

Planning Committee

13 February 2026

Agenda item number 9

Local Plan for the Broads- Submission

Report by Planning Policy Officer

Summary

The Local Plan for the Broads is ready for submission. This report discusses the submission as well as shares some submission documents with members: a Topic Paper on water usage, comments received as part of the second Regulation 19 consultation, an assessment of the policies in the Regulation 19 Local Plan against the emerging NPPF, a Topic Paper to explain the approach to identifying and meeting housing need.

Recommendation

It is recommended that Planning Committee Members:

1. Endorse the 90 litres per head per day water usage topic paper
 2. Endorse the responses to the second Regulation 19 consultation
 3. Endorse the assessment of the Regulation 19 Local Plan against the emerging NPPF
 4. Endorse the Housing need topic paper
 5. Endorse the Local Plan for submission to the Planning Inspectorate
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1. Introduction

- 1.1. The Local Plan is ready for submission. There are some submission documents included in this Report for Members to consider and provide comments for and endorse.
- 1.2. Submission was delegated to Officers. However, timings allow these documents and endorsement for submission to come to this February Planning Committee. If Planning Committee endorses submission, the intention is to submit on, or close to, Monday 16 February. The decision would not go to Broads Authority – rather it would be a combination of endorsement by Planning Committee and using the delegated powers from Broads Authority.

2. Water use – 90 litres per head per day topic paper

- 2.1. Members will recall from the January Planning Committee meeting that we received comments from the water companies and the Environment Agency requesting water

usage of 90 litres per head per day rather than 110 litres per head per day. It is proposed that we support this recommendation. A topic paper, [Appendix 1](#), has been produced to justify this standard and discuss how the standard could be implemented and delivered.

3. Second Regulation 19 comments and responses

- 3.1. The second Regulation 19 consultation ended on 16 January 2026. The comments received are included at [Appendix 2](#) alongside proposed responses. These will be merged with the responses to the first Regulation 19 consultation for submission.

4. Future proofing the Local Plan against the emerging NPPF

- 4.1. A separate item on this month's Planning Committee agenda discusses the emerging NPPF and includes a proposed response. This emerging NPPF is a big change to planning. The transition arrangements are such that it is prudent to seek to future proof the emerging Local Plan against the emerging NPPF. [Appendix 3](#) includes an assessment of the policies against the emerging NPPF and identifies where some changes to the emerging Local Plan could be made so the policies are able to be used when the new NPPF comes in. This issue will need to be discussed with the Inspector. It is likely that the new NPPF will be issued during the examination of the Local Plan.
- 4.2. Please note that the Local Plan will be examined against the current December 2024 NPPF.

5. Housing need topic paper

- 5.1. A topic paper has been produced to explain the approach to identifying housing need and explaining how this need will be met. It refers to various types of housing need. See [Appendix 4](#).

6. Next steps

- 6.1. On endorsement of these documents and endorsement to submit the Local Plan for examination, Officers will send the necessary documents to the Planning Inspectorate. The Planning Inspectorate are aware that the Local Plan is being submitted, and we have started to prepare for the examination. After submission, we await instructions from the Planning Inspectorate. We will keep Members updated on progress of the Local Plan examination.

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Date of report: 27 January 2026

Appendix 1 – [90 litres per head per day water usage topic paper](#)

Appendix 2 – [Second Regulation 19 Local Plan consultation responses](#)

Appendix 3 – [Assessment of Regulation 19 Local Plan against emerging NPPF](#)

Appendix 4 – [Housing need topic paper](#)

Local Plan for the Broads
90 litres per head per day water usage

Topic Paper

January 2026

Contents

1.	Introduction	2
2.	Current standards	2
3.	Recent Government consultation.....	2
4.	Why go beyond the current building regulations for water usage?	3
5.	Shared Standards	4
6.	Other examples of Local Plan policies going beyond the optional building regulations	5
7.	Proposed amendments to the Regulation 19 Local Plan policy	7
8.	Example conditions.....	7
9.	Delivery and implementation	8
10.	Viability of 90l/h/d	8
	Appendix 1: Comments received as part of the first Regulation 19 consultation	9
	Appendix 2: Amendments to Local Plan policy	11
	Appendix 3 – Viability Assessment of 90l/h/d.....	15

1. Introduction

The Local Plan for the Broads Regulation 19 version includes Policy PUBDM7 Water efficiency and re-use. This policy includes a standard for new dwellings to be built to 110 litres per head per day (l/h/d) water use.

As part of the consultation on the Regulation 19 version of the Local Plan, objections were received with proposed amendments seeking 90l/h/d. The objections can be found at [Appendix 1](#).

The Topic Paper has been produced in liaison with Anglian Water Services, Essex and Suffolk Water and the Environment Agency.

It seeks to justify amending PUBDM7 to replace 110l/h/d water use standard with 90l/h/d.

2. Current standards

Minimum water efficiency standards were introduced by the Government into the Building Regulations in 2010. The provisions require that all new homes are built so that their calculated water use is no more than 125 l/p/d (Regulation 36 Building Regulations 2010 and Part G of Schedule 1). Water use is calculated, and compliance is demonstrated by using the methodology set out in the Water Efficiency Calculator for New Dwellings (“the Water Calculator, Part G2 Approved Documents”), as well as the fittings-based approach.

An optional requirement (optional technical standard) also exists, of 110 l/p/d, in areas of water stress. This enables local planning authorities, where there is water stress, to impose a tighter standard for new development through a condition on the granting of planning permission, effectively requiring additional water efficiency (for example, more efficient taps and showers).

The adopted Local Plan for the Broads 2019 includes the optional technical standard. The emerging Local Plan for the Broads (Regulation 19 version, December 2025) also includes the optional technical standard.

3. Recent Government consultation

[Review of Water Efficiency Standards in the Building Regulations 2010 - Defra - Citizen Space](#) consultation ran between 23 September 2025 and 16 December 2025. This public consultation included an option to revise the minimum Water Efficiency Standard in new houses through fittings from 125 l/p/d to 105 l/p/d, and the optional technical standard from 110 l/p/d to 100 l/p/d. It included a call for evidence on water reuse systems in new developments, to enable even greater water efficiency.

4. Why go beyond the current building regulations for water usage?

The entire eastern England region is classified as seriously water stressed. It is the driest area in England receiving only around 600mm annual rainfall which is around two-thirds of the average for England and Wales. The region faces a supply demand deficit of 730 million litres/day by 2050 with half of this deficit needing to be met through demand management, including water efficiency. In some cases, required sustainability changes may not be possible for the water company to accommodate without compromising supplies to existing customers and/or growth. Water companies can make an overriding public interest case to defer the licence changes under Regulation 19 of the Water Environment (Water Framework Directive) Regulations 2017. A water company's need to defer licence changes is an indicator that abstraction could cause environmental deterioration, and this is a relevant planning consideration under Regulation 33 of the Water Environment (Water Framework Directive) Regulations 2017. The Norwich and the Broads WRZ has been identified as an area where a regulation 19 exemption will apply.

The following summarises the Shared Standards document (see Section 5 for more details).

The Government's 2024 [consultation on planning policy](#) noted there is a growing gap in our water supplies that will rise to circa five billion litres a day by 2050 if no further action is taken above existing measures (from 2025 onwards). [A summary of England's revised draft regional and water resources management plans — GOV.UK](#) by the Environment Agency identified that the gap between supply and demand is increasing with the challenges of climate change, population growth, drought resilience and increasing environmental protection requiring more water to be available. It also highlighted that Water Resource Management Plans (WRMP) rely on ambitious demand management, including water efficiency, is to address approximately half (48%) of this forecasted deficit.

The area's reliance on strategic transfers shows that water resources will be increasingly redistributed across the region in the future. This, combined with increasing pressure of growth and climate change, means there is a strong case for high levels of water efficiency across the region.

The Shared Standards area covers two main Natural England Area Teams; Norfolk, Suffolk, and West Anglia. Within these teams, inside the Shared Standards area, there are 239 Sites of Special Scientific Interest (SSSIs) which have water dependent features. This includes 20 National Nature Reserves, 11 Special Areas of Conservation, 11 Special Protection Areas and 13 Ramsar sites. Of the 239 SSSIs, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach (see section B2). The Shared Standards complement or support the delivery of those measures.

The Written Ministerial Statement (WMS) in 2023 'The Next Stage in Our Long-Term Plan for Housing Update' encourages LPAs to set more stringent standards in Local Plans and in planning permissions 'in areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes'

5. Shared Standards

These [Shared Standards](#) set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, to support Local Planning Authorities (LPAs) to deliver sustainable growth in this area. It has the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England.

The Shared Standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery.

The Shared Standards recommend that LPAs include Local Plan policies that:

- Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of 85-95 litres/person/day (l/p/d) for residential developments is feasible. Annex C provides information on this.
- Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator.
- Require new, for major non-domestic developments to include water saving measures and water reuse in their designs.

6. Other examples of Local Plan policies going beyond the optional building regulations

The following tables sets out what some other Local Plans are doing regarding water use of new dwellings.

Local Plan	Policy requirement	Local Plan progress	Further information
Chelmsford Local plan	POLICY DM25 – SUSTAINABLE BUILDINGS: The Council will expect all new buildings to incorporate sustainable design features to reduce carbon dioxide and nitrogen dioxide emissions, and the use of natural resources, as follows: A) Water efficiency All new dwellings are required to: Achieve a water efficiency standard of 90 litres/person/day	Regulation 19 pre-submission consultation held	Pre Submission Consultation 2025
Castle Point Local Plan	Policy SD9 – Water Supply and Waste Water 1. All new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day. Where it can be demonstrated that this is not feasible part G2 and regulation 36(2)(b) of the Buildings Regulations will apply.	Regulation 19 pre-submission consultation held	castle-point-plan-regulation-19-consultation-july-2025.pdf
Huntingdonshire Local Plan	Draft Policy LP 16 Water Efficiency: A proposal for new residential development will be supported where it can demonstrate that it is designed to utilise no more than 90 litres per person per day of mains supplied/ potable water.	Regulation 18 Preferred Options consultation underway	Preferred Options Draft Local Plan to 2046
Uttlesford Local Plan	Policy CP34 Amend the second sentence of the second paragraph (water efficiency) as follows: All new residential development that achieves should achieve at least a water efficiency standard of 90 litres per person per day will be supported .	Examination / Main Modifications consultation held	MM24: 2025-09-15-ulp-schedule-of-main-modifications-to-the-submission-plan.pdf
Milton Keynes Local Plan	Policy CEA5 Water efficiency: Proposals for residential development must achieve using a fixtures and fittings approach, unless superseded by a more stringent national policy or Building Regulations requirement, a 93 litres per person per day water efficiency standard for mains supplied water/potable water.	Reg 19 (proposed submission) consultation	MK City Plan 2050 FINAL VERSION (Regulation 19) - version to print and publish.pdf

Local Plan	Policy requirement	Local Plan progress	Further information
Greater Cambridge Local Plan	Policy CC/WE - Water efficiency in new developments: All development proposals (with the exception of householder applications) must demonstrate that there will be an adequate water supply available to serve the development. Where development is being phased, each phase must demonstrate sufficient water supply and the provision of the necessary infrastructure prior to occupation of that phase of development. For residential development of 100 or more dwellings, water usage of no more than 80 litres/person/day is required. For less than 100 dwellings a range between 90 & 100 litres/person/day.	Reg 18 consultation underway	Greater Cambridge Local Plan Parts 1-2 & Greater Cambridge Local Plan Parts 4-10
Colchester Local Plan	Policy NZ3: Wastewater and Water Supply: To achieve greater water efficiencies and support demand management, all new buildings must include water efficiency measures. Residential development will be required to meet the water efficiency standard of 80 litres per person per day. Proposals should submit a water efficiency calculator report to demonstrate compliance and include clear evidence on the approach to water conservation.	Reg 18 (preferred options) consultation underway	Colchester City Council - Colchester City Council Preferred Options Local Plan Regulation 18 Consultation 2025
Breckland Local Plan	Policy HOU 17: Water efficiency: All development will demonstrate water efficient design. This is to be achieved by ensuring that: a) New residential development is designed to utilise no more than 85 litres per person per day of mains supplied water / potable water per person per day (l/p/d). b) New, extended or redeveloped non-household* buildings aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) for BREAAAM standard within a minimum score of 3 credits within WAT01 Water Consumption issue category, or an equivalent standard set out in any future update to BREAAAM.	Reg 18 consultation (Preferred Options)	Breckland Local Plan (Regulation 18)

7. Proposed amendments to the Regulation 19 Local Plan policy

It has been proposed by Anglian Water Services, Essex & Suffolk Water and the Environment Agency that policy PUBDM7: Water efficiency and re-use be amended to change 110l/h/d to 90l/h/d: All new residential developments will be required to achieve a water efficiency standard of 90 litres per person per day.

