

Planning Committee

Agenda 13 February 2026

10.00am

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

John Packman, Chief Executive – Friday 6 February 2026

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

Introduction

1. To receive apologies for absence
2. To receive declarations of interest (see [Appendix 1](#) to the Agenda for guidance on your participation having declared an interest in the relevant agenda item)
3. **To receive and confirm the minutes of the Planning Committee meeting held on 16 January 2026** (Pages 4-18)
4. To note whether any items have been proposed as matters of urgent business
5. Chairman's announcements and introduction to public speaking
Please note that public speaking is in operation in accordance with the Authority's [Code of Practice for members of the Planning Committee and officers](#).
6. Request to defer applications included in this agenda and/or vary the order of the agenda

Planning and enforcement

7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**
 - 7.1. BA/2025/0287/FUL How Hill Nature Reserve, How Hill, Ludham (Pages 19-25)
 - 7.2. BA/2025/0370/FUL Approach To Carpark Off Fen Lane, Beccles (Pages 26-33)
 - 7.3. BA/2026/0004/COND Broad View, Fleet Lane, South Walsham (Pages 34-41)
8. **Enforcement update** (Pages 42-51)
Report by Development Manager

Policy

9. **Local Plan for the Broads - Submission** (Pages 52-115)
Report by Planning Policy Officer
10. **National Planning Policy Framework consultation and changes to Biodiversity Net Gain**
(Pages 116-146)
Report by Planning Policy Officer

Matters for information

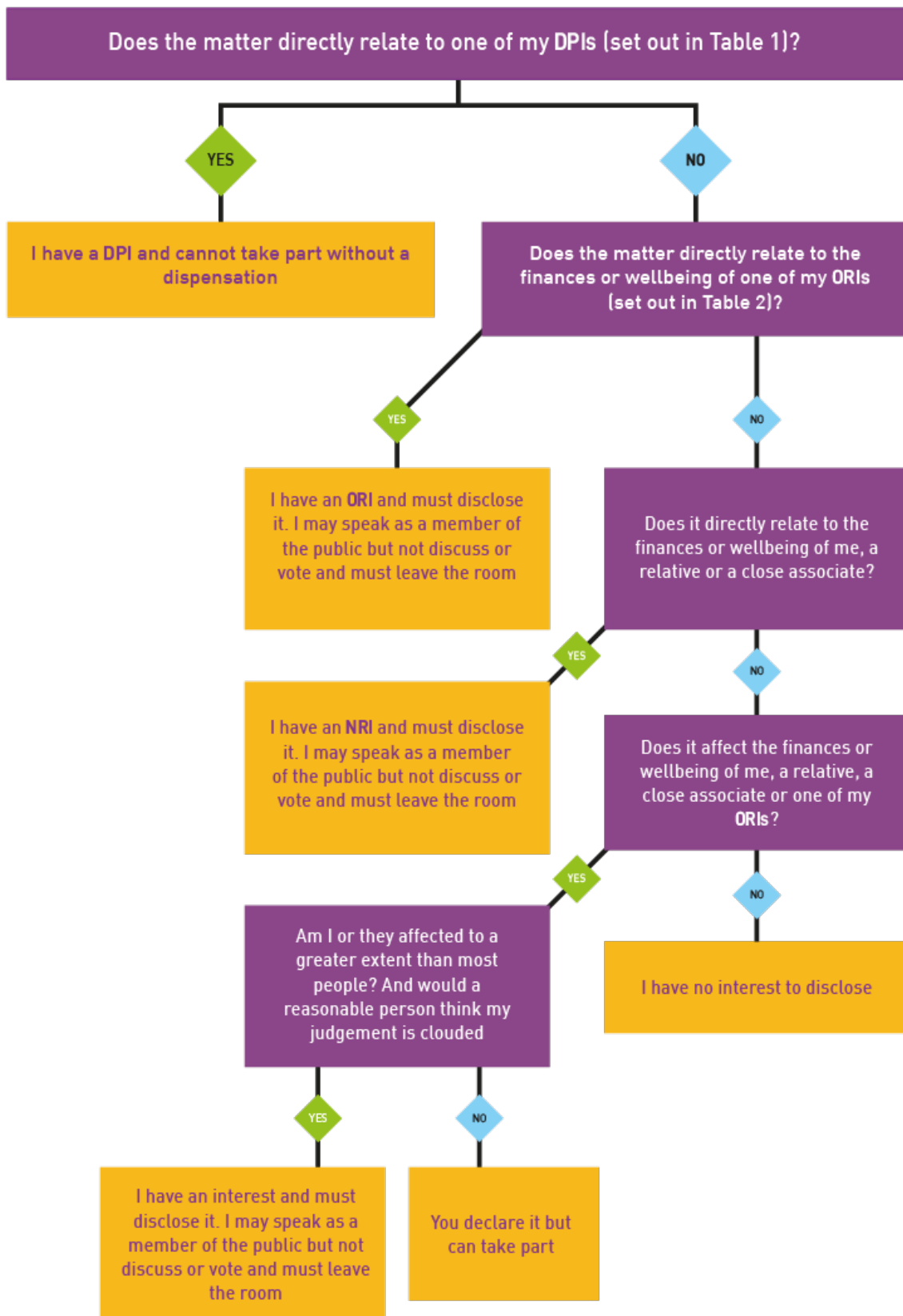
11. **Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q4 (1 October to 31 December) 2025** (Pages 147-153)
Report by Planning Technical Support Officer
12. **Appeals to the Secretary of State update** (Pages 154-155)
Report by Development Manager
13. **Decisions made by Officers under delegated powers** (Pages 156-160)
Report by Development Manager

Other matters

14. Other items of business
Items of business which the chairman decides should be considered as a matter of urgency pursuant to Section 100B (4)(b) of the Local Government Act 1972
15. **To note the date of the next meeting – Friday 13 March 2026 at 10.00am at The King’s Centre, 63-75 King Street, Norwich, NR1 1PH**

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

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



Planning Committee

Minutes of the meeting held on 16 January 2026

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Present

Tim Jickells – in the Chair, Harry Blathwayt, Stephen Bolt, Andrée Gee, Tony Grayling, Gurpreet Padda, James Reeder, Matthew Shardlow, Vic Thomson and Fran Whymark

In attendance

Natalie Beal – Planning Policy Officer (items 10-12), Jason Brewster – Governance Officer, Kate Knights– Heritage and Design Manager (item 9), Callum Sculfor – Assistant Planning Officer (item 7.1), Ruth Sainsbury – Head of Planning, and Lorraine Taylor – Head of Governance

Members of the public in attendance who spoke

Christopher Cooper, the applicant, and Councillor Fraser Bowe, Thorpe St. Andrew South-East Ward Member, for item 7.1 - BA/2025/0313/HOUSEH 12 Manor House, Yarmouth Road, Thorpe St Andrew.

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

Apologies were received from James Harvey, Martyn Hooton and Leslie Mogford.

Openness of Local Government Bodies Regulations 2014

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

2. Declarations of interest and introductions

Members provided their declarations of interest as set out in Appendix 1 to these minutes and in addition to those already registered.

3. Minutes of last meeting

The minutes of the meeting held on 5 December 2025 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business

5. Chair's announcements and introduction to public speaking

The Chair stated that public speaking was in operation in accordance with the Authority's Code of Practice for members of the Planning Committee and officers. Those who wished to

speakers were invited to come to the Public Speaking desk when the application they wished to comment on was being presented.

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

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

7. Applications for planning permission

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

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

(1) BA/2025/0313/HOUSEH 12 Manor House, Yarmouth Road, Thorpe St Andrew Rebuild existing brick driveway piers and the installation of timber gates.

Applicant: Mr Jeremy Clarke

The Assistant Planning Officer (APO) provided a detailed presentation of the application to rebuild brick driveway piers and enable the installation of new timber gates.

The APO indicated that the application was before the committee as Cllr Bowe, the Ward member of Broadland District Council, had raised material considerations which warranted the application to come before the committee.

The APO provided a presentation which included location maps, a site map, aerial photographs with the site marked, photographs of the site from various vantage points along Yarmouth Road.

The APO explained that the application was in accordance with Policy DM11: Heritage Assets, DM21: Amenity, and DM43: Design of the Broads Local Plan. The area of concern related to Policy DM23: Access and Highways given that Yarmouth Road (A1242) was classified as a principal road within the Norfolk County Council route hierarchy and carried a high volume of traffic. The proposed gates would be positioned along the back edge of the pavement. In practical terms, this created a realistic potential for vehicles to have to stop and wait, either within the carriage way, or across or within the footway while the gates opened and closed. This would interrupt traffic and pedestrian movement and would be detrimental to highway safety and to the safe and efficient functioning of the local highway network. This was the harm that had been identified under Policy DM23. The APO said that in discussion with the applicant, it had been requested that various elements of the proposal could be conditioned by planning condition, these included automation, sensors, increased opening speed of proposed gates and keeping the gates open during the day, but closed at night. These points had been considered by the Highway Authority, however, this did not remove the fundamental issue of the gates' location at the highway edge. It was further noted that the

proposed controls were not a reliable or enforceable solution. As a result, the identifying harm could not be satisfactorily addressed through planning conditions.

The APO said that in order to be acceptable in highway terms, the gates would have to be set back a minimum of five metres from the highway's edge so that vehicles could wait clear of the highway for the gates to open. This mitigation was not provided in the proposal, and no alternative highway solution had been submitted to overcome the objection. Alternative example sites were provided in the submitted design and access statement provided by the agent on the planning application however, these examples did not add weight to the proposal as applications were assessed on their own merit. The provided examples were historic, and the history of the examples were not clear. As such the examples of the gates provided could have been completed without planning permission or would have been approved based on highway advice at the time which would have likely changed.

The APO acknowledged the anti-social behaviour and security concerns stated by the applicant as a material consideration. These concerns had to be weighed in the planning balance, however it did not justify an access arrangement, that as the Highway Authority advised, would create an unavoidable obstruction.

The APO said that planning system was not the primary mechanism for securing the range of measures that could otherwise be used to address anti-social behaviour which could be pursued through other routes without causing highway harm.

Consequently, the application was recommended to be refused as contrary to policy DM23 of the Broads Local Plan. The APO informed the committee that a separate listed building application had been submitted at the same time as the planning application, and was approved as listed building consent solely related to impact on the listed building. The APO emphasised that the approval of the listed building application did not grant approval for the development.

A Member sought clarification on the approximate location of the gate should it be set back five metres. The APO pointed out the approximate location of this on the site plan provided. If the gate were to be set back five metres the Highway Authority would not object to the application.

A Member asked if more information could be provided on a previously approved application that was referred to in the presentation given by the APO and its relevance. The APO advised it was not relevant to the decision of the current application before the committee but was relevant as the proposal was attached to a listed building. Listed building consent had already been approved for the present application, however, the acceptability for listed building consent would not impact on the decision of planning approval.

Mr Cooper provided a statement in support of the application commenting that the Highway Authority did not reject to the gate in principle but had rejected the application due to the five-metre set back rule. Mr Cooper stated that while Yarmouth Road was an A road, so too was the A11, and under real world conditions the two roads were wholly different. Due to this Mr Cooper believed that a 'one-size-fits-all' policy was not appropriate. Mr Cooper said

Yarmouth Road was not a fast-flowing A road but was an urban route that served a number of driveways and entrances. Many of these would cause delays but commented these would not cause an obstruction that would endanger satisfactory functioning of the local highway network. In relation to this Mr Cooper noted that a similar objection was not raised by the Highway Authority when commenting on the new housing development opposite. Mr Cooper believed any slowing of traffic associated with the proposed gate and driveway would be indistinguishable from everyday conditions and could not be characterised as harmful.

Mr Cooper asked Members to consider the origins and relevance of the five-metre set back guidance. Mr Cooper said this guidance had not been updated in a long time and said technology had improved since then. Mr Cooper addressed highways concern which stated the gate would take a long time to open by emphasising this was not the case. The gate opening time would be sixteen seconds and operated by a trigger with a range of fifty metres. Consequently, when the average slow-down time of a vehicle travelling at 30mph was considered with this remote range, the traffic wait period would be six seconds. Mr Cooper further emphasised this wait time would only be at night, when the gate was primarily closed.

Mr Cooper highlighted Norfolk County Council policy and guidance which recognised driver behaviour and speed were influenced by the surrounding environment, in which turning movement, parking activity and junction density would act as natural traffic calming. Mr Cooper said a number of areas around Norwich were introducing new speed limits and as such it was difficult to reconcile the objection of the local Highway Authority with their own acknowledgement that driver behaviour on the stretch of Yarmouth Road required moderation, following the installation of an electronic speed monitoring sign directly opposite the applicant's property.

Mr Cooper said there was difficulty in understanding the position that operational parameters could not be secured by condition as planning was often granted with conditions and highlighted a suggestion previously made in which the proposed gate would remain open from dawn and be closed at dusk. This was rejected due to the timing clash with rush hour traffic during winter months, however, believed that this could be remedied by providing clear opening and closing times of 8am and 8pm respectively. Mr Cooper asserted there was no desire to keep the proposed gate closed during the day and believed any future owners of the property would share this desire.

Mr Cooper believed that the Highway Authority had provided contradictions in its objection as it had stated the acceptance of existing gates along the highway and previous applications did not set a precedent. Mr Cooper said that the Highway Authority had used precedent in a variety of ways, to its advantage, in its submissions. Mr Cooper highlighted this in the insistence that gates along the highway caused significant delays and safety fears, while no evidence of this had been provided. Previous successful appeals researched by Mr Cooper had sighted proportionality in reality to the hypothetical delays and safety fears, which could not be substantiated or proven.

Mr Cooper said a gate was needed due to ongoing occurrence of drug dealing, attempted vehicle theft and public urination and defecation which had resulted in repeated involvement

of emergency services. Mr Cooper also raised concerns regarding the neighbouring property and expressed fears that a child living in the property may run into traffic.

Cllr Bowe provided a statement in support of the of the application commenting that the gate was necessary to enhance the security and safety of residents while maintaining the visual amenity of the local area. Cllr Bowe emphasised the primary purpose of the application was to address ongoing concerns regarding unauthorised access, antisocial behaviour and opportunistic crime in the vicinity of the property. Cllr Bowe acknowledged the concerns of the applicants, given the issues they had faced, which had increased their anxiety and eroded their sense of safety and wellbeing. Cllr Bowe commented these incidents had drained police resources and were inconvenient at best, and at worse disgusting.

Mr Bowe was disappointed that the issues around crime and disorder had not been addressed and stated it was important to frame the ongoing issue in the context of statutory responsibilities under Section 17 of the Crime and Disorder Act 1998. This act placed a duty on all local authorities to consider the needs to prevent crime and disorder, substance misuse and reoffending in every decision made. Cllr Bowe said this was directly relevant to the situation faced by the applicants. Cllr Bowe emphasised the repeated anti-social behaviour, in combination with the increased risk associated with the nearby half-way house meant the applicants vulnerability to crime and disorder was tangible and persistent.

Cllr Bowe advised Section 17 compelled the Authority to seek solutions that both addressed and mitigated these risks and said it was a statutory imperative to approve the application for the proposed gate. Cllr Bowe was perplexed by the objection of highways when considering approval had been granted to relocate an existing bus stop that was set back in a layby to the main highway further down Yarmouth Road. The new location of this bus stop would be on a bend and a short distance before traffic lights. Cllr Bowe believed this was more likely to cause significant delay and congestion than the proposed gate and as such contradicted the reason for objection to the proposed application.

Cllr Bowe concluded the gate was a reasonable, proportionate and a necessary measure to improve security and reduce the risk of crime and urged the Committee to consider the issues faced by residents, the overall legal responsibilities the Committee held and the benefits that the proposal would bring.

A Member commented that the Highways Authority were a statutory consultee and as such needed to be given due understanding.

A Member queried what resources the Authority had to ensure any conditions relating to the opening and closing times of the gate were upheld and what responsibility the Authority had in monitoring this. The Head of Planning said the duty of enforcement would fall to the Planning Authority. There were limited resources to enforce this, and the APO further added that the Highway Authority would need to be satisfied that any such conditions could be enforced. This was seen as difficult to achieve as such monitoring would push the boundary of enforceability and did not believe this could be easily enforced.

A Member expressed sympathy with the issues faced by the applicants and had hoped the change in the nature of the property over time would improve the situation. The Member acknowledged there were other means by which the gate would be acceptable and said there may be other means to improve security and commented all of these factors would need to be considered in the decision-making process.

A Member queried the location of the gates, in relation to the residential property, if they were moved back the required five metres. The APO provided the location on an aerial image of the property and pointed out the current proposed gate location, the location of the property, the location of the property's garage, the courtyard area and the neighbouring property. The APO said there was a substantial drop in height from the highway.

