (FRA), dated July 2023 and referenced 332511296, which has been updated from the previous submission under BA2023/0320/FUL. The current application proposes a new location for the wind pump and the revised FRA includes updated modelled data, in line with the guidance.
- 3.4. The EA are satisfied that the proposed windpump will not impact on their flood defence assets at this location, nor affect their required access for maintenance.
- 3.5. The applicant/person(s) responsible for the development should be aware that The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for several activities within 8 metres of the bank of a main river or 16 metres if it is a tidal main river. The full details of these activities are available to view online in the EA's full response. It is the responsibility of the applicant and/or person(s) responsible for the development to consult with the EA at the earliest opportunity in respect of Environmental Permits.

Natural England

- 3.6. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. No objection.

Broads Internal Drainage Board

- 3.7. The Board's Officers have reviewed the documents submitted in support of the above planning application. Land Drainage Consent is required to enable the proposals at this site, however the applicant has applied to the Board and been granted the necessary consent.

Biodiversity Net Gain Consultant

- 3.8. The project is needed to wet land for the success of a significant habitat restoration project. Work will involve the installation of a Bosman B4 wind water mill and formation of c. 20m of new ditch through existing reedbed. The concrete sheet piles and the base of the mill cover an area of <math><4\text{m}^2</math>.
- 3.9. Apart from a few exceptions, all planning applications are subject to the pre-commencement Biodiversity Gain planning condition. For low impact projects the "De

minimis” conditions can be applied to determine whether the proposal will be exempt from mandatory 10% gain (HMSO, 2024).

- 3.10. The first condition is that the development does not impact an onsite priority habitat. The second condition is that the development impacts; a) less than 25m² of onsite habitat that has biodiversity value greater than zero; and b) less than 5m in length of onsite linear habitat.
- 3.11. The majority of the proposed development will be confined to an area which is currently modified grassland with an approximate area of <4m². This is the only impact to habitats that have a relative value that is greater than zero.
- 3.12. With reference to The Biodiversity Gain Requirements (Exemptions) Regulations 2024, the applicant has supplied sufficient information to demonstrate that this development falls below the “De minimis” 25m² threshold and is therefore considered to be exempt from the mandatory 10% Biodiversity Net Gain Requirement.

BA Ecology

- 3.13. The site lies approximately 190m south of the Ant Broads and Marshes SSSI. The small scale of the works and short time scale is unlikely to have any significant effect on the designated site. The installation of a wind pump is planned from mid-February to mid-April, taking 2 days to erect with small scale water vole mitigation prior to the works.
- 3.14. MHE Consulting Summary Survey Report for Water Voles, states an A11 water vole licence application to Natural England for the scheme will be required. This is to be conditioned and implemented during the mitigation period for water voles, either between 15 February to 15 April or from 15 September to 31 October.
- 3.15. The bank provides potential refugia such as a hibernaculum, grass snakes are known to be active on the site. Displacement cutting is to take place outside of the hibernating season for reptiles (March-September).
- 3.16. During the works if any evidence of nesting birds is seen within the vicinity, works are to stop immediately, and advice sought from a suitably qualified independent Ecologist. All wild bird species, their eggs and nests are protected by law under the Wildlife & Countryside Act 1981.
- 3.17. Environmental Conditions - The Biosecurity protocol ‘Check, Clean, Dry’ should be observed at all times during the development.
- 3.18. A pollution prevention plan should be submitted to the LPA identifying potential pollution risks (e.g. chemical spillages, refuelling operations), how these risks will be minimized and how any emergency incidents will be dealt with and reported.
- 3.19. Biodiversity enhancements - One - A frame barn owl box to be positioned on a mature tree facing between North – East, with the base of the box 3 metres from ground level. A clear flight path to the box should be maintained. The box should be maintained in perpetuity.

- 3.20. No objection to the application if the applicant adheres to an A11 water vole licence, mitigation and enhancements forementioned.

BA Landscape

- 3.21. No objection. The information submitted together with additional details provided by the applicant has been reviewed and considered proportionate and appropriate to demonstrate the potential impacts on the landscape character of the site and the surrounding area.
- 3.22. The information demonstrates that while the wind pump may be visible in some locations including Ludham FP11 and Barton Turf FP9, it is likely the structure will be viewed as a minor component of the overall view.
- 3.23. Given the limited height of the structure and the additional measures suggested for mitigation including painting the pump to reflect traditional mill treatments, these measures will help to reduce the likely impact of the structure on views within the wider landscape, and where visible the wind pump will be viewed as a modern interpretation of traditional drainage structures seen throughout the Broads landscape.
- 3.24. While there have been no public comments made on the application and other responses have been supportive, the landscape consultant has suggested discrete public information boards explaining the structure and its purpose in relation to the scheme to re-wet the marsh would be beneficial in increasing public awareness of the relationship of these structures (both historic and contemporary) and the valued landscape of the broads.

BA Historic Environment Manager

- 3.25. The wind pump is in the northern part of the Buttles Marsh site in closer proximity to the grade II* listed Turf Fen Mill and How Hill House which is grade II listed. The impact on the setting of these designated heritage assets and how that may affect their significance therefore needs to be considered as set out in the NPPF and Local Plan policy DM11a.
- 3.26. The landscape setting is integral to the significance of both of these heritage assets. Turf Fen was built as a utilitarian structure to drain the marshes in which it sits, a predecessor to the structure now being proposed. The immediate setting of the mill will not be altered by the proposal and any impact on its wider setting should not erode this significance.
- 3.27. How Hill House was built by the wealthy Boardman family to address the landscape and take advantage of the views from the hill on which it sits. As part of the reason for its location and design was this relationship with the wider landscape the potential for changes to the wider setting to impact on this significance is greater.
- 3.28. The proposed windpump is to be no more than 6m in height (including the sails) and its location is at lower marsh level to the east of the flood bank, which is at a higher level

and along which the footpath runs. To the east of the site, a bank of trees on slightly higher ground provides a backdrop to the pump when viewed from certain directions.

- 3.29. In the tradition of Broads wind turbines, the pump is proposed to be painted black which white sales.
- 3.30. Taking account of the mitigation measures, the visual impact of the wind pump will be limited and when viewed from How Hill House, given the much greater scale and closer proximity of Turf Fen Mill, this heritage asset will continue to dominate the landscape.
- 3.31. If glimpsed views in either direction between the heritage assets and the new wind pump are present, the scale, design and position of the proposed windpump is such that it will not erode the significance of the designated heritage assets and could be said to continue the long tradition of water management in the Broads.

4. Representations

Broads Society

- 4.1. The Broads Society Fully supports this application aimed at rewetting Buttle Marsh and has no objection to the form of the proposed windpump.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
 - DM5 – Development and Flood Risk
 - DM11 – Heritage Assets
 - DM13 – Impact on Ecology
 - DM16 – Development and Landscape
 - DM43 – Design

6. Assessment

- 6.1. Following planning permission granted for engineering works to re-wet Buttle Marsh and restore sustainable peat building conditions including installation of a wind pump under application reference BA/2023/0320/FUL, the current application is simply seeking to re-locate the already approved wind pump to the northwest corner of Buttle Marsh without making any changes to the approved scheme in any other aspect. The main considerations in the determination of the application are the principle of the development, the impact on landscape, ecology and biodiversity, heritage assets and flood risk.

Principle of development

- 6.2. In terms of the principle of development, there are no specific policies within the Local Plan for the Broads which relate to this type of development. However, it is recognised that the marshes are nationally and internationally important wetland habitats for many species and large areas are designated as a result. It is also recognised that peat is hugely important to the environment – acting as a carbon store, wildlife habitat and as a means of flood control.
- 6.3. With this in mind and given the previously approved scheme under application reference BA/2023/0320/FUL, Strategic Policy SP6 is relevant as this requires that development protects the value and integrity of nature conservation interest and objectives of national and local nature conservation designations and should demonstrate biodiversity gains wherever possible. The principle of the development is therefore considered acceptable.

Impact upon the landscape

- 6.4. The information provided has been reviewed and considered proportionate and appropriate to assess the potential landscape and visual impacts of the proposed new location of the wind pump.
- 6.5. Overall, while the wind pump may be visible in some locations including several of the public foot paths in close proximity to the site, it is likely that the structure will be viewed as a minor component of the overall view given its restricted height and external finishes, which are seeking to reflect traditional mill treatments and provide a modern interpretation of traditional drainage structures that are seen throughout the Broads landscape.
- 6.6. Based on the information provided together with the landscape assessment the proposal is considered acceptable and complies with Policy DM16 of the Local Plan for the Broads 2019.

Impact on ecology

- 6.7. The site lies approximately 190m south of the Ant Broads and Marshes SSSI. The small scale of the works and short time scale is unlikely to have any significant effect on the designated site subject to the Biosecurity protocol 'Check, Clean, Dry' being observed at all times during the development.
- 6.8. In addition, prior to the installation of the wind pump a Pollution Prevention Plan will need to be submitted and approved in writing by the Local Planning Authority to ensure potential pollution risks (eg. chemical spillages and refuelling operations) are identified and how they will be minimized as well as how emergency incidents will be dealt with and reported. This will be conditioned accordingly.
- 6.9. Biodiversity enhancements will also be necessary, these have been identified as one A-frame barn owl box to be positioned on a mature tree facing between North – East,

with the base of the box three metres from ground level and a clear flight path to the box to be maintained in perpetuity.

- 6.10. Based on the above assessment and subject to the required conditions and biosecurity protocols being adhered to, the proposal complies with Policy DM13 of the Local Plan for the Broads 2019.

Design – impact on heritage assets

- 6.11. The wind pump is proposed in the northern part of the Buttles Marsh site in closer proximity to the grade II* listed Turf Fen Mill and How Hill House which is grade II listed. The impact on the setting of these designated heritage assets and how that may affect their significance has been considered. In addition, the landscape setting is also integral to the significance of both heritage assets.
- 6.12. The proposed windpump is to be no more than 6m in height (including the sails) and in the tradition of Broads wind turbines, the pump is proposed to be painted black with white sales.
- 6.13. Its location is at lower marsh level to the east of the flood bank, which is at a higher level and along which the footpath runs. To the east of the site, a bank of trees on slightly higher ground provides a backdrop to the pump when viewed from certain directions.
- 6.14. Given the above mitigation measures, the visual impact of the wind pump will be limited and when viewed from How Hill House, since Turf Fen Mill is much greater in scale and proximity, this heritage asset will continue to dominate the landscape.
- 6.15. Should glimpsed views in either direction be apparent between the heritage assets and the new wind pump, the scale, design and position of the proposed wind pump is such that it will not erode the significance of the designated heritage assets and therefore complies with Policy DM11 and DM43 of the Local Plan for the Broads 2019 and the overarching requirements of the NPPF.
- 6.16. Additionally, the proposal will enable the continued long tradition of water management in the Broads.

Flood Risk

- 6.17. The EA have reviewed the submitted Flood Risk Assessment (FRA) which has been updated to take account of the current application and new location for the wind pump. The revised FRA includes updated modelled data, in line with relevant guidance.
- 6.18. The EA are satisfied that the proposed windpump will not impact on their flood defence assets at this location, nor affect their required access for maintenance and therefore have no objection to the scheme. The proposed development therefore accords with Policy DM5 of the Local Plan for the Broads 2019.

Other issues

- 6.19. Outstanding discharge of Conditions 3 and 4 of the original planning permission reference BA/2023/0320/FUL are currently being considered by the Broads Authority Planning Department. As part of this application the applicant has confirmed that the wind pump previously granted permission will not be installed and that no details will be provided in respect of Condition 3, point a) of planning permission BA/2023/0320/FUL as the wind pump will be installed under the permission now sought.

7. Conclusion

- 7.1. Based on the information submitted to support this application for the proposed works, the principle of development is in accordance with all relevant planning policy, in particular DM5, DM11, DM13, DM16 & DM43. The proposal follows a previous approval to improve existing land use by creating new wetland features capable of supporting greater biodiversity and offering adaption to climate change along with continuing to provide freshwater for local farming. The design of the proposals is considered to be acceptable and it is not considered that the proposal will result in an adverse impact on, biodiversity, flood risk or have an unacceptable adverse impact on either heritage assets or landscape character. Therefore, it is recommended that planning permission is approved subject to conditions.

8. Recommendation

- 8.1. Approve subject to the following conditions:
- Time Limit
 - In accordance with plans
 - Details of Pollution Prevention Plan
 - Biodiversity Mitigation and A11 licence for water vole
 - Observe biosecurity protocol 'Check, Clean, Dry'
 - Displacement cutting outside of the hibernating season for reptiles
 - If evidence of nesting birds found works to stop immediately
 - One - A frame barn owl box.

9. Reason for recommendation

- 9.1. It is considered that the principle of development is in accordance with all relevant planning policy, in particular DM5, DM11, DM13, DM16 & DM43 of the Local Plan for the Broads.

Author: Jane Fox

Date of report: 18 November 2025

Appendix 1 – [Location map](#)

Appendix 1 – Location map

BA/2025/0238/FUL - Land To West Of, Clint Street, Ludham, Norfolk



© Crown copyright [and database rights] 2024 Ordnance Survey AC0000814754. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form. Bluesky International Ltd. / Getmapping PLC

Planning Committee

5 December 2025

Agenda item number 7.2

BA/2023/0443/FUL Richardsons Boatyard, The Staithe, Stalham

Report by Planning Officer

Proposal

Proposed redevelopment to provide new visitors' centre/reception, workshop extension, associated parking and landscaping etc., demolition of existing workshop buildings and excavation of basins to provide additional/enhanced moorings.

Applicant

Richardsons Leisure Ltd

Recommendation

Approval with conditions

Reason for referral to committee

Major application

Application target date

5 March 2024

Contents

1.	Description of site and proposals	2
2.	Site history	4
3.	Consultations received	4
	Parish Council	4
	Environment Agency	4
	Norfolk County Council (NCC) Highways	4
	Natural England	5
	Norfolk and Suffolk Boating Association	5
	Broads Internal Drainage Board	5
	Norfolk Police Architectural Liaison Officer	5
	Planning Committee, 5 December 2025, agenda item number 7.2	1

The Broads Society	5
North Norfolk Environmental Protection Team	5
BA Landscape Architect	5
BA Heritage and Design Manager	5
BA Tree officer	5
BA Ecologist	5
4. Representations	5
5. Policies	6
6. Assessment	7
Background	7
Principle of development	8
Impact upon the landscape	8
Design and Heritage	11
Trees	12
Ecology	13
Impact on peat	13
Amenity of residential properties	15
Highways and public rights of way	15
Flood risk	15
Other issues	16
7. Conclusion	16
8. Recommendation	16
9. Reason for recommendation	17
Appendix 1 – Location map	19

1. Description of site and proposals

- 1.1. Richardson’s Boatyard in Stalham is a large marina in the Stalham Staithe area, sited towards the northern end of Stalham Dyke on its eastern side, and accessed via the road known as The Staithe. The site covers approximately 11.3 hectares and includes 320 metres of frontage onto the dyke. It features 9 existing buildings, predominantly workshops including 3 sizeable workshops, and 3 large areas of moorings.

- 1.2. The site is effectively divided up by virtue of its mooring basins so that at the eastern side there are 2 large workshop buildings, next to which is a mooring basin. Beyond this is a central area featuring an office building and a large area of car parking. At the northern end of this section is the third of the large workshop buildings, and to the west of the office building and car parking are two parallel mooring basins divided by a spit of land which also provides car parking. Following this is the area to the western side which ultimately fronts onto Stalham Dyke, this area features the remaining 5 buildings which are in a rough line in a north to south configuration parallel to the dyke, these all being workshop buildings. To the dyke side of the buildings and fronting onto the dyke are three further mooring basins divided by small sections of land, this includes a section of stern-on moorings open to the dyke, and side-on moorings to the dyke side.
- 1.3. The site has a long frontage onto the road known as The Staithe to the northern boundary, and also onto the A149 which passes the north-eastern part of the site. The southern part of the site comprises a private dyke which provides access to the various internal parts of the site, beyond this is an area of woodland.
- 1.4. The surrounding area comprises woodland to the south of the site and part of the area to the west on the opposite side of Stalham Dyke. Also, on the opposite side of Stalham Dyke are residential properties, holiday lets, and a boatyard. The dyke also provides access to the town staithe northwest of the site and the Museum of the Broads north of the site. Further residential properties are sited to the north of the site, and a builders yard sited opposite the entrance to the subject site.
- 1.5. Stalham Dyke and the areas to the west and north of the site are within the Stalham Staithe Conservation Area and is included in the conservation area, abutting the subject site on its northern and western boundaries. A grade II listed building known as The Old Granary is sited approximately 35 metres to the north of the subject site, there are also a number of buildings of local interest in the immediate surrounding area.
- 1.6. An area of designated sites commences some 270m to the south-west of the subject site comprising the Broadland RAMSAR, Broadland SPA, The Broads SAC, and a Site of Special Scientific Interest (SSSI). There is also a County Wildlife Site to the opposite side of the A149.
- 1.7. It is proposed to demolish the 5 workshop buildings which are parallel to Stalham Dyke on the western side of the site, the office building to the centre of the site, and the workshop at the northern end of the central area. The 2 workshop buildings at the eastern side of the site would be retained, with one being extended along its flank, and the other utilised for private mooring.
- 1.8. A visitor centre and reception building is proposed at the northern end of the central area.
- 1.9. Of the mooring basins, the one to the eastern side is retained as existing providing 70 moorings for the hire fleet. In the central area the two parallel mooring basins divided

by a spit of land are retained, with a relatively modest widening of one of the basins on its eastern side, and the other basin extended at its northern end, the basins providing 130 moorings for the hire craft business (60 x fleet mooring, 58 x charter storage moorings, and 12 day boat hire moorings).