The supporting text would then be amended to explain what would be needed as part of a planning application:

- The 2023 Written Ministerial Statement (WMS) urges local planning authorities in seriously water-stressed areas to adopt stricter water standards in Local Plans and planning permissions. This updates the 2015 WMS, which previously prohibited requiring tighter water efficiency standards than those in the Building Regulations 2010.
- The tighter standard of 90 litres/person/day is in line with the Government's Environment Improvement Plan and Plan for Water and would be controlled by means of a planning condition.
- The applicant will need to submit information to show the water fixtures and fittings they will use to meet 90 l/h/d.
- This water calculator needs to be used and submitted with an application: [Calculator - Unified Water Calculator](#)¹.

Please see amendments to the policy at [Appendix 2](#).

8. Example conditions

A condition will be applied that will require the water use of the fixtures and fittings to be as per that stated in the water calculator submitted as part of the planning application.

The applicant will also need to send in the correspondence with either Anglian Water or Essex and Suffolk Water to demonstrate they had been successful in obtaining the Environmental Incentive (see next section).

If the applicant has decided against the Environmental Incentive approach, they will be required to send in sufficient evidence to demonstrate compliance with the 90l/h/d standard.

¹ The online water calculator table is based on the water efficiency calculator in Part G of Building Regulations - see Appendix A Table A1 [Approved Document G: Sanitation, hot water safety and water efficiency](#)

9. Delivery and implementation

Anglian Water currently offers a Water Environmental Incentive Scheme of £500 per property to achieve 90 l/p/d; this environmental incentive can be found [here](#). If the application for details and fittings meet the criteria to meet 90 l/p/d Anglian Water will undertake site audits post construction and pre-occupation - by scheduling a visit by one of their Development Service Technicians to visit the site and complete an audit - once this is passed, then a payment of the incentive amount will be paid as a credit against the infrastructure charge. The applicant would need to send in the correspondence to demonstrate they had been successful in obtaining the Environmental Incentive.

Essex & Suffolk Water's current developer charges are here: [Developer services charges](#). Household properties may be eligible for a 100% discount against the infrastructure charge if it meets our criteria, set out in accordance with OFWAT's Environmental Incentives Common Framework. This is designed to encourage new developments to achieve more water-efficiency standards and encourage sustainability. Developers must demonstrate that the properties have been fitted to achieve a consumption of no more than 100 litres per person per day² and that installed fittings do not exceed the maximum consumption set out in the below column under 'Common Environmental Incentive'. ESW may audit a sample of properties to verify that submitted information matches the fittings installed at the property. The applicant would need to send in the correspondence to demonstrate they had been successful in obtaining the Environmental Incentive.

10. Viability of 90 litres per head per day

We asked the Local Plan viability consultants to assess the impact of 90l/h/d water usage on viability. They conclude that: *The impact of the additional cost involved in moving to water demand equivalent to 90 litres per head per day has minimal impact on viability. The results of the sensitivity testing do not change any of the conclusions set out in chapter 7 of the Local Plan Viability Assessment.*

The assessment of 90l/h/d can be found at Appendix 3.

Annex C of the [Shared Standards](#) discusses the issue of viability and the cost impact of going beyond 110l/h/d water use and this generally matches the assessment of the viability consultants.

² Essex & Suffolk Water are currently working on new environmental discounts, and they will be in place at the beginning of next year for implementation in the new financial year (April 2026).

Appendix 1: Comments received as part of the first Regulation 19 consultation

Comment received Anglian Water Services, Essex & Suffolk Water and Environment Agency in relation to PUBDM7:

Anglian Water considers the policy is SOUND in principle, however, with the publication of the Shared Standards for Water Efficiency in Local Plans, we are now advising local planning authorities to introduce tighter water efficiency standards using the evidenced approach. Given The Broads Local Plan is at an advanced stage, we are mindful that the Shared Standards represents a step change, but the Shared Standards would provide the evidence required to support the policy specification "any higher standards established ... locally".

The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery.

We recommend that LPAs include Local Plan Policies that:

- Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible.
- Require new, extended or redeveloped non-domestic¹ development to aim to achieve full credits in the BREEAM water calculator.
- Require new major non-domestic developments to include water saving measures and water reuse in their design.

These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. It is considered that a modification to Policy PUBDM7 can help make development in The Broads more water efficient and allow sustainable growth, whilst

longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives.

It is recognised that the Broads Local Plan is at an advanced stage in its preparation, but this consultation provides an opportunity to include a tighter water efficiency standard that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that:

- The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations. There are non-domestic water restrictions in both Anglian Water and Essex & Suffolk Water areas which are referenced in the supporting text to Policy PUBDM7.
- Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. The Norwich and the Broads water resource zone (WRZ) is identified as one of the WRZs with deterioration risk as a result of abstraction pressures.
- At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs. For example, Anglian Water offer a £500 incentive for residential properties that achieve a water efficiency standard of 90 l/p/d which would be within the shared standards water efficiency parameters of 85-95 l/p/d suggested for Local Plan policies. These incentives can support the viability of delivering water efficiency measures.

Based on the Shared Standards introducing a 'locally established water efficiency standard', Policy PUBDM7 could be modified to reflect the recommendations in the Shared Standards. Whilst the overall level of development in The Broads is low, it is considered the evidence set out in the Shared Standards is clear that tighter water efficiency standards are necessary for sustainable growth and nature recovery, which supports the National Park purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks, and the long term vision and fundamental principles for the Broads National Park in the Broads Plan 2022-2027.

Appendix 2: Amendments to Local Plan policy

It is proposed that the policy as amended as follows. This reflects all comments made on PUBDM7.

Policy PUBDM7: Water efficiency and re-use

1. All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to ~~110~~ 90 litres per head per day of mains supplied potable water or any tighter water efficiency higher standard subsequently established nationally through Building Regulations or locally. Measures to reduce water demand further will be encouraged and supported. If 90l/h/d is proven as not viable or practicable, then a standard between 90l/h/d and 110l/h/d is expected.
2. All new/replacement/converted or extended buildings are required to incorporate greywater recycling³ and rainwater harvesting⁴ unless it is not feasible to do so.
3. Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to ~~be~~ include water efficient fittings.
4. All new/replacement/converted non-domestic buildings are required to be designed to be water efficient. Policy PUBDM55 may be of relevance.
5. Planning applications need to include sufficient detail as to the intended standard and set out the measures to be incorporated to enable compliance. A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:
 - a) Baseline information relating to existing water use within a development site; and
 - b) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling).
6. Prior to the first occupation of development a completion certificate shall be submitted to the Local Planning Authority confirming the design standard under part 1 has been verified and fully implemented.

Reasoned Justification

All new homes must meet the mandatory national standard set out in the Building Regulations (125 litres/person/day). The NPPG says *'Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the*

³ Greywater recycling is the appropriate collection, treatment and storage of wastewater discharged from kitchens (tap water or dishwasher water), baths or showers, to meet a non-potable water demand in the building, such as toilet flushing, washing machine cycles, outside tap or other non-potable water-compatible use.

⁴ Rainwater harvesting systems are the appropriate collection and storage of rainwater run-off from hard outdoor surfaces (e.g. roofs) to meet a non-potable water demand in the building or garden, such as toilet flushing, washing machine cycles, outside tap/watering plants or other non-potable water-compatible use. Rainwater harvesting may also be possible to design into a site's sustainable drainage system (SuDS) ([see the policy on surface water run-off](#)).

tighter Building Regulations optional requirement of 110 litres/person/day⁵. This is noted and was the standard in the 2019 Local Plan for the Broad. But this ~~The~~ policy seeks ~~110~~ 90l/h/d (litres per head per day) and the reasons for this are set out in the ~~Local Infrastructure Study~~ Water usage 90l/h/d Topic Paper (2025) and summarised below⁶.

The Water Stressed Areas Classification (Environment Agency, 2021)⁷ summary table shows that the areas of Essex & Suffolk Water and Anglian Water are water stressed.

The 2023 Written Ministerial Statement (WMS) urges local planning authorities in seriously water-stressed areas to adopt stricter water standards in Local Plans and planning permissions. This updates the 2015 WMS, which previously prohibited requiring tighter water efficiency standards than those in the Building Regulations 2010.

The tighter standard of 90 litres/person/day is in line with the Government's Environment Improvement Plan and Plan for Water. <<the emerging NPPF (PM13 b ii) refers to 'or exceptionally a more stringent local standard in areas of serious water stress' and this could be referred to in the final policy>>

There is clear support from Anglian Water and Essex and Suffolk Water in adopting this water efficiency and re-use approach. Demand management, such as reducing leakage, and encouraging customers to use less water is an important component of Water Resource Management Plans and helps to ensure that there will be sufficient water resources for future population growth, coping with the impacts of climate change, and to ensure a healthy and flourishing environment.

Anglian Water have advised that they can no longer guarantee to supply non-domestic water requirements for intensive/high water consumptive uses such as manufacturing/ food processing and production, due to water supply being squeezed by abstraction reduction, climate change and a fast-growing population. Therefore, where new and unplanned non-domestic requests are received, which exceed 20,000 litres per day (0.020 Ml/d) (this may be less, dependent on the availability of water in that area) Anglian Water will need to decline the request for more water in order to protect existing supplies and the environment. Their regulatory position means they are unable to supply new non-domestic demands if this jeopardises domestic supplies for existing and new residential customers and businesses.

⁵ The 'optional' enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency' March 2015, page 15, G2(3). At 2015 this is defined as consumption 110 litres per person per day to be demonstrated [Sanitation, hot water safety and water efficiency: Approved Document G - GOV.UK \(www.gov.uk\)](#)

⁶ [Broads Local Plan: Local Infrastructure Study \(pdf | broads-authority.gov.uk\)](#) xxxxxx

⁷ [Water stressed areas – 2021 classification - GOV.UK \(www.gov.uk\)](#)

Similarly, Essex & Suffolk Water also advise that businesses should not assume that Essex & Suffolk Water can meet all new non-domestic water demand in the Blyth or Northern Central Water Resource Zones.

Delivery and implementation of the policy

If Government policy or legislation relating to water use of dwellings becomes more stringent, or at significant variance with above, after the adoption of this plan, the most stringent standard will be adopted.

The applicant should contact the relevant water company to find out if they require a water resources assessment for new non-domestic supplies and if they offer environmental incentive schemes to fund water efficiency measures in new developments.

As part of the planning application, the applicant will need to submit information to show the water fixtures and fittings they will use to meet 90 l/h/d. This water calculator needs to be used and submitted with an application: [Calculator - Unified Water Calculator](#)⁸.

The 90l/h/d standard will be controlled through a planning condition. A condition will be applied that will require the water use of the fixtures and fittings to be as per that stated in the water calculator submitted as part of the planning application. The applicant will also need to send in the correspondence with either Anglian Water or Essex and Suffolk Water to demonstrate they had been successful in obtaining the Environmental Incentive⁹. If the applicant has decided against the Environmental Incentive approach, they will be required to send in sufficient evidence to demonstrate compliance with the 90l/h/d standard.

New development needs to incorporate measures to minimise water consumption. Water management systems, including grey water recycling and rainwater harvesting, should be incorporated into new development unless proven unfeasible.

The Authority will consider site constraints, technical restrictions, financial viability, and the delivery of additional benefits to the Broads where requirements of the policy cannot be

⁸ The online water calculator table is based on the water efficiency calculator in Part G of Building Regulations - see Appendix A Table A1 [Approved Document G: Sanitation, hot water safety and water efficiency](#)

⁹ **Anglian Water** currently offers a Water Environmental Incentive Scheme of £500 per property to achieve 90 l/p/d; this environmental incentive can be found [here](#). If the application for details and fittings meet the criteria to meet 90 l/p/d Anglian Water will undertake site audits post construction and pre-occupation - by scheduling a visit by one of their Development Service Technicians to visit the site and complete an audit - once this is passed, then a payment of the incentive amount will be paid as a credit against the infrastructure charge. The applicant would need to send in the correspondence to demonstrate they had been successful in obtaining the Environmental Incentive.