A Member said they were sympathetic with the anti-social behaviour faced by the applicants but equally would not feel comfortable going against the advice of the Highway Authority.

A Member had sympathy for the application and said highways were a statutory consultee and commented that a recent successful appeal to an application that was rejected on the advice of the Highway Authority. This highlighted that inspectors did not consider objections from highways to be an absolute rejection.

A Member commented that Yarmouth Road was a busy road and believed the objection from highways deserved due consideration.

A Member asked if anti-social behaviour was the primary issue faced by the applicants. Mr Cooper confirmed this was the case and said they had looked at the proposed five metre set back however, this would not resolve the issues relating to anti-social behaviour as it would create an inlet on the driveway in which the anti-social behavioural issues would likely continue.

A Member commented that a compromise might be found in which the gate could be set back a distance shorter than five metres. The Head of Planning advised that the five-metre distance was a standard highway set back to allow a standard sized car to pull off the road without creating an obstruction.

A Member expressed sympathy with the antisocial behaviour issues raised but believed that the advice provided by the Highway Authority should be considered.

Vic Thomson proposed, Gurpreet Padda seconded

It was resolved by 9 votes for and 1 abstention to refuse the application.

8. Enforcement update

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

Land On The West Side Of River Waveney, Beccles (Unauthorised wooden decking structure)
An enforcement notice had been issued on 12 December 2025 for the removal of the unauthorised structure. A three-month compliance period was issued, and officers were in contact with the other party.

Land On The South-West Side Of Norwich Road, Gillingham (Unauthorised decking and raised platform area)

An enforcement notice had been issued on 12 December 2025 for the removal of the unauthorised structure. A three-month compliance period was issued, and officers were in contact with the other party.

9. Bungay and Ditchingham Dam Article 4 Direction review

The Heritage and Design Manager (HDM) provided a detailed presentation on proposed Article 4 directions. The presentation contained maps outlining the existing area covered by the current Article 4, maps outlining the proposed area to cover a new Article 4, and various images of properties in the area that had been considered during the review process. The Article 4 directions proposed would be non-immediate and would come into force on 22 April 2026.

It was explained that an Article 4 direction was a mechanism which enabled the removal of permitted development rights in order to protect the amenity of an area by protecting traditional features. These directions would only apply to residential houses and would not apply to flats, listed houses and commercial properties which had more limited permitted development rights. Article 4 directions would only apply to street facing or water facing elevations or those fronting public open areas.

The HDM advised the review had been prompted by the work East Suffolk Council had carried out. Historically, Article 4 directions had been applied area wide and covered large geographical areas. The recommendations of the Heritage and Design Manager reflected current best practice, as outlined in paragraph 54 of the National Planning Policy Framework (NPPF), in that Article 4 directions were based on robust evidence and cover a limited geographical area.

The review process mapped the status of buildings in the conservation area to ascertain whether the buildings were listed, flats, commercial properties and if they were considered to positively contribute to the conservation area but were non-listed. Property features were also mapped. These features included appropriateness of front boundaries, chimney stacks, original roof forms, windows and doors. The extent of proposed Article 4 directions were determined using these criteria.

The HDM proposed three Article 4 directions. The first recommendation was an Article 4 Direction to cancel the existing Article 4 direction, dating from 1998, covering Bungay and Ditchingham Dam as shown in appendix 3. This Article 4 direction covered a large geographical area and a number of properties including listed buildings, flats, and commercial

properties which would be removed under the proposed direction as their inclusion was not necessary.

The second recommendation was to implement a new Article 4 direction that would cover a smaller number of non-listed houses which included two properties on Bridge Street and a number of properties on Staithe Road. These properties were deemed to have historic character that contributed positively to the conservation area and should be maintained under the proposed Article 4 direction.

The third recommendation was also a new Article 4 direction and proposed to cover a larger part of the Ditchingham Dam conservation area (as the conservation area was extended in 2013). This proposed the extension of an existing Article 4 direction to cover additional properties along Ditchingham Dam, whilst excluding a single property that did not front the street, a commercial property and buildings whose contribution to the conservation area was considered to be neutral. These neutral properties for exclusion included a number of late twentieth century buildings.

The HDM said there were circumstances in which homeowners could claim compensation for the imposing of new Article 4 directions where less than twelve months' notice had been provided. There were limited circumstances where compensation could be claimed which would arise if the local planning authority had refused planning permission for developments which would have been permitted if the Article 4 direction had not been introduced. Compensation for such cases could only be claimed within twelve months of the introduction of a new Article 4 direction. Items that could warrant compensation included professional fees on aborted work and the cost of complying with conditions that would not otherwise have been required. The HDM pointed out that this would only apply to the proposed extended area in Ditchingham Dam as all other properties were already covered by an existing Article 4 direction.

The HDM said that if the Committee approved the proposed Article 4 directions, properties in the proposed and existing Article 4 directions would be served with a notice on 26 January, a slight change to the date proposed in the report. A public consultation period would commence on 26 January and end on 9 March. Site notices would be displayed, various organisations consulted, and the Secretary of State would be informed. A drop-in session had also been arranged on 25 February in Bungay which would be jointly held with East Suffolk Council. The HDM confirmed any existing Article 4 directions would remain in place prior to the introduction of new Article 4 directions.

A Member acknowledged the risk outlined in the report was negligible but queried whether the new Article 4 directions could be introduced with the provision of a twelve month notice period to mitigate this risk. The HDM said this would create a potential risk as homeowners in the extended area could make amendments to their property within the notice period. It was also noted that the Authority was conducting the implementation of the new directions in conjunction with East Suffolk Council to ensure consistency in the area.

A Member asked if it would be easier for homeowners to modify properties removed from the Article 4 direction. The HDM confirmed there was potential for this, however, the properties remained in both the conservation area and the Broads Authority area. Due to this any material changes would still require planning permission. The removal of boundary fences under a metre in height and the painting of a property were provided as examples of alterations that could be carried out following the removal of an Article 4 direction, however, the HDM expressed the need to protect properties that contributed significantly to the area.

A Member asked if the removal of the neutral properties from the Article 4 direction would make it easier to install solar panels on the properties. The HDM said solar panels were not restricted by the Article 4 or by conservation areas and as such they could be installed on front roof sloping elevations.

A Member was disappointed that the proposal would remove a specific commercial property from the Article 4 direction. The HDM advised an Article 4 direction would not apply to the property as it was a commercial property and therefore had different permitted development rights. The property in question was not currently under the existing Article 4 direction and was not proposed to be included in the new Article 4 direction. The HDM acknowledged that the property remained in the conservation area and planning permission would be required to develop the property. The Member was pleased by this response and expressed admiration for the property's design.

A Member requested the Authority's commitment to heritage be emphasised during the consultation period. The HDM advised the letter sent out would be detailed and supplementary material would be provided.

Matthew Shardlow proposed, seconded by Stephen Bolt

It was resolved unanimously to endorse the Bungay and Ditchingham Dam Article 4 directions.

10. Consultation Responses

The Planning Policy Officer (PPO) introduced the report, which documented the response to the Acle Neighbourhood Plan produced by Acle Parish Council, the Reforms to the statutory consultee system proposed by the Ministry of Housing, Communities and Local Government, and changes to electric vehicle charging permitted development rights proposed by the Department of Transport.

Acle Parish Council, Acle Neighbourhood Plan

The PPO advised Acle Parish Council were reviewing their existing Neighbourhood Plan. This review was welcomed; however, a number of comments and two objections were proposed. The first of these objections was a lack of clarity as to whether housing outside the development boundary would be permitted or not, and the second was the lack of mention regarding the need for a Habitats Regulations Assessment (HRA) when seeking to improve access to the countryside. The PPO hoped these objections would enable improvement to the Neighbourhood Plan.

Ministry of Housing, Communities and Local Government Reforms to the Statutory Consultee System

The PPO reminded members that the deadline for response had passed and responses were for information purposes only. The government had proposed the removal of three organisations as statutory consultees. The Ministry of Housing, Communities and Local Government presented a list of questions, and the Authority had provided responses to sixteen of these. The PPO produced these responses in collaboration with the Development Manager.

Department of Transport, Electric Vehicle Charging Changes to Permitted Development Rights

The proposal sought consultation on changes to permitted development rights (PDRs) to allow for multiple units of equipment housing or storage units for electric vehicle charge points in non-domestic, off-street carparks and the installation of cross-pavement solutions and associated domestic charge points.

The PPO raised concerns regarding the lack of key contextual information. Images had not been included in the consultation and as such the appearance of the units the Government was seeking consultation on were unknown. Consequently, the response was framed around an image search of the housing equipment, resulting in assumptions on the appearance of the equipment. The PPO's response requested greater clarity in future and expressed support for the proposal subject to conditions. It was suggested that the risk of fire should also be considered and included to the consultation response.

Fran Whymark proposed, seconded by Andrée Gee

It was resolved unanimously to endorse the nature of the proposed responses to:

- **Acle Parish Council, Acle Neighbourhood Plan**
- **Ministry of Housing, Communities and Local Government Reforms to the Statutory Consultee System**
- **Department of Transport, Electric Vehicle Charging Changes to Permitted Development Rights.**

11. Local Plan for the Broads- Regulation 19 first consultation responses

The Planning Policy Officer (PPO) presented the report which detailed the comments received as part of the first Regulation 19 consultation and responses to these comments. The PPO advised the second consultation would end on 16 January 2026 at 4pm.

The PPO said there was a lot of support expressed during the first consultation period in addition to some useful comments. While there were many objections, the PPO highlighted three more significant objections that had been received. These were objections to 20% Biodiversity Net Gain (BNG) on viability grounds, requests for 90 litres per head per day water usage and objections to the Chedgrave area being classified as a Settlement Fringe landscape type.

The PPO said they were producing a topic paper regarding the water usage request. This would involve cooperation from objecting parties and would be analysed by a viability consultant.

In response to the objections raised regarding settlement fringe classification, the Heritage and Design Manager had visited the area with our landscape consultant to provide further analysis. The assessment found the area could be classified as settlement fringe landscape character, but the boundary could be amended and updated.

The PPO made the Committee aware that the new NPPF would be released at some point in 2026. This presented challenges to BNG as the consultation version of the emerging NPPF states there would only be an allowance to exceed 10% BNG on specific sites rather than across a Local Plan area. As a result, it would not be possible to exceed this threshold areawide on local plans, as is proposed in the emerging Local Plan for the Broads. The Authority's local plan would be examined against the pre-existing NPPF, against which the Authority had commitment to 20% BNG. This could be invalidated by an emerging NPPF that would restrict BNG to 10%.

Announcements had also been made which would further impact BNG. Firstly, the minimum size threshold in which BNG would apply to an application would be an area of 0.2 hectares. Consequently, applications from the Authority would tend not to require BNG as applications typically were smaller than this. Secondly, the PPO advised the government was intending to consult to remove the need for BNG on brownfield land.

The Authority would await guidance from the Local Plan Inspector regarding its policy on water usage and BNG.

A Member commented it would be beneficial for the Government to consider an exemption for National Parks in relation to BNG.

A Member sought clarification on the water usage request. The PPO said the reduction in water usage was in relation to the area being in water stress and therefore the need for greater water efficiency. The need to reduce the use of water, as well as looking at ways of providing more water, is addressed in the Asset Management Plans of the water companies. A Member commented this was in relation to long term forecasts of demand in which twin track approaches, that included water usage reduction, were presented and monitored by environmental authorities.

A Member commented it would be beneficial to specifically include Section 41 species when referring to protected species. The PPO said the NPPF introduced a new term, habitats and species of principal importance, in the glossary. This term included Section 41 species in the definition and so it may be that we use the emerging NPPF term in the Local Plan

Andrée Gee proposed, seconded by Harry Blathwayt

It was resolved unanimously to endorse the Chedgrave Settlement Fringe Policy.

12. Annual Monitoring Report

The Members received the Annual Monitoring Report (AMR) setting out planning data from the previous financial year. The Planning Policy Officer (PPO) noted that the Authority could not demonstrate a five-year land supply when either the Liverpool or Sedgefield approach was used. Highlighted in the report was the self-build exemption calculation. The Authority has had an exemption from the duty (Self Build and Custom Housing Act 2015) to give enough suitable development permissions to meet the identified demand.

There was no interest on the Authority's self/custom-build register over the last base period and the guidance on how to complete the necessary calculation to check if exemption to the duty is not clear. The PPO had previously used two different means of calculating this, however, after contacting the Ministry of Housing, Communities and Local Government (MHCLG) a third calculation was suggested. The PPO had requested further clarification from MHCLG and was awaiting response. The PPO had sought further clarification as the response received contradicted the National Planning Policy Guidance. The PPO intended to report the findings at a later date, as part of an addendum to this and other AMRs.

Stephen Bolt proposed, seconded by Matthew Shardlow

It was resolved unanimously to endorse the Annual Monitoring Report.

13. Appeals to the Secretary of State

The Committee received a schedule of appeals to the Secretary of State since the last meeting. The Head of Planning advised the only update to the appeals received was regarding the refusal of changing 440 metres of timber quay headings to plastic headings at Hickling. An appeal had been submitted and was in progress.

14. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 24 November 2025 to 2 January 2026 and there were no Tree Preservation Orders confirmed within this period.

15. Other items of business

There were no other items of business.

16. Date of next meeting

The next meeting of the Planning Committee would be on Friday 13 February 2026 at 10:00am at The King's Centre, 63-75 King Street, Norwich.

The meeting ended at 11:45am

Signed by

Chair

DRAFT

Appendix 1 – Declaration of interests Planning Committee, 16 January 2026

Member	Agenda/minute	Nature of interest
Gurpreet Padda	11	Works for Marine Management Organisation, a consultee on the Local Plan for the Broads - disclosable pecuniary interest
Fran Whymark	7.1	Member of Broadland District Council - other registerable interest

DRAFT

Planning Committee

13 February 2026

Agenda item number 7.1

BA/2025/0287/FUL How Hill Nature Reserve, How Hill, Ludham

Report by Planning Officer

Proposal

Replacement of wooden boardwalk and bridge with recycled plastic

Applicant

Broads Authority

Recommendation

Approve

Reason for referral to committee

The Broads Authority is the applicant.

Application target date

05 December 2025

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1. Description of site and proposals

- 1.1. The How Hill site is located in the north of the Broads, in the valley of the River Ant between the villages of Irstead to the north and Ludham to the south. The site forms a nature reserve within which is How Hill House, a Grade II listed building used as an education centre.
- 1.2. The location of this application site is to the west of the main How Hill site and to the northeast of Reedham Water. The Reedham Marshes Wildlife Water Trail is open annually from Easter to the end of October and provides access to the National Nature Reserve for the public. The trail is accessed by transportation in the Electric Eel boat which is moored on the River Ant near Toad Hole Cottage to the east. As part of the trail there is an opportunity for passengers to get off the boat and walk to a bird hide that overlooks Reedham Water. The walking route runs alongside and through a section of wet woodland. Part of the route is unsurfaced however the area through the woodland is currently surfaced with a timber boardwalk which is regularly inundated with water. The boardwalk is connected across an open water dyke by a timber bridge to a further length of boardwalk through fen which leads to the bird hide. The proposal seeks to replace the existing bridge and boardwalk as both are nearing the end of their serviceable life.
- 1.3. The design of the replacement boardwalk will be almost identical to the existing except for a change of materials to recycled plastic. Dimensions of the walkway will be the same (1.3m wide), with an additional runner along the edges which will provide an extra safety measure, giving a more visible edge to the boardwalk. The sleepers may need to be slightly closer together for added strength, but this will not result in a noticeable change.
- 1.4. The current arched bridge will be dismantled and replaced identically to the existing structure. The supporting structures may need to be replaced; however, this will not be evident until works commence. In any event, the supports will be replaced like for like, timber and metal as they currently are. The bridge deck boards will be replaced with recycled plastic.

2. Site history

- 2.1. BA/2021/0472/FUL - Replacement of wooden boardwalk with recycled plastic and replacement of arched wooden bridge with horizontal wooden alternative.

Approved 04 February 2022.

3. Consultations received

Parish Council

- 3.1. Ludham Parish Council – supports the application.