- 1.10. The three mooring basins adjacent to Stalham Dyke to the western side of the site would be expanded through the narrowing of the land separating the three basins from one another and from Stalham Dyke, and an extension of the basins to the east across the area currently occupied by the 5 workshop buildings which are parallel to the Stalham Dyke. There is also a minor extension at the northern end of the mooring area. It is noted that the existing banks along the eastern side of Stalham Dyke would be retained.
- 1.11. The works here would retain the three mooring basins and include finger pontoons to regularise the mooring provision, with a total of 95 stern on moorings and 10 side on moorings. All the mooring in this area would be private moorings. The existing mooring provision here in the three basins is approximately 60 moorings, so the increase in mooring provision adjacent to Stalham Dyke would be in the region of 45 moorings. It is noted that the stern on and side on moorings along Stalham Dyke would be retained as existing and at the current number of moorings.
- 1.12. There are currently 530 car park spaces at the site. The proposed site would have 303 car park spaces, 49 drop off spaces, and 2 coach parking spaces.
- 1.13. A total of 10 no. full-time jobs will be created as a result of the proposals.

2. Site history

- 2.1. In 2012 planning permission was granted for the roof installation of photovoltaic solar panels under planning reference BA/2012/0130/FUL.

3. Consultations received

Parish Council

- 3.1. Council has no objections to this planning application.

Environment Agency (EA)

- 3.2. Currently there is a holding objection on flood risk grounds, this relates to additional information requested by the EA which has subsequently been provided, and the EA have been reconsulted. Members will be updated verbally on the EA consultation response.

Norfolk County Council (NCC) Highways

- 3.3. The Highway Authority raise no objection to the revised proposals but would recommend conditions and an informative note be appended to any grant of permission your Authority is minded to make.

Natural England

- 3.4. No objection subject to appropriate mitigation being secured.

Norfolk and Suffolk Boating Association

- 3.5. Comments made on original proposal.

Broads Internal Drainage Board

- 3.6. Advised Land Drainage Consent is required.

Norfolk Police Architectural Liaison Officer

- 3.7. Information and advice provided.

The Broads Society

- 3.8. The Broads Society generally supports the application in principle as, although the proposals are extensive, they offer an opportunity for positive enhancement and improvements to the layout of the boatyard.

North Norfolk Environmental Protection Team

- 3.9. I have noted the phase one investigation report undertaken on behalf of the applicant. The report is robust and comprehensive to support the conclusions of the Author. In conjunction with the recommendations of the author the applicant will need to undertake further investigation of the site to fully characterise the risks identified in the Phase 1, secured by planning conditions.

BA Landscape Architect

- 3.10. No landscape objection raised subject to conditions.

BA Heritage and Design Manager

- 3.11. No objection subject to conditions. It is considered that the scheme is acceptable and meets the requirement of Local Plan Policies DM11 and DM43, as well as the BA Design Guide and Code requirements, particularly those relating to boatyards.

BA Tree officer

- 3.12. No objection subject to conditions.

BA Ecologist

- 3.13. No objection. All mitigations and enhancements should be followed. Some conditions are required before work can begin.

4. Representations

- 4.1. 6 responses were received with the relevant points summarised as follows:

- Redevelopment is probably well overdue for this site, having not been updated for many years. The boating industry will not only benefit from this proposed facility, but the new development will enhance the local tourist industry and will provide additional employment for the local community enhancing the local economy.

- There is no mention of access from the river. Surely this should also be a prime consideration bearing in mind that this is a boat yard from which boats travel.
- The 3 "hammerheads" are directly opposite our frontage and quay heading onto the river. We remain deeply concerned about potential narrowing of the river, general boat access, increased wash from greater boat traffic activity, safety and general traffic flow of river craft.
- Concern over increase in boat traffic using Stalham Dyke and surrounding system, including congestion at Ludham Bridge. Demand for visitor and 24 hour moorings will further increase. There will be subsequent impacts on the River Ant.
- Increase of mooring capacity could have an adverse effects on the local landscape character and tranquility. Additional moorings and boats would lead to more boat trips on the surrounding waterways with subsequent effects on tranquility, levels of recreational activity and potential for disturbance of designated sites.
- I think this would enhance the Marina have a better visual aspect from the road and the whole site. Providing a much better visitor experience, improved entrance and parking facilities. I feel this proposed plan would enhance and benefit the local area.
- In principle, the Museum of the Broads supports this planning application. It will enhance the current site which is in need of some upgrading. It will encourage tourism and add to the 'experience' of not only those visiting the Broads, but the rest of Norfolk and East Anglia.
- Careful consideration must be given to road access to the site and to and from the A149. Staithe Road may not cope with a large increase in movements.
- Suitable car parking and traffic movements on the site will need to be managed in a sustainable way.
- We would suggest that as part of this redevelopment, mooring on the river side is limited.
- There is reference to sustainable energy use but we would like to see a more comprehensive emphasis on creation of a carbon neutral operation throughout.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
 - DM5 - Development and Flood Risk
 - DM10 - Peat Soils
 - DM11 - Heritage Assets

- DM13 - Natural Environment
- DM16 - Development and Landscape
- DM21 - Amenity
- DM20 - Settlement fringe landscape character
- DM22 - Light pollution and dark skies
- DM23 - Transport, highways and access
- DM28 - Development on Waterside Sites
- DM31 - Access to the Water
- DM32 - Riverbank stabilisation
- DM33 - Moorings, mooring basins and marinas.
- DM43 - Design
- DM44 - Vis. and Com. Facilities and Services
- DM46 - Safety by the Water
- STA1LP - Land at Stalham Staithe (Richardsons)

5.3. Other material considerations:

- National Planning Policy Framework
- Planning Practice Guidance
- Stalham Conservation Area character appraisal
- Landscape Character Assessment: 28 Ant Valley - Wayford Bridge to Turf Fen

6. Assessment

6.1. The application is for the redevelopment of the site involving the excavation of basins to provide additional/enhanced moorings, a new visitors' centre/reception, workshop extension, associated parking and landscaping, and the demolition of existing workshop buildings.

Background

6.2. There has been a number of delays with this application, this has been around the siting and design of proposed buildings, removal of trees, landscape and ecology issues, the proposed moorings adjacent to Stalham Dyke, and the disposal of peat arisings. Following meetings and discussions an amended proposal was received which sought to reduce the number of new buildings, retain trees and existing landscape features including the defined bank edge along Stalham Dyke, alter the site layout, and include

additional soft planting. The issue of peat disposal was carefully considered and potential deposit sites assessed.

Principle of development

- 6.3. The principle of the proposed development is acceptable insofar as the enlargement of the existing mooring areas will contribute to the network of facilities around the Broads system and would result in an improvement to the quality of the mooring provision. The mooring provision is existing and the improvement would increase the revenue stream which would help support the viability of the business at the site. In these respects the proposal is considered to accord with the general thrust of Policy DM33 of the Local Plan for the Broads.

Impact upon the landscape

- 6.4. The existing Stalham marina is a sizeable site which dominates the Stalham Staithe area due to its scale and to some extent due to the scale of buildings and the appearance and character of those buildings. This is most keenly felt when viewed from the A149 and some parts of The Staithe, and from Stalham Dyke. In longer views along Stalham Dyke leading up to the subject site the marina is largely hidden due to the well tree lined riverbanks and gentle meander in the river, with its presence revealed when alongside other sizable mooring areas to the west of the river.
- 6.5. The site is dominated by the 3 large workshop buildings. The 2 buildings to the south-east corner of the site, which are to be retained, are generally well sited with some level of screening which partly mutes their presence, and with a backdrop of mature trees which provides a softer background to the buildings. An extension is proposed to the 98.3m wide north facing elevation of the northern of the 2 workshop buildings, this comprises a single storey flat roofed projection with a width of 70.2m and sited centrally on the building frontage, with a height matching the eaves level of the building. Centrally on the extension would be an additional storey with a mono-pitched roof and a width of 30.3m. Although taller than the eaves at the section of the existing building it adjoins, the overall height of the proposed 2-storey element of the extension is 6.3m, the host building has an overall height of 8.95m, this would ensure that the scale of the proposed extension is acceptable with regard to the scale of the host building and therefore is acceptable in terms of the appearance of the site.
- 6.6. The existing south facing roof of the northern of the 2 workshop buildings would be fitted with solar panels. These are sited so that they would face away from the subject site, with a second workshop building to the rear, and a tree belt on the southern boundary of the site. The solar panels would make a contribution to sustainability and would not have an adverse impact on the appearance of the workshop building or the character and appearance of the subject site.
- 6.7. The building at the corner of the A149 and The Staithe, which is to be demolished, is a more obvious presence on site due to its size and siting, and lack of any screen planting, with its long elevation on The Staithe effectively forming the site boundary. Whilst an

appropriate building for the site, its siting is such that it dominates the corner of the site with a presence in the street scene which effectively turns its back on the road and presents a long blank façade. The loss of this building is therefore considered to be of benefit to the appearance of the site, surrounding area, and street scene.

- 6.8. The removal of a large and dominating building will make a significant change to the way the site is experienced and appreciated, particularly from the A149 and The Staithe. In roughly the same location, although noticeably separated from the northern site boundary, is a new 2 storey visitor centre/reception of a modern design and appearance. The siting of the building is such that it would provide visual interest in this area of the site and act as a focal point in this the most open part of the site. This would help ensure that the commercial provision is a readable presence, and the expanse of the many mooring areas have context and a sense of scale. This would be augmented by a soft landscaping scheme which would present a softer and more pleasing appearance particularly when viewed from The Staithe. The BA Heritage and Design Manager commented that the amalgamation of the visitor centre and reception block and its relocation to the north of the site provides a much more coherent layout and concentrates the built form to the eastern side of the site closer to the road, which is certainly beneficial and will reduce the potential impact on the setting of the Stalham Staithe Conservation Area and the wider Broads' setting. The proposed visitor centre/reception is acceptable with regard to the size and siting and therefore is acceptable in terms of the appearance of the site.
- 6.9. To the central area of the site there are minor extension to the existing basins, these are relatively modest in relation to the size of the existing basins, but would allow for a more regularised mooring provision through the use of finger pontoons. The overall appearance of this section of the site would remain as existing and would be acceptable in landscape terms.
- 6.10. To the south of the central area of the site is an area of moorings along the southern bank of the site. This comprises approximately 60m of quayheading with access from a timber boardwalk next to an area of closely mowed grass. It is proposed to extend the quayheading by 72.8m immediately west of the existing quayheading. This is a semi-natural area which appears to be periodically maintained in a sympathetic manner, with an informal footpath along the bank. The BA tree officer has commented that 'Previously one of my main concerns was the increase in mooring on the southern boundary and associated access. I see that the access has been minimized in the new layout and, having inspected it I think with a little judicious pruning pedestrian access is possible. There is a need for new quay heading which should not affect existing trees. This element of the proposal is an extension to an existing mooring provision, opposite the central mooring basins, and with sufficient separation from the site entrance on Stalham Dyke to maintain a sufficient level of natural appearance in views from Stalham Dyke. The proposed quayheading extension is therefore considered acceptable.

- 6.11. To the western side of the site the 3 mooring basins would be enlarged but retained as 3 separate basins, and with the outside edge of the basins which is the eastern riverbank of Stalham Dyke also retained. The area of the site adjacent to the 3 mooring basins is comprised of predominantly of hardsurfacing and features 5 old workshop buildings of reasonably modest size in the context of the site, although as a group do have a clear presence on the site. The 5 buildings are obviously of an age, have a tired appearance and are not worthy retention, the loss of these buildings being considered acceptable. The area where the buildings and surrounding hardstanding exists would be excavated to provide enlargements to the 3 mooring basins, with an 11.3m spit of land on the eastern side to maintain separation to the central mooring basins, along with providing access to moorings, car parking, and access to the peninsula at the south-western corner of the site. The resulting appearance, although notably different from the existing primarily through the removal of the 5 buildings, is considered acceptable as it complements the existing mooring provision and contributes to the overall boatyard use of the site. The peninsula and the mature trees sited there would be retained, which softens the appearance of the site when approached along Stalham Dyke from the south, and retains some vertical elements on this side of the site which provides more visual interest. Whilst the appearance of the western side of the site would notably change, this change is considered acceptable, and given the age and appearance of the existing buildings, their removal would contribute to an improvement in the overall of appearance of this section of the site, which being adjacent to the Conservation Area would also be beneficial.
- 6.12. The level of activity on the rivers is such that the waterscape here can be very congested in the summer months. Following amendments to the proposal the number of proposed moorings has been reduced, with the number of different moorings now proposed as follows:

MOORING TYPE	EXISTING	PROPOSED	CHANGE
Private Moorings	180	226	+46
Charter Fleet Moorings	250	130	-62
Charter Storage Mooring		58	
Day Boat	0	12	+12
Educational Trip Boat	0	1	+1
24 Hour Free Moorings	0	2	+2
TOTAL	430	429	-1

Overall, there is a loss of 1 mooring when compared to existing mooring numbers. This is predominantly due to the changes in mooring accessibility where finger pontoons are proposed to all the mooring areas proposed to be altered as a result of the current scheme. This has clear benefits in the use of the moorings and reflects a trend across the Broads system where safer boat access through the use of finger jetties and floating pontoons. This does have an impact on mooring provision but also increases the attractiveness and usability of the mooring offer at the site. Generally speaking, private

moorings can create more spontaneous river traffic which extends beyond the summer holiday season, this could affect local tranquillity of the river throughout the year, but the overall numbers are reasonable taking into account the existing provision, and any effects would likely be localised and lessen the further away from the site travelled.

- 6.13. The BA Landscape Architect has provided a balanced assessment of the proposal and concluded that the development would be beneficial to the locality as it included removal or refurbishment of existing buildings considered to be negative features in the landscape, landscape proposals respond to the site context and address the site interface along the northern boundary with Staithe Road, the positioning and design of visitor centre, car parking and circulation around the site are well considered. The proposals are in line with the landscape requirements set out in site specific policy STA1, along with policy DM16 of the Local Plan for the Broads and the scheme is considered acceptable in landscape terms.

Design and Heritage

- 6.14. The application proposes the removal of one large workshop building, 5 smaller workshop buildings, and the reception building. A new reception/visitor centre would be provided and an extension to one of the retained large workshop buildings. The BA Heritage and Design Manager has assessed the proposal, commenting that generally it is considered that the proposed visitor centre / reception is acceptable. It uses a relatively contemporary design but reflects the form and materials used elsewhere in the boatyard. Although the courtyard type arrangement is not typical of boatyard development, given the proposed use of the building as a visitor centre and reception, it is considered that this is acceptable and the arrangement should provide a pleasant and welcoming space for users. Although it is a substantially sized building, it is acceptable in this relatively open area where there are a number of other substantially sized buildings. The massing of the building is also broken up into individual elements which helps to reduce the impression of size’.
- 6.15. The proposed extension to the large workshop building to the east of the site is of a simple design which provides some visual interest to the long workshop building façade, and with a height at ground and first floor which helps ensure that it relates well to the host building in both appearance and scale. The overall design is acceptable as an extension and in contribution to the existing workshop building.
- 6.16. The BA Heritage and Design Manager has concluded that ‘generally it is considered that the scheme is acceptable and meets the requirement of Local Plan Policies DM11 and DM43, as well as the BA Design Guide and Code requirements, particularly those relating to boatyards’.