Essex & Suffolk Water's current developer charges are here: [Developer services charges](#). Household properties may be eligible for a 100% discount against the infrastructure charge if it meets our criteria, set out in accordance with OFWAT's Environmental Incentives Common Framework. This is designed to encourage new developments to achieve more water-efficiency standards and encourage sustainability. Developers must demonstrate that the properties have been fitted to achieve a consumption of no more than 100 litres per person per day⁹ and that installed fittings do not exceed the maximum consumption set out in the below column under 'Common Environmental Incentive'. ESW may audit a sample of properties to verify that submitted information matches the fittings installed at the property. The applicant would need to send in the correspondence to demonstrate they had been successful in obtaining the Environmental Incentive.

met. The Authority will expect developers to make a case on a site-by-site basis. If 90l/h/d is proven as not viable or practicable, then a standard between 90l/h/d and 110l/h/d is expected.

Major non-household developments that require significant non-domestic water use need to liaise with the relevant water company about availability and produce a Water Resource Assessment which shall be shared with the relevant water company as any application is considered.

Policy PUBDM55 may be of relevance for some non-domestic schemes. That policy sets a BREEAM standard and emphasises the importance of meeting water calculator credits through that standard.

Also see [open space policy \(PUBDM10\)](#) – this states that artificial pitches that are designed to require water will not be permitted. Other new pitches that require watering will need to demonstrate how water will be supplied and used sustainably.

And in terms of landscaping, the [landscape section](#) states: to reflect that the East of England is an area of water stress, new landscaping/planting is expected to follow sustainable planting principles and be adaptive to climate change and be water-smart: using plants that are not dependent on additional watering/do not require a large amount of water.

This guide may be of use to applicants: [Developing water efficient homes \(pdf | watersafe.org.uk\)](#). So too could the Norfolk and Suffolk 'Reclaim the Rain' project: [Reclaiming the Rain \(reclaimtherain.org\)](#). More details on implementing the policy are included in [Appendix 5](#).

for within build costs and plot costs for the viability modelling.

Since publication of the LPVA and in response to an evidence report on water stressed areas which was produced by a number of water authorities, including Anglian Water,

[Shared Standards in Water Efficiency for Local Plans June 2025](#) the BA has asked for further viability information regarding the impact of moving to water demand equivalent to 90 litres per head per day.

Cost assumptions for water efficiency

Again this is a cost that can be met through a fittings-based approach. The Water Ready report (table 3) shows how this can be achieved with costs ranging from £1,000 to £3,000 per dwelling. **We have assumed that a mid-point of £2,000 is reasonable.** This is a similar approach as taken by Chelmsford Council in their recent [Viability Update Note November 2024](#) paragraph 5.24, although we note this has not yet been through examination.

As a comparison, the adopted Crawley Borough Council Local Plan, sets out through Policy SDC4 that all new residential development within the 'Sussex North Water Resource Zone (WRZ)' "is designed to utilise no more than 85 litres of mains supplied water per person per day". The policy was supported at examination by a [Topic Paper May 2023](#), which references the Sussex Water Neutrality Assessment (Part C Strategy December 2022) and provides costs to achieve a 85l/p/d standard: "A fittings-based approach would cost between £349 and £431 per dwelling. Where appliances (i.e. dishwashers and washing machines) are not part of the standard fit-out this cost range would increase to £1,049 to £1,531 (representing the additional cost of supplying appliances specified to the required water-efficient standard)".

Applying a [CPI increase of 2.3%](#) to the Crawley costs (covering the period between the 2 reports) would take the upper range to between £441 and £1,566 per dwelling, depending on whether appliances were provided as standard. Noting that anecdotal evidence suggests that appliances are usually supplied by the developer, these figures are below those taken from the Water Ready report, demonstrating our cautious approach.

Under the [Water Environmental Incentive Scheme](#) various incentives are offered by the water companies to developers (£500 per dwelling by [Anglian Water Company](#) for each eligible plot built by a developer that achieves 90 l/p/d for example – from April 2025). We have not allowed for an incentive in our sensitivity modelling because the amounts are variable and not necessarily guaranteed, however, in practice, some incentive is likely to be available to reduce the overall cost.

Impact on viability

The results of the original viability modelling can be found in the LPVA tables 5.1 for non-waterfront locations and 5.2 for waterfront locations. Sensitivity modelling where affordable rented units were changed to social rent can be found at table 5.4. All **typologies demonstrate strong viability with sufficient headroom to absorb the additional cost for water efficiency of 90 l/h/d**. The exceptions to this are the 1-unit typology which is not viable in any speculative circumstances and the 3-unit typology which is marginally non-viable on brownfield land in non-waterfront locations with social rented affordable dwellings (but viable with affordable rent).

As a further sensitivity test, we have taken 3 sample typologies and cash-flowed the additional cost. We have taken non-waterfront locations on brownfield land where, although results fully supported the BA draft policies, viability was lower than on waterfront or greenfield typologies. Discounting the 1-unit typology, we have included the least viable typology, 3-units, as well as the largest typology (100 units) and the 12- unit typology which is just above the 10-dwelling threshold. The results, on a per unit basis, with differing affordable rented tenures, are shown in the table below.

Table 1: results of water efficiency modelling to 90 l/h/d – residual value per unit for brownfield land in non-waterfront locations (rounded)

Ref	Units	Original result	With water efficiency measures
Res 2 - AR	3	£7,800	£5,700
Res 2 - SR	3	-£700	-£2,700
Res 5 - AR	12	£43,300	£41,200
Res 5 - SR	12	£35,400	£33,300
Res 7 - AR	100	£46,700	£44,700
Res 7 - SR	100	£38,500	£36,400

AR = affordable rent / SR = social rent

The results show reduced viability but, in all circumstances, viable typologies remain viable and deliverable. The 3-unit typology with social rented units produces marginally non-viable results but the viability of the same scheme with affordable rented units shows that a small adjustment to the housing mix could ensure viability. In fact, the additional cost per typology represents between 0.63% and 0.7% of scheme GDV.

Conclusion

The impact of the additional cost involved in moving to water demand equivalent to 90 litres per head per day has minimal impact on viability. The results of the sensitivity testing do not change any of the conclusions set out in chapter 7 of the LPVA.

Appendix 2 – Second Regulation 19 Local Plan consultation responses

Rep #	Name:	Organisation/Group:	Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
1	Chris Waldron	Defence Infrastructure Organisation	Policy PUBDM21: Renewable and low carbon energy	-	-	-	<i>In response to the second Regulation 19 consultation.</i> The MOD notes and welcomes the provision within Policy PUBDM21: Renewable and low carbon energy General principles– “6. Proposals shall not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets. 7. The authority shall also consider the impact of proposals on air traffic safety, radar, reflected light and telecommunication, water quality and water resources.”	In addition the MOD recommend, in order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, Broads Authority should include at future stages of the Local Plan, policy wording that makes clear that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.	Noted. This is already in the policy at part 6.	No change proposed.
2	Chris Waldron	Defence Infrastructure Organisation	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> The area covered by any Broads Authority Local Plan Review Plan period 2021 to 2041 consultation will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of RRH Neatished and the East Wide Area Multilateration (WAM) Network. Eastern WAM Network is a new technical asset, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through Broads Authority Local Plan review preferred options area of interest. Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address.	None	Background information noted. We will check our GIS system.	No change proposed.
3	Chris Waldron	Defence Infrastructure Organisation	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> A number of the policies within the site-specific area in the Broads Authority Local Plan fall within statutory safeguarding zones, with areas of land that have been identified as having potential for mixed development but offers no specifics. As such the MOD is unable to provide any detailed advice in relation to specific safeguarding criteria that would apply to any potential development sites. At such time as more detail on the location and extent of potential development sites becomes available the MOD would be able to provide more detailed responses. The MOD should be consulted on any development that triggers statutory consultation requirements.	None	Comment noted.	We will check our GIS system and ensure DM Officers are aware of the trigger.

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4	Clare Howe	Sport England	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> I have received the consultation on the additional information being consulted on regarding the Sustainability Appraisal. Having reviewed the changes in bright pink, Sport England have no further comments to our comments raised previously at Reg 19.	None	Noted.	No change proposed.
5	-	Active Travel England	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Since 1st June 2023 ATE has been a statutory consultee on all planning applications for new developments that meet or exceed one or more of its application thresholds. This statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive. However, ATE has commissioned an independent review of its planning service and undertook a Local Plan Discovery Project to scope out opportunities for ATE's involvement in local plans in the future. ATE is currently considering the recommendations from this work. Should there be any changes to ATE's role in plan-making then Local Planning Authorities will be advised in writing.	None	Noted.	No change proposed.
6	Andrew Marsh	Historic England	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Thank you for consulting us on the Local Plan for the Broads - Regulation 19 version, again. As the Government's adviser on the historic environment, Historic England is keen to ensure that its protection is fully considered at all stages and levels of the local planning process. We therefore welcome the opportunity to comment on these proposals. I can confirm that while we do not have any further comments to make at this stage, we would be interested in receiving future consultations on this and related projects.	None	Noted.	No change proposed.
7	Martin Thirkettle	Broads Society	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> I can confirm that the Broads Society has no further comments to make at this stage.	None	Noted.	No change proposed.
8	Pauline James	Acle Parish Council	Policy PUBACL1: Acle Cemetery extension	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Acle Parish Council supports the two site specific policies that concern Acle. Both sites are very much needed for the village.	None	Noted.	No change proposed.
9	Pauline James	Acle Parish Council	Policy PUBACL2: Acle Playing Field extension	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Acle Parish Council supports the two site specific policies that concern Acle. Both sites are very much needed for the village.	None	Noted.	No change proposed.
10	Steve Gower	Norfolk Constabulary	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Provided some detailed advice. Generally content with how the Local Plan refers to crime prevention.	None	Noted. Will pass on detailed information to Development Management colleagues.	No change proposed.
11	Philip Porter	National Highways	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> The letter does just say we have no further comment to our original response, so you can rely on the first response dated 15 September 2025.	None	Noted.	No change proposed.

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12	Chris Balls	-	Policy PUBSP13: Navigable water space	-	-	-	<p><i>In response to the second Regulation 19 consultation.</i> Whilst legally compliant I feel there needs to be more consideration of the potential for restoration of more commercial use of the waterways by shipping and cross river ferries etc. Autonomous technology could make this economically viable in the medium term future and integrated transportation strategy needs to consider both current and future needs. Inappropriate developments could hinder these potentially environmentally and socially friendly developments difficult. e.g. lack of dredging, removal of moorings. Must ensure the Norwich Navigation rights are maintained with Norwich still designated as a port. Automation is already seeing a return to smaller ships in Europe as well as on demand small foot ferries, in time this could easily be adapted to the Broads</p>	<p>I feel the Navigation and other related legal responsibilities (including environmental shipping legislation) needs more mention as waterways are navigable by Internationally trading (and Pleasure) vessels which comply with a reasonably high International Standard that does not always directly translate to local regulation but is reasonable to consider equivalent. Similar could possibly be said for foreign road vehicles.</p>	<p>We would tend to support appropriate, safe use of the waterways. The ferries that operate offer a service that is welcomed and they do so in a safe and appropriate way. It is down to individual businesses and organisations to investigate using the water to transport freight and we would be open to working with them on their proposals. The Integrated Access Strategy supports improvement and expansion of access points for ferries. Purely from the position of the Authority facilitating access for vessels and our approach to commercial freight on the rivers. the Authority's Safety Management System, describes the Authority's responsibilities as part of the Port Marine Facilities Safety Code. The SMS includes a dedicated section on "Management of Hydrography", covering dredging, tidal flows, navigation channels, and aids to navigation. This underpins continual surveys and maintenance essential for regular freight access. As there is currently no commercial freight, or future plans for such river traffic, the Authority's maintenance dredging is optimised for the current recreational traffic (see Waterways Management Strategy for more details). If schemes to re-introduce commercial freight were proposed, then the hydrographic regime and provision of commercial mooring on private land would be considered at that time. In terms of the Local Plan, Policy PUBDM38: Access to the water says: 3. Development proposals for new freight wharves and for the provision of freight interchange on brownfield sites adjacent to the navigation will be permitted where these are in accordance with the other policies of the Local Plan. And then in the supporting text to that policy: The waterways of the Broads have the potential to provide a sustainable and efficient mode of transporting freight. However, it is important that the use of waterways for this purpose does not affect the special qualities of the Broads. Consequently, proposals for infrastructure to support the greater use of the waterways by freight will be permitted if they do not have an adverse impact on landscape character, biodiversity, dark skies, tranquillity or other people's enjoyment of the Broads. Also, in terms of Cantley Sugar Beet Factory, the use of water is considered in that policy: PUBCAN1.</p>	No change proposed.
13	Alex Jessop	Suffolk Wildlife Trust	Policy PUBDM16: Biodiversity Net Gain				<p><i>In response to the second Regulation 19 consultation.</i> With specific regard to Section 1 of Policy PUBDM16; There is currently no clear guidance which states that a local authority cannot include required net gain above the minimum statutory level of 10%. 20% has widely been shown to offer greater confidence in delivering a gain (whereas 10% is the minimum level to have confidence in no net loss). Suffolk Wildlife Trust have long advocated for plans in Suffolk to include a minimum 20% policy and support the Broads Authority in including this in their vision for the Broads.</p>	<p>We do not think a change is necessary. However, should it be necessary to change the wording of the plan to remove the requirement for delivery of 20% then we would support and encourage the plan to read that an "ambition to deliver 20% net gain should be evident" or similar.</p>	Support noted.	No change proposed.
14	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBSP15 – Residential Development	yes	yes	-	<p><i>In response to the second Regulation 19 consultation.</i> The Borough Council previously expressed their support through the previous Broads Local Plan Regulation 19 Consultation for the objectively assessed housing need from the part of the Broads within the Borough likely needing to be met in those parts of the borough outside of the Broads, in accordance with Agreement 13 of the Norfolk Strategic Planning Framework (NSPF), and reiterated through the 2025 Statement of Common Ground between the Broads Authority and Great Yarmouth Borough Council.</p>	Not seeking changes	Support noted.	No change proposed.