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

1. fully shielded (enclosed in full glass cut-off fitments)
2. directed downwards (mounted horizontally to the ground and not tilted upwards)
3. switched on only when needed (no dusk to dawn lamps)
4. white light low energy lamps (Philips Cosmopolis or fluorescent) and not orange or pink sodium sources)

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

Ward Member

- 3.2. This application can be determined by the Head of Planning (delegated decision)

BNG Consultant

- 3.3. The project involves like for like replacement of raised boardwalk and foot bridge. There will be no changes to cover types and impacts are expected to be temporary.
- 3.4. The nature of the planned works require consent under a full planning application that if granted would include the mandatory biodiversity gain condition. The request to use the de minimis exemption is considered reasonable as the planned works will be temporary and the existing conditions will be reinstated following replacement of the boardwalk. Under these circumstances there is a reasonable case for applying to use the de minimis exemption. The rationale is that there is no need to apply a loss if baseline habitat type and condition can be returned within two years. This is considered achievable.
- 3.5. It follows, therefore, that there will be no impacts to priority habitat and that there will be no impact to more than 25m² of area habitat (that has a baseline greater than zero) or more than 5m of linear habitat.

BA Landscape

- 3.6. No objection to the proposal. If approval is given, please could the selection of material be conditioned to secure the product and colour as shown in the application.

BA Heritage and Design Manager

- 3.7. Although timber would be preferable, as it would weather-down and look more recessive in this natural environment, photographs of the previous installation in recycled plastic at How Hill have been provided and it is evident that the proposed colour does appear a brown/grey colour which is not dissimilar to the timber. Given that the proposed footpath is not particularly prominent in the wider landscape but is largely overhung by ferns, reeds and other vegetation, and set primarily within an enclosed wet woodland, in this instance there are no objections to the proposal.

4. Representations

- 4.1. None received.

5. Policies

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

6. Assessment

- 6.1. The application seeks to replace an existing wooden boardwalk with a recycled plastic material and replace the existing pedestrian bridge with a new, like for like, timber replacement with recycled plastic boards. The replacements will be in the same position on the nature trail.

Principle of development

- 6.2. The nature trail at How Hill is open annually from Easter to the end of October and provides access to the National Nature Reserve for the general public. The Broads Authority has a responsibility to ensure that access to the public is available. Both the bridge and the boardwalk are nearing the end of their serviceable life and are now due for replacement. The principle of the development is therefore acceptable.

Impact on the landscape

- 6.3. It is proposed to replace the existing wooden boardwalk with a recycled plastic material that has been used elsewhere within the Broads Area including more recently at How Hill as approved under application reference BA/2021/0472/FUL.
- 6.4. In considering the principle of replacing a traditional material such as timber with a recycled/composite plastic material, this is typically resisted throughout the Broads due to circumstances relating to a building, the visibility of the material, or a specific character of an area. Each proposal is considered on a case-by-case basis and, subject to details, the change of material may be acceptable in some cases.
- 6.5. In this instance, the area is very natural however, timber does have a limited lifespan, and the Broads Authority recognises that the overall quality of plastic/recycled materials has improved in recent years with some of the products achieving a relatively natural finish. It is also recognised there are benefits of using recycled plastic for a boardwalk, including its inherent non-slip properties, removing the need for chicken wire or any other type of additional design requirements. The proposed recycled plastic is a dark coloured material and would be replacing an unsightly, damaged and dangerous boardwalk. In addition, with no need for treatment, unlike tanalised timber, there is no risk of leaching into the surrounding environment. Subject to a high-quality product being used the plastic will, over time, weather to a natural finish comparable to timber and as it is in an enclosed area and sited horizontally there will be no adverse visual impact on the surrounding landscape.
- 6.6. The proposed bridge will be replaced with a mix of timber for the upper supports and handrail, which would be more visible in the landscape, with recycled plastic boards to match those on the replaced boardwalk thereby providing a similar structure to the existing bridge. There is no objection from either the Landscape Architect or the Heritage and Design Manager to the replacements, the proposal is therefore considered to be acceptable in terms of Policies DM11, DM16 and DM43.

Biodiversity Net Gain

- 6.7. The information submitted with the application has been assessed by the Broads Authority's BNG Consultant, who advises that the use of the de minimis exemption is reasonable as the planned works will be temporary and the existing conditions will be reinstated following replacement of the boardwalk.
- 6.8. It is therefore concluded that the proposal is acceptable in meeting the requirements of The Environment Act 2021 and Policy DM13 with regard to BNG.

7. Conclusion

- 7.1. The proposals will allow for improved and safer access along the nature trail around How Hill. The proposed change in materials will reduce the need for continued replacement in the longer term and is considered to be acceptable regarding the

impact on the character of the area in this case. It is therefore recommended that planning permission is approved subject to conditions.

8. Recommendation

8.1. Approve subject to the following conditions:

- Time Limit
- In accordance with the submitted documents and plans.
- Constructed in accordance with the agreed material schedule or requirement to submit details of material if they differ due to supply issues.

9. Reason for recommendation

9.1. Subject to the conditions outlined above, the application is considered to be in accordance with Policies DM11, DM13, DM16 and DM43 of the Local Plan for the Broads 2019.

Author: Jane Fox

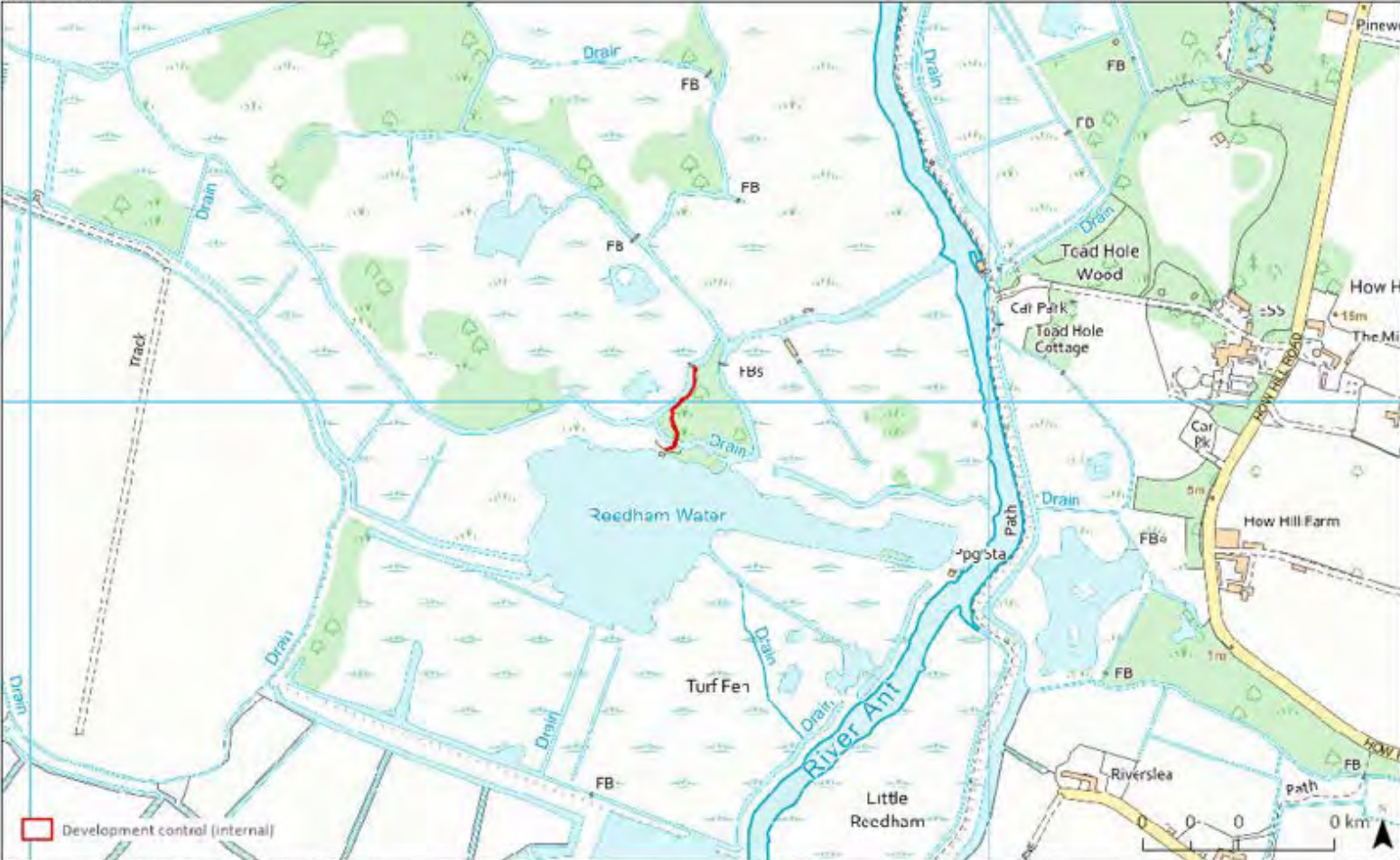
Date of report: 19 January 2026

Appendix 1 – [Location map](#)

Appendix 1 – Location map

BA/2025/0287/FUL -How Hill Nature Reserve, How Hill, Ludham

Scale: 1:5,000



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Planning Committee

13 February 2026

Agenda item number 7.2

BA/2025/0370/FUL Approach To Carpark Off Fen Lane, Beccles

Report by Assistant Planning Officer

Proposal

Installation of 3 cycle charging boxes

Applicant

Beccles Town Council

Recommendation

Approve Subject to conditions

Reason for referral to committee

Broads Authority involvement

Application target date

16.02.2026

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1. Description of site and proposals

- 1.1. The application has been submitted by the Town Council. The site lies at The Quay car park, in Beccles, east of the River Waveney. The Quay forms part of the established riverside area at the northern edge of the town, characterised by a mix of recreational, leisure and mooring-related uses, including private moorings, boat hire facilities, and riverside parking.
- 1.2. The immediate surroundings include a surfaced car park and footpath providing direct access to the river and quay, with associated café facilities located to the west. To the north, the site is surrounded by marshland with the River Waveney providing open views across to the Suffolk countryside and floodplain. The area has regular visitor activity, particularly during the summer months, and serves as a key gateway to the Broads network for both private and hire craft.
- 1.3. The car park is largely level and surfaced in gravel, with the proposals relating to a small, grassed area at the entrance to the car park.
- 1.4. Access to the car park is by Fen Lane, a small bridge over a dyke and then into the gravelled car park. North of the car park is the A146, which is a busy road, providing access to the town of Beccles. To the east of the site are further marshes, and the Morrisons supermarket off George Westwood Way which runs to the south.
- 1.5. The site lies within Flood Zone 3, as defined by the Environment Agency's flood mapping, and is also adjacent to the Beccles Conservation Area.

2. Site history

- 2.1. No relevant history for this site.

3. Consultations received

Environment Agency

- 3.1. No objection.

BA Landscape

- 3.2. The car park is close to the industrial/commercial area, and benefits from some natural screening from trees and surrounding vegetation. The colour of the proposed structure will mean its appearance is not overbearing. The proposals would result in the loss of a small area of grassland, and my preference would be for the structure to be placed closer to the Beccles signboard, as grouping these features could reduce the sense of landscape clutter. However, there might be a practical reason why this is not possible, and overall, I do not have an objection.

BA Historic Environment Manager

- 3.3. The proposed location is to the north-east of the Beccles Conservation Area and given the scale of the development and the distance between the two it is unlikely that there will be any impact on the conservation area. The design of the units has been slightly simplified, and this is considered to be an improvement. It is considered that this is an appropriate location, being located in proximity to a number of other small-scale structures and in a transitional area between the town and the marshland beyond. It is in relatively close proximity to a commercial area which is also less sensitive in townscape and landscape terms. The preference for the material for the units would have been timber but due to the requirement for them to be theft and fire proof, it is understood that this is not possible. It is considered the graphite-coloured recycled plastic is an acceptable compromise in this instance. I therefore have no objection to the proposal.

Cllr Sarah Plummer

- 3.4. This application can be determined by the Head of Planning (delegated decision). This is a project being undertaken by Beccles Town Council/Fenland Charitable Trust and I fully support it.

4. Representations

- 4.1. Broads Society - The Broads Society fully supports this application for 3 cycle recharging boxes which will provide sustainable tourism opportunities for both visitors and locals in the Southern Broads area.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
- DM11 – Heritage Assets
 - DM15 – Renewable Energy
 - DM16 – Development & Landscape
 - DM21 – Amenity

- DM29 – Sustainable tourism and recreation development
- DM43 – Design
- SP5 – Historic Environment

6. Assessment

- 6.1. The main issues to be considered include the principle of the development, the impacts on neighbouring amenity, the landscape and the design of the proposed development. This report will also include an assessment of the potential tourism and recreation improvements, along with the renewable energy benefits.

Principle of development

- 6.2. The installation of electric bike charging pods aligns with the Broads Authority's commitment to promoting sustainable transport options and reducing carbon emissions in the region. Given the increase in the use of electric cycles, particularly on rural routes within the Broads, the provision of these charging facilities supports an evolving industry that encourages environmentally friendly travel alternatives.
- 6.3. The Local Plan places an emphasis on enhancing sustainable infrastructure that minimises ecological impact while promoting tourism and accessibility within the area. The charging pods would enable cyclists to extend their journeys, thereby increasing accessibility to the Broads' natural and cultural attractions, without reliance on motor vehicles. This provision aligns with the Authority's sustainability objectives by reducing fossil fuel dependency and supporting eco-tourism initiatives.
- 6.4. Furthermore, the installation of electric bike charging pods is consistent with national policies set out in the NPPF (chapter 14) that encourage alternative modes of transportation, particularly those that are low in environmental impact. By enabling longer journeys, these facilities contribute to the region's sustainable tourism objectives and provide additional utility for both residents and visitors. The principle of this development is therefore considered acceptable

Impact on the landscape

- 6.5. The proposed pods are small in scale, appropriately sited on a small grass area, adjacent to the existing car park, containing uses associated with travel in one place. This layout effectively conserves the local landscape, as the pods are positioned to minimise visibility from surrounding areas, preserving the traditional, open character of the Broads landscape. Additionally, the car park is a public space where traffic and cyclists moving are a common sight. Therefore, it is considered that the application is acceptable in terms of Policy DM16 – Development and Landscape.

Amenity of residential properties

- 6.6. Policy DM21 requires that all new development must ensure a satisfactory level of amenity for occupiers and users. In this case, the proposed pods are situated within the car park setting, screened by shrubs and several large trees. While the pods will be

visible from the road and the public car park, they are not of a height to have a significant visual impact. The proximity of Fen Lane and adjacent footpaths ensures safe, convenient access to the pods. Accordingly, the proposal is considered to comply with Policy DM21 – Amenity.

Design

- 6.7. Policies DM43, SP5 and DM11 of the Broads Local Plan collectively require that all development achieves a high standard of design which integrates effectively with its surroundings, reinforces local distinctiveness and landscape character, and preserves or enhances the historic environment.
- 6.8. The electric cycle charging pods are functional units with a contemporary appearance. Their design has been developed to balance practicality, safety, and visual appearance.
- 6.9. In terms of materials, the pods will be finished in a black mock timber plastic cladding. While not a natural timber product, this material has previously been accepted by the Authority on other similar schemes across the Broads and is now considered an appropriate and established finish for this type of infrastructure. The colour and texture provide a muted, recessive appearance that works well within natural and visitor environments, while offering significantly improved fire resistance and durability over genuine timber.
- 6.10. The proposed materials and design therefore represent a practical and contextually suitable solution, ensuring safety without detracting from the character of the area or the setting of nearby heritage assets. The development will read as a small-scale addition within the existing site context and will not result in harm to the appearance of the area or the special qualities of the Broads.
- 6.11. It is therefore considered that the proposal accords with Policies DM43 (Design), SP5 (Historic Environment) and DM11 (Heritage Assets) of the Broads Local Plan.

Renewable Energy

- 6.12. Policy DM15 supports renewable energy technology. The proposed cycle charging pods are minor in scale compared to traditional renewable energy developments like solar farms or wind turbines. The pods are designed with a flat solar panel roof that provides renewable energy to power the internal equipment and will not require extensive ancillary infrastructure like power lines or storage buildings, which the policy stipulates should be evaluated in proposals. Since these pods are compact and do not interfere with sensitive biodiversity areas or cultural heritage, they do not compromise the Broads' environmental or visual character. Given the pods' scale and location, they meet the intentions of DM15 by supporting renewable energy infrastructure without altering the landscape's distinctive qualities.