Navigation

- 6.17. The scheme as originally submitted included moorings along the eastern bank of Stalham Dyke leading up to the site, and the replacement of the eastern bank of Stalham Dyke with floating walkways and finger jetties, this being to the western side of

the subject site. The scheme was subsequently amended to remove both of these proposed elements, there are no longer new moorings proposed outside of the existing site parameters, and the existing Stalham Dyke edge at the western side of the site would be retained. The result of this is that there would be no narrowing of the existing navigation either through the provision of new moorings or alterations to the existing moorings or dyke banks. There is existing mooring along Stalham Dyke to the western side of the subject site, this would be retained as existing and again would not contribute to the narrowing of the existing navigation.

- 6.18. The mooring provision on the western side of the site, with 3 basins accessed directly from Stalham Dyke, would be expanded through the enlargement of each of the 3 basins, although it is noted that improvements to the mooring through provision of finger jetties does have some impact on mooring numbers as they take up space formally occupied by moored boats. The additional moorings here would total 45. Although contributing to additional river traffic along Stalham Dyke, the width of the dyke would be maintained, and the numbers proposed are not excessive when considering the overall provision of moorings in this area. No objections were received in internal consultations and no adverse comments made at navigation committee. The proposed changes to the mooring provision at the site are therefore considered acceptable in terms of impact on navigation with regard to Policy DM33 of the Local Plan for the Broads.

Trees

- 6.19. The scheme as originally submitted would have resulted in the loss of existing trees which are considered to make a telling contribution to the site and its appearance within the surrounding area. The BA tree officer assessed the amended scheme commenting that 'it is clear that the revised layout takes a much more sensitive approach to the existing trees and their retention as part of the redevelopment. I am glad to see the large trees in the northwestern corner retained as well as the line of Willows and Silver Birch in the southwest of the site. The proposed parking on the norther boundary of the site, replacing the previously proposed chalets will lead to far less potential conflict with the exiting large Poplars. I also feel that the new check in/reception area and play area are better placed requiring less tree loss'.
- 6.20. Proposed mooring along the southern boundary has been greatly reduced, in response to this the BA tree officer has commented that 'I see that the access has been minimized in the new layout and, having inspected it I think with a little judicious pruning pedestrian access is possible. There is a need for new quay heading which should not affect existing trees'.
- 6.21. In conclusion the BA tree officer has raised no objections to the proposed development, subject to the submission of an Arboricultural Method Statement to ensure the future protection health and safety of the trees to be retained prior to, during and following any approved development. The proposal in relation to trees is considered acceptable with regard to policy DM16 of the Local Plan for the Broads.

Ecology

- 6.22. The site lies 270m upstream of the Broadland Special Protection Area (SPA) and Ramsar, The Broads Special Area of Conservation (SAC), and the Ant Broads and Marshes Site of Special Scientific Interest (SSSI). The proximity of these designated sites required a Habitat Regulations Assessment – Stage 1 Screening carried out by the BA ecologist and submitted to Natural England. In response Natural England raised no objection to the proposal commenting that without appropriate mitigation the application would have an adverse effect on the integrity of the designated sites. In order to mitigate these adverse effects and make the development acceptable, mitigation measures should be secured for the provision of appropriate silt curtains and the implementation of a Construction and Management Plan (CEMP). The requirement for submission of a CEMP and a Landscape and Ecological Management Plan (LEMP) was proposed in the ecology documents submitted in support of the application, and in the planning conditions proposed by the BA ecologist.
- 6.23. A Preliminary Ecological Appraisal and Ecological Impact Assessment were submitted in support of the application; these consider the potential ecological impacts on the basis of existing conditions at the site and surrounds for the construction phase and lifetime of the development. The documents were assessed by the BA ecologist and considered to be acceptable, no further surveys were deemed to be required, measures to avoid or reduce impacts are discussed, and ecological enhancements proposed. As with the CEMP and LEMP proposed mitigation and enhancement are proposed to be secured by planning condition, subject to which the proposal is considered to be acceptable in ecology terms with regard to Policy DM13 of the Local Plan for the Broads.

Impact on peat

- 6.24. The proposed works include a number of areas of excavation to provide additional mooring space. These are predominantly on the mooring areas which are immediately adjacent to Stalham Dyke on the western side of the site, and also extension of the two mooring basins to the central area of the site. The proposed excavations would predominantly be on hard landscaped areas. The proposal requires consideration of the peat that would be excavated as part of the works.
- 6.25. Policy DM10 sets out a presumption in favour of the preservation of peat in-situ, with development proposals that will result in unavoidable harm to peat only being permitted subject to assessment against specific criteria, namely:
- i) There is not a less harmful viable option;
 - ii) The amount of harm has been reduced to the minimum possible;
 - iii) Satisfactory provision is made for the evaluation, recording and interpretation of the peat before commencement of development; and
 - iv) The peat is disposed of in a way that will limit carbon loss to the atmosphere.

- 6.26. The nature of this element of the proposal which is to extend the existing mooring basins necessarily requires excavation, as such it is not possible to consider the preservation of peat in-situ.
- 6.27. A peat stratigraphy report was submitted in support of the application, this noted that 'the general condition of the peat resource within the area to be excavated is considered to be 'Moderate' to 'Good', reflecting the substantial modification of a proportion of the primary peat by the historic placement of dredged material and hard core and some historic excavation leading to the development of secondary peat'.
- 6.28. In seeking to reduce the amount of harm to the minimum possible, the report advises that the footprint of the new basins has been designed to ensure minimal landtake, having been reduced from 10810m² to 9480m², and avoids areas of semi-natural vegetation where active peat formation is ongoing. Areas of the site where is no peat and areas of former turbary have been maximised. Together this does reduce the excavation of solid peat or well-consolidated secondary peat. It is therefore considered that the proposal satisfies criteria i) and ii) of Policy DM10.
- 6.29. The applicants have included as proposed mitigation measures that the Geological Society of Norfolk be invited to visit the site during excavation work to make records and take samples of the exposed geology. This would satisfy criterion iii) of Policy DM10.
- 6.30. In considering how to address the suitable depositing of the excavated peat various options for re-use of the peat local to the excavation have been considered, this included use on a site to the opposite side of the A149, deposit at another Richardsons site where excavation was under consideration, bank-restoration or other wetland restoration opportunities, the peat stratigraphy report concluding that there are no viable options on site, on the landholding available to Richardsons Ltd, or elsewhere in the upper Ant catchment which would not cause damage to habitats/protected wildlife or risk biosecurity implications'. Consequently, it is proposed that the excavated peat would be spread upon nearby arable land.
- 6.31. The spreading of excavated peat on nearby arable land does have some benefits which the peat stratigraphy report argues 'increase the levels of organic matter in the soils and so improve water retention and boost CO₂ uptake by those soils, increase uptake of fertilisers by crops and help prevent surface runoff'. Although it is not being disposed of in a way that will limit carbon loss to the atmosphere, it is considered on balance that this approach is not an unreasonable one given the constraints presented and the Local Planning Authority is satisfied that the policy requirements under criterion iv) of DM10 have been meet.
- 6.32. In conclusion, the proposed extension of the existing mooring basins are considered to be acceptable with regard to Policy DM10 and criterion f) of Policy DM33 of the Local Plan for the Broads.

Amenity of residential properties

- 6.33. The proposed new building and extended workshop are sited well away from neighbouring residential properties and so will not have an impact on residential amenity by virtue of the built form. There is minimal change to the overall number of moorings at the site, noting the change in the type of moorings provided. A new visitor centre is to be provided, along with an external play area, this has the potential to attract additional visitors to the site. However, given the size of the site, its layout and separation of the visitor provision from the residential areas, and the siting of the entrance which should ensure that traffic visiting the site does not pass the residential properties on The Staithe, the proposed changes to the site would not unduly impact on the amenity and privacy of the neighbouring residents with regard to Policy DM21 of the Local Plan for the Broads.

Highways and public rights of way

- 6.34. Norfolk County Council has assessed the amended scheme, noting that 'the initial plans reduced parking provision and the detailed breakdown in that respect provided by the applicant indicated that the proposed provision would meet the requirements of the development, with the caveat that an addition 96 spaces could be achieved by "over spill" parking on the mooring sides. The plans now indicate that the "over spill" has significantly reduced or is not available, with drop off spaces clear being shown in those areas. However, whilst there is now limited flexibility or spare capacity, clearly it is evident that the parking provision still meets the original justified parking provision for the development. Likewise, I am minded that clear demarcation of parking will ensure both functionality of parking areas and also help to maximise the space available'.
- 6.35. According, the Highway Authority raise no objection to the revised proposals subject to conditions and an informative note. The proposal is therefore acceptable with regard to Policy DM23 of the Local Plan for the Broads.

Flood risk

- 6.36. The proposal includes the removal of 2 buildings to the central area of the site and 5 to the western side of the site. A new reception/visitor centre is proposed to the central area, and an extension added to one of the retained workshop buildings in the eastern part of the site. The proposed scheme has benefits from a flood risk point of view in terms of the expansion of the area of water through the expanded mooring basins, and the notable reduction in the footprint of buildings. The Environment Agency (EA) commented on the proposal, raising concerns over a lack of clarity regarding the floor level of the proposed visitor centre/reception, and in response to an erroneous comment in the submitted design and access statement which referred to land raising. The agent for the application has provided clarity on the floor level of the visitor centre/reception, clearly showing that it is at the minimum level required by the EA, and provided an amended design and access statement removing the reference to land raising as this does not part of the subject proposal. Whilst the information has been submitted to address the EA concerns and the proposed scheme would be acceptable

with regard to policy DM5 of the Local Plan for the Broads, a formal consultation request has been sent to the EA for an updated response in light of the new information, this is expected to arrive after publication of this report, therefore members will be verbally updated on the contents of the updated EA consultation response.

- 6.37. In relation to overall flood risk at the site, the proposed works would reduce the footprint of the existing built form and extend various mooring areas. This would increase the flood water capacity at the site by a noticeable amount. The proposed visitor centre/reception has a raised ground floor level and includes a first floor which is positive in terms of flood resilience and site safety. The proposed works would contribute to an improvement overall at the site in relation to flood risk and is acceptable in relation to Policy DM5 of the Local Plan for the Broads, subject to any updated consultation responses received.

Other issues

- 6.38. The application proposes 2 new visitor moorings. The proposed numbers are such that this is considered to be an adequate provision taking into account the change in mooring numbers are the policy requirement for visitor moorings under Policy DM33 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The proposed development would provide an improvement to the existing mooring provision and allow for mooring types and numbers in keeping with the contemporary needs of the business. The removal of redundant buildings and provision of a modern visitor centre and reception will improve the appearance, layout, and function of the site. The proposed new building and workshop extension are considered to be acceptable in terms of size, design, and siting. The proposed development would not have an adverse impact on the character and appearance of the landscape and adjacent conservation area. There would be no adverse impact on ecology and designated sites, and no impact on the amenity of neighbouring residents. The proposal is acceptable in terms of highways impact and flood risk. Consequently, the application is considered to be in accordance with Policies DM5, DM10, DM11, DM13, DM16, DM23, DM28, DM31, DM32, DM33, DM43, and STA1LP of the Local Plan for the Broads, along with the National Planning Policy Framework.

8. Recommendation

- 8.1. Subject to no new issues raised by consultees, to approve with the following conditions:
- i. Standard time limit
 - ii. In accordance with approved plans
 - iii. Details of method statement for piling and dredging works

- iv. Details of Construction Environmental Management Plan
- v. Details of Landscape and Ecological Management Plan
- vi. Details of Pollution Prevention Plan
- vii. Details of all external materials including solar panels
- viii. Details of Arboricultural Method Statement
- ix. Details of landscaping scheme including a landscape management plan
- x. Replacement of trees or plants planted under landscape scheme
- xi. Details of extracted peat use. Spoil to be deposited in flood zone 1. Re-use within 7 days
- xii. Details of phase 2 assessment of the risks posed by any contamination
- xiii. Details of remediation scheme following phase 2 assessment
- xiv. Details of staging/piling/quayheading
- xv. Details of upgraded/widened vehicular access
- xvi. Details of provision for on-site parking for construction workers
- xvii. Details of visitor mooring sign - position, size, and design
- xviii. Details of the play equipment
- xix. Provision of silt curtains during all active works
- xx. Follow mitigation for reptiles, birds, breeding birds, and bats as set out in 5.2.1 of the EIA
- xxi. Habitat enhancement as set out in 6.2.2 of the EIA
- xxii. Provision of nest boxes and cups, and bat boxes, as set out in 6.3.1 of the EIA
- xxiii. No external lighting without agreement in writing
- xxiv. No residential mooring
- xxv. Short stay moorings retained
- xxvi. Provision of visibility splays
- xxvii. Access gates/bollard/chain/other means of obstruction - function and siting
- xxviii. Works for on-site car parking/servicing/turning/waiting areas

9. Reason for recommendation

- 9.1. The proposal is considered to be in accordance with Policies DM5, DM10, DM11, DM13, DM16, DM23, DM28, DM31, DM32, DM33, DM43, and STA1LP of the Local Plan for the

Broads, along with the National Planning Policy Framework which is a material consideration in the determination of this application.

Author: Nigel Catherall

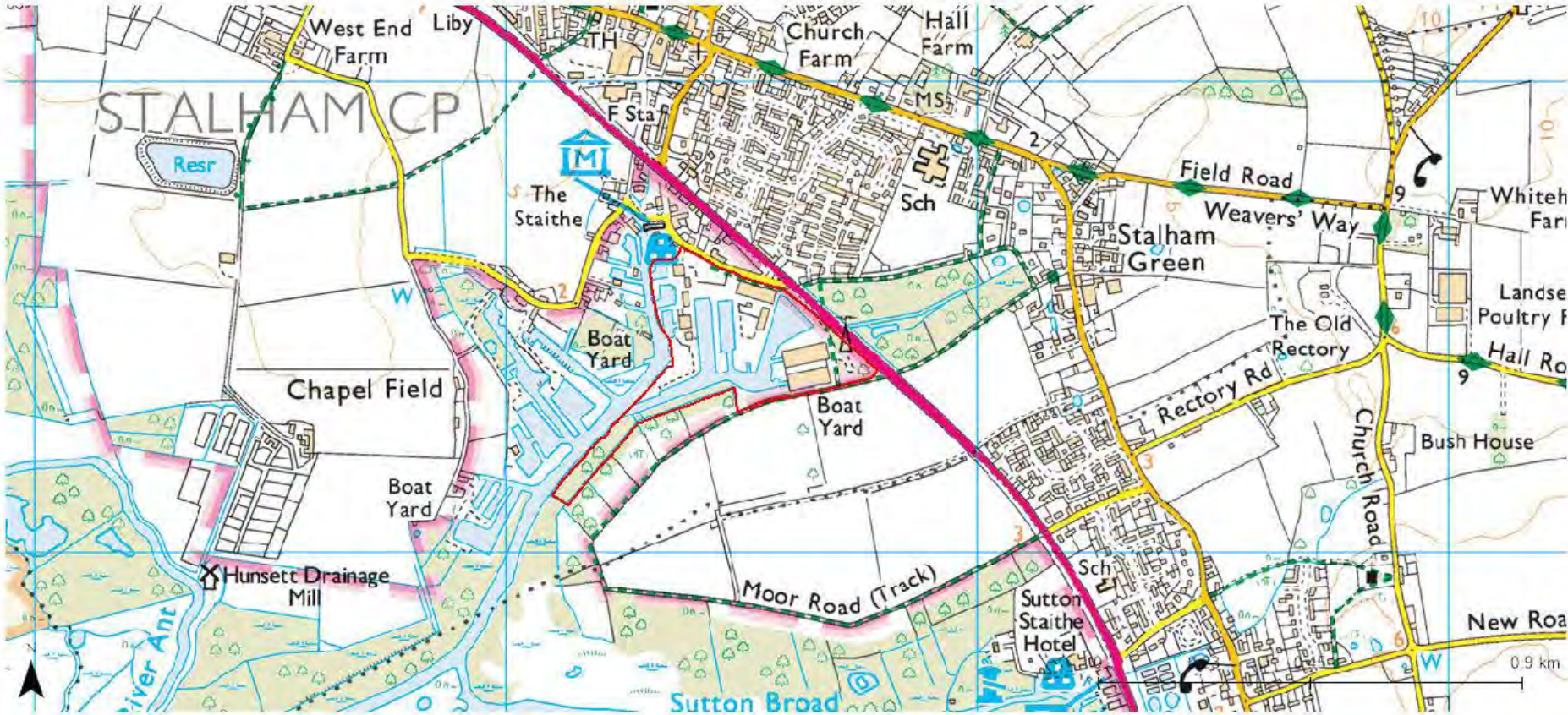
Date of report: 13 November 2025

Background papers: BA/2023/0443/FUL

Appendix 1 – [Location map](#)

