Planning Committee

Agenda 6 November 2026

10.00am

National Centre for Writing, Dragon Hall, 115 – 123 King Street, Norwich, Norfolk, NR1 1QE

Sarah Cowley, Chief Executive – Friday 30 October 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 9 October 2026** (Pages 4-15)
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/2026/0191/ADV Broads Authority Information Centre, Station Road, Hoveton (Pages 16-23)

7.2. BA/2026/0208/FUL Bridge Stores, Main Road A1064, Acle Bridge (Pages 24-38)

8. **Enforcement update** (Pages 39-41)
   Report by Development Manager

Policy

9. **Norfolk Environmental Delivery Plan** (Pages 42-94)
   Report by Environment Policy Advisor

Matters for information

10. **Consultations submitted** (Pages 95-126)
    Report by Planning Policy Officer

11. **Appeals to the Secretary of State update** (Pages 127-128)
    Report by Development Manager

12. **Decisions made by Officers under delegated powers** (Pages 129-131)
    Report by Development Manager

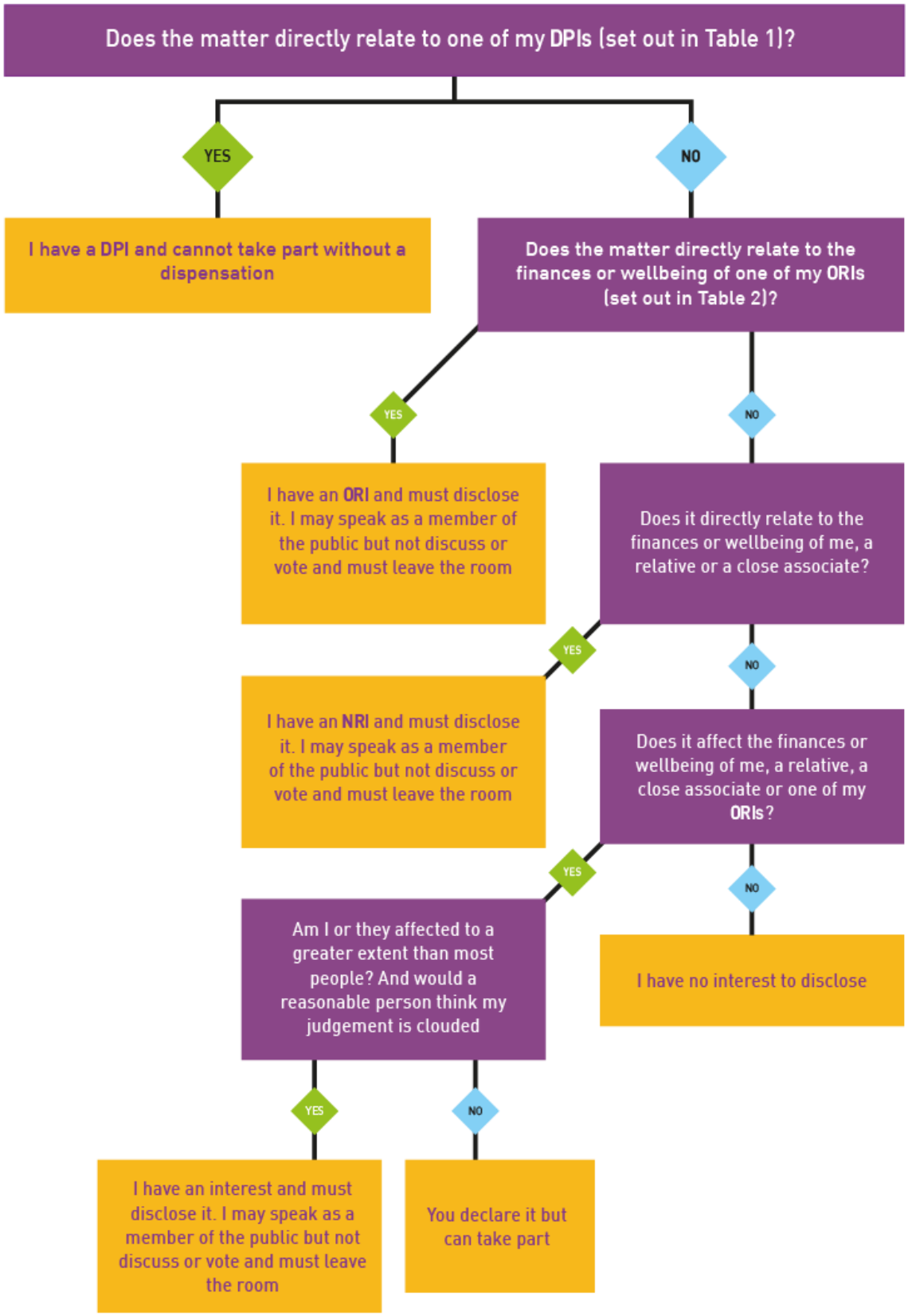
Other matters

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

14. **To note the date of the next meeting – Friday 4 December 2026 at 10.00am at National Centre for Writing, Dragon Hall, 115-123 King Street, Norwich NR1 1QE**

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 9 October 2026

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DRAFT

Present

Tim Jickells – in the Chair, Harry Blathwayt, Stephen Bolt, Gary Champion, Tom Daly, James Harvey, Martyn Hooton and Matthew Shardlow

In attendance

Natalie Beal – Planning Policy Officer (item 10), Jason Brewster – Governance Officer, Stephen Hayden – the Authority's Arboricultural Consultant (item 9), Steve Kenny – Development Manager, Kate Knights– Heritage and Design Manager (item 9) and Andrea Long – Nationally Significant Infrastructure Projects Officer (item 11)

Members of the public in attendance who spoke

No members of the public in attendance.

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

Apologies were received from Tony Grayling 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 7 August 2026 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business.

5. Chair's announcements and introduction to public speaking

No members of the public had registered to speak.

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

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

7. Applications for planning permission

There were no applications for consideration.

8. Enforcement update

Members received an update report from the Development Manager on enforcement matters previously referred to the Committee. No further updates were provided at the meeting.

9. BA/2026/0001/TPO Woodland To The North Of Long Dyke, Wayford Bridge