Sustainable Tourism and Recreation Development

- 6.13. Policy DM29 deals with sustainable tourism and recreation development, and consideration must be given to both the locational and design principles laid out in the policy. The proposed pods are sited within an area of hardstanding associated with a popular area and a public car park. This aligns with criterion (ii) of the policy, which supports development that is closely associated with existing visitor sites. Additionally, the pods offer sustainable access, being specifically intended to support cyclists, which aligns with the policy's aims. Given the compact size of the pods and their siting within an area of existing hardstanding, they are unlikely to create significant additional demand on the highway network. There is also sufficient existing parking for both cars and cycles, meeting criteria (vi) and (vii).
- 6.14. The placement of the pods does not impact on dark skies, as they do not include bright lighting, and they are carefully sited to avoid harm to the landscape character or local wildlife habitats. By supporting eco-friendly transportation, the pods also contribute positively to the area's environmental quality, aligning with criterion (viii).
- 6.15. The design and scale of the pods are appropriate to their setting, aligning with criterion (ix). They are small, non-intrusive structures that do not affect navigation or the open nature of the surrounding landscape, meeting the requirement for compatibility with local character.
- 6.16. The installation of the pods is compatible with the objectives and detailed requirements of Policy DM29. Their location and their support for sustainable tourism enhance accessibility for cyclists without detracting from the unique qualities of the Broads landscape.

Other issues

- 6.17. The installation of electric cycle charging pods represents a positive step forward in supporting sustainable transportation options within the Broads. As an evolving industry, electric cycle charging infrastructure is becoming increasingly important for promoting eco-friendly travel. The manufacturer, Intelligen, and other partners, have outlined plans to expand this network, installing additional charging pods in sites across the Broads network and beyond, which would enhance accessibility for cyclists and encourage a shift toward greener forms of transport in the area. The installation of these pods in the current location is a forward-thinking measure that aligns with the Authority's sustainable tourism objectives and broader environmental goals.

7. Conclusion

- 7.1. In conclusion, the proposed electric cycle charging pods have been assessed against policies DM11 (Heritage Assets), DM15 (Renewable Energy), DM16 (Landscape), DM21 (Amenity), and DM43 (Design). The pods are strategically located within an existing car park. This siting minimises their impact on both the landscape and visual amenity, ensuring compatibility with the key landscape characteristics. They contribute positively to tourism infrastructure while encouraging eco-friendly transport options as outlined above. Given this, the installation of these pods is therefore acceptable

8. Recommendation

8.1. Approved subject to conditions:

- Three Year timeframe for commencement
- In accordance with the approved plans and material details.

9. Reason for recommendation

- 9.1. The placement of three electric cycle charging pods at The Quay car park in Beccles is in accordance with NPPF guidance and Policy DM11, DM15, DM16, DM21, DM29, DM43 of the Local Plan for the Broads and is considered acceptable.

Author: Callum Sculfor

Date of report: 20 January 2026

Appendix 1 – [Location map](#)

Appendix 1 – Location map

BA/2025/0370/FUL - Approach To Carpark Off Fen Lane Beccles Suffolk NR34 9BH



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Planning Committee

13 February 2026

Agenda item number 7.3

BA/2026/0004/COND Broad View, Fleet Lane, South Walsham

Report by Planning Officer

Proposal

Amendment to dormer windows and extension to decking area, variation of conditions 2 and 4 of permission BA/2025/0120/FUL.

Applicant

Mr Alan Goodchild

Recommendation

Approval with conditions

Reason for referral to committee

Applicant is BA Member

Application target date

6 March 2026

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1. Description of site and proposals

- 1.1. The subject comprises a residential plot on the eastern bank of South Walsham Broad, accessed via Fleet Lane, a narrow tarmacked road which runs parallel to the Broad on part of its eastern side. Fleet Lane in this section is a private road also forming a Public Right of Way, known as South Walsham Footpath 1. The plot contains a cabin which has a lawful use as a dwellinghouse located adjacent to the northern boundary of the site, to the immediate east of which is a storage shed. The cabin features black painted timber walls and a thatched roof. Both the cabin and shed are located on the eastern half of the plot which is mostly hard surfaced and includes areas for dinghy storage, car parking, and slipway access. The western half of the plot is laid to lawn. The southern side of the site features a mooring cut with a slipway to the rear.
- 1.2. The area is predominantly rural, with development around the Broad being limited to the areas along Fleet Lane and the adjacent Kingfisher Lane. The remaining areas around the Broad comprise woodland. Development along Fleet Lane and Kingfisher Lane is generally small and domestic in scale. There is a boatyard to the northern end of Fleet Lane which offers moorings, launching and other boating services, currently operated by Bondons Moorings Ltd. The proposed location is in an area dominated by chalet type dwellings and boathouses adjacent to the water's edge. The buildings are almost exclusively clad with dark-stained timber shiplap cladding and have thatched roofs.
- 1.3. The Broad bank along the developed areas is hard engineered, predominantly with timber quayheading. Along Fleet Lane the boundary to the Broad side of the road is generally a mix of >1.8m high closed panel fences and hedges, the obvious exception being the South Walsham staithe and slipway which is open to the road.
- 1.4. The site is located within flood zones 2 and 3, with the proposed dwelling being sited in both flood zones. The site is not within a Conservation Area and does not contain any listed buildings.
- 1.5. In July 2025 planning permission was granted with conditions to demolish the existing cabin and shed, and to replace these with a 1.5 storey dwellinghouse featuring a gable fronting the Broad and 2 gabled roof dormers to either side of the roof. The approved dwelling measures 8.0m x 10.5m, with a maximum height of 8.05m, falling to 4.2m at eaves. The approved external finish of the dwelling was black stained timber cladding with a cedar shingle roof. The dwelling would be raised above ground level by 0.91m, with hit and miss boarding to screen the void beneath the building, apart from on the northern side where the proximity of the boundary fence would screen the void. The

approved scheme includes a raised terrace to the western and southern sides of the dwelling, along with a smaller section in a recessed area within the south-west corner of the dwelling. The roof would include the provision of flush fitting solar pv panels sited between the two dormers on the southern roof slope. The approved scheme includes a canoe and dinghy pontoon to the front of the existing hard engineered bank, this would measure 13m by 1.9m.

- 1.6. Some months after gaining planning permission the applicant contacted the Broads Authority to advise that the roof dormers (commonly referred to as gabled dormers) would need to be adjusted to overcome a technical issue which has been highlighted during detailed study ahead of manufacture. Essentially, the latest Building Regulations and required U Values dictate the roof sections must be much thicker to comply, which means that the dormers cannot be provided in the approved position.
- 1.7. To overcome this issue the applicant proposes lowering the dormers so that effectively they become a continuation of the dwellinghouse flank walls and are cut into the roof eaves (commonly referred to as wall dormers). The overall size and design of the dormers, and their position on the horizontal axis have not been altered.
- 1.8. In addition to the proposed change to the dormer position, the applicant proposes to a minor addition to the approved raised terrace, this would extend the terrace area beyond the approved steps at the northern end only. The width of the proposed extended area is 3.82m and the additional projection is 0.75m, with the depth of the remaining 6.50m width of terrace remaining as approved including steps down to the garden.
- 1.9. It is noted that the application as submitted included a proposed change of materials from timber cladding to composite cladding. Following discussion with the applicant this element of the proposal has been removed.

2. Site history

- 2.1. In 2020 planning permission was granted for the re-location of the southern boundary of the site, provision of a replacement building on the site to the south, and relocation of the site access. The permission included the replacement of timber quay heading with galvanised steel, and a new mooring cut (planning reference BA/2020/0055/FUL).
- 2.2. In 2022 a Lawful Development Certificate for established use of a building as a dwellinghouse within Class C3 was not issued due to a lack of evidence being provided in support of the application (planning reference BA/2022/0475/CLEUD).
- 2.3. In 2023 a Lawful Development Certificate for established use of a building as a dwellinghouse within Class C3 was issued following submission of additional evidence (planning reference BA/2023/0467/CLEUD).

- 2.4. In 2025 planning permission was granted to demolish the existing cabin and outbuildings and replace with a new dwellinghouse. The permission included the installation of a canoe and dinghy pontoon (planning reference BA/2025/0120/FUL).

3. Consultations received

BA Historic Environment Manager

- 3.1. No objection subject to conditions.

4. Representations

- 4.1. None received

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).

- 5.2. The following policies were used in the determination of the application:

- DM2 - Water Quality and Foul Drainage
- DM4 - Water Efficiency
- DM5 - Development and Flood Risk
- DM6 - Surface water run-off
- DM13 - Natural Environment
- DM16 - Development and Landscape
- DM21 - Amenity
- DM22 - Light pollution and dark skies
- DM23 - Transport, highways and access
- DM31 - Access to the Water
- DM40 - Replacement Dwellings
- DM42 - Custom/self-build
- DM43 – Design

- 5.3. The Local Plan for the Broads is being reviewed. This has reached a late stage; the Regulation 19 consultation ended 16 January 2026 and as a result, the Local Plan is being prepared for submission to the Planning Inspectorate. As set out at Paragraph 49 of the December 2024 NPPF, Local Planning Authorities may give weight to emerging policies in emerging plans, reflecting the objections received on them and also how the policies meet the NPPF. All emerging policies have been assessed as to what weight

they can be afforded, in line with paragraph 49 of the December 2024 NPPF. Where relevant, commentary relating to an emerging policy is included in this report. For ease of reference, the policies in the Publication version/Regulation 19 version of the Local Plan have a prefix of PUB. The Regulation 19 version of the Local Plan can be found here: [Regulation 19 Local Plan](#). The following policies, relevant to this application, received no negative comments and therefore have some weight:

- PUBDM5: Water quality and foul drainage
- PUBDM22: Development and landscape
- PUBDM38: Access to the water
- PUBDM51: Custom/self-build

5.4. Material planning considerations:

- National Planning Policy Framework
- Planning Practice Guidance
- Self-build and custom Housebuilding Act 2015
- Landscape Character Area 23 Bure Valley - Wroxham to Fleet Dyke, South Walsham
- Design Guide and Code for the Broads
- Broads Authority Flood Risk SPD

6. Assessment

6.1. The replacement dwelling and canoe pontoon was approved under planning ref BA/2025/0120/FUL and was assessed against current planning policy, the Local Plan for the Broads and the NPPF. As such the assessment of this application only needs to consider the change to the position of the dormers, and the alteration to the raised terrace. The key areas of consideration are impact on landscape, design, and residential amenity.

Impact on the landscape

6.2. The proposed amendments to the dormers and raised terrace are considered acceptable as they retain the overall appearance of the approved scheme and do not have an unacceptable impact on landscape and waterscape character. The dormers overall the same size as approved so do not project further from the roof plane. Indeed, in being partly cut into the eaves the cheeks of the dormers are less visible, the resulting appearance being less prominent roof protrusions. The overall roof appearance with the amended dormer positions, and the appearance of the dwelling, are considered to be acceptable in landscape and waterscape terms, and complies with Policy DM16 of the Local Plan for the Broads and emerging Regulation 19 Local Plan policy PUBDM22.

- 6.3. The proposed amendment to the raised terrace only results in a minor increase to the footprint of the approved terrace and access steps and does not increase the height of the structure, with the additional projection being only 0.75m. It would result in an additional section of balustrading along the terrace frontage; in the context of the approved development this is considered acceptable. The additional terrace area is proposed for the siting of a hot tub, this is shown on the plans as being free standing on a concrete slab, therefore the hot tub itself would be screened by the hit and miss boarding. The amendment to the raised terrace is considered to be acceptable in landscape and waterscape terms, and complies with Policy DM16 of the Local Plan for the Broads.

Design

- 6.4. The overall design of the dormers is not altered, but their amended siting does result in a noticeable change to the design of roof and the relationship of the dormers to the vertical dwellinghouse walls. The use of wall dormers is not an unusual approach when making roof additions, and the design of the dwelling is such that the roof can affectively accommodate wall dormers without having an unacceptable impact on the design of the dwelling. The scale of dormers and their siting is acceptable and maintain a suitable balance to the appearance of the dwelling. The overall roof appearance with the amended dormer positions, and the appearance of the dwelling, are considered to be acceptable in design terms, and complies with Policy DM43 of the Local Plan for the Broads.
- 6.5. The proposed change to the approved raised terrace results in a form of design and appearance which is typical of raised terraces which commonly are finished with a balustrade, steps, or a combination of both. The combination in this instance is well considered, maintaining a sufficient openness to the water frontage, and in terms of design and appearance is acceptable and complies with Policy DM43 of the Local Plan for the Broads.

Amenity of residential properties

- 6.6. The property to the north of the subject site is part of the wider Bondons boatyard site, with a mooring cut sited adjacent to the shared boundary. The amended area of the raised terrace would not result in an undue loss of privacy at the neighbouring site taking into account the use of the site, the layout, and with regard to the approved scheme at the subject site. The proposed amendment to the raised terrace is therefore acceptable and complies with Policy DM21 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The proposed amendments to the approved dormers and raised terrace has an acceptable design which maintains the appearance of the approved dwelling, with no impact on the character and appearance of the surrounding landscape and waterscape, and no impact on the amenity at neighbouring sites, consequently the application is

considered to be acceptable and complies with Policies DM16, DM21, and DM43 of the Local Plan for the Broads, and emerging Regulation 19 Local Plan policy PUBDM22.

8. Recommendation

8.1. That planning permission be granted subject to the following conditions:

- Time limit
- In accordance with plans and documents
- In accordance with Pollution Prevention Plan
- In accordance with materials
- Details of large scale details of joinery
- Water consumption rate of no more than 110 litres/person/day
- PROW to remain open and accessible
- Sign up to Flood Warnings
- Void beneath dwelling to remain unobstructed
- No external lighting without prior written permission
- Provision of bat boxes
- Provision of bird cup or box
- Pontoon to be used for dingy and canoes and not for large, beamed vessels
- Removal of Permitted Development rights (Part 1 all relevant)

Author: Nigel Catherall

Date of report: 28 January 2026

Background papers: BA/2026/0004/COND and BA/2025/0120/FUL

Appendix 1 – [Location map](#)

Appendix 1 – Location map

BA/2026/0004/COND - Broad View, Fleet Lane, South Walsham



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Planning Committee

13 February 2026

Agenda item number 8

Enforcement update

Report by Development Manager

Summary

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

Recommendation

To note the report.

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

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

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

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

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

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

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

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

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
2 February 2024 BA/2022/0007/ UNAUP2	Holly Lodge, Church Loke, Coltishall	Unauthorised replacement windows in listed building	<ul style="list-style-type: none"> • Authority given to serve a Listed Building Enforcement Notice requiring the removal and replacement of the windows and the removal of the shutter. Compliance period of 15 years • LPA in discussions with agent for landowner [10/04/2024] • No resolution achieved through discussion. Legal advice sought [29/08/2024] • Case review – Listed Building Enforcement Notice to be served, in process of content being considered and drafted. • Listed Building Enforcement Notice served by hand on Friday 24th January. • Appeal submitted and valid – start date 19/03/2025. Will be dealt with by compliance officer [21/03/2025] • PINS contacted about delay, await response [19/11/2025] • PINS confirmed no case officers available [25/11/2025]
12 December 2025 BA/2024/0045/ UNAUP4	Land on the South-West Side of Norwich Road, Gillingham, Beccles	Unauthorised fence and development of mooring plot.	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring removal from the site all wooden boarding from the floor area including the raised stepped seating area to the rear of the plot, leaving a walkway with a width of no more than 2 meters from the edge of the quay heading. • Enforcement Notice served 12 December 2025 - compliance period 3 months [26/01/2026]
12 December 2025 BA/2025/0031/ UNAUP2	Land on the West Side of River Waveney Beccles	Unauthorised development without planning permission.	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring removal from the site all wooden decking boards and posts mounted into the ground which forms any part of the raised decking area. • Enforcement Notice served 12 December 2025 - compliance period 3 months [26/01/2026]

Author: Steve Kenny

Date of report: 26 January 2026

Background papers: Enforcement files

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
-

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.

Author: Natalie Beal

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

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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.

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.
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.

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.
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> ”.

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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.

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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

Planning Policy Team
The Broads Authority,
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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 read 'DB', is positioned above the typed name.

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

Cell shading	Scope of impact of emerging NPPF
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 'Set lement: 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 set lement in the development plan (whether using defined set lement boundaries or equivalent terms, or criteria for identifying set lement extents). Set lements do not include hamlets and scat ered groups of houses located outside predominantly built-up areas, unless specifically defined as a set lement 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: Crabbet '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

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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).

Planning Committee

13 February 2026

Agenda item number 10

National Planning Policy Framework consultation and changes to Biodiversity Net Gain

Report by Planning Policy Officer

Summary

An amended NPPF is out for consultation. There are also some changes to how Biodiversity Net Gain is applied. This report briefs Members and sets out a response to the consultation.