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15	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBFLE1 – Broadland Sports Club	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation that they are keen to support the continued use and potential improvement to Broadland Sports Club as a health and wellbeing facility that supports the area. The Council maintains their support for Policy PUBFLE1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV1, ENV3, ENV4, ENV7, SOC4 and ENV6, and the stronger wording around walking, cycling, car parking and light pollution in comparison to the 2019 Local Plan policy.	Not seeking changes	Support noted.	No change proposed.
16	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBGTY1 – Marina Quays (Port of Yarmouth Marina)	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation that they would support the re-use and enhancement of the space for river and other leisure activities where compatible with the flood risk of the site, particularly as this site benefits from planning consent. The Council maintains their support for Policy PUBGTY1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV10, EV11, SOC4 and SOC6 and SOC8.	Not seeking changes	Support noted.	No change proposed.
17	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBORM1 – Ormesby Waterworks	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support of the protection of Ormesby Water treatment works from development which may adversely affect the proper functioning of the water works, and its contribution to the landscape and visual amenity of the locality. The Ormesby waterworks provide much of the public water supply to the Great Yarmouth Borough, and the upgrading and maintenance of these works are important in supporting economic and population growth in the Borough. The Council maintains their support for Policy PUBORM1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV2, ENV3, ENV4, ENV10, ENV11 and SOC4.	Not seeking changes	Support noted.	No change proposed.

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18	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBTHU1 - Tourism development at Hedera House, Thurne	yes	yes	-	<p><i>In response to the second Regulation 19 consultation.</i></p> <p>The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support for the allocation of the site for tourism uses and a proportionate amount of general market housing enabling development. The Borough Council recognises that the allocation may assist in supporting the small-scale range of services and facilities within Thurne (including the Local convenience store and public house. Whilst Policy PUBTHU1 is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV3, ENV4, ENV7, ENV10, ENV11 SOC1, SOC4 and ECO1 it was assessed as having a negative impact on objectives ENV1 and SOC6. The policy rated negative in terms of access to services and facilities as well as impact on roads due to likely single occupancy car use. However, THU1 was allocated in the 2014 Sites Specifics Local Plan by the Inspector, and the allocation has been rolled forward into the subsequent Local Plan and now benefits from planning permission. The Sustainability Appraisal shows that the overall impact of the policies in combination as positive and subsequently the council maintains its support for PUBTHU1.</p>	Not seeking changes	Support noted.	No change proposed.
19	Sunny Raggett	Great Yarmouth Borough Council	PUBSSTRACKS – Former Rail Trackways	yes	yes	-	<p><i>In response to the second Regulation 19 consultation.</i></p> <p>The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support for the Policy and its potential to expand and integrate the networks of paths, cycleways, and bridleways which benefits residents and visitors whilst considering impacts on habitats sites, as well as seeking development to deliver the tracks. The policy would align with adopted Policy GSP7 of the Great Yarmouth Local Plan Part 2 (and emerging Policy SUT1 of the publication final Local Plan) by seeking to use former rail trackways to provide a link between Bradwell, Belton and areas outside of the borough to the south-west. The Council maintains their support for Policy PUBSSTRACKS, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV1, ENV3, ENV4, SOC1 and ECO3.</p>	Not seeking changes	Support noted.	No change proposed.

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20	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBSSA47 – Road Schemes on the Acle Straight (A47)	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously noted within the previous Broads Local Plan Regulation 19 Consultation the provision of a Policy that would be used to assess proposals for changes to the Acle Straight. Realising the full dualling of the Acle Straight continues to be a key ambition of the Borough Council and is critical to the long-term health of industries and job growth in the borough, which are of importance to the wider and national economy. The Borough Council welcomed the potential identification of a strategic cycling route between Acle and Great Yarmouth, as required to be considered by criterion '8' of the Policy. The Council acknowledges the emphasis placed on climate change resilience, and notes the overall positive impact on objectives ENV1, ENV2, ENV3, ENV4, ENV5, ENV6, ENV9, ENV10 and ENV11 in the Sustainability Appraisal.	Not seeking changes	Support noted.	No change proposed.
21	Joe Wyatt	Norfolk County Council LLFA	Sustainability Appraisal	-	-	-	<i>In response to the second Regulation 19 consultation.</i> In NTSS and in 2.3, the SA lists the special qualities of the Broads. However, it is noted that the flood risk management the Broads provide has not been listed despite it being a key benefit.	The text should be amended to include the Broads as a flood risk management asset. Further work is recommended.	Comment noted. The 'parent' document for the identification of the special qualities of the Broads is the Broads Plan. This is the Management Plan for the Broads. The Local Plan for the Broads links to the current Broads Plan and includes the special qualities of the Broads that are identified. It will be for the LLFA to raise this comment as and when the Broads Plan is reviewed and consulted on.	No change proposed.
22	Joe Wyatt	Norfolk County Council LLFA	Sustainability Appraisal	-	-	-	<i>In response to the second Regulation 19 consultation.</i> In section 2.6, the LLFA notes that flood risk is not listed but water is.	Please confirm whether flood risk is included in the water point or whether this is water quality.	This list is taken directly from the The Environmental Assessment of Plans and Programmes Regulations 2004 Statutory Instrument, Schedule 2. You will note that the SA objective ENV6 refers to flood risk.	No change proposed.
23	Joe Wyatt	Norfolk County Council LLFA	Sustainability Appraisal	-	-	-	<i>In response to the second Regulation 19 consultation.</i> The non-technical phase "rain bursts" should be replaced with "intense rainfall events" such as in section 5, in the climate change subsection.	Replace 'rain bursts' with 'intense rainfall events'	This is in the Local Plan and SA. The term rain bursts is exactly that - non technical. But we can change it.	Replace 'rain bursts' with 'intense rainfall events'.
24	Joe Wyatt	Norfolk County Council LLFA	Sustainability Appraisal	-	-	-	<i>In response to the second Regulation 19 consultation.</i> In Appendix 10, there is clear overlap with text produced in the Local Plan.	The LLFA is aware that the text in the Local Plan is being updated but it is not clear whether the text in the SA is going to be updated to match the text in the local plan. Clarification is requested.	Yes, the list is copied from the Local Plan. So it reflects the Local Plan. The SA assessing the main modifications that are agreed through the Local Plan process and then consulted on is yet to be produced, but the REG19 number 2 will form the basis for the SA and will be checked to ensure it is up to date.	No change proposed.
25	Sandra Squire	Forestry Commission	Policy PUBDM15: Natural Environment	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Under "Biodiversity enhancements and wildlife friendly features" the first bullet point mentions "expecting as the norm, planting of native species". We would recommend this wording be changed to "planting of native species in areas predominantly laid out for biodiversity and wildlife (as opposed to amenity)". This is because the wording as it is would conflict with the "delivery and implementation" section on policy PUBDM19, especially sections 6a, 6e, 6f & 6j.	As stated above, change "expecting as the norm, planting of native species" to "planting of native species in areas predominantly laid out for biodiversity and wildlife (as opposed to amenity)"	The supporting text for PUBDM15 does not need to change to include ...'predominantly laid out for biodiversity and wildlife'. The policy is about the requirement for all development to provide biodiversity enhancements and clearly states that these will reflect the specifics of the site. Use of native species should be encouraged across all aspects of a development. The reported clash with PUBDM19 is suggesting that the use of native species doesn't allow for the stated use of climate resilient species, but we don't think these are mutually exclusive. There are native species that are more drought tolerant, hardy to changing conditions etc. We think PUBDM19 needs to include the wording 'native species' – then we are linking the two.	Amend PUBDM19 to refer to native species.

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26	David Barker	Evolution Town Planning	Supporting text of policy PUBDBM46 New Residential Moorings	Yes	No	Positively Prepared; Justified:	<p><i>In response to the second Regulation 19 consultation.</i> The Estate has recently found delivering the residential moorings more complex as the application has progressed. This is because of the local planning authority's interpretation of the supporting text of the residential moorings policy which is making it more difficult to deliver residential moorings. This text is similar in the existing and proposed Local Plans, hence the need for these representations in order to provide clarity. In the supporting text of the emerging Local Plan under the sub heading 'Definition of a Residential Mooring and what can moor there,' it states that the vessel will be used as the 'main residence.' This is a significant restriction on the property rights of those using residential moorings as it prevents letting or other such activities which are commonly allowed for other homes unless there are exceptional circumstances.</p>	<p>For the purposes of this policy, a 'residential mooring' is a mooring where someone lives aboard a vessel, the vessel is capable of navigation, where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base. For the purposes of this policy, it should be noted that there is an expectation that the moorings will be occupied by a vessel of standard construction and appearance, and which is conventionally understood to be a boat. The residential mooring relates to how the land is used and not necessarily to a specific boat.</p>	<p>The proposed change in wording could result in residential moorings being used as second homes or holiday homes. The purpose of them is to be lived in as a form of residential accommodation as per the Planning and Infrastructure Act 2016. Whilst not addressing this comment, but a reflection of this comment, it is proposed to amend the definition slightly as well as refer to the issue of main residence in the policy.</p>	<p>Amend definition as follows; For the purposes of this policy, a 'residential mooring' is a mooring where someone lives aboard a vessel <u>as their sole and principal residence and</u> the vessel is capable of navigation, where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base.</p>
27	David Barker	Evolution Town Planning	Supporting text of policy PUBDBM46 New Residential Moorings	Yes	No	Positively Prepared; Justified:	<p>This creates problems for the Estate Trustees finding people to occupy the moorings as it imposes a significant restriction on the homes. This is not a type of restriction proposed on bricks and mortar homes which may be built in the Broads area. It is not a restriction proposed by East Suffolk on homes allowed in Somerleyton village. There is no justification given in the Local Plan why this significant restriction is required. If it is intended to help deliver moorings as the Council has suggested in discussions on the planning application, then it has the opposite effect. For full representation, see Appendix A below.</p>	<p>See above</p>		<p>Amend part 9 of the policy as follows; Conditions will be used to restrict the number, scale and size of boats using the residential moorings. A management plan for the site and a register of those who live on boats will be required and will be covered by a planning condition imposed on any planning permission granted. A condition will also be used to ensure the vessel will be the sole and principle residence of the occupier.</p>
28	David Barker	Evolution Town Planning	Supporting text of policy PUBDBM46 New Residential Moorings	Yes	No	Positively Prepared; Justified:	<p><i>In response to the second Regulation 19 consultation.</i> The second point of objection is the supporting text which states that: 'the Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.' This is unsound and cannot be done as at the point a planning application is submitted it is impossible to know what the boats who will use the mooring over its lifetime will look like.</p>	<p>Remove this text: The Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.</p>	<p>Disagree. The Authority is aware of some plans to have buildings on pontoons or rafts to be what is moored at residential moorings and these are contrary to flood risk policy. Hence the requirement to confirm what is intended to be moored at the residential moorings.</p>	<p>No change proposed.</p>