Appendix 1 – Location map

BA/2023/0443/FUL - Richardsons Boatyard, The Staithe, Stalham



© Crown copyright [and database rights] 2024 Ordnance Survey AC0000814754. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form. Bluesky International Ltd. / Getmapping PLC

Planning Committee

5 December 2025

Agenda item number 7.3

BA/2025/0251/FUL Wayford Nurseries, Wayford Road, Wayford Bridge

Report by Planning Officer

Proposal

Replace 8 polytunnels with single, large polytunnel

Applicant

Mr Nicholas Meale

Recommendation

Approval with conditions

Reason for referral to committee

Major application

Application target date

2 February 2026

Contents

1.	Description of site and proposals	2
2.	Site history	3
3.	Consultations received	4
	Natural England	4
	BNG consultant	4
	BA Ecologist	4
4.	Representations	4
5.	Policies	4
6.	Assessment	5
	Principle of development	5
	Impact upon the landscape	5
	Planning Committee, 5 December 2025, agenda item number 7.3	1

Amenity of residential properties	6
Design and appearance	6
Biodiversity Net Gain	6
Other issues	6
7. Conclusion	7
8. Recommendation	7
9. Reason for recommendation	7
Appendix 1 – Location map	9

1. Description of site and proposals

- 1.1. The subject comprises part of a well-established farm shop, garden centre, and nursery site known as ‘Wayford Nurseries’ or ‘AG Meale and Sons’ with associated retail buildings, glasshouses, polytunnels, and plant hardening open areas, set amidst fields in horticultural and agricultural use, part of the wider Wayford Nurseries site.
- 1.2. The site is located to the northern side of Wayford Road (A149), with the vehicle entrance to the site approximately 300m north-east of Wayford Bridge.
- 1.3. The subject area covers three elements of the site. Eight polytunnels in a row which are used for the growing of plants. To the front (east) of the polytunnels is an uncovered area which is used to bring plants on and to harden them, with an element of retail. To the immediate west of the polytunnels is an area used for growing strawberries and raspberries which includes some elements of polytunnel coverage, these two areas being separated by a hedgerow.
- 1.4. To the north of the subject area site is an open area for plant sales, a café, and retail buildings selling plants, consumables, and garden equipment. To the east of the subject area is a hard surfaced car park, with fields to the south and west. There is a glasshouse at the site which is located to the east of the retail buildings.
- 1.5. The wider site comprises 105 hectares producing potatoes, asparagus, cabbage, cauliflower, calabrese (broccoli), kale, corn, pumpkins, beet, barley and wheat for sale at the site.
- 1.6. The surrounding area is predominantly in agricultural use. There are pockets of residential development, the closest to the subject area of the site form part of the wider ownership area, with further dwellings immediately east and south-east of the wider site. To the west are commercial uses around Wayford Bridge.
- 1.7. The site is not within a conservation area and lies outside of flood zones 2 and 3. The subject site is approximately 565m east of the Broad Fen SSSI, SAC, SPA, and Broadland Ramsar site.

- 1.8. The proposal is to remove the 8 existing polytunnels and replace them with a single large polytunnel structure constructed of polythene over metal framework. The proposed polytunnel would cover much of the area of the existing polytunnels, the adjacent plant hardening area, and part of the adjacent hedgerow area. The total size of the proposed polytunnel is 55m by 48m except for the south-east corner where an area of 25m x 9.6m is absent as it steps in to take account of the existing boundary. Despite being one large structure rather than a collection of individual structures, the overall appearance is a standard polytunnel, an elongated tunnel with a curved roof, in this case appearing as 5 adjoined polytunnels with 5 curved roofs. The height of the main structure is 3.85m, with the maximum height to the top of the curved roofs being 6.68m. The area to the north of the proposed polytunnel would be retained as a plant hardening area with a surface of paving slabs and gravel.
- 1.9. It is noted that there is an extant permission for replacement of the 8 polytunnels with a glasshouse and covered area under planning reference BA/2024/0066/FUL. The applicant has explained in the submitted application form that construction costs proved prohibitive for the glasshouse.

2. Site history

- 2.1. BA/2024/0066/FUL - Replace 8 poly-tunnels with glasshouse & covered area. Approved with conditions.
- 2.2. BA/2022/0015/AGR - Steel Portal Framed Building for the purpose of storing grain produced by the applicant. Prior approval not required.
- 2.3. BA/2015/0168/FUL - Proposed coffee shop, patio and play area. Approved with conditions.
- 2.4. BA/2013/0206/FUL - Replacement toilet block and staff room. Approved with conditions.
- 2.5. BA/2006/1209/HISTAP - Erection of extension to provide replacement glasshouse / plant area and coffee shop. Approved with conditions.
- 2.6. BA/2004/1420/HISTAP Erection of canopy over walkway. Approved with conditions.
- 2.7. BA/2003/1469/HISTAP Erection of building to provide additional retail / storage area. Approved with conditions.
- 2.8. BA/1995/2344/HISTAP Construction of potato storage building
- 2.9. BA/1995/2329/HISTAP Covered open area for plant sales, glasshouse, coffee house and porch to glasshouse and existing farm shop. Approved with conditions.
- 2.10. BA/1994/2429/HISTAP Extension to include butchers, bakers, coffee shop and additional greenhouse. Refused.

- 2.11. BA/1991/2730/HISTAP Extension to existing building used for storage, preparation and sales of produce. Approved with conditions.
- 2.12. BA/1989/3003/HISTAP Erection of relocatable office and toilet accommodation Approved with conditions.
- 2.13. BA/1989/2901/HISTAP Extension of use of building to include sale of bought in produce. Approved with conditions and s106 agreement.
- 2.14. BA/1989/2900/HISTAP Greenhouse for the display and sale of plants grown within the nursery grounds. Approved with conditions.
- 2.15. BA/1988/3438/HISTAP Portal framed building for onion conditioning and potato storage. Approved with conditions.
- 2.16. BA/1987/3594/HISTAP Erection of additional glasshouse. Approved with conditions.

3. Consultations received

Natural England

- 3.1. No objection

BNG consultant

- 3.2. Additional information requested

BA Ecologist

- 3.3. No objection subject to conditions and enhancements.

4. Representations

- 4.1. None.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
 - DM6 - Surface water run-off
 - DM13 - Natural Environment
 - DM16 - Development and Landscape
 - DM21 - Amenity
 - DM23 - Transport, highways and access
 - DM43 - Design
 - DM51 - Retail development in the Broads

5.3. Other material considerations:

- National Planning Policy Framework
- Planning Practice Guidance

6. Assessment

- 6.1. The proposal is to replace the existing 8 polytunnels with a single large polytunnel structure. The existing polytunnel are sited side by side in a line with a separation maintained between each polytunnel. The proposed polytunnel would be one continuous structure although with the appearance of 5 adjoined polytunnels by virtue of the roof structure and entrances.
- 6.2. The main issues in the determination of this application are the principle of development, the design and appearance of the proposed polytunnel, impact on landscape, ecology, neighbour amenity, BNG, highway and parking issues.

Principle of development

- 6.3. In terms of the principle of development, the proposed polytunnel would partly replace 8 existing polytunnels and partly cover over an existing open area, all within the existing site. There would be no change to the use of those areas which would still be used for the growing and hardening of plants including an element of sales, all for the benefit of the existing and well established business at the site. The proposal is therefore considered acceptable in principle.

Impact upon the landscape

- 6.4. The existing nursery and garden centre site is well concealed by virtue of the surrounding landscape and boundary features. This includes a well-established mature hedgerow along the boundary with Wayford Road, with the only gap being at the vehicle entrance to the site, although glimpses of the site are possible at other points. At the entrance the existing polytunnels are visible, and the proposed polytunnel would also be visible, however this is a view framed by trees and within the context of an established business, so would not be unexpected or detrimental to the character and appearance of the site and surrounding area.
- 6.5. The existing polytunnels have a maximum height of 4.25m, the proposed polytunnel will have a maximum height of 6.68m so will be more of a presence at the site. The majority of the garden centre/nursery buildings are between 4.50m and 5.20m. There are structures taller than the proposed polytunnel on site comprising a grain silo (east of the subject polytunnel area to the opposite side of the car park) adjacent to which are a pair of chimneys. Whilst the proposed polytunnel would not be the tallest structure on site, by virtue of its length and width it will potentially be the more prominent structure. However, the buildings in this locale are commonly 2 storey dwellings which are taller than the proposed polytunnel, there are also sizeable farm buildings to the west which again are notably taller than the proposed polytunnel, and of a use which is broadly comparable to the proposed structure. The proposed

polytunnel, in the context of the existing garden centre/nursery, in a landscape with buildings of notable height, and on a site which is well screened from most public vantage points, would not have an unacceptable impact on the appearance of the site or surrounding landscape character and the wider Broads landscape.

- 6.6. The proposed glasshouse is therefore considered acceptable with regard to Policy DM16 of the Local Plan for the Broads.

Amenity of residential properties

- 6.7. There are residential properties around the site, although only one in proximity of the proposed development. The garden centre/nursery is an established use and taking into account the siting and scale of the polytunnel, along with its use, it is considered that the proposed polytunnel will not result in an undue impact on the amenity and privacy enjoyed by neighbouring residents, with regard to Policy DM21 of the Local Plan for the Broads.

Design and appearance

- 6.8. The provision of polytunnels at garden centres and nurseries is fairly typical and the proposed polytunnel would replace existing polytunnels at the Wayford Nurseries site. The proposed polytunnel has a standard appearance and is of a suitable scale for the site and its setting within the site. In addition, the height of the proposed polytunnel is reasonable taking into account the existing buildings at the site and in the immediate surrounds, as discussed in paragraph 6.5 of this report.
- 6.9. The appearance of the proposed polytunnel, and the replacement of the existing polytunnels is therefore considered acceptable with regard to Policy DM43 of the Local Plan for the Broads.

Biodiversity Net Gain

- 6.10. The proposed development will require the removal of an existing hedge which is sited between the existing polytunnels that are proposed for removal and the strawberry growing area and other polytunnels on the area of the site to the west. The hedge is described as a non-native and ornamental hedgerow. A small sites metric was submitted in support of the application, this was reviewed by the BNG consultant who commented that 'The submitted metric reports that the project will generate a gain of 0.46 (48.25%) area units by improving the condition of vacant land from moderate to good'. However, they also commented that need the applicant will need to provide certainty that the forecast gain can be delivered, and requested submission of additional supporting information. An update on this issue will be provided verbally to members.

Other issues

- 6.11. The BA ecologist has assessed the proposed scheme and advised that there are no ecology concerns for the development as long as conditions are met. New lighting is known to affect the foraging and commuting success of some bat species, but as polytunnels, glasshouses and industrial buildings are already in existence and there are

few natural features within the development site to support bat use, potential impact is considered negligible. The proposed polytunnel is 565m from the nearest designated site and the nature of the works are such that there would be no impact on the integrity of the designated sites, and Natural England raised no objection to the proposal. Planning conditions for suitable biodiversity enhancement and mitigation would be included in any grant of planning permission. In this respect the proposal is considered acceptable with regard to Policy DM13 of the Local Plan for the Broads.

- 6.12. The proposal would provide broad sustainability benefits in that the new polytunnel would allow for use of a more efficient heating system, and rainwater harvesting would be introduced in this area of the site. This would accord with Policy DM6 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The proposed provision of a single large polytunnel in place of an existing row of polytunnels and adjacent open air area is acceptable in principle, is acceptable in terms of design and appearance, would not result in an unacceptable landscape impact, would not impact on residential amenity and is acceptable in ecological terms.

8. Recommendation

- 8.1. That planning permission be granted subject to the following conditions:
- i. Time limit
 - ii. In accordance with plans
 - iii. Standard BNG condition
 - iv. Biodiversity enhancement in form of provision of habitat for wildlife
 - v. Vegetation clearance/demolition works outside of main bird breeding/nesting season or checked by ecologist prior to works
 - vi. Follow biosecurity protocols
 - vii. Use of polytunnel for growing/hardening of stock for sale on site only
 - viii. External lighting plan

9. Reason for recommendation

- 9.1. The proposal is considered to be in accordance with Policies DM6, DM13, DM16, DM21, DM23, DM43 and DM51 of the Local Plan for the Broads, along with the National Planning Policy Framework which is a material consideration in the determination of this application.

Author: Nigel Catherall

Date of report: 20 November 2025

Background papers: BA/2025/0251/FUL

Appendix 1 – [Location map](#)

Appendix 1 – Location map

BA/2025/0251/FUL -Wayford Nurseries, Wayford Road, Wayford Bridge



© Crown copyright [and database rights] 2024 Ordnance Survey AC0000814754. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form. Bluesky International Ltd. / Getmapping PLC

Planning Committee

5 December 2025

Agenda item 7.4

BA/2025/0031/UNAUP2 Land On The West Side Of River Waveney, Beccles

Report by Development Manager

Summary

There is no planning permission for the unauthorised wooden decking structure, the development is contrary to planning policy and permission could not be granted.

Recommendation

To authorise the service of an Enforcement Notice, and any subsequent action deemed necessary.

Contents

1.	Site location and description	1
2.	The unauthorised development	2
3.	The planning issues	2
	The acceptability of the development	2
	The expediency of enforcement action	3
4.	Financial implications	5
5.	Conclusion	5
	Appendix 1 – Location maps	6
	Appendix 2 – Photos of development	8

1. Site location and description

- 1.1. This development is situated on land on the west side of the river Waveney in Beccles opposite the Waveney House Hotel. There are a large number of privately owned mooring plots along this west bank of the river and access to them is via Gillingham Dam. They are classified as mooring plots and as such, most have a wooden raised walkway to a wooden mooring post. Some have a small platform to make it easier to

get access to the boat. They are all very similar in design and appearance and are mostly surrounded by natural reedbeds. The overall feel is of being undeveloped and with a natural appearance in contrast to the opposite side of the riverbank.

2. The unauthorised development

- 2.1. This unauthorised wooden structure has been built opposite the foot path of plot number 6 and is approximately 1 meter in height. It is built on round wooden steaks driven into the ground supporting a raised wooden decking area of approximately 6 meters depth and 9 meters in length.

3. The planning issues

- 3.1. The Broads Authority has a Local Compliance and Enforcement Plan which sets out its approach to dealing with enforcement matters. At paragraph 3.6 it states that *“legislation gives the LPA strong legal powers to deal with breaches of planning control, in most cases the first approach is to use negotiation to reach a satisfactory resolution in a timely manner”*.
- 3.2. 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.”
- 3.3. In determining how to take this matter forward, the LPA must, therefore, first consider whether the unauthorised development is acceptable in planning terms, whether it is capable of being made acceptable, or whether it is unacceptable. If the unauthorised development is not and cannot be made acceptable, then the LPA must consider the expediency of enforcement action.

The acceptability of the development

- 3.4. Looking first at the acceptability of the existing unauthorised development, Adopted Local Plan Policy requires that Policy SP7 states: Development proposals will ensure that the location or intensity of the use or activity is appropriate to the character and appearance of the Broads and pay particular attention to the defining and distinctive qualities of the varied positive landscape character areas and the character, appearance and integrity of the historic and cultural environment

- 3.5. Adopted Policy DM16 states: Development proposals which conserve and enhance the key landscape characteristics of the Broads and comply with other relevant policies, in particular Policy DM43 (design), will be permitted.
- 3.6. Adopted Policy DM43 states: All development will be expected to be of a high design quality. Development should integrate effectively with its surroundings, reinforce local distinctiveness and landscape character and preserve or enhance cultural heritage. that and the development is therefore contrary to.

The expediency of enforcement action

- 3.7. When a breach of planning control has taken place and the LPA is considering what action is appropriate, it will need to look carefully at a number of factors. The factors are expediency, proportionality and consistency.

Expediency

- 3.8. Expediency may be explained as an assessment of the harm that is being caused by the breach. Harm may arise through a range or combination of factors, for example adverse impact on visual amenity due to poor design or materials, and this would be an example of direct harm arising from the unlawful development. There is also the generic harm which arises from a development which is in conflict with adopted policies and which, if it were not addressed, would undermine the policies in the development plan as well as the principles of the NPPF and NPPG. Furthermore, a failure to address non-compliant development would undermine the integrity of the planning system and paragraph 59 of the NPPF emphasises the importance of this when it states “Effective enforcement is important to maintain public confidence in the planning system”, demonstrating that this is a valid objective in itself.
- 3.9. The harm resulting from the unauthorised development arises from a poor design and a structure out of place within the wider landscape of the rural appearance. There is also potential damage to the biodiversity of the area. No habitat surveys were carried out before construction and no consultation with appropriate agencies was carried out to ensure the development had minimal effect on the wider environment.
- 3.10. There will be costs associated with enforcement action, however, when balanced against the need to ensure, amongst other matters, the protection of the planning system it is considered that enforcement action is likely to be expedient given the benefits of securing a cessation of the development.