Recommendation

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

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1. Introduction

- 1.1. An amended, refreshed NPPF is out for consultation.
- 1.2. Section 2 uses a published article that explains the key changes to the NPPF as basis for briefing Members of the changes. Wording is taken from Planning Resource article titled ‘**60 things you need to know about the rewritten NPPF (updated 18.12.25)**’ released on 18 December 2025. The original article can be found here (subscription needed): [60 things you need to know about the rewritten NPPF \(updated 18.12.25\) | Planning Resource](#).
- 1.3. Section 3 addresses proposed changes to Biodiversity Net Gain that are outside of the proposed new NPPF.
- 1.4. Appendix 1 shows the proposed response to the NPPF consultation. The Committee’s comments, guidance and endorsement are invited.

2. 60 things you need to know about the rewritten NPPF

- 2.1. The government published the much-anticipated new version of the NPPF on 16 December. Out for consultation until 10 March 2026, the draft document vastly increases the length of the current NPPF, from 69 pages to 100, with a further 25 pages of annexes.
- 2.2. It also entirely restructures the current document around a series of policies within thematic chapters. Most chapters are split between plan-making policies and “decision-making policies”, the latter being how the document refers to what the government previously called national development management policies.
- 2.3. Instead of simply listing the text in consecutively numbered paragraphs, the draft presents plan-making and decision-making policies as numbered policies, much like they would be in local plans. The consultation says this presentational change is being made for ease of reference.
- 2.4. Below are the 60 key points from the draft issued for consultation.
- 2.5. Please note that text in italics is wording from the Planning Policy Officer.

2A GENERAL PRINCIPLES

1. The draft of the new NPPF put out for consultation contains both revised plan-making policies and national decision-making policies (NDMPs) in one document. As revealed by housing secretary Steve Reed in November, these NDMPs are proposed to be non-statutory. However, the associated [consultation](#) makes clear this status remains “under review”, with the case for statutory NDMPs likely to be reconsidered “if the proposed policies do not have

the desired outcomes of supporting more effective decisions and reducing generic or alternate policies in development plans”.

2. According to plan-making policy PM6 on general principles for plan-making, “all plan-makers” should not “duplicate, substantively restate or modify” what is contained in the NPPF’s decision-making policies. Policies should only be included that are “necessary and relevant to the plan being prepared”.

3. The draft proposes that as soon as it is live, local development plan policies that are “in any way inconsistent with the national decision-making policies” outlined in the NPPF should be given “very limited weight” in decision-making. The exception to this rule would be where local policies have been examined and adopted against the new framework.

We will seek to ‘future proof’ our Local Plan to reflect the emerging NPPF where possible, in liaison with the Planning Inspector through the examination of the Local Plan.

4. Plans being prepared today under the existing plan-making system can continue to be judged against the current NPPF. However, any plans being brought forward under the new system envisaged under the 2023 Levelling Up and Regeneration Act, due to come into force early next year, should use this new version.

This is where we are currently.

5. The proposed NPPF includes a series of new annexes that hold key technical reference information, including the methodologies by which to calculate housing need and the housing delivery test, and to conduct green belt reviews. The consultation issued alongside the draft also proposes moving new planning practice guidance on viability into a further NPPF annexe.

2B ACHIEVING SUSTAINABLE DEVELOPMENT

6. Policy S1 says any development plan should seek to meet the development needs of their area as a minimum. Plans should provide for new development, and improvements to the environment, in a way that promotes a sustainable pattern of growth and seeks to mitigate climate change and adapt to its effects, the policy says.

7. Policy S3 takes forward the presumption in favour of sustainable development. It retains the existing principle that proposals which accord with the various development plans should be approved without delay.

8. Policy S4 says development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, which includes impacts in relation to other policies in the framework. This might be where the proposal would have an unacceptable impact in relation to the allocation or safeguarding of land for particular uses in the development plan, or to the application of certain policies in the framework for safeguarding, the draft says.

9. Policy S5 proposes a new “tilted balance” to assessing development proposals outside settlements. It says only certain forms of development should be approved outside settlements. These include:

- Rural business and services that need to be located outside settlements.
- Development within reasonable walking distance of a railway station that provides a high level of connectivity to jobs and services (the document clarifies that this would include green belt development assessed to be not inappropriate).
- Development that would address “an evidenced unmet need” (including where the council cannot demonstrate a five-year housing land supply) and where development would be well related to an existing settlement or would comprise major development for storage and distribution purposes that accord with policy E3.

These developments, it says, should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects.

2C STRATEGIC PLANNING: SPATIAL DEVELOPMENT STRATEGIES

10. Policy PM1 introduces the new system of strategic planning. It says spatial development strategies (SDSs) are required to be produced by strategic planning authorities and the mayor of London. They should set a positive vision for future growth and change at a subregional scale, and should be “genuinely strategic in nature”, allowing for more detailed issues to be considered through other parts of the development plan.

11. SDSs should set out a strategy for a sustainable pattern of growth covering a period of at least 20 years. This includes through the apportionment to local planning authorities in the strategy area of objectively assessed needs for housing and other uses.

12. Tests of soundness are applied to the examination of SDSs. The tests are “positive”, “appropriate”, “effective” and “consistency with national policy”, as set out in policy PM14. The “positive” test states that a strategy which does not provide for objectively assessed needs “should be considered an exception”.

2D LOCAL PLANNING

13. Policy PM2 says local plans should provide a spatial strategy for a period of no less than 15 years. But the consultation asks whether this period is still appropriate, or whether it should be reduced to ten years.

14. Local plans should be prepared and adopted within 30 months of publishing a “Gateway 1” self-assessment. Authorities must start on the preparation of the next local plan no later than five years after adoption of the current plan. But it says this should be earlier where an inspector at examination of the current plan has made a recommendation to do so or where there has been a significant change in local circumstances (including an increased housing requirement).

15. Policy PM10 instructs plan-making authorities to engage proactively and regularly to identify and address cross-boundary matters, including where development needs that

cannot be met wholly within a particular plan area could be met elsewhere, and to determine optimal locations for growth. Where matters are already addressed by an adopted SDS, plan-making authorities within the strategy area do not need to revisit them when preparing their plans.

16. Statements of common ground should be used to demonstrate that relevant cross-boundary matters have been addressed, including by distributing and providing for unmet needs across neighbouring and/or nearby areas. Where it has not been possible to fully address cross-boundary matters, plan-making authorities should demonstrate that they have taken all reasonable steps to address them.

17. Quantitative standards set through development plan policies should be limited to infrastructure provision, affordable housing requirements, parking and design and placemaking, says policy PM13. These should be in instances where such standards will provide clarity and a high degree of certainty about the requirements that relevant development proposals are expected to meet. The consultation makes clear this means plans will not be expected to set higher standards for energy efficiency than those within building regulations.

18. The soundness tests for local plans remain, with the exception of the “effective” test being replaced by a “realistic” test, and a new test stating that the plan should be in general conformity with any adopted SDS for the area.

2E CHANGES TO DECISION-MAKING POLICIES

19. The new policy on development viability, DM5, sets out a range of scenarios where viability tests might be appropriate to reduce planning contributions from a site to levels below that expected in local policy. The policy says viability tests are reasonable where the development proposed is different from that envisaged during the local plan examination; where the site characteristics “differ substantially” from those assumed during the plan process; where the site is burdened by unforeseeable costs; or where economic circumstances have changed significantly.

20. A revised policy on planning conditions and contributions makes clear that “model” planning conditions “should be used unless there are strong reasons for using a different condition”. Conditions requiring discharge prior to development commencing “should be avoided”, it proposes.

21. Both local authorities and mayoral authorities are “strongly encouraged” to make use of local development orders (LDOs) to provide certainty to applicants about the prospects of permission. The current framework does not extend to mayoral authorities and authorities are merely “encouraged” to use LDOs.

22. The fact that an up-to-date calculation of local housing need is higher than the local housing requirement should not be considered evidence of unmet housing need for a period of five years from adoption of a plan, as long as certain conditions are met. These are that the planning authority can demonstrate a five-year supply of deliverable housing sites (with

the appropriate buffer) and where the housing delivery test indicates that the delivery of housing is more than 75 per cent of the housing requirement over the previous three years.

2F GREEN BELT

23. Housing and mixed-use development around stations defined as “well-connected” will not be considered inappropriate, provided it is of an appropriate scale, does not prejudice long-term development proposals and complies with the “golden rules”. The government says the objective of this policy is to support high-density development in sustainable locations. Footnote 52 of the document defines the term “well-connected”.

24. Policy GB2 says the preparation of strategic plans (SDSs) should be informed by an assessment of the strategic role of green belt land in the area. The assessment should take into account the five purposes of the green belt, it adds. The strategic assessment should be used to help develop the SDS and to identify whether there are areas where green belt boundaries may require further consideration through the preparation of local plans.

25. Green belt reviews should identify broad locations for strategic development including new settlements and major urban extensions. Such broad locations should extend over any large site allocations in adopted local plans, it says.

26. The development plan should set out ways in which the impact of green belt releases could be offset through compensatory improvements to the environmental quality and accessibility of remaining green belt land, reinstating a requirement that had been dropped in the 2024 version of the framework.

27. Local plans should be informed by an assessment that identifies grey belt land, in accordance with a process that reflects the guidance on green belts issued in February 2025. “Green belt assessments should form a routine part of plan-making where green belt exists, including identifying any land that constitutes ‘grey belt’,” the consultation document says.

28. Policy GB3 says green belt boundaries should be altered through local plans where this would enable the development of land around stations, or where exceptional circumstances are fully evidenced and justified.

29. The definition of grey belt in the glossary of the document no longer excludes so-called “footnote seven” areas, in which sites such as wildlife habitats or assets such as heritage buildings are protected, from grey belt designation. The consultation document says the reference was “originally included to ensure that our grey belt policy reforms did not undermine the protection given to these areas”. However, it says the reference “could make it more difficult to accurately identify grey belt” sites and “apply additional layers of protection”, which it says is “unnecessary”.

30. Policy GB8 states that major housing developments in the green belt should be subject to the golden rules regarding affordable housing and infrastructure provision. It clarifies that where development complies with the golden rules, this should be given substantial weight.

31. Part 3 of this policy sets out the three circumstances in which a site-specific viability assessment may be justified to allow contributions expected by the golden rules policy to be

adjusted. These are where a proposal is on brownfield land, where it is for a multi-phase, strategic site, or for a development model “which is of a wholly different type to that assumed in the viability assessment that informed the development plan”. In these cases, it says, development should still “make the maximum possible contribution” to affordable housing and infrastructure.

2G HOUSING

32. Under proposed policy HO1, the housing requirements for individual local authorities should be taken from strategic-level SDSs, where those exist, and “should not be retested” during local plan formation unless there has been a “significant change in circumstances”. The new plan-making policy for housing also proposes changing existing policy to specifically reference the need to accommodate travellers.

33. Policy HO2 proposes that where SDSs are not in place, the housing requirement figure should be higher than the identified local housing needs assessment “where appropriate”. This would include situations where more homes are required to meet the needs of neighbouring authorities, or where authorities have “significant growth ambitions”.

34. Local authorities will be required, under proposed policy HO5, to set a minimum level of homes that should be built to accessible standards in their area, against a national baseline of 40 per cent. On sites of 150 homes or more, councils should use their local plan to set expectations for tenure mix in order to drive build.

35. The consultation proposes introducing a medium-size site category into the planning system, covering developments of 10-49 homes, with an area of up to 2.5 hectares in size. This definition, more generous than proposed in the government’s [earlier consultation](#), is to be linked in to various policy easements – for example, that medium-sized sites be allowed to pay cash-in-lieu contributions for affordable housing (see below).

36. Under policy HO6, the consultation proposes local plans should allocate at least ten per cent of the housing requirement to sites of between one and 2.5 hectares. The policy also retains the existing requirement for plans to allocate a further 10 per cent to sites of one hectare or smaller.

37. Under proposed decision-making policy HO8, proposals for military affordable housing should not be required to meet local plan targets to provide additional affordable housing contributions. This includes where military housing is delivered on its own or alongside other forms of affordable housing.

38. The ministry of housing, communities and local government is consulting on whether to allow developers of medium-sized sites [to be exempted] from the requirement to deliver on-site affordable housing. The consultation has requested views on whether it should insert text into policy HO8 on providing affordable homes, such that “a cash payment in lieu should be accepted” where developments meet the medium-site definition.

39. New proposed policy HO13 on the build-out of residential and mixed-use development encourages local authorities to impose planning conditions on applicants “requiring that

development begins within a timescale shorter than the relevant statutory default period". However, it says this should be done only where it would speed build-out "without threatening its implementation or viability".

2H URBAN AND SUBURBAN DENSIFICATION

40. A proposed decision-making policy L2 on making effective use of land calls for "substantial weight" to be given to various types of proposals that reuse existing sites. It specifically encourages schemes that remediate land; make better use of underutilised land; provide temporary uses; make use of airspace above existing development; or provide "sensitive redevelopment or additional development within existing plots", including mansard roof extensions.

41. While opening up the possibility of "additional development within existing plots", policy L2 also places limits on the scale of redevelopment within "residential curtilages". It says schemes should "not occupy more than twice the footprint of the existing building on the site, and retain at least 50 per cent of the non-developed area within the building curtilage".

42. Residential or mixed-use developments within settlements should increase the density in the area in which they are proposed, according to new decision-making policy L3. It says that while an area's character should be taken into account in decisions, this "should not preclude development which makes the most of an area's potential".

43. Policy L3 also proposes that plots around train stations should be built out at a density of at least 40 dwellings per hectare (dph), rising to 50dph where the station is "well-connected". The NPPF defines well-connected stations as those in the top 60 English "Travel to Work" areas by gross value added and are served by four trains or trams per hour overall (i.e. two trains per hour in any one direction).

2I CLIMATE CHANGE

44. Local authorities should consider the risk of wildfires when drawing up local plans, and should propose development patterns that "contribute to radical reductions in greenhouse gas emissions". The proposed plan-making policy CC1 on climate change says local plans "can" be informed by an assessment of baseline carbon emissions and the potential effect of development options on future emissions.

45. New proposed decision-making policy CC2 on the mitigation of climate change states that projects should, "where relevant", deliver a variety of sustainability benefits. These include being located close to sustainable transport and/or local facilities and amenities; conserving energy through design approaches; reusing existing materials; connecting to decentralised heat networks; and contributing to habitat restoration.

46. Under CC2, substantial weight would be given to improving the energy efficiency of existing buildings through a development proposal. Likewise, substantial weight would be given to the use of renewable or low-carbon sources or heat networks.

47. Proposed policy CC3 addressing adaptation to climate change requires decision-makers to consider the "potential impacts of climate change over the lifetime of the

scheme". Existing policy does not specify whether it has to go further than considering existing impacts.

2J ECONOMY AND TOWN CENTRES

48. Substantial weight should be given to the economic benefits of proposals for commercial development, according to policy E2. When assessing whether there is an unmet need for such development, considerations should include whether market signals indicate an undersupply of specific types of land or premises, and whether a proposal's specific locational requirements are met by existing allocations in the development plan.

49. The draft framework retains the town centre-first principle, including the sequential and impact tests for retail developments. It retains the core principle that "main town centre uses" should be located in centres but seeks views on the retention of the sequential test.

2K HERITAGE

50. Development proposals involving heritage assets should specifically consider the potential positive effects on the heritage asset of the scheme when assessing impact. The revised policy, HE5, on assessing effects on heritage assets proposes stating that it is the effect on an asset's significance rather than the scale of the development that should be considered by decision-makers.

51. The new draft proposes revising the weight given to the consideration of the potential effect of a development proposal on a designated heritage asset from "great" to "substantial". A footnote to the draft NPPF states that this is to bring the document in line with statutory tests that require considerable importance and weight to be given to harm to the relevant designated assets.

2L VISION-LED TRANSPORT APPROACH

52. Sustainable transport considerations should form part of early engagement with local communities when drawing up local plans, under proposed plan-making policy TR1. The policy also suggests that councils set thresholds for what constitutes a significant amount of movement arising from new development, against which to make planning decisions.

53. Policy TR2 states that local plans should set local parking standards. Currently the NPPF suggests this as an option.

2M NATURAL ENVIRONMENT

54. Local authorities should not attempt to levy higher biodiversity net gain requirements than the statutory level, except for on specific site allocations where fully justified. The stipulation comes in draft plan-making policy N1 on identifying environmental opportunities and safeguards.

This is a disappointing proposal as it means that our proposed policy on 20% BNG, which we have justified and checked in viability terms, would not be valid if this stance is taken forward in the final NPPF.

55. Decision-takers should consider landscape character and “existing natural features” when considering the impact of development proposals. Under decision-making policy N2, development proposals should consider these factors and minimise biodiversity impact, which, where it cannot be avoided or mitigated, should result in permission being refused.

56. Development proposals should incorporate integrated nest boxes for birds, known as “swift bricks”, into their construction “unless there are compelling technical reasons which prevent their use”. Decision-making policy N2 proposes that developments should also include features to support other threatened species including bats and hedgehogs.