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29	Alasdair Hain-Cole	Environment Agency	Policy PUBDM7: Water efficiency and re-use	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We note that Appendix 11 (“Explanation why reasonable alternatives were not taken forward”) refers to Policy PUBDM7: Water efficiency and re-use as requiring a 110l/h/d standard. In a Statement of Common Ground relating to Environment Agency comments made as part of the first Regulation 19 consultation, the Broads Authority have since agreed to amend the use to 90l/h/d for consideration through the Examination. Regardless, this does not affect the Sustainability Appraisal’s assessment of Policy PUBDM7, and that a policy for a tighter water standard “is considered needed”.	Seeks 90l/h/d water use.	See 90l/h/d Topic Paper.	See 90l/h/d Topic Paper.
30	Alasdair Hain-Cole	Environment Agency	Duty to Cooperate	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Following the government’s announcement that the Duty to Cooperate will not form part of the new regulations for the plan-making system expected in 2026, we would like to state our satisfaction with the level of cooperation and engagement provided by the Broads Authority over the course of this Local Plan production period. We are committed to maintaining this relationship in the future.	Not seeking changes	Support noted.	No change proposed.
31	Brian Wilkins	Norfolk and Suffolk Boating Association	Sustainability Appraisal	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We failed to find any reference in the Sustainability Assessment, to the most sustainable form of transport on the Broads, and the most sustainable form of tourism, which is transport by engineless boat propelled by the harnessing of wind and tide. We consider that this ought to feature in your SA, because: <ul style="list-style-type: none"> •Sailing is one of the most important elements of the cultural heritage of the Broads, as set out in sections 7.10 and 7.11 of the Local Plan. •The Navigation, and Boating on the Broads is why there is special legislation for the Broads – The National Parks Act could not apply to the Broads because of the Navigation. •Boating is a very major consideration – Toll income from boat owners amounts to well over half of the Broads Authority’s regular annual income. •Encouragement of sailing, making passage under sail, and sail training, appear to be appropriate to policies SOC1, SOC3, ENV7, ENV11 and ENV12? 	No change proposed.	This is noted, but sailing itself is not a land use. The Local Plan relates to land use. There are policies that relate to navigation and moorings and stabilisation and residential moorings and tourism. The Local Plan gives general support to use of the water by all types of boats. So the general thrust of the comment is addressed. No specific wording is provided.	No change proposed.
32	Brian Wilkins	Norfolk and Suffolk Boating Association	Section 9 of Local Plan	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We suggest amending, under Strengths, page 31 Item n), “Substantial engaged community of private boat owners”	Amend to “Substantial engaged community of private boat owners, <u>many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors</u> ”.	Agree.	Amend to “Substantial engaged community of private boat owners, <u>many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors</u> ”.

Rep #	Name:	Organisation/Group:	Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
33	Brian Wilkins	Norfolk and Suffolk Boating Association	Policy PUBSP13: Navigable water space	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We endorse the draft policies PUBSP13: 'Navigable water space' and PUBDM38: 'Access to the water'.	Not seeking changes	Support noted.	No change proposed.
34	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM38: Access to the water	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We endorse the draft policies PUBSP13: 'Navigable water space' and PUBDM38: 'Access to the water'.	Not seeking changes	Support noted.	No change proposed.
35	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM41: The impact of replacement quay heading on navigation.	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We strongly endorse the content, as proposed, of policy DM41, 'The Impact of replacement quay headings on the Navigation', to prevent extensions of the shoreline from extending into the waterspace, adverse to the Navigation.	Not seeking changes	Support noted.	No change proposed.
36	Brian Wilkins	Norfolk and Suffolk Boating Association	Policy PUBDM40: Moorings, mooring basins and marinas	-	-	-	<i>In response to the second Regulation 19 consultation.</i> However we are concerned that Policies DM40 and DM41 fail to establish that existing moorings may be refurbished without challenge when the existing piling or other components are at end-of life. Not infrequently, quay headings that have been in use for fifty years or more require replacement of pilings that have succumbed to corrosion or decay in the wet marine environment, especially if previously constructed in short-life treated softwood. Recent negotiations at Hickling, and perhaps elsewhere, suggest that additional clarity is required. We believe this is important because quay headings are essential for access onto the water, and that the best way to appreciate the special qualities of the Broads is from a boat.	No change proposed.	Local Plan policies are relevant to proposals that need Planning Permission. Like for like replacements are generally acceptable. And under 25m we don't seek planning applications. Maintenance is likely to not need planning permission. It is not clear what changes are proposed. The policy is clear that navigation must be protected.	No change proposed.
37	Brian Wilkins	Norfolk and Suffolk Boating Association	Policy PUBDM41: The impact of replacement quay heading on navigation.	-	-	-	<i>In response to the second Regulation 19 consultation.</i> However we are concerned that Policies DM40 and DM41 fail to establish that existing moorings may be refurbished without challenge when the existing piling or other components are at end-of life. Not infrequently, quay headings that have been in use for fifty years or more require replacement of pilings that have succumbed to corrosion or decay in the wet marine environment, especially if previously constructed in short-life treated softwood. Recent negotiations at Hickling, and perhaps elsewhere, suggest that additional clarity is required. We believe this is important because quay headings are essential for access onto the water, and that the best way to appreciate the special qualities of the Broads is from a boat.	No change proposed.	Local Plan policies are relevant to proposals that need Planning Permission. Like for like replacements are generally acceptable. And under 25m we don't seek planning applications. Maintenance is likely to not need planning permission. It is not clear what changes are proposed. The policy is clear that navigation must be protected.	No change proposed.

Rep #	Name:	Organisation/Group:	Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
38	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks as well as piling	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Turning to Policy DM42, we believe the Authority is misguided in recommending at Item 3 that the Authority's preference is timber for the piled components of quay heading and landing stagings. Whilst treated softwood is very appropriate for cappings and walings, it has such a short life in the wet/dry intertidal zone even if pressure treated with preservative. Timber compares very poorly with lightweight galvanised steel sheet piling and with the longevity of proprietary recycled plastic piling sections. The policy is correct to say that each has its merits, but the need to re-pile in timber at intervals of ten to fifteen years is irresponsible and a flagrant waste of the owners or Toll-payers money when there are proven alternative options that can be expected to last four times as long.	No change proposed.	The entire policy needs to be read together. Points 1 and 2 are general principles. Then there is point 3 which relates to timber. And then after that point 4 which clearly talks about other materials. This policy was compiled with assistance from the Head of Construction and the Rivers Engineer.	No change proposed.
39	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks as well as piling	-	-	-	It is very apparent that the draft policy has not been guided by appropriate engineering expertise. This should be sought at the first opportunity, and the whole life cost of maintaining quay headings given much greater priority over appearance. It is also apparent that the policy is over-preoccupied by the colour of the material used for piling in quay headings -The colour is irrelevant – nearly all of the piling is below water and ground level, and the small amount above average water level quickly weathers to a dull/matt green or grey, with the effects of tidal waters, detritus and marine growth.	No change proposed.	The entire policy needs to be read together. Points 1 and 2 are general principles. Then there is point 3 which relates to timber. And then after that point 4 which clearly talks about other materials. This policy was compiled with assistance from the Head of Construction and the Rivers Engineer.	No change proposed.
40	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM28: Light pollution and dark skies and nocturnal character	-	-	-	<i>In response to the second Regulation 19 consultation.</i> One additional point we would raise is the need for planning control of bright waterside lighting at night (the examples on Horning Racing Reach and at Great Yarmouth are typical). The lights interfere with helms' night vision and have an impact on marine safety. They tend to provoke retaliation in the form of the use of searchlights on boats – which should be discouraged on the Broads.	Not seeking changes	Agreed. We do have a policy relating to light pollution. And you can report specific lights to us for us to investigate either through planning or through our navigation role.	No change proposed.
41	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBSP14: Mooring provision	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Regarding the provision of electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case. {Reference policies PUBSP14 (4) and DM28}.	Not seeking changes	Support noted.	No change proposed.

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42	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM28: Light pollution and dark skies and nocturnal character	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Regarding the provision of electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case. {Reference policies PUBSP14 (4) and DM28}.	Not seeking changes	Support noted.	No change proposed.

Draft

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Our ref: E374.C1.BroadsRep.Let01A
16th January 2026

Dear Sir / Madam,

Broads Local Plan Review

This letter supports the online representations submitted on the 16th January 2026 and is a complete copy of the text of the representations.

These representations are an objection to the supporting text of policy PUBDBM46 New Residential Moorings.

The representations are made by the Trustees of the Somerleyton Estate. The Trustees own the Somerleyton Marina which has been proposed in the emerging Local Plan for an allocation for 15 residential moorings. The allocation is increasing from 10 moorings in the 2019 Local Plan, to 15 moorings in the emerging Local Plan, and this increase is supported by the Trustees.

The Somerleyton Estate owns the Somerleyton Marina and the adjacent boatyard. Both are longstanding local businesses. The Marina was bought by the Estate around 14 years ago from the holiday company TUI who had planned to use it to support their holiday camps near Gt Yarmouth. Their plan was not successful so the Marina was put up for sale and bought by the Estate to so support the boatyard which they owned, and other village facilities. The Estate has now paid off the borrowing it incurred when buying the Marina and would like to invest in new facilities and create residential moorings.

The Estate has submitted a planning application for a first phase of 9 residential moorings which at the time of writing has not been decided pending discussions with the planning authority.

Research has shown that none of the other 5 residential mooring's allocations in the 2019 Local Plan have seen planning applications come forward to date. The Somerleyton Estate is the only organization actively trying to deliver residential moorings who has got as far as submitting a planning application. The 2019 Local Plan had predicted that aside from the Somerleyton allocation that 23 residential moorings would have been applied for by this point. The 2019 Local Plan suggested that 41 residential moorings would be applied for between 2019 and 2030, so delivery is significantly behind what was planned.

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The Estate has recently found delivering the residential moorings more complex as the application has progressed. This is because of the local planning authority's interpretation of the supporting text of the residential moorings policy which is making it more difficult to deliver residential moorings. This text is similar in the existing and proposed Local Plans, hence the need for these representations in order to provide clarity. In the supporting text of the emerging Local Plan under the sub heading 'Definition of a Residential Mooring and what can moor there,' it states that the vessel will be used as the 'main residence.' This is a significant restriction on the property rights of those using residential moorings as it prevents letting or other such activities which are commonly allowed for other homes unless there are exceptional circumstances. This creates problems for the Estate Trustees finding people to occupy the moorings as it imposes a significant restriction on the homes.

This is not a type of restriction proposed on bricks and mortar homes which may be built in the Broads area. It is not a restriction proposed by East Suffolk on homes allowed in Somerleyton village. There is no justification given in the Local Plan why this significant restriction is required. If it is intended to help deliver moorings as the Council has suggested in discussions on the planning application, then it has the opposite effect.

The Estates aim is that the residential moorings will bring people to live in the area. They hope that active boat owners will support the boatyard more effectively than the current marina users, many of whom are not active boat users. The hope is that the new residents will support the nearby pub which is owned and supported by the Estate to ensure that it remains a village amenity.

The Estate has an extensive database of people who have visited Somerleyton Hall or other Estate facilities and attractions as well as Marina users. From this database It has sought expressions of interest from people who would be interested in residential moorings. They have had several sensible expressions of interest which is considered a good start to a project which is likely to take several years to deliver all the moorings.

As noted in the emerging Local Plan supporting text, the Council has found that most people interested in residential moorings would be single people or childless couples. The Estate agrees with this view.

The Estates research has found that the people choosing residential moorings over bricks and mortar want a more flexible way of living. While people are interested in living on the moorings, some want flexibility as they will work away for periods of time, or if they are retired want to travel and whilst not using the boat would rent their boat. This flexibility would be prevented by the Councils strict interpretation of the supporting text.

When planning to live on a residential mooring, residents also want security so will take a long lease from the Estate to give them security of where they will live. It is difficult for people to commit to long term arrangements with the Estate if they do not have flexibility, for example if they have to live elsewhere or want to rent the boats to others for any reason.