Proportionality

- 3.11. The second test is one of proportionality; enforcement action should always be proportionate to the seriousness of the harm being caused. In this case consideration of acceptability was taken by the planning department, but our opinion the development would not receive support in its current state. Possible long-term damage to the environment and visual amenity leads us to the conclusion that it should be removed.
- 3.12. Where it is accepted that an LPA has a responsibility to protect the planning system in order to maintain public confidence in it, it follows that the extent of the action should

be directly proportionate to the extent of the breach. In this case, only the full removal of the unauthorised development is justified.

- 3.13. It is noted that the owner intends to use this unauthorised development for private leisure purposes. These, however, are private benefits and should not override the public benefits associated with upholding the planning system.
- 3.14. Overall, it is considered that enforcement action to secure the cessation of the unauthorised development is proportionate.

Consistency

- 3.15. The third test is consistency, and the Local Compliance and Enforcement Plan identifies the need to ensure consistency so that a similar approach is taken in similar circumstances to achieve similar outcomes.
- 3.16. Other enforcement actions have been taken against other riverside developments including quay headings, unauthorised buildings and unauthorised unacceptable changes of use.
- 3.17. It is considered that enforcement action against the breaches identified here would be consistent with the approach taken elsewhere and therefore meets the requirements of the Local Compliance and Enforcement Plan.
- 3.18. Finally, it is noted in the Local Compliance and Enforcement Plan that whilst the law gives an LPA strong legal powers to deal with unauthorised development, the preferred approach is always to seek to negotiate a solution, and the fourth test considers whether this approach has been applied. In negotiating a solution, the outcome will either be that the development is (or is made) acceptable and planning permission is granted, or, where the development is not and cannot be made acceptable, that the breach is stopped. In this case, for the reasons outlined above, the development cannot be made acceptable and there is no prospect of planning permission being granted. The solution will therefore require the cessation of the development.
- 3.19. In this case the Authority has contacted the landowner to explain that their development is unauthorised and should be removed from the site. Having given the owner reasonable time to undertake the removal, unfortunately there has been no effort to comply with this request. Subsequent email requests have had no response or action from the landowner. The authority has no option but to take formal enforcement action.
- 3.20. In considering expediency it is also necessary to take account of the impacts and costs of taking action, which would include the resources required to do this, as well as what is likely to be achieved. The more harm that is being caused then the more likely it is that it will be expedient to take enforcement action due to the need to stop the harm. Conversely, if there is little harm it may not be expedient to pursue the matter, particularly if the costs are high. In this case, there is significant harm to interests of public importance from development which is intrinsically unacceptable. The service of

Enforcement Notices, as a first step, incurs little cost other than officer time; if further action is needed to secure compliance this will need to be considered.

- 3.21. In conclusion, it is considered that the development is unacceptable and enforcement action can be justified as expedient.

4. Financial implications

- 4.1. The service of Enforcement Notices will require officer time; any costs associated with administration will be met from the existing planning service budget.
- 4.2. If compliance is not achieved voluntarily there will be costs associated with enforcing this. Members will be advised of progress through the regular update to Planning Committee, so there will be the opportunity to consider any additional costs.

5. Conclusion

- 5.1. The unauthorised development at the site is contrary to development plan policy and could not be granted planning permission.
- 5.2. The Local Compliance and Enforcement Plan explains that where an unauthorised development is unacceptable and cannot be made acceptable, the LPA should seek to negotiate a solution. There is no realistic prospect of a negotiated solution here and it is recommended that an Enforcement Notice is served requiring the cessation and removal of the unauthorised development. A compliance period of 3 months would be appropriate.
- 5.3. In consideration of serving this Enforcement Notice, the Local Planning Authority has had full regard to the provisions of the Human Rights Act 1998. The Authority considers that any interference with the rights of the owner, occupier or any other persons with an interest in the land is necessary, proportionate, and justified in the interests of the proper exercise of planning control and the protection of the public amenity.
- 5.4. In particular, the Authority has considered the rights under Part 1 - Article 6 (right to a fair hearing), Part 1 - Article 8 (right to respect for private and family life), and Article 1 of the First Protocol (protection of property). The Authority is satisfied that the requirements of this Notice are reasonable and that the legitimate aims of enforcing planning legislation cannot be achieved by less intrusive means.

Author: Steve Kenny

Date of report: 18 November 2025

Background papers: Enforcement file BA/2025/0031/UNAUP2

Appendix 1 – [Location map](#)

Appendix 2 – [Photos of development](#)



© Crown copyright [and database rights] 2024 Ordnance Survey AC0000814754. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form. Bluesky International Ltd. / Getmapping PLC

Appendix 2 – Photos of development





Planning Committee

5 December 2025

Agenda item 7.5

BA/2024/0045/UNAUP4 Land On The South-West Side Of Norwich Road, Gillingham, Beccles

Report by Development Manager

Summary

There is no planning permission for the unauthorised decking and raised platform area, the development is contrary to planning policy and permission could not be granted.

Recommendation

To authorise the service of an Enforcement Notice, and any subsequent action deemed necessary..

Contents

1.	Site location and description	2
2.	The unauthorised development	2
3.	The planning issues	2
	The acceptability of the development	3
	The expediency of enforcement action	3
4.	Financial implications	5
5.	Conclusion	5
	Appendix 1 – Location maps	7
	Appendix 2 – Photos of development	10

1. Site location and description

- 1.1. The site is situated on the northwest riverbank on the river Waveney north of Beccles town. Access to the mooring plot is off a slip road on the main A146 Norwich Road just before the road bridge crossing the river Waveney. The mooring plot is the first one after the Broads Authority's 24-hour mooring. The plots along the riverbank can clearly be seen looking down from the foot path on the road bridge and from the opposite east side footpath of the Waveney riverbank. This is a very open and undeveloped area heading away north from Beccles Town.

2. The unauthorised development

- 2.1. The owner has fully enclosed the plot with 1.8-meter wooden fence panels along all 3 sides. Access is through a gateway at the front of the plot. There are wooden steps leading down to the mooring. The whole of the floor area has been decked using scaffold boards as decking. There is a raised platform area towards the rear of the plot which runs for 13.5 meters in length with a height of 50cm and a depth of 110cm.

3. The planning issues

- 3.1. The Broads Authority has a Local Compliance and Enforcement Plan which sets out its approach to dealing with enforcement matters. At paragraph 3.6 it states that *"legislation gives the LPA strong legal powers to deal with breaches of planning control, in most cases the first approach is to use negotiation to reach a satisfactory resolution in a timely manner"*.
- 3.2. 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."
- 3.3. In determining how to take this matter forward, the LPA must, therefore, first consider whether the unauthorised development is acceptable in planning terms, whether it is capable of being made acceptable, or whether it is unacceptable. If the unauthorised development is not and cannot be made acceptable, then the LPA must consider the expediency of enforcement action.

The acceptability of the development

- 3.4. Looking first at the acceptability of the existing unauthorised development, Adopted Local Plan Policy requires that Policy SP7 states: Development proposals will ensure that the location or intensity of the use or activity is appropriate to the character and appearance of the Broads and pay particular attention to the defining and distinctive qualities of the varied positive landscape character areas and the character, appearance and integrity of the historic and cultural environment
- 3.5. Adopted Local Plan Policy DM16 states: Development proposals which conserve and enhance the key landscape characteristics of the Broads and comply with other relevant policies, in particular Policy DM43 (design), will be permitted, so is therefore inappropriate and conflicts with.
- 3.6. Adopted Policy DM43 states: All development will be expected to be of a high design quality. Development should integrate effectively with its surroundings, reinforce local distinctiveness and landscape character and preserve or enhance cultural heritage. that and the development is therefore contrary to.

The expediency of enforcement action

- 3.7. When a breach of planning control has taken place and the LPA is considering what action is appropriate, it will need to look carefully at a number of factors. The factors are expediency, proportionality and consistency.

Expediency

- 3.8. Expediency may be explained as an assessment of the harm that is being caused by the breach. Harm may arise through a range or combination of factors, for example adverse impact on visual amenity due to poor design or materials, and this would be an example of direct harm arising from the unlawful development. There is also the generic harm which arises from a development which is in conflict with adopted policies and which, if it were not addressed, would undermine the policies in the development plan as well as the principles of the NPPF and NPPG. Furthermore, a failure to address non-compliant development would undermine the integrity of the planning system and paragraph 59 of the NPPF emphasises the importance of this when it states “Effective enforcement is important to maintain public confidence in the planning system”, demonstrating that this is a valid objective in itself.
- 3.9. The harm resulting from the unauthorised development arises from a poor design and structure out of place within the wider landscape of the rural appearance. There is also potential damage to the biodiversity of the area. No habitat surveys were carried out before construction and no consultation with appropriate agencies was carried out to ensure the development had minimal effect on the wider environment.
- 3.10. There will be costs associated with enforcement action, however, when balanced against the need to ensure, amongst other matters, the protection of the planning system it is considered that enforcement action is likely to be expedient given the benefits of securing a cessation of the development.

Proportionality

- 3.11. The second test is one of proportionality; enforcement action should always be proportionate to the seriousness of the harm being caused. In this case consideration of acceptability was taken by the planning department, but our opinion is that it would not receive support in its current state. Possible long-term damage to the environment and visual amenity leads us to the conclusion that the majority of the structure should be removed.
- 3.12. Where it is accepted that an LPA has a responsibility to protect the planning system in order to maintain public confidence in it, it follows that the extent of the action should be directly proportionate to the extent of the breach. In this case, most of the scaffold decking should be removed from the site, leaving a maximum 2 meters width decking measured from the edge of the quayheading to give access to the boat mooring. The height of the fences should be lowered to conform with the neighbouring plots.
- 3.13. It is noted that the owner intends to use this plot for private leisure purposes. These, however, are private benefits and should not override the public benefits associated with upholding the planning system.
- 3.14. Overall it is considered that enforcement action to secure the cessation of the unauthorised development is proportionate.

Consistency

- 3.15. The third test is consistency and the Local Compliance and Enforcement Plan identifies the need to ensure consistency so that a similar approach is taken in similar circumstances to achieve similar outcomes.
- 3.16. Other enforcement actions have been taken against other riverside developments including quay heading, unauthorised buildings and unauthorised unacceptable changes of use.
- 3.17. It is considered that enforcement action against the breaches identified here would be consistent with the approach taken elsewhere and therefore meets the requirements of the Local Compliance and Enforcement Plan.
- 3.18. Finally, it is noted in the Local Compliance and Enforcement Plan that whilst the law gives an LPA strong legal powers to deal with unauthorised development, the preferred approach is always to seek to negotiate a solution and the fourth test considers whether this approach has been applied. In negotiating a solution, the outcome will either be that the development is (or is made) acceptable and planning permission is granted, or, where the development is not and cannot be made acceptable, that the breach is stopped. In this case, for the reasons outlined above, the development cannot be made acceptable and there is no prospect of planning permission being granted. The solution will therefore require the cessation of the development.
- 3.19. In this case the Authority has met with the landowner on site to explain that their development is unauthorised and should be removed from the site. Having given the

owner reasonable time to undertake the removal, unfortunately there has been no effort to comply with this request. Subsequent email requests have had no response or action from the landowner, so we are forced to take formal enforcement action.

- 3.20. In considering expediency it is also necessary to take account of the impacts and costs of taking action, which would include the resources required to do this, as well as what is likely to be achieved. The more harm that is being caused then the more likely it is that it will be expedient to take enforcement action due to the need to stop the harm. Conversely, if there is little harm it may not be expedient to pursue the matter, particularly if the costs are high. In this case, there is significant harm to interests of public importance from development which is intrinsically unacceptable. The service of Enforcement Notices, as a first step, incurs little cost other than officer time; if further action is needed to secure compliance this will need to be considered.
- 3.21. In conclusion, it is considered that the development is unacceptable and enforcement action can be justified as expedient.

4. Financial implications

- 4.1. The service of Enforcement Notices will require officer time; any costs associated with administration will be met from the existing planning service budget.
- 4.2. If compliance is not achieved voluntarily there will be costs associated with enforcing this. Members will be advised of progress through the regular update to Planning Committee, so there will be the opportunity to consider any additional costs.

5. Conclusion

- 5.1. The unauthorised development at the site is contrary to development plan policy and could not be granted planning permission.
- 5.2. The Local Compliance and Enforcement Plan explains that where an unauthorised development is unacceptable and cannot be made acceptable, the LPA should seek to negotiate a solution. There is no realistic prospect of a negotiated solution here and it is recommended that an Enforcement Notice is served requiring the cessation of the unauthorised use. A compliance period of 3 months would be appropriate.
- 5.3. In consideration of serving this Enforcement Notice, the Local Planning Authority has had full regard to the provisions of the Human Rights Act 1998. The Authority considers that any interference with the rights of the owner, occupier or any other persons with an interest in the land is necessary, proportionate, and justified in the interests of the proper exercise of planning control and the protection of the public amenity.
- 5.4. In particular, the Authority has considered the rights under Part 1 - Article 6 (right to a fair hearing), Part 1 - Article 8 (right to respect for private and family life), and Article 1 of the First Protocol (protection of property). The Authority is satisfied that the

requirements of this Notice are reasonable and that the legitimate aims of enforcing planning legislation cannot be achieved by less intrusive means.

Author: Steve Kenny

Date of report: 18 November 2025

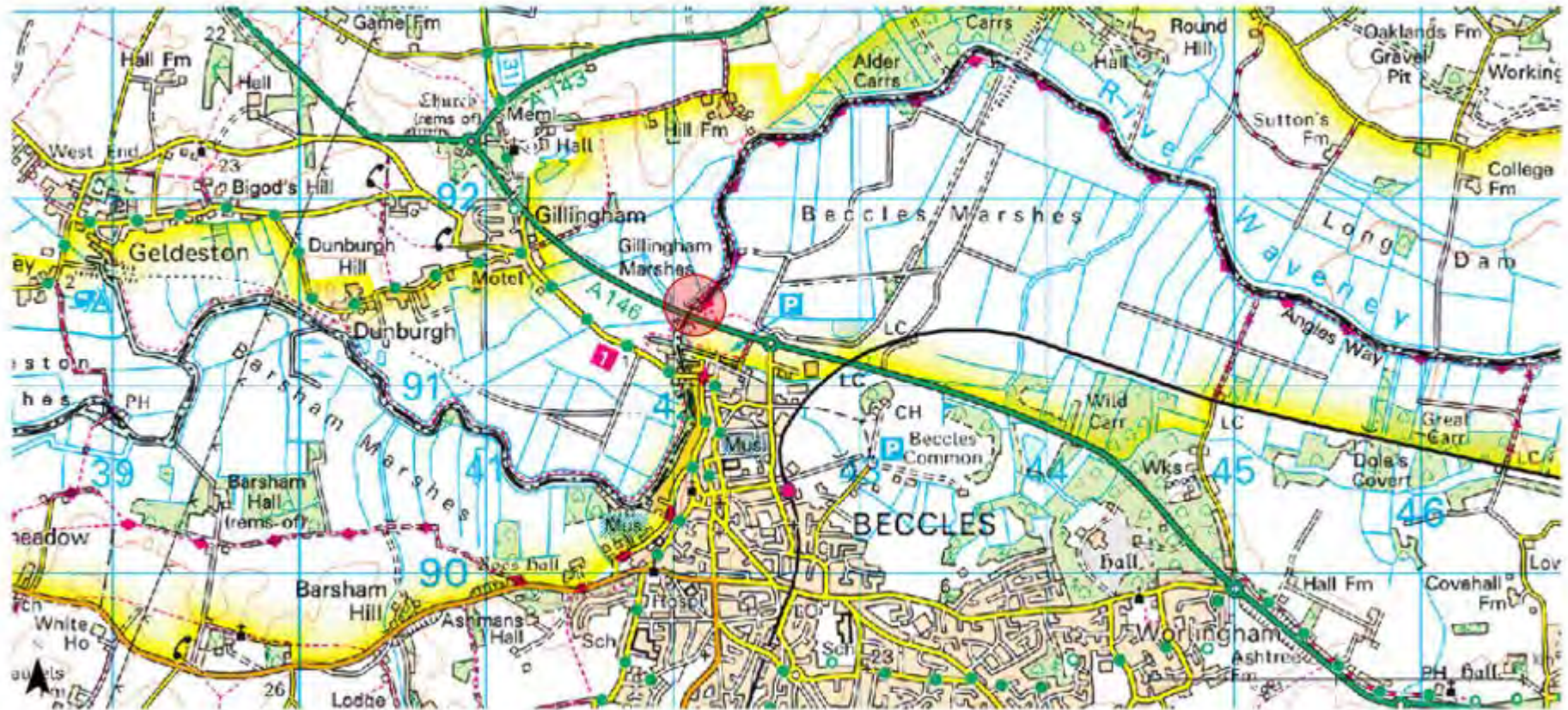
Background papers: Enforcement file BA/2024/0045/UNAUP4