57. Substantial weight should be given to the preservation of the natural beauty of protected landscapes, replacing “great weight” in the current framework. The proposed policy N4 for protected landscapes adds that major development should only be supported in “exceptional circumstances”.

It is noted that reference to the National Parks Circular is removed and the loss of the clear wording around National Parks and the Broads having the ‘highest status of protection in relation to landscape and scenic beauty’. No reason is given for these changes.

2N MINERAL EXTRACTION

58. Local authorities’ development plans should not identify new oil and gas sites outside licensed areas and should not identify any sites at all for coal or peat extraction. The draft policy M1, relating to planning for a sufficient supply of minerals, says plans should distinguish between the exploration, appraisal and production phases of oil and gas developments.

The issue of peat excavated as a by-product of development is still not addressed at a national level.

59. “Substantial weight” should be given to the benefits of mineral extraction in decision-making, including works that facilitate the exploration and extraction of a new category of “critical and growth minerals”. These are defined in policy M3 as minerals that support either the green energy transition, net zero, national security or the government’s industrial strategy.

60. In decision-making, applications for peat extraction should be refused, and proposals for coal workings should only be approved in very limited circumstances. Decision-making policy M5 says proposals must facilitate the exploration or production of licenced oil and gas reserves; be necessary for public safety; or target the capture and use of methane from coal mines.

3. Other changes to BNG

3.1. While not in the NPPF consultation, MHCLG has set out that it will exempt smaller developments up to 0.2 hectares from biodiversity net gain and simplify requirements on small and medium sites that are not exempted. They also will make it ‘easier, quicker, and cheaper to deliver BNG offsite’. Also set out is that Defra will consult on an

additional targeted exemption for brownfield residential development on sites up to 2.5 hectares.

- 3.2. More information can be found here: [Planning reforms: delivering homes, supporting farmers, and protecting nature – Environment](#).
- 3.3. The article/announcement says: ‘A full consultation response and implementation timeline is expected to be published in the new year, alongside a consultation response on implementing BNG for nationally significant infrastructure projects (NSIPs), which will go live in May 2026. Until changes are officially implemented which will require secondary legislation in some cases, BNG continues to apply in its current form and developers should continue to follow existing guidance and legislation when delivering BNG’.
- 3.4. We await the specific details, but it is fair to say that most developments that come forward in the Broads are small and so the new size threshold may mean that fewer schemes will need to address BNG. That coupled with the proposal to reduce opportunities to require more than 10% BNG (explained in section 2 at number 54) means that the impact that BNG could have is going to be much reduced. There are of course still requirements to assess impact on biodiversity. And the Authority has a long track record of securing biodiversity enhancements which we would still be able to require.

Author: Natalie Beal

Date of report: 27 January 2026

Appendix 1 – NPPF consultation response

Appendix 1 – Proposed response to NPPF consultation

Document: The consultation version of the NPPF is here: [National Planning Policy Framework: draft text for consultation](#). The accompanying document is here: [National Planning Policy Framework: proposed reforms and other changes to the planning system](#).

Due date: 10 March 2026

Status: Draft

Proposed level: Planning Committee endorsed

Proposed response:

6) Do you agree with the role, purpose and content of spatial development strategies set out in policy PM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Partly agree with the introduction of Spatial Development Strategies (SDSs) as this has been a significant gap in Policy making since the abolition of Regional Spatial Strategies in England in 2010 which had existed in different forms since the 1960s. It is particularly important to National Parks & the Broads where development may be limited within them, but the impact of development will be felt on the both the wider setting of the protected landscape, the environment/nationally designated sites and the economy.

Under the December 2024 NPPF and PPG (2a-014-20241212) there is the ability for National Park and the Broads Authority to use a ‘method determined locally’ rather than the standard method to assess housing need. This is essential because these protected landscapes do not operate like normal housing market areas. They often have high rates of second homes and short-term lets due to a strong visitor economy, and there is no potential to address affordability through significant increases in supply because this would conflict with their statutory purposes. This facility does not appear to be given in the draft PM1, S1 or HO1. Strategic Authorities with a high proportion of protected landscapes will struggle to meet the combined standard method figures for all the local authority areas within the SDS without such a locally determined housing need figure being applied to the protected landscapes.

The NPPF must therefore specifically refer to SDSs that include a protected landscape within them and their elevated status in terms of protection. Perhaps most areas that are to produce a SDS have either a National Park/the Broads or National Landscapes in. Maybe more than one (for example, for the Norfolk and Suffolk SDS, there will be the Broads as well as two National Landscapes). There should be a criterion relating to continuing the protection and enhancement of the protected landscape and its setting, having regard to the management plan as well as the Levelling Up and Regeneration Act 2023 (LURA) which introduced a strengthened statutory duty for local authorities to conserve protected landscapes. Section 245 of the LURA (Protected Landscapes) amended the duty on relevant authorities in respect of their functions which affect land within National Parks and The Broads to ‘seek to further’ the statutory purposes of Protected Landscapes when reaching decisions and undertaking

activities that impact these areas¹. Relevant authorities need to apply the duty when undertaking any function in relation to, or so as to affect, land in a Protected Landscape; this includes decision making in respect of development management and planning applications.

There is no mention of climate change adaptation, mitigation or resilience in the list of issues a strategic development strategy should address. There is no issue more 'genuinely strategic, cross-boundary' as climate change. Climate change needs to be included.

11) Do you agree with the principles set out in policy PM6(1c), including its provisions for preventing duplication of national decision-making policies? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Partly agree but the main issue is whether or not the NDMPs are statutory or non-statutory – it is currently proposed that they are not. You will be aware of the contradictions this introduces in that Section 38 (6) of the 2004 Act relates to the primacy of the Development Plan and yet the NPPF is proposing national decision-making policies. This will create confusion and introduce uncertainty and inconsistency of approach across LPAs and PINS.

In addition, national decision-making policies are going to try to make a one size fits all approach to the entire country of England. Cities are different to towns and villages which are different to rural areas which are different to protected landscapes and coastal communities. The new NPPF needs to ensure there is potential for Local Plans to include policies that elaborate on certain parts of national decision-making policies or take a particular stance forward, if it is fully justified. What if the one size fits all national decision-making policies just don't work for a particular area because of the local circumstances? Is there scope to address this through Local Plans?

13) Do you agree with the approach to the preparation of plan evidence set out in policy PM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

It is not clear what evidence the Government thinks has been produced that is not needed. It is not clear why a LPA would spend precious funding and time on work that is not required.

19) Do you agree that the tests of soundness set out in policies PM14 and PM15 will allow for a proportionate assessment of spatial development strategies, local plans and minerals and waste plans at examination? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If not, please explain how this could be improved to ensure a proportionate assessment, making it clear which type of plan you are commenting on?

PM14 part 1 – says examiner, then Inspector, then examiner – it needs to be consistent. Or is there a difference? What is that difference?

¹ [Levelling-up and Regeneration Act 2023](#) – Section 245, part 11 onwards.

20) Do you have any specific comments on the content of the plan-making chapter which are not already captured by the other questions in this section?

In terms of examining Supplementary Plans and Neighbourhood Plans, do they need to consider/be in conformity with SDSs?

21) Do you agree with the principles set out in policy DM1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

The glossary defines Medium development: 'For housing, development where 10-49 homes (inclusive) will be provided, and the site has an area of up to 2.5 hectares'.

Development that size can have an impact on the area and still need infrastructure to support them. DM1 seems to imply that schemes for medium and minor development don't need to engage early with locals and stakeholders. DM1 goes into say that minor and medium sized schemes don't need to produce a planning statement. The planning statement would be proportionate and not an overly burdensome task.

22) Do you agree with the policy DM2 on information requirements for planning applications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

It is not clear what information to accompany planning applications the Government thinks that LPAs are requesting that is not needed. It is not clear why LPAs would do that. The DM Officer then needs to spend time assessing the information that is not needed.

If there are requirements as per national development management policies, why are they on the local validation checklist?

31) Do you agree with the new intentional unauthorised development policy in policy DM8? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree. 32) Are there any specific types of harm arising from intentional unauthorised development, and any specific impacts from the proposed policy, which we should consider? a) If so, are there any particular additions or mitigations which we should consider?

Give weight in what way? Need guidance on this and the various scenarios. Not clear how the intention test would be applied.

35) Do you agree with the proposed definition of settlements in the glossary? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

It is not clear why 'Broads Authority' is in brackets. Please remove the brackets. We ask this every time the NPPF is published – footnote 23, page 22.

In the glossary you would need to define what is a hamlet as this would be a matter of interpretation.

There is a concern that relying on the glossary to define what a settlement is, is a stage removed from Policy S4, because S4 just says 'settlements' it does not refer to settlement/development boundaries or point to the development plan.

36) Do you agree with the revised approach to the presumption in favour of sustainable development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

The proposed NPPF is confusing and lacks clarity. The current wording of the current NPPF is clear.

The presumption in favour of sustainable development is mentioned twice in the emerging NPPF, whereas in current NPPF, it is referred to 9 times.

S5 1 J i is very permissive with no cross reference to footnote 23. This is a concern as footnote 23 protects protected landscapes from inappropriate development. The equivalent footnote in the current NPPF is footnote 7 and that is referred to in both plan making and decision making in terms of Paragraph 11. This needs to be addressed.

S3 is the presumption in favour of sustainable development. It defers to policy S5 for development outside of settlements.

- *S5 2 could defer to N4, but that is not clear if it is the case. The NPPF needs to be clear about what S5 2 refers to.*
- *S5 5 talks about green space. But there is no mention in S5 or S3 about the areas referred to in footnote 23 which is the current NPPF footnote 7.*

Not all settlements have a settlement or development boundary. These boundaries are set out in Local Plans and tend to reflect the services and facilities within them. Local Plans direct development to areas with these boundaries. The proposals in the NPPF seems to treat all settlements the same, regardless of if they have services and facilities within them. This could lead to dwellings being built in unsustainable locations in settlements without services and facilities and therefore increased reliance on single occupancy car use to access services and facilities like schools and shops, rather than being able to walk, cycle or use public transport to access them. Also, such settlements without such facilities are more rural in nature and may not have satisfactory broadband. And promoting development in settlements without services and facilities could lead to increase in social isolation and the negative health and wellbeing impacts associated with that. It is not clear from this if LPAs can set settlement boundaries/development boundaries or if this approach is a thing of the past as all settlements are now treated as equal.

37) Do you agree to the proposed approach to development within settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Agree with the approach – this is a well-established principle in planning policy

S4 part 1 – needs to also refer to the development plan like is proposed elsewhere. There is no explanation as to why the development plan is being ignored in this instance. Part 2ai then refers to the development plan.

38) Do you agree to the proposed approach to development outside settlements? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree. 39) Do you have any views on the specific categories of development which the policy would allow to take place outside settlements, and the associated criteria? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons.

S5 part 1 – needs to refer also to the development plan like is proposed elsewhere. There is no explanation as to why the development plan is being ignored in this instance.

S5 part 1a – people need to access sports facilities, allotments and burial grounds. They need to access the others in the list, but they tend to need to be or are located outside of settlements anyway. The location of sports facilities, allotments and burial grounds need to be accessed by walking, cycling and public transport otherwise there will be reliance on single occupancy car use, with the associated car parking needed. As written, this will not ‘prevent unsustainable patterns of growth and conserve rural character’ as is set out in the consultation document accompanying the draft NPPF.

S5, part 1b – what is a rural business? Is it a business that is located or wants to be located in a rural area, as that can be any business. What are the tests that determine if something is a rural business and has a genuine need to be in a rural area?

S5, part 1d – this could result in a dwelling in an isolated location resulting in reliance on single occupancy car use – this would result in ‘badly located development’.

S5, part 1e – these groups of houses would not be classed as settlements and would not have access to services and facilities and would result in reliance on single occupancy car use and could lead to social isolation and again ‘badly located development’. It would also lead to differing opinions about what infilling is; how big can the gap be, does it have to be on both sides/front & back of the site etc.

S5, part 1h and part 1j – what is ‘well related’?

40) Do you agree with the proposed approach to development around stations, including that it applies only to housing and mixed-use development capable of meeting the density requirements in chapter 12? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, including any evidence that this policy would lead to adverse impacts on Gypsies and Travellers and other groups with protected characteristics.

S5, part 1h is written oddly. 'within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services'²⁶; physically well-related to a railway station or a settlement within which the station is located' – should it be an 'or' and then go on to list the other things in the paragraph? As is these two locational criteria are 'or' and then a proposal needs to meet all of the remain criteria? This needs clarifying.

S5, part 1h – what is a 'reasonable walking distance'? Do there need to be footways that can be used, or is walking on the road ok? What about use throughout all seasons and times – as in it is a safe route that has streetlights?

42) Do you agree with the approach to planning for climate change in policy CC1? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Page 27 Paragraph 1d – "Green & Blue" Infrastructure would be preferred.

43) Do you agree with the approach to mitigating climate change through planning decisions in policy CC2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If not, what additional measures could be taken to ensure climate change mitigation is given appropriate consideration?

CC2 part 1f – these talks about creation or restoration of habitats which can act as carbon stores, but it does not talk about protecting them from development in the first place. This needs to be addressed.

CC2 part 1f – Support reference to peatland. But you need to check if peatland is a habitat or a soil. If it is a soil type, then you need to amend part 1f to refer to peat soils and/or carbon rich soils.

Paragraph 2 of policy CC2 refers to giving weight to heat networks. This language seems inconsistent with the current proposal to create Heat Network Zones that will mandate the use of heat networks in certain areas. The wording should be strengthened to reflect that heat networks are non-optional for certain developments, and that there should be weight given to siting developments within those zones to maximise their effectiveness."

44) Do you agree with the approach to climate change adaptation through planning decisions in policy CC3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) What additional measures could be taken to ensure climate change adaptation is given appropriate consideration?

CC3 1a – this seems to be contrary to the flood risk policies in the NPPF. The use of ‘or’ implies that development does not need to be located where risk of flooding is minimised – it seems to say that can be ignored if development can be made safe. This is saying that development can go in flood risk areas. This is in total contrast to the flood risk section of the NPPF. Para 170 of the current NPPF says ‘Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere’. The emphasis being on ‘necessary’. That is not included in CC3 1a.

CC3 1 a: ‘Be located where the risk of flooding is minimised, or can be managed and the development made safe without increasing risk elsewhere, in accordance with policies F4, F5, F6, F7 and F8’

48) Do you agree the requirements for spatial development strategies and local plans in policy HO1 and policy HO2 are appropriate? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree

HO1 part 2 – residential moorings and residential caravans (non gypsy and traveller) are not included in the list, but the Housing and Planning Act 2016 requires Housing Authorities to assess the need.

The groups listed basically describes everybody apart from working aged people without children who own their own home. It is therefore not helpful – it would be better to simply say ‘take account of everybody’s needs and leave the a-j list out or put it in the glossary, adding ‘working aged people without children who own their own home’ and describe it as a definition of different groups.

49) Is further guidance required on assessing the needs of different groups, including older people, disabled people, and those who require social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If so, what elements should this guidance cover?

Yes – an agreed methodology for residential moorings and residential caravans (non gypsy and traveller).

55) Do you agree the plan-making requirements, for both local plans and spatial development strategies, in relation to large scale residential and mixed-use development are sufficiently clear? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

This section needs to refer to the impact on and setting of protected landscapes.

56) Do you agree our proposed changes to the definition of designated rural areas will better support rural social and affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Calling a parish that has a population of 3,000 or less a 'Designated Rural Area' and then still having Section 157 of the Housing Act 1985 which says 'an area designated by order of the Secretary of State as a rural area' is going to cause confusion as they use the same words but apply to different places. We suggest using different phrases/words.

In addition, the glossary refers to National Parks but DOES NOT include The Broads. This means that this policy does not apply to the Broads as written, although it does apply to National Parks and National Landscapes. This was a serious omission in the last NPPF which needs to be rectified now by adding The Broads, so the policy in the NPPF applies to National Parks, The Broads and National Landscapes.

HO5 1 a i – last sentence – what about medium development? The accompanying document on page 43 says '...to allow affordable housing contributions to be sought on minor development in parishes...' – but HO5 1 a I does not say minor development (or medium development); it only says 'major development'. What happens with medium development?

57) Do you agree with our proposals to ask authorities to set out the proportion of new housing that should be delivered to M4(2) and M4(3) standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The previous Government consulted on a change to Building Regulations that would apply nationwide. This document implies something is coming from this Government – what is going to happen regarding the accessible homes standard at a national level?