Discussions with the first interested parties about residential moorings in Somerleyton Marina have shown that the restrictions proposed by the Broads Authority will make it less likely that they will use the moorings.

The Broads Authority Boat Dwellers Accommodation Assessment Final Report August 2022 (BDAA) is part of the evidence base for the new Local Plan. This shows that the definition of a boat dweller is someone who uses the boat as a main residence. This should not be taken to mean that the boats in the allocations should only be main residences. When other types of homes are developed for main residences, it is accepted that to function effectively that flexibility is needed so that sometimes they will not be main residences.

Section 2 headed Consultation in the BDAA report sets out issues delivering residential moorings.

Paragraph 2.2 states: *'the main reasons why people choose to reside on boats were lifestyle choice, a lack of affordable or alternative housing, local connections, to be outdoors, to be mobile, for cultural reasons, and to escape mainstream society. Both boat dwellers and stakeholders commented on the main issues facing boat dwellers. Boat dwellers appreciate the sense of belonging fostered by the community and stated that this way of life may suit people who may not want to reside in one place or require a semi-permanent residence.'*

Paragraph 2.5 states: *'as well as those living on boats for 12 months of the year, it was highlighted that there is a growing demand for semi-permanent use. For example, there is a growth in the use of boats by students who live on boats whilst they study at the local university or college, and people who work in the area during the week but have an alternative address for the rest of the time.'*

Paragraph 2.6 states: *'it was acknowledged that there are very few permanent residential moorings in the Broads Authority area, compared to there being about 200 boat dwellers living on boats all year in the area.'*

Paragraph .8 states: *'some commented on how not all people want permanent residential moorings, but more flexibility. The cost and requirements placed on providers of permanent residential moorings often put potential providers off from having such provision. They prefer to have non-permanent residential provision, allowing people to stay at the mooring for up to 10 out of 12 months. It was suggested that if the process and requirements to provide permanent residential moorings were more flexible, marinas and boat yards would be more inclined to provide them.'*

These comments reflect the flexibility that potential boat residents have made about the Somerleyton residential moorings. It highlights that providers can be put off delivering residential moorings which is supported by the evidence that none of the Local Plan allocations for residential moorings have been delivered. It highlights the lack of residential moorings in the Broads which further illustrates the difficulties of providing this type of accommodation. Section 2 of the BDAA report sets out that people often use boats or areas without permission for residential purposes which will deliver poorer quality accommodation compared to sites with planning permission.

Imposing such a significant restriction on the use of a home, requires a clear justification and a clear Local Plan policy.

The delivery of residential moorings will be improved and the Plan will be made sound if the supporting text is made clear that the residential mooring does not have to be a main residence. It is not possible for owners of residential moorings to know if boats have been moored in one place for over 28 days a year.

This will make the Local Plan sound by meaning that it will be supported by the plans evidence base. It will be Positively Prepared as the strategy which will meet the need for residential moorings. It will be Justified by being a strategy based on reasonable evidence.

The second point of objection is the supporting text which states that: *'the Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.'* This is unsound and cannot be done as at the point a planning application is submitted it is impossible to know what the boats who will use the mooring over its lifetime will look like.

The change to the text on page 241 of the draft Local Plan should be:

Definition of a residential mooring and what can moor there.

For the purposes of this policy, a 'residential mooring' is a mooring where someone lives aboard a vessel, the vessel is capable of navigation, ~~where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year.~~ The vessel may occasionally/periodically go cruising and return to base. For the purposes of this policy, it should be noted that there is an expectation that the moorings will be occupied by a vessel of standard construction and appearance, and which is conventionally understood to be a boat. The residential mooring relates to how the land is used and not necessarily to a specific boat. ~~The Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.~~

Yours Faithfully

A handwritten signature in black ink, appearing to be 'DB', written in a cursive style.

David Barker MRICS MRTPI
Director

The Local Plan for the Broads and the emerging NPPF

January 2026

1. Introduction

In December 2025 (through to March 2026), a new NPPF was consulted on. This emerging NPPF is significantly different to the current December 2024 NPPF. The transition arrangements, as proposed in the accompanying consultation document ([National Planning Policy Framework: proposed reforms and other changes to the planning system](#)) are as follows:

For decision making: Where policies in the Framework and development plan are consistent, then this would be straightforward. Practically, consistency between policies would mean that no tension would arise on how issues should be considered. Therefore, the draft Framework sets out that due weight should be given to development plan policies relative to the consistency with the Framework. Where there is inconsistency between policies in the Framework and development plan policies, this would be much more difficult for decision-makers to navigate. To address this, we are proposing that development plan policies should be afforded very little weight where inconsistency arises, except where they have been examined and adopted against the new Framework. This would:

- *Give clarity on how inconsistency should be managed in decision-making; and*
- *Ensure government priorities which are reflected in policies of the Framework have effect as quickly as possible and are not hindered by policies that have not been produced in accordance with this Framework.*

To this end, each policy proposed in the emerging Local Plan for the Broads is assessed against the consultation version of the NPPF. Where issues arise and text can be changed fairly simply to future proof the Local Plan, these are identified in purple in the following table. Where issues arise and it is not clear how they can be addressed to future proof the policy, these are in red. Green shows there are likely to be no issues between the emerging NPPF and emerging Local Plan. Orange shows areas where the Local Plan is not contrary to the emerging NPPF but supplements the considerations. Finally, grey are very locally specific issues that are not covered in the NPPF but there is no reason that these cannot have full weight.

Generally, the aim of this assessment is to raise the issue of seeking to future proof the Local Plan as the Local Plan is examined.

2. Emerging NPPF versus the emerging Local Plan for the Broads

Table key

<u>Cell shading</u>	<u>Scope of impact of emerging NPPF</u>
Green	generally fits with NPPF
Orange	Local Plan policy supplements emerging NPPF
Purple	some wording changes needed
Red	significant issue/divergence
Grey	a very local issue, not covered in the NPPF

Policy number, name and hyperlink	Policy versus emerging NPPF
Throughout	Assess references to the December 2024 NPPF. There is potential to cross refer to the new NPPF (if it is in place prior to adoption) or make general references to the NPPF.
Policy PUBDM1: Major Development in the Broads	Seems to generally fit with N4 of the emerging NPPF.
Policy PUBDM2: Embodied Carbon	NPPF talks about climate change. NPPF quiet on this particular aspect but emerging policy generally fits with CC policies. The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.
Policy PUBDM3: Pollution and Hazards in development and protecting environmental quality	Seems to generally fit with P policies of the emerging NPPF.
Policy PUBSP1: Responding to the Climate Emergency	Seems to generally fit with CC policies of the emerging NPPF.
Policy PUBDM4: Climate change adaption and resilience checklist	NPPF talks about climate change. Checklist is a local approach to addressing climate change. The policy approach generally fits with CC policies. The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBDM5: Water quality and foul drainage	Seems to generally fit with W4 of the emerging NPPF.
Policy PUBDM6: Boat wash-down facilities	This fits with P policies and N policies. But the NPPF silent on invasive species. The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.
Policy PUBDM7: Water efficiency and re-use	We would be going further than the optional building regs. We do have a topic paper to justify this. Seems to generally fit with CC 1 c and PM13 of the emerging NPPF.
Policy PUBSP2: Strategic flood risk policy	The emerging NPPF seems to keep the same stance regarding flood risk as the current one. Seems to generally fit with F policies of the emerging NPPF.
Policy PUBDM8: Development and flood risk	The emerging NPPF seems to keep the same stance regarding flood risk as the current one. The EA support the tick sheet. Seems to generally fit with the F policies of the emerging NPPF.
Policy PUBDM9: Surface water run-off	The emerging NPPF seems to keep the same stance regarding surface water as the current one. Seems to generally fit with the F policies of the emerging NPPF.
Policy PUBDM10: Open space on land, play space, sports fields and allotments.	Seems to generally fit with HC policies of the emerging NPPF.
Policy PUBDM11: Green and blue infrastructure and Public Rights of Way	Seems to generally fit with N, DP and CC policies of the emerging NPPF.
Policy PUBSP3: Soils	Seems to generally fit with CC and P policies of the emerging NPPF.
Policy PUBDM12: Peat soils	CC2 1 f of the emerging NPPF seems to generally support our stance. Should we refer to the emerging NPPF wording in our policy?
Policy PUBSP4: Historic Environment	Seems to generally fit with HE policies of the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBDM13: Heritage Assets	Seems to generally fit with HE policies of the emerging NPPF.
Policy PUBDM14: Re-use, Conversion or Change of Use of Historic Buildings	<p>Generally fits with HE policies of the emerging NPPF, although it goes beyond the requirements of the NPPF, for example the requirement to retain the building in its original use (DM14, 1 and 3). However that is appropriate given that we are a protected landscape. References in the new NPPF include: S5, CC2, HO11, GB7, HE6, E4.</p> <p>The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.</p>
Policy PUBSP5: Biodiversity	<p>Seems to generally fit with N policies of the emerging NPPF. Local Plan policy SP5 2 c, which refers to biodiversity enhancements is supported through N2 f of the emerging NPPF, so general thrust of biodiversity enhancements is supported.</p> <p>Section 41 is Habitats and Species of Principal Importance in new NPPF. Use those words in the emerging Local Plan?</p>
Policy PUBDM15: Natural Environment	<p>Seems to generally fit with N policies of the emerging NPPF. Local Plan policy DM15 part 12, which refers to biodiversity enhancements is supported through N2 f of the emerging NPPF, so general thrust of biodiversity enhancements is supported</p> <p>Section 41 is Habitats and Species of Principal Importance in new NPPF. Use those words in the emerging Local Plan?</p>
Policy PUBDM16: Biodiversity Net Gain	<p>BNG to be only for sites over 0.2Ha.</p> <p>And more than 10% BNG can only be on specific sites.</p> <p>There are also plans by the Government to consult on making it easier to deliver BNG off site.</p> <p>There are also plans to tackle BNG and brownfield land.</p> <p>The emerging Local Plan could be amended, if needed as follows:</p> <p>In BNG policy – state that 20% applies to Site-Specific policies unless they are below the size threshold or exempted in another way, or</p>

Policy number, name and hyperlink	Policy versus emerging NPPF
	<p>Mention in relevant Site-Specific policies as a requirement.</p> <p>We have the evidence to justify 20% BNG.</p>
<p>Policy PUBDM17: Mitigating Recreational Impacts</p>	<p>It does not seem that this is going to be affected/addressed through either Environmental Delivery Plans or the Nature Restoration Fund. It is a HRA related issue. Generally seems to fit with N policies of the emerging NPPF.</p>
<p>Policy PUBDM18: Mitigating Nutrient Enrichment Impacts</p>	<p>Nature Restoration Fund and EDPs may take over. But they are not a requirement – an applicant can choose to mitigate in another way. The wording of this may need to evolve to reflect NRS and EDPs.</p>
<p>Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development</p>	<p>Seems to generally fit with N2 of the emerging NPPF.</p>
<p>Policy PUBDM20: Energy demand and performance of new buildings (including extensions)</p>	<p>Section on listed building meets HE6 3 of the emerging NPPF.</p> <p>Energy hierarchy seems to meet generally CC2 1 c and DP3 1 c of the emerging NPPF whilst not setting a new energy efficiency standard.</p>
<p>Policy PUBDM21: Renewable and low carbon energy</p>	<p>Generally meets W3 of the emerging NPPF.</p> <p>Our policy does include additional considerations that are not included in the emerging NPPF, like impacts on MOD infrastructure which the MOD asked us to include in the policy. That could meet the thrust of the emerging NPPF at P1 1 b iv.</p> <p>Generally, the thrust does meet W3 part 2 of the emerging NPPF: ‘Where proposals for this form of development come forward outside areas which have been identified as suitable for them they should be acceptable when assessed against the national decision-making policies in this Framework, taken as a whole’ as the considerations are generally within the emerging NPPF.</p> <p>N2 1 b of the emerging NPPF generally support solar not going on BMV.</p>