Appendix 1 – [Location maps](#)

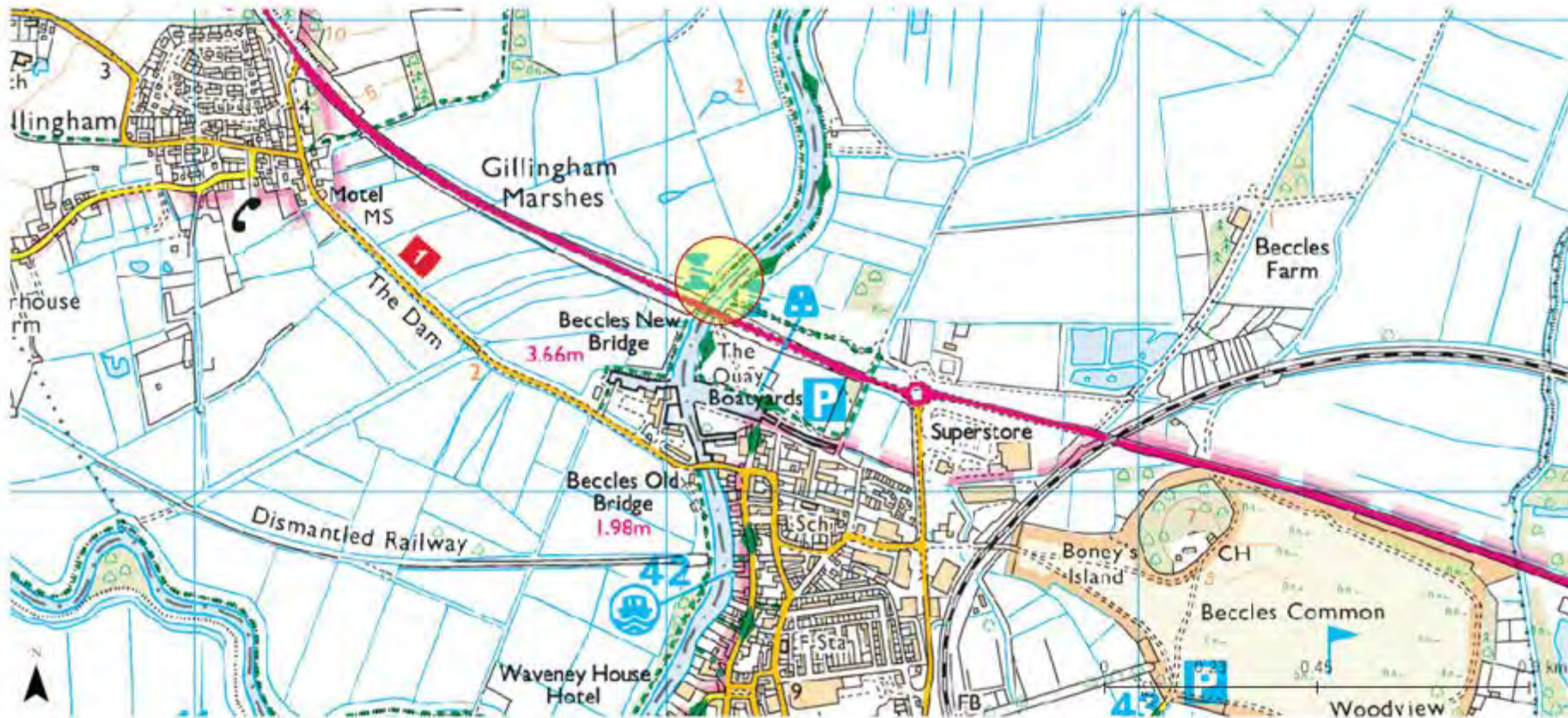
Appendix 2 – [Photos of development](#)

Appendix 1 – Location maps

BA/2024/0045/UNAUP4 - Land On The South-West Side Of Norwich Road, Gillingham, Beccles



© Crown copyright [and database rights] 2024 Ordnance Survey AC0000814754. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form. Bluesky International Ltd. / Getmapping PLC



© Crown copyright [and database rights] 2024 Ordnance Survey AC0000814754. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form. Bluesky International Ltd. / Getmapping PLC



© Crown copyright [and database rights] 2024 Ordnance Survey AC0000814754. You are permitted to use this data solely to enable you to respond to, or interact with, the organisation that provided you with the data. You are not permitted to copy, sub-licence, distribute or sell any of this data to third parties in any form. Bluesky International Ltd. / Getmapping PLC

Appendix 2 – Photos of development





Planning Committee

5 December 2025

Agenda item number 8

Enforcement update

Report by Development Manager

Summary

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

Recommendation

To note the report.

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

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

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

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Listed for hearing on 9 August 2023 at 12pm at Norwich Magistrates' Court [17/05/2023] • Operator pleaded 'not guilty' at hearing on 9 August and elected for trial at Crown Court. Listed for hearing on 6 September 2023 at Norwich Crown Court [09/08/2023] • Hearing at Norwich Crown Court adjourned to 22 September 2023 [01/09/2023] • Hearing at Norwich Crown Court adjourned to 22 December 2023 [26/09/2023] • Hearing postponed at request of Court, to 8 April 2024 rescheduled date [16/01/2024] • Hearing postponed at request of Court, to 14 May rescheduled date [10/04/2024] • Court dismiss Defendants' application to have prosecution case dismissed. Defendants plead 'not guilty' and trial listed for seven days commencing 23 June 2025 [14/05/2024] • Officers attended pre-trial hearing and date of full trial confirmed as above. No further information added by defendant. [21/03/2025] • 26th June 2025 - Trial took place at Crown Court. All defendants pleaded guilty before Jury sworn in. Proceeding adjourned until 25th July 2025 for sentencing hearing. • July sentencing cancelled by the court. New date set for Monday 6th October. • All defendants sentenced with a total fine of £20000 reduced by 10% for their guilty pleas. After some reductions by the Judges, costs of £48650 were

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<p>awarded to the Authority. They have 6 months to pay or face custodial sentences. The High Court administers the collection of both fines and costs.</p> <ul style="list-style-type: none"> • Officers have been in contact with Mr Hollocks, who now wishes to resolve the matter by removing the statics from site by mid-November. Members will be updated as necessary. The option to take direct action remains. • All statics have been emptied, disconnected and removed from their standings and relocated to a temporary position adjacent to the access road beyond. This is a temporary measure, and the caravans will be removed from the site entirely in due course [19/11/2025]
<p>13 May 2022 BA/2022/0023/ UNAUP2</p>	<p>Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter</p>	<p>Unauthorised operation development comprising erection of workshop, kerbing and lighting</p>	<ul style="list-style-type: none"> • Authority given by Chair and Vice Chair for service of Temporary Stop Notice requiring cessation of construction 13 May 2022 • Temporary Stop Notice served 13 May 2022. • Enforcement Notice and Stop Notice regarding workshop served 1 June 2022 • Enforcement Notice regarding kerbing and lighting served 1 June 2022 • Appeals submitted against both Enforcement Notices [12/07/2022] • Appeals dismissed and Enforcement Notices upheld 29 July 2024. • Workshop to be dismantled and removed off site within two months; all associated structures and fixtures to be removed off site, services (electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months • Kerbed structure and lighting columns to be taken down and electricity connections to be taken up, all within two months; all structures, materials and associated debris arising from the above to be removed off site and the land to be made good within three months [30/07/2024]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Site visit to be carried out and owner reminded of compliance periods [27/09/2024] • Discussions continuing, held up by court case on other issue. [19/12/2024] • Since the court case, it has been discussed that the kerbs and lights should be removed, although it appears that the Police have concerns over the removal of the lights citing safety on the site by users. Consequently, officers are to meet the owner on site to explore a solution without significantly harming the environment of the area. • The owner has agreed to finish the workshop with appropriate cladding to present a satisfactory appearance that will enable him to retain on site. • The lights have now been disconnected, the kerbs and the posts remain until a solution is agreed upon. The owner has assured the LPA that the lights will not be switched on again without written permission from us [19/11/2025]
<p>21 September 2022</p> <p>BA/2017/0006/UNAUP1</p>	<p>Land at Loddon Marina, Bridge Street, Loddon</p>	<p>Unauthorised static caravans</p>	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravans. • Enforcement Notice served [04/10/2022] • Enforcement Notice withdrawn on 19 October due to minor error; corrected Enforcement Notice re-served 20 October 2022 • Appeals submitted against Enforcement Notice [24/11/2022] • Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024. • Residential use of the caravans to cease, the caravans and associated structures, fixtures, fittings and domestic paraphernalia to be removed off

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<p>site, services (including water and electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good, all within six months [30/07/2024]</p> <ul style="list-style-type: none"> • Owner to be reminded that notice to be complied with by 29 January 2025 [27/09/2024] • Discussions continuing [26/11/2024] • Since the court case, officers have discussed the way forward on this case, as the notices have not been complied with. Mr Hollocks has served an eviction notice on one occupier, with the intention to remove the caravan by mid-November. The remaining one will be assessed as managers accommodation and maybe able to be regularised by application. • The caravan identified as Y in the enforcement notice has been disconnected, removed from its standing, and placed in storage within the boatyard. The former occupant has been re-housed elsewhere. The owner is engaging with the LPA regarding the continued use of caravan X as managers' accommodation, with a view to regularising this arrangement [19/11/2025]
<p>9 December 2022 BA/2018/0047/ UNAUP3</p>	<p>Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter</p>	<p>Unauthorised static caravan (Unit Z)</p>	<ul style="list-style-type: none"> • Planning Contravention Notice to clarify occupation served 25 Nov 2022. • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravan • Enforcement Notice served 11 January 2023 [20/01/2023] • Appeals submitted against Enforcement Notice [16/02/2023] • Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> Residential use of the caravan to cease within two months; the caravan and associated structure or fixtures to be removed off site, services (electricity and water) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months [30/07/2024] Site visit to be carried out and owner reminded of compliance periods [27/09/2024] Discussions continuing, held up by court case on other issue. [19/12/2024] This caravan will be removed by mid-November with the other two. Officers have been invited to attend when the action is to be taken by the owners.
31 March 2023 BA/2023/0004/ UNAUP2	Land at the Berney Arms, Reedham	Unauthorised residential use of caravans and outbuilding	<ul style="list-style-type: none"> Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of the caravans Enforcement Notice served 12 April 2023 Enforcement Notice withdrawn on 26 April 2023 due to error in service. Enforcement Notice re-served 26 April 2023 [12/05/2023] Appeal submitted against Enforcement Notice [25/05/2023] Appeals dismissed and notice upheld with variations [22/04/2025] This site will be discussed further with the owner, once the proposed action at the other sites is taken. All statics have been emptied, disconnected and removed from their standings and relocated to a temporary position adjacent to the access road beyond. This is a temporary measure, and the caravans will be removed from the site entirely in due course [19/11/2025]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
2 February 2024 BA/2022/0007/ UNAUP2	Holly Lodge, Church Loke, Coltishall	Unauthorised replacement windows in listed building	<ul style="list-style-type: none"> • Authority given to serve a Listed Building Enforcement Notice requiring the removal and replacement of the windows and the removal of the shutter. Compliance period of 15 years • LPA in discussions with agent for landowner [10/04/2024] • No resolution achieved through discussion. Legal advice sought [29/08/2024] • Case review – Listed Building Enforcement Notice to be served, in process of content being considered and drafted. • Listed Building Enforcement Notice served by hand on Friday 24th January. • Appeal submitted and valid – start date 19/03/2025. Will be dealt with by compliance officer [21/03/2025] • PINS contacted about delay, await response [19/11/2025]

Author: Steve Kenny

Date of report: 19 November 2025

Background papers: Enforcement files

Planning Committee

5 December 2025

Agenda item number 9

Consultation responses

Report by Planning Policy Officer

Summary

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

Recommendation

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

1. Introduction

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

Author: Natalie Beal

Date of report: 25 November 2025

Appendix 1 – [Essex and Suffolk Water – Water Recycling, Transfer and Storage Project](#)

Appendix 2 – [Greater Norwich Authorities - Draft Policy 2: Sustainable Communities SPD](#)

Appendix 3 – [Greater Norwich Authorities - Draft Implementation of the Greater Norwich Green Infrastructure Strategy SPD](#)

Appendix 4 – [Broadland and South Norfolk Design Code SPD](#)

Appendix 1 – Essex and Suffolk Water – Water Recycling, Transfer and Storage Project

Essex and Suffolk Water

Document: [Suffolk Water Recycling Transfer & Storage Project \(suffolkwaternetwork.co.uk\)](http://suffolkwaternetwork.co.uk)