64) Do you agree flexibility relating to the size of market homes provided will better enable developments providing affordable housing? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

There is an issue here regarding creating 'mixed and balanced communities'? Too much of one housing type in an area would not result in mixed and balanced communities.

66) Are changes to planning policy needed to ensure that affordable temporary accommodation, such as stepping stone housing, is appropriately supported, including flexibilities around space standards? a) If so, what changes would be beneficial?

There is no definition as to what 'stepping stone housing' is in order to make an informed response. The consultation document implies this is a type of housing rather than an organisation.

73) Do you agree with the criteria set out regarding the locations of community1based specialist accommodation, including changes to the glossary? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree. 74) Do you agree with the criteria set out regarding the locations of purpose-built student accommodation and large-scale shared living accommodation, including changes to the glossary? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

HO9 1 a i says 'being located where residents will be able to access frequently-used services easily and safely by walking, wheeling (including mobility scooters) and public transport' which is supported, but HO9 b ii does not say the same thing; HO9 b ii says 'being located where residents will be able to access frequently-used services (such as education facilities) easily and safely'- no mention of walking, wheeling and public transport. HO9 1 c i says the same as HO9 1 a i.

How does a LPA define 'easily and safely'?

HO9 1 a i and HO9 1 c i need to refer to cycling when referring to accessing services easily and safely.

75) Do you agree the proposals provide adequate additional support for rural exception sites? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, including what other changes may be needed to increase their uptake?

HO10 2 a – what does 'physically well-related to settlements' mean?

80) Do you agree the proposals in policy HO13 will help to ensure development proposals are built out in a reasonable period? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

HO13 1 – what about medium sized development? Is it not important that is developed without unnecessary delay? Isn't the point of introducing medium sized development and that sized development not having the same requirements as major, for it to be built out quickly?

HO13 1 – as written, this is an introduction. It is not requiring anything. Is that the intention? Or should it be requiring information, as part of an application, showing how the scheme will be built out without delay?

HO13 2 – beginning development in a shorter time period will not mean the scheme is completed any quicker. There are often some pre-commencement conditions that can be completed making the permission extant. The issue that is trying to be addressed is completing schemes and this will not affect that.

82) Are any more specific approaches or definitions needed to support the delivery of very large (super strategic) sites, including new towns? Yes, no a) Please provide your reasons.

HO13 3 – what is ‘large scale’ in this instance?

87) Do you agree with the approach to rural business development in policy E4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

There is some duplication with S5 1.b. Presumably that deals with new development, what does E4 deal with under ‘sustainable growth of businesses. This should be made clear.

E4 2 a - what does ‘physically well-related to settlements’ mean?

91) Do you believe the sequential test in policy TC3 should be retained? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

The use of the sequential test has been problematic since the concept was first introduced in PPG 6 Planning for Town Centres in 1996. The aim being a town centre first hierarchy to prevent out of town retail development. This has clearly not worked – evidenced by the numerous out of town retail parks around every town and city in the country. You need to consider if this is still a viable way of assessing retail development and protecting town centres.

TC3 5 – what does ‘small scale’ mean?

93) Do you agree that the updated policies provide clearer and stronger support for the rollout of 5G and gigabit broadband? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

First of all, the policy in the NPPF is ‘CO’ whereas in the supporting document it is ‘TI’. It is presumed this is a mistake and TI should be CO.

CO1 2 – it is noted that this part of the draft NPPF says ‘local planning authorities should not require minimum distances to be maintained between telecommunications infrastructure and other development’. The fans on masts are louder in the summer on hot days which is when those living in houses are wanting to open windows, including at night. The noise from masts is not mentioned as a consideration.

95) Do you agree the supporting information requirements are proportionate and sufficient without creating unnecessary burdens? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

CO2 1 a – local residents need to be consulted. This is easy to do by a leaflet or letter drop. It is strange that the community is not included.

CO2 1 – *There needs to be a requirement for proposals to justify why they need to be where proposed. That is not questioning the need for expansion or upgrading; it is requiring justification for the proposed location.*

[Cabinet Siting and Pole Siting Code of Practice, Issue 2, 2016 - GOV.UK](#) does not seem to be mentioned in this section and it seems logical to do so.

98) Do you agree with the proposed approach to supporting development for renewable and low carbon development and electricity network infrastructure in policy W3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree, and any changes you would make to improve the policy.

Taking away the ability for local plans to set local considerations relating to renewable energy is not supported.

We note for example that these issues are not addressed in the proposed NPPF, but are important to consider and address when planning and determining schemes:

- *Impact on safeguarded MOD sites and assets.*
- *Impact on air traffic safety, radar, reflected light and telecommunication, water quality and water resources.*
- *For solar farms within 300 m of a water body, that they will not reflect polarised light that may attract aquatic insects or deceive them into laying eggs on the solar panels.*
- *Avoiding best and most versatile agricultural land.*
- *For turbines: The potential for impacts on birds and bats must be fully assessed and avoided and mitigated. This assessment needs to address the potential effect the colour of turbines can have on biodiversity;*
- *No unacceptable adverse impact on local amenity as a result of noise, shadow flicker and visual intrusion or conflict with public safety. To protect visual amenity, there will be a presumption against development within a distance of six times the turbine blade tip height of residential properties unless it can be demonstrated that the presence of turbines would not have an unacceptable impact on living conditions;*
- *Potential interference to television and/or radio reception and information and telecommunications systems will be avoided and/or mitigated;*
- *The proposed wind turbines shall be located appropriate distances from highways, and railway lines to provide a safe topple distance. A minimum topple distance of the turbine height plus 10% is recommended;*
- *No unacceptable adverse effects on sensitive or well used viewpoints;*

Furthermore, what about local evidence informing such decisions? For example, as a protected landscape, we have a Landscape Sensitivity Study that relates to solar farms and wind turbines. Are you saying that we cannot use that to inform our decisions as it is a locally produced consideration?

W3 2 - There needs to be a requirement for proposals to justify why they need to be where proposed. That is not questioning the need for renewable energy; it is requiring justification for the proposed location.

99) Do you agree with the proposed approach to supporting development for water infrastructure in policy W4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

W4 2 - There needs to be a requirement for proposals to justify why they need to be where proposed. That is not questioning the need for water infrastructure; it is requiring justification for the proposed location.

We recommend including a reference to water needs of nature restoration and agriculture, not just infrastructure and energy.

105) Do you agree with the exclusion of development involving onshore oil and gas extraction from policy M3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

Footnote 41 needs to cross refer to policy M5. As written, it does not say where in the NPPF proposals for involving peat, coal or onshore oil and gas extraction will be considered.

107) Do you agree policy M4 sufficiently addresses the impacts of mineral development, noting that other national decision-making policies will also apply? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. 108) Please provide your reasons, particularly if you disagree.

M4 1 a – this needs to refer to protected landscapes and landscape character. It refers to the natural and historic environment, but this needs to go further to include landscape impact.

109) Do you agree with approach to coal, oil and gas in policy M5? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree. 110) Are there any other exceptional circumstances in which coal extraction should be permitted? Yes/No 111) If yes, please outline the exceptional circumstances in which you think coal extraction should be permitted.

There is no question about the peat part of M5.

M5 1 – there is no mention of peat excavated as a by-product of other development. That is development that involves excavation of peat, but the development itself is not about peat extraction. For example, mooring basins whereby peat is excavated to make space for boats. The NPPF seems to want to protect peat, but this particular way of peat being excavated is not considered.

118) Do you agree the high-level design principles provided in policy L2(d) appropriate for national policy? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

L2 d – what about ensuring that buildings can withstand additional floors placed above them? Or indeed proving, as part of planning applications, that such development can be safely

accommodated on existing buildings. You need to consider those who own the flats (for example) on which other rooms, in one form or another, are going to be developed and any impact on the structural integrity of their building.

L2 d – what about the issue of cycle and car parking provision? There is no mention of fully understanding and addressing the demand for parking from such intensification.

L2 d ii – this list is quite minimal. It needs to refer to

- a) Overlooking of windows of habitable rooms and private amenity space;*
- b) Loss of privacy;*
- c) Overshadowing of private amenity space;*
- d) Loss of daylight and/or sunlight to existing windows of habitable rooms;*
- e) Overbearing impact/visual dominance;*

120) Do you agree with the proposed safeguards in policy L2 that allow development in residential curtilages? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

L2 1 b says ‘such as by bringing back into residential use empty homes and other suitable buildings’ – it could be that there are buildings that could be made suitable, but these are located away from settlements. This is a throw away sentence with the implications not adequately considered. Care needs to be taken here – what is the intention? Should other parts of the NPPF be cross referenced?

124) Do you agree with the proposed definition of a ‘well-connected’ station used to help set higher minimum density standards in targeted growth locations? In particular, are the parameters we’re using for the number of Travel to Work Areas and service frequency appropriate for defining a ‘well1connected’ station? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons and preferred alternatives.

Footnote 26 and 45 says ‘a top 60 Travel to Work Area located partially or fully within England by Gross Value Added (GVA)’ – what are these and where do you find out where they are? Is there a website that could be referred to?

128) Do you agree policy L4 provides clear high-level guidance on good design for residential extensions? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. 129) Please provide your reasons, particularly if you disagree

L4 is a nation decision making policy. As stated previously, it is not clear if Local Plans can supplement these.

L4 does not cover all considerations relating to a residential extension. The important considerations are:

- a) Incorporate a good quality design which maintains or enhances the character and appearance of the building, its setting, heritage impact, and the streetscape/landscape.*

Schemes shall not create an adverse effect on, or lead to undesirable changes to, the landscape or any other valued characteristic;

b) Are subservient and sympathetic to the existing property. Proposals shall not detract from the character, appearance, or amenity of the original building, its setting or neighbouring buildings and shall not amount to the creation of a separate independent dwelling;

c) Do not have an unacceptable impact on the amenities of neighbouring occupiers; and

d) Will not result in over-development of the plot and will retain suitable amenity space for the dwelling. The cumulative effects of extensions within the plot will be considered.

146) Do you agree that policy DP1 provides sufficient clarity on how development plans should deliver high quality design and placemaking outcomes? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Partly agree. In DP1: 1b would it be worth including protected landscapes in the list of circumstances where it may be necessary to have a design guide and / or design code in order to ensure a particularly high quality of design appropriate to its sensitive context?

147) Do you agree with the approach to design tools set out in policy DP2? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Partly agree. Does there need to be further clarity about the status of existing adopted Design Guides / Codes that have been completed in the last few years since the requirement for a Design Code was made mandatory in the NPPF?

148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Strongly agree.

149) Do you agree with the proposed approach to using design review and other design processes in policy DP4? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) If not, what else would help secure better design and placemaking outcomes?

Partly agree. It will be important to ensure that tools such as Building for a Healthy Life are referred to in the forthcoming Design Guidance. Building for a Healthy Life provides a succinct and clear baseline for developments that is useful to both developers and LPAs.

148) Do you agree policy DP3 clearly set out principles for development proposals to respond to their context and create well-designed places? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

DP3 1 c – what about resilience to climate change? This needs to be mentioned.

DP3 2 – should the last sentence become the first sentence? As written, the order seems odd.

152) Do you agree with the changes proposed in policy TR3(1a), including the reference to proposals which could generate a significant amount of movement, and the proposed use of the Connectivity Tool? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

TR3 1 a – what does this mean ‘unless the nature of the use makes this impractical’? And to what does ‘this’ refer to?

153) Do you agree that proposed policy TR4 provides a sufficient basis for the effective integration of transport considerations in creating well-designed places? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

TR4 1 a – is the use of the word ‘with’ correct here: ‘and with neighbouring areas’ – should that be ‘within’? It does not make sense as written.

TR4 1 b – is facilities the right word? To me that means cycle storage. ‘...such as continuous footways and segregated cycle facilities which are adequately lit...’. Do you mean cycle lanes or cycle routes perhaps?

158) Do you agree with the approach to planning for healthy communities in policy HC1, including the expectation that the development plan set local standards for different types of recreational land, drawing upon relevant national standards? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

In addition to local green spaces, consideration should be given as to how communities access wider protected landscapes and National Parks for recreation outside of their own community, and as part of the sustainable transport considerations in Chapter 5.

161) Do you have any views on whether further clarity is required to improve the application of this policy, including the term ‘fast food outlets’, and the types of uses to which it applies?

*HC5 1 needs to end with ‘Development proposals for hot food takeaways or fast-food outlets should be refused **if they are:**’*

162) Do you agree with the proposed approach to retaining key community facilities and public service infrastructure in policy HC6? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

We are concerned by the proposed change. When preparing our current Local Plan, we had similar criteria to HC6 1 b but the Inspector told us to remove it. Their [report](#) at para 97 says 'Criterion d in Policy PUBDM43 allows the loss of community facilities where an equivalent facility is available. This could lead to the loss of valuable facilities in villages and fail to protect rural communities. The criterion should therefore be deleted, in order to ensure the policy is effective and consistent with national policy relating to the rural economy and healthy communities (M63)'. This meant the policy says 'Applications for the change of use or redevelopment of an existing community, visitor or recreational facility or service that meets a local need or contributes to the network of facilities through the Broads will only be permitted where: a) It can be proven that there is no community need for the service/facility; or b) It can be demonstrated through a viability assessment that the current use is economically unviable'.

163) Do you agree with the approach taken to recreational facilities in policy HC7, including the addition of 'and/or' with reference to quantity and quality of replacement provision? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

The accompanying consultation document says 'In doing so, it recognises that an improvement in the quality of recreational land can sometimes offset a reduction in overall quantity, although we welcome views on the effect of this change'. The change could allow the converse to happen; the provision of a larger area of poor-quality recreational land. So to stick with the original wording that says 'of both quantity and quality' would ensure the provision meets both criteria.

164) Do you agree with the clarification that Local Green Space should not fall into areas regarded as grey belt or where Green Belt policy on previously developed land apply? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Agreed – this wording does not change the current situation which appears to work well.

165) Do you agree with policy P1 as a basis for identifying and addressing relevant risks when preparing plans? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

P1 c – this needs to mention light pollution as well. Light pollution is referred to in P3 1 c and P3 2 a and P3 2 d. So including in P1 c would be consistent.

P1 c is more for decision making than local plans.

178) Do you agree with the proposed new additions to Table 2: Flood Risk Vulnerability Classifications? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Should any other forms of development should be added? Please give your reasoning and clearly identify which proposed or additional uses you are referring to.

Annex F says this under more vulnerable: 'Buildings used for dwelling houses (including floating/rising designs), student halls of residence, drinking establishments, nightclubs and hotels'. What does 'including floating/rising designs' mean? Is this can float or do float houses? Or does this mean buildings on pontoons? This term needs to be defined as it could cause unwanted issues.

180) In what circumstances would it be reasonable to seek more than 10% biodiversity net gain on sites being allocated in the development plan, especially where this could support meeting biodiversity net gain obligations on other neighbouring sites in a particular area?

N1 2 and footnote 69 – it is not clear why only certain allocated sites can have greater than 10% BNG rather than a local plan policy that covers the entire LPA area. If BNG of more than 10% can be justified and is viable, then that is a good thing and therefore policies to reflect this need to be allowed.

181) Do you agree policy N2 sets sufficiently clear expectations for how development proposals should consider and enhance the existing natural characteristics of sites proposed for development? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

N2 1 f – integrated nest bricks could also be bat bricks or bee bricks. So perhaps this should say 'Development proposals should incorporate integrated nest boxes (~~commonly known~~ such as swift bricks and bat bricks)

182) Do you agree the policy in Policy N4 provides a sufficiently clear basis for considering development proposals affecting protected landscapes and reflecting the statutory duties which apply to them? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, including how policy can be improved to ensure compliance.

N4 1 – says 'Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads'. 'Protected Landscapes' is the Broads, National Parks and National Landscapes. So does N4 1 mean that the wildlife and cultural heritage in national landscapes should not have significant weight as the wording focuses in on National Parks and the Broads and does not include National Landscapes?

N4 – need to be consistent with capitalisation: Protected Landscapes or protected landscapes?

N4(1) The substitution of 'natural beauty' for 'landscape and scenic beauty' is supported as this reflects the legislation for protected landscapes. However, the removal of the phrase

‘which have the highest status of protection’ is very concerning, especially when coupled with the weakening of protections in N4(2).

National Parks, National Landscapes and the Broads have been accepted as having the highest level of landscape designation in the country over many iterations of the NPPF. Nothing has changed in the legislation to merit the removal of this phrase, indeed the amendments to primary legislation introduced under Section 245 of the Levelling Up and Regeneration Act were supposed to strengthen protections.

It is also noted that the current NPPF paragraph 189 references in footnote 66 the extant National Parks Circular, which provides reassurance that this Circular still constitutes Government policy. As this Circular has not been included in the Annex A list of Government statements that this NPPF would supersede, it is recommended that reference to it be reinstated within or as a footnote to N4(1).