Policy number, name and hyperlink	Policy versus emerging NPPF
	<p>We do seek justification for turbines to be in the Broads, but that is not justification for turbines in the first place.</p> <p>We do set out lots of considerations for turbines which are logical considering our area, but these are not set out in the emerging NPPF.</p> <p>The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.</p>
Policy PUBSP6: Landscape character	Seems to generally fit with N policies of the emerging NPPF.
Policy PUBDM22: Development and landscape	Seems to generally fit with N policies of the emerging NPPF.
Policy PUBDM23: Land raising	Seems to generally fit with N policies of the emerging NPPF.
Policy PUBDM24: Excavated material	Seems to generally fit with N policies of the emerging NPPF.
Policy PUBDM25: Utilities infrastructure development	<p>Generally in line with the emerging NPPF.</p> <p>For telecoms, we do require engagement with the community and the emerging NPPF does not. We do required justification for why go where proposed – this is not querying the need for the telecoms.</p> <p>The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.</p>
Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	Seems to generally fit with N policies of the emerging NPPF.
Policy PUBDM27: Amenity	<p>Seems to generally fit with H and P policies. But not all of the considerations in the policy are included in the emerging NPPF.</p> <p>The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.</p>

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBSP7: Tranquillity in the Broads	Seems to generally fit with P3 and N4 policies of the emerging NPPF.
Policy PUBDM28: Light pollution and dark skies and nocturnal character	Seems to generally fit with P3, especially P3 2 d, N4 3 policies of the emerging NPPF.
Policy PUBSP8: Accessibility and Transport	Seems to generally fit with TR policies of the emerging NPPF.
Policy PUBSP9: Recreational access around the Broads area	Seems to generally fit with TR policies of the emerging NPPF.
Policy PUBDM29: Transport, highways and access	Seems to generally fit with TR policies of the emerging NPPF. Could say in this policy that we have regard to/defer to the parking standards of the district/county.
Policy PUBDM30: Recreation facilities parking areas	Seems to generally fit with TR policies of the emerging NPPF.
Policy PUBSP10: A prosperous local economy	Seems to generally fit with E policies of the emerging NPPF.
Policy PUBDM31: New employment development	Seems to generally fit with E policies of the emerging NPPF .
Policy PUBDM32: Protecting general employment	Seems to generally fit with E policies of the emerging NPPF.
Policy PUBDM33: Farm diversification	Seems to generally fit with E policies of the emerging NPPF.
Policy PUBSP11: Waterside sites	This is a local issue. Seems to generally fit with E policies of the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBDM34: Development on waterside sites in employment or commercial use, inc. boatyards.	This is a local issue. Seems to generally fit with E policies of the emerging NPPF.
Policy PUBDM35: Retail development in the Broads	Seems to generally fit with TC policies of the emerging NPPF.
Policy PUBSP12: Sustainable tourism	Seems to generally fit with E policies of the emerging NPPF.
Policy PUBDM36: Sustainable tourism and recreation development	Seems to generally fit with E policies of the emerging NPPF.
Policy PUBDM37: Holiday/tourism accommodation – new provision and retention	Seems to generally fit with E policies of the emerging NPPF.
Policy PUBSP13: Navigable water space	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the emerging NPPF.
Policy PUBDM38: Access to the water	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the emerging NPPF.
Policy PUBDM39: Bank stabilisation	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the emerging NPPF.
Policy PUBSP14: Mooring provision	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the emerging NPPF.
Policy PUBDM40: Moorings, mooring basins and marinas	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the emerging NPPF.
Policy PUBDM41: The impact of replacement	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
quay heading on navigation.	
Policy PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks.	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the emerging NPPF.
Policy PUBDM42A: Safety by the water	Seems to generally fit with P5 of the emerging NPPF.
Policy PUBSP15: Residential development	Seems to generally fit with S1, HO policies of the emerging NPPF.
Policy PUBDM43: Affordable housing	Seems to generally fit with HO policies. Our off-site threshold is not set out in the NPPF, but is a local approach with justification. The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.
Policy PUBDM44: Residential development within defined Development Boundaries	Glossary says 'Settlement: Includes cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete. This includes areas defined as a settlement in the development plan (whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents). Settlements do not include hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as a settlement in the development plan'. The emerging Local Plan does identify development boundaries.
Policy PUBDM45: Gypsy, Traveller and Travelling Show People	Seems to generally fit with HO policies of the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBDM46: New residential moorings	Not mentioned in the emerging NPPF (and we have commented to say so) but is a requirement in the Planning and Infrastructure Act 2016.
Policy PUBDM47: Permanent and temporary dwellings for rural enterprise workers	Seems to generally fit with HO policies of the emerging NPPF.
Policy PUBDM48: Elderly and specialist needs housing	Seems to generally fit with HO policies of the emerging NPPF.
Policy PUBDM49: Residential ancillary accommodation	Seems to generally fit with HO policies of the emerging NPPF.
Policy PUBDM50: Replacement dwellings	Seems to generally fit with HO policies and S5 c of the emerging NPPF.
Policy PUBDM51: Custom/self-build	Seems to generally fit with HO policies of the emerging NPPF.
Policy PUBPS16: Strategic Design Policy	Seems to generally fit with DP policies of the emerging NPPF.
Policy PUBDM52: Design	Seems to generally fit with DP policies and PM13 in terms of M4 (2) and M4 (3) of the emerging NPPF. And more generally, the thrust of the criteria fit with the emerging NPPF.
Policy PUBDM52A: Proposals for residential extensions	Seems to generally fit with L4 and S5 c policies of the emerging NPPF but does include additional considerations. The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.
Policy PUBDM53: Source of heating	NPPF talks about climate change. NPPF quiet on this particular aspect. Emerging policy generally fits with the CC policies of the emerging NPPF. The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.
Policy PUBDM54: Heat resilient design	Seems to generally fit with CC1, CC3, DP3 policies of the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBDM55: Non-residential development and BREEAM	Seems to generally fit with DP policies of the emerging NPPF.
Policy PUBDM56: Electric Vehicle (EV) Charging Points – fire safety, design, location, and lighting.	Seems to generally fit with TR4. But the design and location and fire issues addressed in the emerging Local Plan policy are not covered in the emerging NPPF. The emerging Local Plan policy is not duplicating the emerging NPPF but supplementing it.
Policy PUBDM57: Fibre to the Premises	Likely to be changed or removed as per NNDC equivalent policy to reflect changes to building regulations.
Policy PUBSP17: Community facilities	Seems to generally fit with HC policies of the emerging NPPF.
Policy PUBDM58: Visitor and community facilities and services	<p>The emerging NPPF introduces this at HC6 1 b: The loss resulting from the proposed development would be replaced by equivalent or better provision, in a location which offers comparable or improved accessibility for the community it serves.</p> <p>Inspector for 2019 Local Plan told us to remove that criterion (as we had it in our draft plan) as this would lead to loss of rural services.</p> <p>BUT... HC6 2 ‘applies only where the facility would be the last of its type in the area concerned’ whereas ours refers to all facilities.</p> <p>Is there scope to talk about how our policy refers to situations not covered by the NPPF HC6? So if it is the last one, then HC6 comes in.</p>
Policy PUBDM59: Designing places for healthy lives	Generally fits with HC policies. The healthy checklist is a local response. But the issues the policy considers are generally covered in the NPPF.
Policy PUBDM60: Planning obligations and developer contributions	Seems to generally fit with DM, P4, HE11 policies of the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBDM61: Advertisements and signs	Not covered in new NPPF. But the issues the policy considers are generally covered in the NPPF.
Policy PUBDM62: Re-use, conversion or change of use of buildings	Seems to generally fit with E4, L2 of the emerging NPPF.
Policy PUBDM63: Leisure plots, amenity plots, conservation plots and mooring plots	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the NPPF.
Policy PUBACL1: Acle Cemetery extension	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBACL2: Acle Playing Field extension.	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBBRU1: Riverside chalets and mooring plots	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBBRU3: Brundall Mooring Plots	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBBRU4: Brundall Marina	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBBRU5: Land east of the White Heron Public House	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBBRU6: Brundall Gardens	Allocation for residential moorings to meet the residential moorings need for the area. A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBCAN1: Cantley Sugar Factory	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBCHE1: Greenway Marine residential moorings	Allocation for residential moorings to meet the residential moorings need for the area. A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBDIL1: Dilham Marina (Tyler's Cut Moorings)	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBDIT1: Maltings Meadow Sports Ground, Ditchingham	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. In particular emerging NPPF policies relating to promoting healthy communities.
Policy PUBDIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBFLE1: Broadland Sports Club	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. In particular emerging NPPF policies relating to promoting healthy communities.
Policy PUBGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)	Allocation for residential moorings to meet the residential moorings need for the area. A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBGTY1: Marina Quays (Port of Yarmouth Marina)	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly P1 and L2.
Policy PUBHOR1: Horning Car Parking	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOR2: Horning Open Space (public and private)	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOR3: Waterside plots	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOR4: Horning Sailing Club	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOR5: Crabbett's Marsh	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOR6: Horning - Boatyards, etc. at Ferry Road. and Ferry View Road	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOR7: Woodbastwick Fen moorings	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOR8: Land on the Corner of Ferry Road, Horning	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly the housing and economy sections of the emerging NPPF.
Policy PUBHOV1: Green infrastructure	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBHOV2: Station Road car park	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOV3: Brownfield land off Station Road, Hoveton	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly P1 and L2.
Policy PUBHOV4: BeWILDerwood Adventure Park	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBHOV5: Hoveton Village Centre and areas adjacent to the Village Centre	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly the retail policies.
Policy PUBNOR1: Utilities Site	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly P1 and L2.
Policy PUBNOR2: Riverside Walk and cycle path	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly the sustainable transport section.
Policy PUBORM1: Ormesby waterworks	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly the section on Securing clean energy and water.
Policy PUBOUL1: Boathouse Lane Leisure Plots	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site	Allocation for residential dwellings to meet the housing need for the area. A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBOUL3: Oulton Broad District Shopping Centre	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly the retail policies.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBPHRB1: Bridge Area	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBPHRB2: Waterside plots	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBPHRB3: Green Bank Zones	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBSOL1: Riverside area moorings	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBSOM1: Somerleyton Marina Residential Moorings	Allocation for residential moorings to meet the residential moorings need for the area. A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)	Allocation for residential moorings to meet the residential moorings need for the area. A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBTSA1: Cary's Meadow	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBTSA2: Thorpe Island	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBTSA3: Griffin Lane – boatyards and industrial area	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBTSA4: Bungalow Lane – mooring plots and boatyards	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBTSA5: River Green Open Space	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBTHU1: Tourism development at Hedera House, Thurne	Allocation for residential dwellings to meet the housing need for the area. A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBWHI1: Whitlingham Country Park plus adjacent land	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBWHI2: Land at Whitlingham Lane	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF. Particularly P1 and L2.
Policy PUBSSTRI: Trinity Broads	An area-wide policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBSSUT: Upper Thurne	An area-wide policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBSSPUBS: Pubs network	A site-specific policy to address and consider local issues and opportunities, but the policy seems to generally fit with the emerging NPPF.
Policy PUBSSROADS: Main Road network	Generally seems to meet TR policies of the emerging NPPF.
Policy PUBSSTRACKS: Former rail trackways	Generally seems to meet TR8 of the emerging NPPF.
Policy PUBSSSTATIONS: Railway stations/halts	Generally seems to meet TR policies of the emerging NPPF.
Policy PUBSSSTAITHES: Staithes	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the NPPF.
Policy PUBSSCOAST: The Coast	Generally seems to meet F policies on coastal change and N policies on landscape and natural environment of the emerging NPPF.

Policy number, name and hyperlink	Policy versus emerging NPPF
Policy PUBSSMILLS: Drainage Mills	Generally seems to meet HE policies of the emerging NPPF.
Policy PUBSSLGS: Local Green Space	Generally seems to meet HC2 of the emerging NPPF.
Policy PUBSSA47: Road schemes on the Acle Straight (A47T)	This is a local issue, not covered by the NPPF. But the issues the policy considers are generally covered in the NPPF. An application for changes to the Acle Straight would likely be an NSIP.



Housing Need Topic Paper

Local Plan for the Broads

January 2026

Contents

1 Introduction	3
2 Identifying Housing need	3
2.1 Market housing	3
2.2 Residential moorings.....	3
2.3 Gypsy and Traveller.....	3
2.4 Residential caravans	4
3 Meeting Housing Need	4
3.1 Three calls for sites	4
3.2 Market housing.....	5
3.3 Residential moorings.....	6
3.4 Gypsy and Traveller.....	7
3.5 Residential caravans	7
4 Windfall.....	8
5 Constraints	8
5.1 Special Qualities	9
5.2 Biodiversity	9
5.3 Geodiversity	10
5.4 Heritage	10
5.5 Flood risk.....	10
5.6 Landscape	10
6 Summary and key messages	10

1 Introduction

This Topic Paper explains the housing need to be addressed in the Local Plan for the Broads review as well as explains how this will be met.