Due date: 10 December 2025

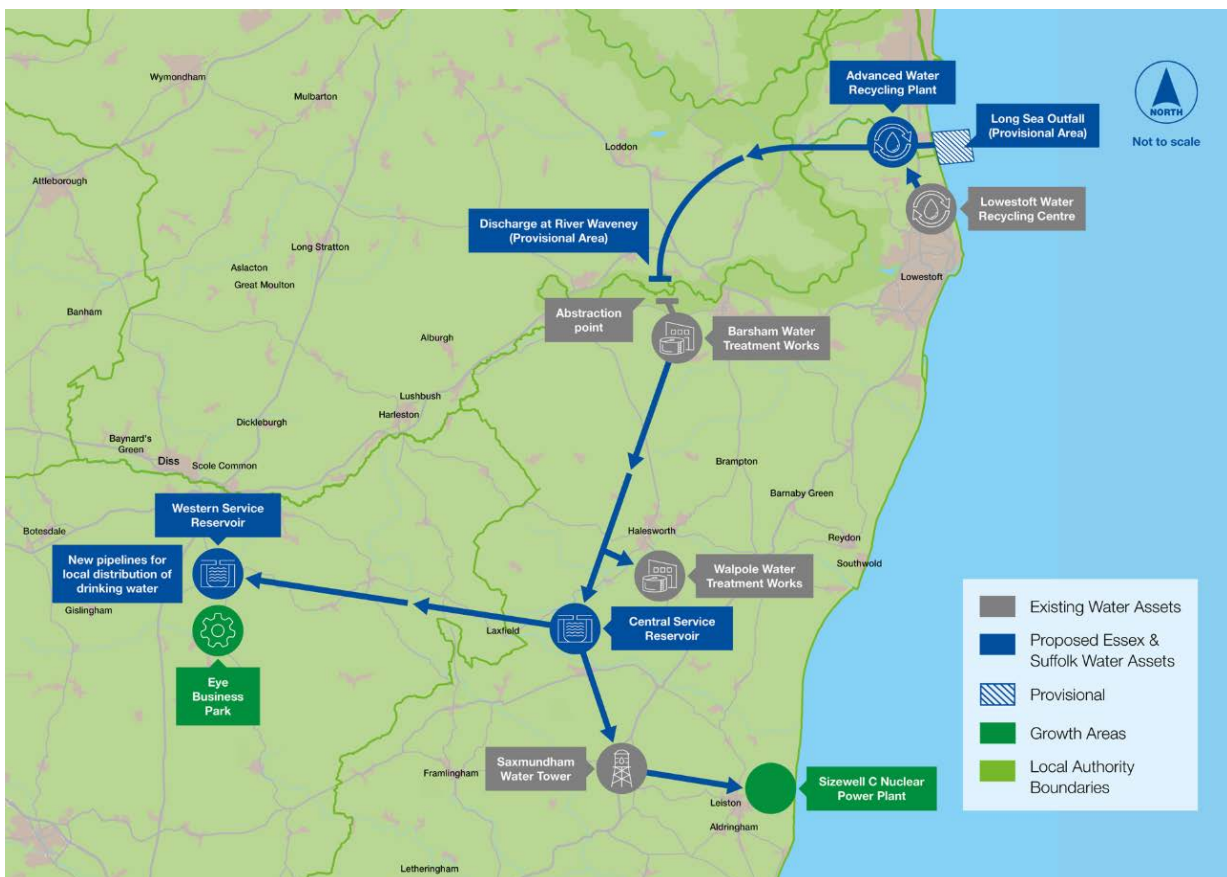
Status: Non statutory consultation

Proposed level: Planning Committee endorsed

Notes

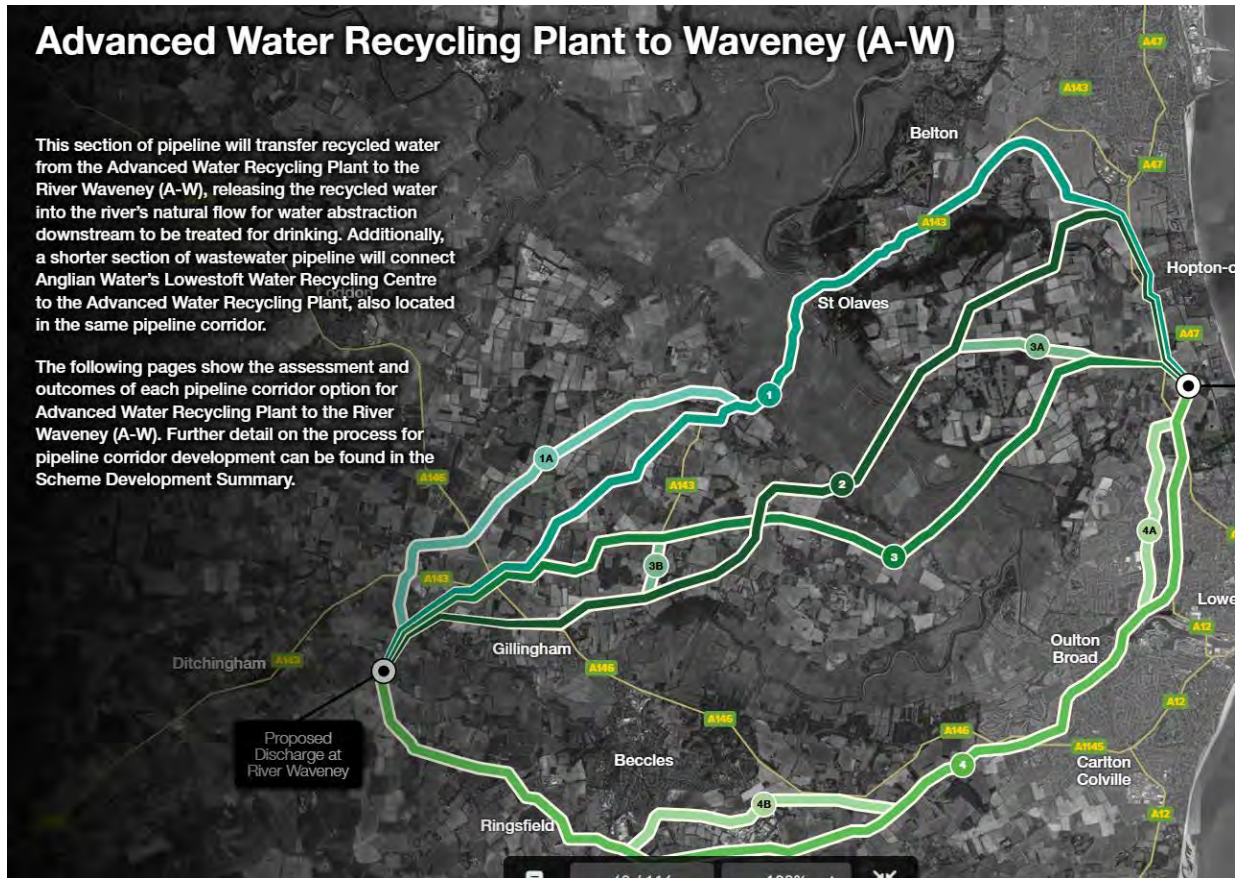
This consultation seeks feedback on:

- The proposed location of a new **Advanced Water Recycling Plant** in Lowestoft
- The proposed locations for two **service reservoirs**, one close to the existing Lodgewood Water Tower near Sibton and one near Eye airfield
- The **pipeline corridors** connecting these key infrastructure components



The Suffolk Water Recycling, Transfer and Storage Project is made up of two key elements, the development of a new Advanced Water Recycling Plant, capable of producing 11 million litres per day of purified recycled water, and strategic network enhancements that will support a more reliable and resilient water supply for the region.

[SSN NonStat Consultation Brochure A21 DIGITAL.pdf](#) | Powered by Box, page 68 shows this map. The individual sections are shown on plans on the following pages.



Proposed response
Summary of response

Generally, there is a lack of detail about the construction of the project. There are no case studies or before, during and after photos from similar schemes to give an idea of how things will work and look.

Comments

- Do we know if it would potentially be used to supplement flow on the Waveney during periods of drought and/or during storm surge events to push back saline water?
- Where the pipeline goes under the Broads navigable waterways, a works licence will be required and the designed depth of the pipeline below the riverbed needs to be appropriate. See [Works Licences](#).
- None of the maps make the Broads Authority executive area obvious. The Broads is a protected landscape with a status equivalent to a National Park and needs to be shown on maps. The Broads has the highest status of protection in landscape terms.
- There does not seem to be anything about how you intend to cross the rivers. There is nothing to show what things will look like where the pipe goes down to then go under the river and then back up. There is nothing to show what the construction process will look

like. How far below the ground/river will the pipes be? What will be the scar in the landscape? What will you do with the excavated material that could be peat? What is the corridor for construction – without knowing that and what that could typically look like, it is hard to give comments on the route. If, say, the construction period lasts a few months and there may be a scar for a few months after that before the vegetation that was there beforehand takes hold again and so after like 6 months you won't be able to tell anything is there, that is one thing. But, say, there is some kind of permanent structure at the points where the pipes go down to go under the river and then another when it comes back up and these structures are obvious in the landscape and need parking and fencing then that is another situation. Or if there will always be a mown grass covered route of the pipes to enable access, that is different to what was there. Will there be manhole covers at regular routes to enable access?

- Page 99 - is that what we are to expect through the Broads? What is the after image if that is during the construction - as in, a few months after the work, what does it look like? It does not seem very deep down, so what are we expecting? This is just included as artwork and not as an annotated demonstration as to what to expect.



- Also page 107 – similar – that is a big scar and does not seem very deep. This image is during construction, but what is the after image like? This is just included as artwork and not as an annotated demonstration as to what to expect.



- Where have you made a route under a river before this and what was the impact? Could there be land slumping as a result of putting a pipe under the river? Will there be impacts on navigation?
- This is all that is talked about in the consultation documents: [SWRTS QandA.pdf | Powered by Box](#) – there needs to be much more. Before, during and after images, maybe cross section diagrams, maybe short videos, maybe case studies of where this has been done before:

How will the pipelines be built, and what disruption should I expect?

Most pipes will be installed using open-cut excavation: digging a trench, laying the pipe, and reinstating the land. Where roads, railways or rivers are crossed, trenchless methods such as tunnelling may be used to minimise disruption.

*You may notice some **temporary noise, dust or traffic**, but we'll use modern equipment and best-practice methods to reduce these as much as possible. We'll also monitor conditions closely and keep local communities informed.*

*Your **water supply will not usually be affected**. If short-term work ever requires a brief interruption, we'll let affected customers know in advance.*

- Where routes pass through peatland and involve excavation or vehicle tracking, the following impacts must be considered:
 - Carbon emissions resulting from peat disturbance

- Compression of the peat soil structure and associated effects on water transmissivity and ecological function
- Summer drying of peat wetlands: Peat wetlands in the Broads are experiencing significant summer drying. Current water-regulation and abstraction pressures mean there is insufficient water available to support wetland enhancement or maintain summer water levels, which increases landscape-scale ecological and carbon-related risks.
- Opportunity for multi-benefit water supply to peatland restoration: The potential for providing water to peatland restoration projects in the Beccles, Worlingham, Geldeston and Barsham area should be considered as part of the investigation, given the multiple environmental benefits.
- Engagement with the Broads Peat Partnership: The Broads Peat Partnership is meeting at 10:00 on 7 January 2026. We would welcome a representative to attend in order to gain a better understanding of these issues.

Appendix 2 – Greater Norwich Authorities - Draft Policy 2: Sustainable Communities SPD

Broadland, Norwich and South Norfolk Councils

Document: Draft GNLP Policy 2 Sustainable Communities Supplementary Planning Document (SPD) available at [Supplementary Planning Document consultations | Norwich City Council](#).

Due date: 19 December 2025

Status: Draft SPD

Proposed level: Planning Committee endorsed

Notes

The Policy 2 SPD will support Greater Norwich Local Plan (GNLP) Policy 2 with the aim of making sure that new developments contribute to the creation of resilient, inclusive, and sustainable communities.

GNLP Policy 2 requires applicants of major developments to submit statements on sustainability, master-planning, timescales for delivery and health impact assessments. The SPD provides guidance on how to write these statements and covers the ten key issues within Policy 2: access to services, new technologies, green infrastructure, densities, design, inclusive and safe communities, environmental protection, flood risk, water efficiency, and energy consumption.

Proposed response

- For the Part 1 on access there should be a requirement to explain how it fits with the LCWIP.
- There should also be explicit consideration of how sustainable access is given to recreational facilities, particular for villages that overlap with the Broads.
- Part 5 on Design under Information required to demonstrate compliance (column 3), we suggest an additional bullet point:
 - The setting of the protected landscape of the Broads Authority Executive Area where development may affect it.
- Part 7 on Environmental Protection should consider presence of peat soils.

Appendix 3 – Greater Norwich Authorities - Draft Implementation of the Greater Norwich Green Infrastructure Strategy SPD

Broadland, Norwich and South Norfolk Councils

Document: Draft Implementation of the Greater Norwich Green Infrastructure Strategy Supplementary Planning Document (SPD) available at [Supplementary Planning Document consultations | Norwich City Council](#)

Due date: 19 December 2025

Status: Draft SPD

Proposed level: Planning Committee endorsed

Notes

This draft SPD supports the delivery of high-quality, multifunctional green infrastructure. It provides guidance for developers, planners and communities on how to use the Greater Norwich Green Infrastructure Strategy to implement GNLP policies 2, 3, 4, 6 and 7.

Proposed response

- 1.1 – It applies to the administrative **Local Planning Authority** areas of Broadland District Council, Norwich City Council, and South Norfolk Council.
- As this is a planning document, rather than saying ‘Broads National Park’, please say ‘Broads Authority Executive Area’.
- What are the instructions for developers within this SPD? It is not clear what they are to do.
- GI Strategy seems to cover the Broads. How should we be involved? Endorse the SPD?
- Page 7 Blue spaces are shown annotated on the map. Do you need to set out what a ‘blue space’ is? Maybe you need a glossary?
- Page 14 – last para: it would be good to be able to promote the area’s heritage in the delivery of some of the projects mentioned (for example, Burgh Castle and Caistor Roman town are both mentioned – as well as others such as Whitlingham Country Park, Ladybelt Country Park, Earlham Park – all have heritage designations). As such other partners might include heritage organisations such as the Norfolk Archaeological Trust, Historic England etc. The promotion of heritage in some of these projects would provide many benefits, including potentially additional funding opportunities.
- Page 17 Active Places – last bullet point – heritage sites could be included in the list of places that could be explored to provide accessible green spaces

- Page 21 – gives the number of listed buildings as 116 – is this just the number in the Greater Norwich area as the Broads contains 279 listed buildings? Again is the number of CAs given (18) just those in the Greater Norwich area as there are 25 in the BA area?
- Page 21 – Industrial heritage – this also includes historic water management structures such as the dyke network and collection of drainage mills in the Halvergate Marshes Conservation Area, used to drain the land to enable its use for grazing
- Page 22 – reference to Broads LCA – state currently being updated?
- Page 32, second column – if this is the RAMS scheme then that needs to say that as that is what it is known as.
- Page 34, urban tree canopy cover standards box – formatting issues.

Appendix 4 – Broadland and South Norfolk Design Code SPD

Broadland and South Norfolk Councils

Document: [South Norfolk and Broadland Design Code Supplementary Planning Document \(SPD\) | Broadland and South Norfolk](#)

Due date: 8 December 2025

Status: Draft SPD

Proposed level: Planning Committee endorsed

Notes

The draft Design Code SPD has been developed to support the delivery of high-quality residential development throughout South Norfolk and Broadland. By setting out clear design expectations, the SPD aims to ensure that new homes and neighbourhoods are attractive, practical, and sensitive to the unique character of our towns and villages. This work has been funded through the Government's Planning Skills Fund and led by expert consultants, with input from Council planning teams and local stakeholders.

The preparation of the Design Code involved extensive informal engagement, including three previous stages of public and stakeholder input. Insights from these stages have helped to shape a practical and locally relevant document. The current consultation represents the final opportunity for all interested parties to contribute before the documents are adopted.

Supporting the Design Code are two key documents: the Broadland Character Assessment, which describes the distinctive features of Broadland's built environment and landscapes, and the Assessment Framework, which provides structured prompts for evaluating the quality of development proposals. Together, these documents are designed to help residents, planners, and developers achieve better outcomes for our communities. The existing South Norfolk Character Assessment (formerly included in the South Norfolk Place-Making Guide SPD) will also form part of the final Design Code.

Proposed response

Summary of response

Generally, there needs to be better reference to the Broads and its setting throughout the documents.

Design code

- Page 2 and Page 11 – the Broads Authority Executive Area is shown on the maps on these pages but there is no explanation as to why and it may not be obvious to users of the document. It needs to state at the beginning of the document that the BA is the LPA for their area and have a separate Design Guide and Code SPD for the BA area. Also, that the Broads is a protected landscape with equivalent status to a National Park and set out the

special considerations (para 189-190 of the NPPF) in order to fulfil the Councils' duty contained in the LURA, section 245.

- Page 9, green column – recommend it says ‘...well-designed lighting (where appropriate)...’
- Page 10, a minor point – the images don’t really match the text (which is about climate change)
- Page 13 – should this page also include ‘Promotion of active travel, with pedestrian and cycle routes provided.’?
- Page 14&15 – Dispersed Settlements and Countryside & villages should still give consideration to public transport access, even if it is via a cycle or pedestrian route as a multi-modal journey.
- Page 15 – could this be seen to say that dwellings in open countryside are acceptable? Would it be better to just say this section is about smaller settlements?
- Page 22 – Active travel includes “wheeling” to take account of alternative forms of cycle and wheelchair use – this is included in N1.3 but should also be referenced in the headline
- Page 23, under the coloured boxes, it includes a key for the colours. It seems more user friendly if, above each orange/red box the title was ‘applies to all schemes’ and above the purple box ‘applies to schemes of 10+ dwellings’ – this means that people don’t need to remember what the colours mean and so the codes can be applied to the scale of development intended.
- Page 27 – image shows pavement parking... I know this section is about local townscape and landscape and incorporating features, but it shows cars parked on pavements and it might be interpreted that is supported and good practice.
- Page 29 – is it worth having a ‘for example’ relating to the second part of N5.4? It is not clear what the second part of N5.4 means in practice: *should also adopt other measures, such as landscape, to relate it to the surroundings.*
- Page 43 – talks a lot about flooding when the section is about nature and biodiversity. N16 for example seems to need its own section.
- Page 54, S5 – maybe mention pavement parking?
- Page 54 – s5.8 does not really say anything.
- Page 61, section 5.2 – large areas of glazing to let in daylight is one thing, but light pollution from these large, glazed areas needs to be mitigated through the use of blinds or curtains. If the glazed areas are out of easy reach, there may be a need for automated dusk to dawn blinds.
- Page 63 – cycle storage. This comes after car parking and bin storage sections in the Code. Given all that is said throughout the Code about promoting active lifestyles and travel, it seems logical to place this earlier in the document to get across how important this is.