The Heritage and Design Manager (HDM) presented the report recommending confirmation of a provisional woodland Tree Preservation Order (TPO) for a mixed deciduous woodland, including oak, ash, willow, alder and birch trees with some areas of wet woodland, located to the north of Long Dyke, Wayford Bridge. A parcel of woodland at the eastern end of the woodland had been sold and the new owner had carried out significant felling and clearing of the understory. It was considered there was a risk of further felling in this area and the potential for further erosion of the woodland should other parcels of it be sold. The Local Planning Authority for the Broads had an obligation to serve TPOs on trees that were considered to be of amenity value and under threat. A Tree Evaluation Method for Preservation Orders (TEMPO) assessment was performed by the Authority's Arboricultural Consultant (AAC) which indicated that the woodland met the criteria for a TPO to be served. A provisional woodland TPO had been served on 11 June 2026 which protected everything that could become a tree including the understory. The HDM indicated that this TPO would need to be confirmed by 11 December 2026.

Two objections had been received, one from the new owner and the other from the previous owner who continued to own the wider woodland.

Both objections had been received within the 28-day consultation period and as per the Authority's Scheme of powers delegated to the Chief Executive and other officers, paragraph 50 (ii), this matter would need to be determined by the Planning Committee. At the Planning Committee meeting on 7 August 2026, Members had considered a site visit to view the woodland to the North of Long Dyke and decided that, in this instance, a visit was not justified.

The HDM presented location maps showing the site in relation to the A1151/A149 between Wayford Bridge and Stalham, in relation to nearby properties including Wayford Bridge Hotel, Wayford Nurseries and the Maltings and in relation to Wayford Marina, the River Ant and Long Dyke. Aerial photographs were presented showing the site in 1946 when it was marshland, a present day image showing the site as woodland and another current image,

from a vantage point above Wayford Bridge looking south along the River Ant, showing the subject woodland to the east bordering Wayford Marina with woodland on the western riverbank. A number of photographs of the woodland were shown taken from various vantage points including from points along the access track off the A149 to Wayford Marina and from within the marina. A site plan was shown depicting the woodland, denoted as W1, with the new owner's triangular plot marked to its eastern end. A couple of photographs were shown of the new owner's site from December 2025 when the Authority first became aware of the felling. Various photographs taken in recent months were shown of the new owner's plot depicting some tree felling, clearing of the understory and the location of an unauthorised container.