2 Identifying Housing need

2.1 Market housing

The housing need for the Broads Authority has been identified by ORS consultants. The report can be found here: [Housing needs assessment \(June 2022\)](#) and [Local Housing Needs Assessment Addendum \(March 2025\)](#). The addendum reflects the change introduced by the current Labour Government to use housing stock rather than population projections. The report identifies the need 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

It should be noted that the housing need that has been identified is part of our 6 constituent districts' need and not additional to.

Furthermore, please note that in calculating the housing need, the consultants factored in holiday homes. Therefore, holiday homes count towards the need. This does not include glamping provision such as Shepherd's Huts.

2.2 Residential moorings

The residential moorings need for the Broads Authority has been identified by RRR consultants. The reports can be found here: [Residential Mooring needs assessment \(August 2022\)](#) and [clarification letter \(May 2025\)](#).

The report identifies the need as 48 residential moorings.

2.3 Gypsy and Traveller

The Gypsy, Traveller and Travelling Showpeople need has been identified, first by RRR and then checked and updated by ORS Consultants. The reports can be found here: [Gypsy and Traveller and Residential Caravans Need Assessment \(Great Yarmouth Borough only\) \(June 2022\)](#), [Great Yarmouth Gypsy and Traveller Accommodation Assessment \(GTAA\) Update \(September 2024\)](#) and [addendum \(May 2025\)](#) as well as [Broads Authority GTAA Review \(December 2024\)](#).

The studies tended to focus on Great Yarmouth Borough as that is where a need was identified. The May 2025 addendum reflects the change in the definition of Gypsy and Travellers. The December 2024 document addresses the need for the rest of the Broads.

The reports identify the needs as follows:

- Travelling Showpeople – 0
- A 5-year need for the Broads part of Great Yarmouth is 10 pitches. Future (beyond 6 years) need for the Broads part of Great Yarmouth borough is 4 pitches.
- Need for the rest of the Broads – 0

2.4 Residential caravans

The residential caravan need for the Broads Authority has been identified by RRR consultants. The report can be found here: [Great Yarmouth and Broads Authority GTRCAA](#).

The report identifies a need of 12 residential caravans in Great Yarmouth Borough. This reflects that the Authority is not aware of caravans being lived in that are non Gypsy and Traveller as well as reflecting unauthorised caravans in an area of the Broads in Great Yarmouth Borough.

3 Meeting Housing Need

3.1 Three calls for sites

Despite three calls for sites¹, no new suitable sites for market housing, Gypsy and Travellers or residential caravans have come forward.

The sites that came forward can be found here:

- [Housing and Economic Land Availability Assessment \(HELAA\) \(September 2023\)](#) and [HELAA part 2 \(February 2025\)](#)

A summary of if a site was taken forward for allocation or not and the reasons found here:

- [From HELAA to Local Plan \(September 2023\)](#) and [From HELAA to Local Plan part 2 \(February 2025\)](#)

As can be seen, the common reasons for not allocating the sites that came forward were; highways objections, landscape/townscape character impact, lack of services and facilities within walking distance from the site, flood risk, loss of marsh and habitat, best and most

¹ Issues and Options consultation, November/December 2022, included a call for sites for residential dwellings, residential moorings (both Broads-wide) and gypsy and traveller sites and residential caravans (both in Great Yarmouth Borough only). Preferred Options consultation, April/May 2024, included a call for sites for residential dwellings, gypsy and traveller sites and residential caravans (not residential moorings as we had met the need at that time). In December 2024, we undertook a standalone call for sites for residential dwellings, residential moorings, gypsy and traveller sites and residential caravans.

versatile land, heritage impacts and lack of marketing. This reflects the constrained nature of the Broads.

Sites for residential moorings have been allocated in the Local Plan.

3.2 Market housing

a) Two sites allocated in the Local Plan

The two sites that are allocated in the Local Plan (Policy PUBTHU1: Tourism development at Hedera House, Thurne for 6 market dwellings and 10 holiday homes and Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site for 76 dwellings) are not new allocations and they have extant planning permission. These policies are included in the emerging Local Plan in case the applicant seeks to change the permitted scheme. If the schemes have been completed on nearing the adoption of the Local Plan, the policies could be removed.

b) Broads Authority owned land

In terms of considering Broads Authority owned land for development, the Broads Authority only owns small parcels of land, and these are in locations that would be subject to the same constraints as those put forward in the call for sites and are not suitable for development. The main ones would be landscape character impact, flood risk and impact on navigation (as we own and operate moorings).

c) Duty to Cooperate

The [Norfolk Strategic Planning Framework - Shared Spatial Objectives and Statement of Common Ground for a Growing County](#) (2025) (NSPF) has been endorsed by all Norfolk Local Planning Authorities. The aims of this document are to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
- Demonstrate compliance with the duty to co-operate (or any successor approach requiring strategic cooperation) and consistency with the NPPF;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high-level plans such as Local Economic and Infrastructure Strategies and;
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

The NSPF includes a series of agreements. Two are relevant to meeting the housing need of the Broads Authority:

- 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.

Every effort has been made to identify and allocate land for residential dwellings as set out in Agreement 10. But given that no suitable sites have come forward Agreement 11 is enacted.

A smaller part of the Broads is within Suffolk and a bespoke agreement with East Suffolk Council has been produced –see Appendix 4 of [Broads Authority Duty to Cooperate Statement](#). In summary:

- East Suffolk Council is 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 41 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.

It should be noted that there are 4 areas with development boundaries within the Broads where market dwellings would be appropriate, subject to details, this could result in more dwellings over the plan period.

And, in terms of holiday accommodation, there are different locational criteria which could result in more dwellings over the plan period.

3.3 Residential moorings

Following three calls for sites and rolling forward of the currently adopted residential mooring policies, the following table shows the sites that are intended to be allocated for residential moorings.

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

It shows a total of 43 residential moorings are allocated and the need to be addressed in the Local Plan is 48 residential moorings. The Local Plan is therefore 5 short of meeting the need of 48 residential moorings.

It is envisaged that during the plan period, more residential mooring schemes may come forward, and these would be assessed using the development management policies of the Local Plan and in particular Policy PUBDM46: New residential moorings. The locational criteria in PUBDM46 does mean that there are opportunities for residential moorings on sites that have not been allocated and these could come forward over the plan period.

3.4 Gypsy and Traveller

As discussed, despite three calls for sites, no Gypsy and Traveller sites have come forward in the Broads part of the Borough of Great Yarmouth.

There are early discussions ongoing relating to a potential Gypsy and Traveller site, but we need to understand flood risk implications and so there are no guarantees this site will be deemed suitable. This particular site would be ideal in terms of access to highways, services and facilities by walking and no obvious landscape impact concerns. We will continue to liaise with the promoter.

In terms of the future need, beyond 5 years, there is a development management policy to help guide proposals if they were to come forward.

3.5 Residential caravans

As discussed previously, despite three calls for sites, no residential caravan sites have come forward.

Such schemes would be assessed using the housing policies of the Local Plan (and other relevant policies).

There are 4 areas with development boundaries within the Broads where such caravans would be appropriate, subject to details, which could result in more dwellings over the plan period.

4 Windfall

We do not consider windfall predictions in meeting the residual need for the varying housing types. This is because the overall numbers are very low and a small variation of approved dwellings/residential moorings/caravans each year is a large proportion as demonstrated below using housing permitted since May 2019 (adoption date of the current Local Plan):

2019/20: 21 dwellings

2020/21: 7 dwellings

2021/22: 21 dwellings

2022/23: 3 dwellings

2023/24: 7 dwellings

2024/25: 2 dwellings

It should be noted that in March 2022, the issue of nutrient enrichment has had an impact on housing delivery.

When this data is assessed:

- Average: 10.17 dwellings
- Range: 2 to 21 dwellings
- Least as a proportion of the average: 2 dwellings is 20% of the average 10.17 dwellings.
- Most as a proportion of the average: 21 dwellings is 206.5% of the average of 10.17 dwellings.

While the Broads Authority does not consider the potential for windfall in calculations for meeting the various housing needs, schemes do come forward that are not allocated in the Local Plan. Given the locational criteria for the various housing need types, there is still potential for windfall sites to come forward over the plan period.

5 Constraints

Fundamentally, the Broads is a heavily constrained area. The Broads is an internationally important wetland and designated protected landscape of the highest order, with a status equivalent to that of a National Park and one of Europe's finest and most important wetlands for nature conservation. Its rich mosaic of habitats comprises, among other things, saltmarshes, intertidal mudflats, shallow lakes, fens, drained marshland, wet woodland, relict estuary and coastal dunes. The Broads' iconic features include 125 miles of lock free waterways, over 25% of the UK's conservation priority wildlife, and more than 60 drainage mills that are still intact. This section gives some background about the area's history and environment.

5.1 Special Qualities

The [Broads Plan](#) sets out the special qualities of the Broads. Over the years, the Authority has asked people to identify the special qualities or features of the Broads they value most.

Common responses include:

- The winding rivers and open water bodies – the ‘broads’
- The variety of habitats
- The abundance and rich diversity of wildlife
- Navigable, lock-free waterways to explore and enjoy
- The variety of patterns and textures in the landscape
- Countryside access to both land and water
- ‘Big sky’ views, dark skies and a sense of remoteness, tranquillity and wildness
- The people, the visitors, the activities
- The history and historic environment: Earth heritage, heritage assets, archaeology
- Boating, boatbuilding and unique heritage fleets
- Cultural assets, skills and traditions such as thatching and millwrighting
- People’s interactions with the landscape
- Waterside settlements and quiet villages

5.2 Biodiversity

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

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

5.3 Geodiversity

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

5.4 Heritage

The Broads Authority Executive Area contains over 278 nationally Listed Buildings, 15 Scheduled Monuments and 25 Conservation Areas. The area has been identified by Historic England as being a site of exceptional potential for waterlogged archaeology, and the Broads Authority maintains a Local List of heritage assets.

5.5 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 flood risk in the Broads is mainly from both fluvial and tidal sources, and the whole character and development in the Broads over many hundreds of years has been closely associated with the water environment and flood risk. Much of the area is defended by flood defence embankments, maintained by the Environment Agency. The flood defences, where they exist, only reduce the risk of flooding and will never eliminate it, and the risk of overtopping or a breach of defences remains.

5.6 Landscape

The Broads is much changed by people over time and is of international historic and cultural significance. Having been awarded status equivalent to a national park, the highest status of protection is conferred upon the area's landscape and natural beauty. The Broads is a low-lying wetland mosaic of flooded former peat workings (shallow lakes or 'broads') of various sizes, river channels, reed swamp, fen, reedbed, carr woodland and drained grazing marsh, arable cultivation with some heath and sand dune. It also includes a small stretch of undeveloped coastline near Horsey and Winterton.

6 Summary and key messages

- i. Despite three calls for sites, the Local Plan for the Broads does not allocate any new dwellings. The housing need that is identified for the Broads is part of the overall need for the 6 constituent districts. Through the Duty to Cooperate, the 6 constituent districts have agreed to meet for the need for the Broads.
- ii. Despite three calls for sites, the Local Plan for the Broads does not allocate any new Gypsy and Traveller sites. A windfall site could have potential to address the Gypsy and Traveller need for the Broads, but flood risk needs to be understood.

- iii. Despite three calls for sites, the Local Plan for the Broads does not allocate residential caravans.
- iv. In terms of residential moorings, the Local Plan for the Broads allocates 43 out of the need of 48.
- v. For all types of development, there are locational criteria and development management policies to guide any windfall development. There are 4 development boundaries in the Local Plan.
- vi. Calculations to meet the housing need of all housing types does not include windfall predictions. This is because the numbers are so low and the variation year on year is a large percentage difference. But the Authority does permit schemes, and more windfall schemes are likely to come forward over the plan period.
- vii. The Broads is constrained as a result of flood risk, wildlife, landscape character and heritage. This is demonstrated by the ability of the Broads Authority to nearly meet the entire need for residential moorings while it is not able to allocate new dwellings; residential moorings and the associated boats are part of the character of the Broads and are deemed acceptable to be lived on in flood risk zones (with the river/water body being classed as 3b).