- Page 63, image with yellow door – is that actually cycle parking? Or something to stop the door swinging too far open? I would question how secure this type of cycle parking is. One would likely opt for back garden shed as cycle parking or maybe even take the bike inside if this is the only option provided. How useable and secure is this? Query use of this as a good example.
- H4.1, 4.2, 4.3 – query why H4.3 is a must – as in a destination must have good cycle parking. Whereas the origins of journeys (houses) only should have good cycle parking. Also, the start of the section says ‘functional and accessible cycle storage is important so that residents find it convenient to use a bike’ so saying ‘should’ in H4.1 and H4.2 does not follow on from the introduction.
- Page 63, cycle parking – there is no mention of shelter over the cycle parking. There is no mention of what you mean by overlooked. There is no mention of CCTV. There is nothing about the type of cycle parking – Sheffield Stands. And nothing about the cycle parking being on flat and level surface.
- Page 75, section 5.8 – perhaps this should be earlier in the document given how pressing climate change is.
- Page 76 – H15.2 & 15.3 – These both show as “should” – whilst the Future Homes Standard is not in force until December 2026, in the interim these should be strengthened to try and prevent a rush of fossil heating systems being installed.
- There is little or no mention of the Broads. Design of schemes could impact on the setting of the Broads.
- 3.1 creating a safe and connected movement network – should reference the Countywide LCWIP and the Broads LCWIP – in particular when sites straddle them.
- 4.2 Streets for walking, cycling and interacting
 - Should include reference to wheeling
 - Should reference LTN 1/20 (for urban settings) or the upcoming Active Travel England Rural Design Guide.

Broadland Character Assessment

- Page 19 – suggest a map is included that shows the areas to which these Character areas apply. See page 27 of the South Norfolk Character Assessment as that does show a map.
- Pages 22 and 23 don’t mention that the Broads has a status equivalent to a National Park.
- Page 22 and 23 images don’t really reflect the Broads – there are no river scenes or boatyards included for example. Given it is a landscape assessment you should also show more wider landscape images containing views of the river.

- Page 27 – not sure why the map is zoomed out so much. Would be better to zoom in to Broadland. See page 31 of the South Norfolk Character Assessment as the equivalent image is zoomed to a good scale.
- Page 27 – All the Broads that is within Broadland needs to be coloured in. The NPPF is clear in paragraph 189 about the setting of the Broads. Indeed, this document says at page 4 ‘Prior to appraising a development site and its immediate setting, it is essential to understand its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change’ – given that the Broads is a protected landscape with a status equivalent to a National Park, it is not clear why the Broads Authority Executive Area is not shown on this plan. It gives the impression that this document has not understood ‘its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change’. Furthermore, there is a Duty on Broadland Council to seek to further contained in the LURA, section 245.
- As the various local character areas are discussed, a map is needed to show where these are – see South Norfolk Character Assessment, page 38 for example where a little map is included.
- Page 53 – again no mention of the Broads being a protected landscape and a status equivalent to a National Park.
- Page 53 – again, no images of the rivers of typical Broads landscape. Given it is a landscape assessment you should also show more wider landscape images containing views of the river.
- Page 54 – no mention of Halvergate Marshes being a Conservation Area.
- Page 57 – there is no mention of protecting the intrinsically dark skies of the Broads. Again, the context is not really addressed adequately.
- Page 57 – N4 is the design code that relates to the Marshes Fringe area which along its whole length borders the BA Executive Area. As such in the first para it should make clear that for all of the bullet points special consideration should be given to the Broads’ protected landscape status and development within its setting.
- Page 73 – Thorpe St Andrew - N4 / N11 Should make clear that special consideration should be given to the Broads’ protected landscape status and development within its setting.
- Page 76 – Brundall - N4 / N11 Should make clear that special consideration should be given to the Broads’ protected landscape status and development within its setting.
- Page 80 – Reedham – N4/N11 Should make clear that special consideration should be given to the Broads’ protected landscape status and development within its setting.
- Page 81 – Acle – no code has been provided for Acle. Is this an omission?

- Page 85 – Wroxham - N4/N11 Should make clear that special consideration should be given to the Broads' protected landscape status and development within its setting.
- Page 88 – Coltishall - N4/N11 Should make clear that special consideration should be given to the Broads' protected landscape status and development within its setting.

South Norfolk Character Assessment

- Page 26 and page 28 - no mention of the Broads being a protected landscape and a status equivalent to a National Park. The NPPF is clear in paragraph 189 about the setting of the Broads. Indeed, this document says at page 4 'Prior to appraising a development site and its immediate setting, it is essential to understand its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change'
- Page 28 – it is strange that there are no images of the Broads' landscape. Given it is a landscape assessment you should also show more wider landscape images containing views of the river.
- Page 31 - Page 27 – All the Broads that is within South Norfolk needs to be coloured in. The NPPF is clear in paragraph 189 about the setting of the Broads. Indeed, this document says at page 4 'Prior to appraising a development site and its immediate setting, it is essential to understand its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change' – given that the Broads is a protected landscape with a status equivalent to a National Park, it is not clear why the Broads Authority Executive Area is not shown on this plan. It gives the impression that this document has not understood 'understand its wider context, in order to establish the general pattern and scale of development, the influence of landscape, views, skylines, predominant materials and the relative sensitivity and capacity for change'. Furthermore, there is a Duty on Broadland Council to seek to further contained in the LURA, section 245.
- Page 40 – needs to refer to the Broads and state it is a Protected Landscape and development that would affect its setting needs special consideration.
- Page 47 – needs to refer to the Broads and state it is a Protected Landscape and development that would affect its setting needs special consideration.
- Page 56 – needs to refer to the Broads and state it is a Protected Landscape and development that would affect its setting needs special consideration.
- The pages that talk in detail about the Local Character Areas – the images just tend to focus on buildings whereas there are no images that relate to the key landscape characteristics – more images showing the wider landscape should be provided.

Compliance checklist

- There is no mention of the Broads. Questions relating to the impact of a scheme on the setting of the Broads is required in order to fulfil the Councils' duty contained in the LURA, section 245.

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

Contents

1	Introduction	4
1.1	About this Duty to Cooperate Statement	4
1.2	Administrative Geography	5
1.3	History of Cooperation.	5
1.4	The future of Cooperation	5
2	Neighbouring Local Planning Authorities	6
2.1	The Broads and its surroundings generally	6
2.2	Cooperation mechanisms	6
2.3	Cooperation outcomes	8
3	Greater Norwich (GN) Joint Local Plan	10
3.1	Cooperation mechanisms	10
3.2	Cooperation Outcomes	10
4	The Coast	11
4.1	Cooperation mechanisms	11
4.2	Cooperation outcomes	11
5	National Parks family	12
5.1	Cooperation mechanisms	12
5.2	Cooperation outcomes	13
6	The Environment Agency	14
7	Historic England	14
8	Natural England	14
9	Mayor of London	14
10	Civil Aviation Authority	14
11	Office of Rail Regulation	14
12	National Highways	15
13	Homes England	15
14	Integrated Care Systems and National Health Service Commissioning Board	15
15	Transport for London	15
16	Integrated Transport Authorities	15
17	Marine Management Organisation	15
18	LEP and LNPs	15
19	Housing need in the Broads	16
19.1	Background.....	16
19.2	Duty to Cooperate with Norfolk LPAs.....	16
19.3	Duty to cooperate with East Suffolk Council	17
20	Gypsy and Traveller need in Great Yarmouth Borough	17
20.1	Background.....	17
20.2	Duty to Cooperate with Great Yarmouth Borough Council	17
21	Other Cross Boundary strategic issues relevant to the Duty to Cooperate and Local Plan	18
21.1	Nutrient Enrichment.....	18

21.2	Recreation Impacts.....	18
21.3	Water quality.....	19
21.4	Water supply	19
21.5	The Broads itself	19
21.6	Flood Risk.....	19
Appendix 1: The Broads Executive Area, District Boundaries and County Boundaries.		21
Appendix 2: Assessment of Local Plan against the Norfolk Strategic Framework Agreements (2021)		22
Appendix 3: Assessment of Local Plan against Marine Plans		31
Appendix 4: East Suffolk Council Duty to Cooperate Letter May 2025		38

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.

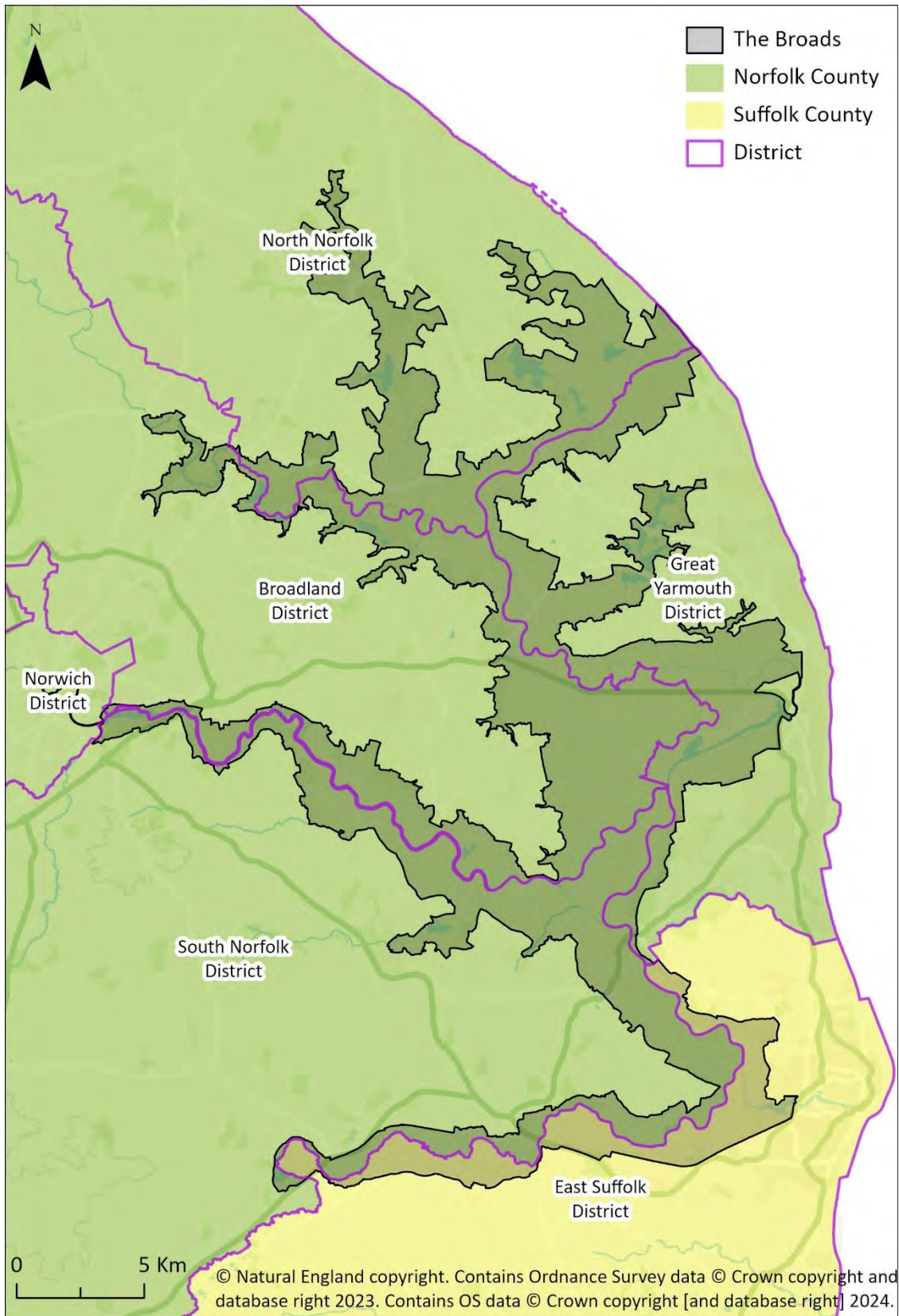
21.6 Flood Risk

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

Planning Committee

5 December 2025

Agenda item number 11

Appeals to the Secretary of State update

Report by Development Manager

Summary

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

Recommendation

To note the report.

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2023/0291/TPOA BA/2023/0002/REF APP/TPO/E9505/9846	Mr J Calver	Appeal received by the BA on 23 August 2023 Appeal start date 2 July 2024	River Green Yarmouth Road Thorpe St Andrew	Appeal against refusal to grant permission for works to TPO tree: T1: Horse Chestnut - Reduce primary stems by approximately 6m & reduce limb at 5.5m.	Delegated decision 11 August 2023 Fast track appeal so no LPA Statement required Site Visit date TBC Appeal Allowed 11 November 2025

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2024/0032/CLEUD BA/2024/0001/REF APP/E9505/X/24/3350415	Mr John Atkins	Appeal start date 26 November 2024 PINS contacted for update	Driftwood, 104 Lower Street, Horning, Norfolk	Lawful Development Certificate for 10 years use as holiday accommodation	Delegated decision 8 May 2024 LPA Statement submitted
BA/2022/0007/UNAUP2 BA/2025/0001/ENF APP/E9505/F/25/3361103	Mr Richard Howlett	Appeal start date 19 March 2025 Written reps PINS contacted for update	Holly Lodge Church Loke, Coltishall, Norwich	Appeal against Listed building enforcement notice - Installation of UPVC windows	Committee Decision 2 February 2024
BA/2025/0045/HOUSEH BA/2025/0002/HHAPP APP/E9505/D/25/3370099	Mr Rod Powney	Appeal start date 18 August 2025	The Boat House Plot K, Bureside Estate Crabbetts Marsh	Replace 25m of timber quay-heading with multi lock plastic piling. Replace existing walkway decking with redwood treated timber. Install 10no. 89r screw piles to a depth of approx. 15m.	Delegated decision 9 April 2025 Fast track appeal so no LPA Statement required PINS unaccompanied site visit planned

Author: Steve Kenny

Date of report: 19 November 2025

Background papers: BA appeal and application files

Planning Committee

5 December 2025

Agenda item number 12

Decisions made by officers under delegated powers

Report by Development Manager

Summary

This report sets out the delegated decisions made by officers on planning applications from 24 October 2025 to 21 November 2025 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Barton Turf And Irstead Parish Council	BA/2025/0249/FUL	Riversdale House Hall Road Barton Turf Norfolk NR12 8AR	Alexander Robinson	Replace external quay-heading 110m with treated redwood. Replaced piling inside wet boathouse with steel, timber waling & capping.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Great Yarmouth	BA/2025/0286/NONMAT	Port Of Yarmouth Marina Caister Road Great Yarmouth Norfolk	Charles Jurak	Reconfiguration of moorings. Non-material amendment to permission BA/2025/0114/COND	Approve
Horning Parish Council	BA/2025/0240/FUL	Bureside Estate, Plot 85 Crabbetts Marsh Horning Norfolk NR12 8JP	Mr Timothy Marshall	Replacement, re-located boathouse with the addition of solar panels	Approve Subject to Conditions
Mettingham Parish Council	BA/2025/0174/FUL	Land To North Of Bungay Road Mettingham Bungay Suffolk NR35 1TW	Assaff Rawner	Retrospective change of use of agricultural land to dog walking field	Approve Subject to Conditions
Ormesby St Michael Parish Council	BA/2025/0256/HOUSEH	My Holme Main Road Ormesby St Michael Norfolk NR29 3LW	Mr Louis Skoyles	Construction of attached garage	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2025/0075/COND	Broadlands Residential Home Borrow Road Lowestoft Suffolk NR32 3PW	Greensleeves Care Trust	Extend retaining wall lines and use of alternative materials, variation of conditions 2 and 4 of permission BA/2023/0476/FUL	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Stokesby With Herringby Parish Council	BA/2025/0303/LBC	The Green, Barn 35 Meters North East Ferry Inn Public House Mill Road Track Stokesby With Herringby Norfolk NR29 3EX	Mr Nick Haward	Replacement barn stable doors	Approve Subject to Conditions
Thorpe St Andrew Town Council	BA/2025/0259/LBC	12 Manor House Yarmouth Road Thorpe St Andrew Norfolk NR7 0EF	Mr Jeremy Clarke	New retaining wall and lead weathering on existing wall top. Reinstate pier capping.	Approve Subject to Conditions
Thorpe St Andrew Town Council	BA/2025/0258/HOUSEH	12 Manor House Yarmouth Road Thorpe St Andrew Norfolk NR7 0EF	Mr Jeremy Clarke	New retaining wall and lead weathering on existing wall top. Reinstate pier capping.	Approve Subject to Conditions
Thurne Parish Council	BA/2025/0269/APPCON	Quackers The Street Thurne Norfolk NR29 3AP	Mr David Short	Details of Condition 3: heat pump of permission BA/2024/0390/HOUSEH	Approve
Wroxham Parish Council	BA/2025/0250/CLEUD	Heronby Beech Road Wroxham Norfolk NR12 8TP	Tony Pearson	Lawful Development Certificate for 10 years use as private residential garden use incidental to the enjoyment of the dwelling house	CLUED Issued

Tree Preservation Orders confirmed by officers under delegated powers

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

Author: Steve Kenny

Date of report: 24 November 2025