N4(2) The main difference between this policy and the existing NPPF is that paragraph 190 says ‘permission should be refused for major development other than in exceptional circumstances...’ whereas N4(2) says such proposals ‘should only be supported in exceptional circumstances’. This change is significant because it turns a presumption for refusal into a caveated support. This shift in language is particularly crucial when viewed alongside S5(2), which establishes where development can be resisted, including on sites outside settlements justified on the basis of unmet needs (S5(1j)). This places special significance on those policies in the NPPF that use the word ‘refused’. N4(2) is one of only two instances where the word ‘refused’ has been removed from a policy, the other being TR6 on highway impacts, which is addressed under Question 155. This appears to be a deliberate attempt to weaken the protection afforded to these landscapes and allow development that would otherwise be considered unacceptable. National Parks and the Broads Authorities strongly object to this change and requests that the language revert to the paragraph 190 wording.

N4(3) This is an additional provision that allows for mitigation of any adverse impacts of major development, with footnote 71 also allowing compensation. The consultation paper says this “reflects the changes we think are needed following the amended legal duty in the Levelling Up and Regeneration Act 2023 that relevant authorities should ‘seek to further’ the purposes of these areas in exercising their functions”. While mitigation and compensation are supported where harm is caused to protected landscapes, the first part of the hierarchy should be to avoid harm. By weakening N4(2), it has been made more likely that major development will be allowed to cause harm to protected landscapes which then needs mitigating and compensating for. This is contrary to the intention of the legislation to strengthen the level of protection given to National Parks, National Landscapes and the Broads.

185) Do you agree the government should implement the additional regard duties under Section 102 of the Levelling-Up and Regeneration Act? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons.

We agree that the government should implement the additional regard duties under S102 of the LURA. Our built heritage is a finite resource that contributes greatly to society in many ways (economically, socially, culturally and educationally). However, it has the potential to be adversely affected by ill-considered development within its setting and so this additional duty

would be welcomed to ensure that consideration is given to how successful development can be achieved within the historic environment. Although the 1990 Act has a similar requirement as regards listed buildings, the same consideration should be given to all designated heritage assets which in terms of the NPPF policies are of equal significance and where setting is already a consideration. This would ensure it is given additional weight.

187) Do you agree with the approach to plan-making for the historic environment, including the specific requirements for World Heritage Sites and Conservation Areas, set out in policies H1 – H3? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

HE1 – although beneficial, this will place additional requirements on LPAs (e.g. creating a strategy for HAR; a heritage assessment to consider the social, cultural, economic and environmental benefits the conservation of the historic environment can bring, production of a design code if they have not already done so and production of a local list) and resources may be an issue for LPAs who are typically understaffed in terms of heritage. In terms of the ‘proportionate heritage assessment’ (HE1. 1b), it is not clear exactly what is meant by this and it should be specified. I would question whether it is necessary for this to be carried out at a local level as HE produce regular ‘[Heritage Counts](#)’ research that does just this. Could this not be referred to?

HE5: I partly agree with the approach to assessing heritage assets in HE5. It is positive that emphasis is being placed on heritage assessments and that greater clarity is being provided on the assessments that should be made, as well as extending this requirement and assessment of the impact of proposals on non-designated heritage assets. However, in terms of HE5.4, could it be made clear what decision makers should do if they are not satisfied that heritage assessments submitted accurately reflect the effects of the proposal on the heritage asset. Should applications be refused or invalidated? Clarity should be provided.

190) Do you agree with the new policies in relation to world heritage, conservation areas and archaeological assets in policies HE8 – HE10? Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree. a) Please provide your reasons, particularly if you disagree.

Strongly agree although I would suggest that in policy HE9: 1b) where it states, ‘Consider the area’s special architectural or historic interest (as identified as part of the designation of the conservation area)’, this should be amended to state, ‘as set out in the conservation area appraisal’. This is because in many instances conservation areas were designated many years ago and the documents relating to their original designation may not be available. However in most instances a conservation area appraisal is available and should set this out clearly.

General comments/queries

- How can LPAs not duplicate National Development Management Policies in their plans when they are non-statutory? To have weight they will surely need to be replicated in adopted policies. If they are non-statutory, they are not enforceable in any way and just 'guidance. Furthermore, if NPPF "policies" have not undergone rigorous SA or SEA, how

can they have more weight than local plan policies which have undergone this process and been examined?

- Transition arrangements are very disappointing and frustrating. As soon as a Local Plan is adopted (2024 NPPF and 'old' plan making system), they could be out of date. Even if the policy approaches reflect truly local issues, which the NPPF does not address. Even if the policy approach reflects truly local circumstances. The transition arrangements need to be amended as follows:

Development plan policies which are ~~in any way~~ inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where ~~they have been examined and adopted against this Framework~~ **there is a clear and justified reason for addressing particular local issues.**

- It is not clear and needs to be explained what is going on with the Future Homes standard.
- It is not clear and needs to be explained what is going on with the M4(2) and M4(3) and changes to building regulations.
- Can local plan policies supplement national development management policies? For example, amenity and wind NPPF policies do not include all considerations.
- If only one aspect of an existing Local Plan policy conflicts with the new 2026 NPPF, is the entire policy given "limited weight"?
- Should settlement boundaries be defined in the Local Plan and shown on the policies map?
- The current NPPF is strong on protection of existing trees, yet the new NPPF only refers to new trees. This is a big oversight. The emerging NPPF needs to roll forward the current NPPF's stance on existing trees. See current NPPF paragraph 136, 187 b.

Planning Committee

13 February 2026

Agenda item number 11

Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q4 (1 October to 31 December) 2025

Report by Planning Technical Support Officer

Summary

This report sets out the development control statistics for the quarter ending

Recommendation

To note the report.

1. Development control statistics

1.1. The development control statistics for the quarter ending are summarised in the tables below.

Table 1

Number of applications

Category	Number of applications
Total number of applications determined	26
Number of delegated decisions	24
Numbers granted	26
Number refused	0
Number of Enforcement Notices	2
Consultations received from Neighbouring Authorities	19

Table 2

Speed of decision

Speed of decision	Number	Percentage of applications
Under 8 weeks	10	38.5
8-13 weeks	0	0

Speed of decision	Number	Percentage of applications
13-16 weeks	0	0
16-26 weeks	0	0
26-52 weeks	0	0
Over 52 weeks	0	0
Within agreed extension ¹	16	61.5
Outside of agreed extension	0	0

- 1.2. Extensions of time were agreed for sixteen applications. Fifteen of these were required because further information was awaited, amendments had been made to the scheme, there had been other discussions which had taken it over time or because a re-consultation was underway. One was due to the application being taken to Planning Committee.

Table 3

National performance indicators: BV 109 The percentage of planning applications determined in line with development control targets to determine planning applications.

National target	Actual
60% of Major applications ¹ in 13 weeks (or within agreed extension of time)	N/A
65% of Minor applications ² in 8 weeks (or within agreed extension of time)	100%
80% of other applications ³ in 8 weeks (or within agreed extension of time)	100%

Author: Thomas Carter

Date of report: 23 January 2026

Appendix 1 – [PS1 returns](#)

Appendix 2 – [PS2 returns](#)

¹ Majors refers to any application for development where the site area is over 10,000m²

² Minor refers to any application for development where the site area is under 10,000m² (not including Household/ Listed Buildings/Changes of Use etc.)

³ Other refers to all other application types

Appendix 1 – PS1 returns

Measure	Description	Number of applications
1.1	On hand at beginning of quarter	39
1.2	Received during quarter	40
1.3	Withdrawn, called in or turned away during quarter	3
1.4	On hand at end of quarter	46
2.	Number of planning applications determined during quarter	26
3.	Number of delegated decisions	24
4.	Number of statutory Environmental Statements received with planning applications	0
5.1	Number of deemed permissions granted by the authority under regulation 3 of the Town and Country Planning General Regulations 1992	0
5.2	Number of deemed permissions granted by the authority under regulation 4 of the Town and Country Planning General Regulations 1992	0
6.1	Number of determinations applications received	0
6.2	Number of decisions taken to intervene on determinations applications	0
7.1	Number of enforcement notices issued	2
7.2	Number of stop notices served	0
7.3	Number of temporary stop notices served	0
7.4	Number of planning contravention notices served	0
7.5	Number of breach of conditions notices served	0
7.6	Number of enforcement injunctions granted by High Court or County Court	0
7.7	Number of injunctive applications raised by High Court or County Court	0

Appendix 2 – PS2 returns

Table 1

Major applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	0	0	0	0	0	0	0	0	0	0
Offices/ Light Industry	0	0	0	0	0	0	0	0	0	0
Heavy Industry/Storage/Warehousing	0	0	0	0	0	0	0	0	0	0
Retail Distribution and Servicing	0	0	0	0	0	0	0	0	0	0
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Large-Scale Major Developments	0	0	0	0	0	0	0	0	0	0
Total major applications	0	0	0	0	0	0	0	0	0	0

Table 2

Minor applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	2	2	0	0	0	0	0	0	0	2
Offices/Light Industry	0	0	0	0	0	0	0	0	0	0
General Industry/Storage/Warehousing	0	0	0	0	0	0	0	0	0	0
Retail Distribution and Servicing	1	1	0	0	0	0	0	0	0	1
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Minor Developments	9	9	0	2	0	0	0	0	0	7
Minor applications total	12	12	0	2	0	0	0	0	0	10

Table 3

Other applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Minerals	0	0	0	0	0	0	0	0	0	0
Change of Use	2	2	0	0	0	0	0	0	0	2
Householder Developments	6	6	0	4	0	0	0	0	0	2
Advertisements	0	0	0	0	0	0	0	0	0	0
Listed Building Consent to Alter/Extend	6	6	0	4	0	0	0	0	0	2
Listed Building Consent to Demolish	0	0	0	0	0	0	0	0	0	0
Certificates of Lawful Development ⁴	3	3	0	3	0	0	0	0	0	0
Notifications ⁴	2	2	0	2	0	0	0	0	0	0
Other applications total	19	19	0	13	0	0	0	0	0	6

⁴ Applications for Lawful Development Certificates and Notifications are not counted in the statistics report for planning applications. As a result, these figures are not included in the total row in Table 4.

Table 4

Totals by application category

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Major applications	0	0	0	0	0	0	0	0	0	0
Minor applications total	12	12	0	2	0	0	0	0	0	10
Other applications total	14	14	0	8	0	0	0	0	0	6
TOTAL	26	26	0	10	0	0	0	0	0	16
Percentage (%)		100%	0%	38.5%	0%	0%	0%	0%	0%	61.5%

Planning Committee

13 February 2026

Agenda item number 12

Appeals to the Secretary of State update

Report by Development Manager

Summary

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

Recommendation

To note the report.

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2024/0032/CLEUD BA/2024/0001/REF APP/E9505/X/24/3350415	Mr John Atkins	Appeal start date 26 November 2024 PINS confirmed no case officers available 25 November 2025	Driftwood, 104 Lower Street, Horning, Norfolk	Lawful Development Certificate for 10 years use as holiday accommodation	Delegated decision 8 May 2024 Appeal Dismissed 9 December 2025

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2022/0007/UNAUP2 BA/2025/0001/ENF APP/E9505/F/25/3361103	Mr Richard Howlett	Appeal start date 19 March 2025 Written reps PINS confirmed no case officers available 25 November 2025	Holly Lodge Church Loke, Coltishall, Norwich	Appeal against Listed building enforcement notice - Installation of UPVC windows	Committee Decision 2 February 2024
BA/2025/0158/FUL	Norfolk Wildlife Trust	Appeal start date 2 January 2026	Pleasure Boat Inn Staithe Road Hickling Norfolk NR12 0YW	Replace 440m of timber quay-heading with interlocking plastic piling & timber capping	Delegated decision 17 September 2025

Author: Steve Kenny

Date of report: 26 January 2026

Background papers: BA appeal and application files

Planning Committee

13 February 2026

Agenda item number 13

Decisions made by officers under delegated powers

Report by Development Manager

Summary

This report sets out the delegated decisions made by officers on planning applications from 05 January 2026 to 30 January 2026 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Barton Turf And Irstead Parish Council	BA/2025/0354/COND	Turf Fen Windpump Irstead Street Irstead Norfolk NR29 5PH	Mr Amanda Rix	Amended schedule of works and proposed sail details, variations of condition 2 of permission BA/2023/0469/FUL	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Barton Turf And Irstead Parish Council	BA/2025/0360/COND	Turf Fen Windpump Irstead Street Irstead Norfolk	Mrs Amanda Rix	Amended schedule of works and proposed sail details, variations of condition 2 of permission BA/2023/0470/LBC	Approve Subject to Conditions
Barton Turf And Irstead Parish Council	BA/2025/0399/APPCON	Kingfishers Hall Road Barton Turf Norfolk NR12 8AR	Mr & Mrs Robert & Anne Mitchell	Details of Condition 4: site investigations including boreholes to determine whether peat is present of permission BA/2025/0221/HOUSEH	Approve
Beccles Town Council	BA/2025/0361/FUL	Morrisons George Westwood Way Beccles Suffolk NR34 9EJ	W.M Morrisons	A new 180mm diameter gas pipework has been installed below ground to serve superstore. The pipe rises to high level to the rear of the superstore and enters the plantroom through the existing louvre. (Retrospective)	Approve Subject to Conditions
Brundall Parish Council	BA/2025/0280/FUL	61 Riverside Estate Brundall Norwich Norfolk NR13 5PU	Mr Martin Reynolds	Replacement holiday cabin with new terrace/veranda	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Horning Parish Council	BA/2025/0328/HOUSEH	Little Chart 96 Lower Street Horning Norfolk NR12 8PF	Mrs Sarah-Jane Neville	Oak clad double cartshed. Vehicular access gates realignment.	Approve Subject to Conditions
Horning Parish Council	BA/2025/0326/FUL	Percival Moorings Ferry Road Horning Norfolk NR12 8PS	Percival Moorings	The siting of a single person use toilet cubical for staff and customers of Percival Moorings Retrospective	Approve Subject to Conditions
Horning Parish Council	BA/2025/0329/FUL	Bureside Estate, Plot 20A Crabbetts Marsh Horning Norfolk NR12 8JP	Mr Tim Betts	Replacement houseboat previously located on the site for holiday use	Approve Subject to Conditions
Hoveton Parish Council	BA/2025/0270/FUL	Halberry Horning Road Hoveton Norfolk NR12 8JW	Mr James Gunn	Replacement of 33m timber quayheading with galvanised steel piling, timber waling, recycled plastic capping. Install additional 5m of new galvanised steel piling, timber waling, recycled plastic capping. New recycled plastic boardwalk and replacement foot bridge.	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Hoveton Parish Council	BA/2025/0348/HOUSEH	Burwood House Horning Road Hoveton Norfolk NR12 8JW	Mr & Mrs John Atkins	Extensions and alterations to modernise dwelling and create supported annexe accommodation	Approve Subject to Conditions
Ludham Parish Council	BA/2025/0346/HOUSEH	Holm-Mere Staithe Road Ludham Norfolk NR29 5NP	Mr and Mrs D Grainger	Replace existing garage with larger garage & workshop	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2025/0343/HOUSEH	Pegaso 17 Pegasus Mews Caldecott Road Lowestoft Suffolk NR32 3PH	Mr Stephen Paul Jones	Erection of shed & greenhouse [retrospective]	Approve Subject to Conditions
Thorpe St Andrew Town Council	BA/2025/0293/FUL	30, 32 And 34A Yarmouth Road Thorpe St Andrew Norwich Norfolk NR7 0EF	Mr James Hupton	1. Change of use of office space to residential at No. 34a 2. Enlarge 2 x existing rear dormers at No. 30 & insert new rear dormer to second floor at No. 32 (rear) 3. Insert new rear window to lower ground floor at No.30 (rear)	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Trowse With Newton Parish Council	BA/2025/0317/FUL	Whitlingham Great Broad Whitlingham Country Park Whitlingham Lane Trowse Norfolk NR14 8TR	Mr Graeme Hewitt	Proposed construction of wetland habitat scrapes for ecological benefit, and construction of boardwalk through Rough Marsh Plantation, together with associated works.	Approve Subject to Conditions
Wroxham Parish Council	BA/2025/0379/HOUSEH	Heronby Beech Road Wroxham Norwich Norfolk NR12 8TP	Mr & Mrs Pearson	Proposed boat house	Approve Subject to Conditions

Tree Preservation Orders confirmed by officers under delegated powers

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

Author: Steve Kenny

Date of report: 2 February 2026