The HDM explained that as well as the objections, three statements in support of the TPO had been received during the consultation period. All the representations and the associated responses by the Authority were detailed in Appendix 1 of the report.

The HDM, in her assessment of the TPO, explained that the woodland was considered to have moderate amenity value being visible from the river as a wooded backdrop to the marina and through glimpsed views from the bridge, the A149, Nobbs Loke and Long Dyke. The woodland provided wider public benefits in terms of biodiversity, providing a habitat to a number of species and being of ecological value as noted in the letters of support. The woodland also provided an important function in terms of water absorption within a damp area. The woodland's condition was considered to be fair with the majority of the trees likely to have a long lifespan, making them suitable for protection. It was acknowledged that the site was prone to flooding at certain times of the year however the trees had grown within these damp and wet conditions. Wet carr woodland was a habitat common to the Broads which contained trees, such as alder, that were well adapted to these conditions.

As to the expediency of the TPO, it was clear from the substantial tree felling undertaken that there was a threat to the woodland. The woodland TPO protected everything that could become a tree and would protect the understory of the site. The aim of the TPO was to protect the woodland as a whole rather than small areas within it. The recommendation was to confirm the woodland TPO and for the TPO not to be modified.

In response to questions the AAC confirmed there was a good working relationship with the new owner and the TPO was being respected and that replanting would be required to ensure the site recovered. The AAC indicated that the new owner had commissioned a tree management plan which did recommend replanting. The AAC explained that the felling on the site had exposed other trees, making them more vulnerable to wind damage, which would require further trees to be felled to mitigate this risk.

The Chair read a statement from Alice Brown, one of the objectors, who was unable to attend the meeting. Mrs Brown noted that of the many people who experience the woodland, including people owning or living on plots in Long Dyke, those living on Wayford Marine, visitors to the boatyards and local residents, only three statements of support for the TPO had been received. Of these three statements, Mrs Brown believed that two of these statements came from the same person. She believed that the high percentage of dead, dying and

dangerous trees within the site rendered any management of the woodland impossible. Mrs Brown believed that raised ground levels and reduced drainage at Wayford Marine had resulted in greater water ingress into the woodland for longer periods which jeopardised its long term future. She felt that her land was already being used to mitigate the harms created by developments at Wayford Marine. The imposition of this TPO would provide further mitigation for Wayford Marine's destruction of a reed bed in 2023-24 contrary to planning regulations. Mrs Brown felt the Authority's TEMPO report was inaccurate having focused on the new owner's site and failed to address the flood damaged condition of the trees in the wider woodland.

The Development Manager (DM) read a statement from a solicitor operating on behalf of David Rothwell, the other objector, neither of whom were able to attend the meeting. The solicitor stated that Mr Rothwell had not sought to indiscriminately clear the woodland; his concern throughout had been the condition and safety of the trees. Since submitting the objection, Mr Rothwell had obtained an independent arboricultural assessment of the woodland. This report had identified genuine arboricultural and safety concerns and recommended specific management works, continued inspection and replanting. The solicitor noted that the Forestry Commission's inspection had identified that some of the previously felled trees were dead or decayed. Mr Rothwell refuted any allegations that he had undertaken any tree felling since the provisional TPO had been served. Mr Rothwell requested that the TPO was not confirmed. If the TPO was to be confirmed, he requested that the geographic extent of the TPO be revised to encompass the area required to address the identified risk. In either event, Mr Rothwell would work constructively with the Authority and follow professional arboricultural advice to ensure the woodland was safely and responsibly managed and replanted.

The DM read a statement in support of the TPO provided by Mr and Mrs Page, plot owners at Long Dyke, who were unable to attend the meeting. They believed that the new owner intended to extend his mooring into the marshland which would require additional tree felling to manage the right of way associated with the mooring. They believed a failure to confirm the TPO would risk further loss of trees on the site negatively impacting the flood defence, environmental protection and biodiversity provided by the woodland.

A Member asked about the possible planning issues at Wayford Marine raised by Mrs Brown. The DM explained that further investigation would be undertaken to confirm whether a breach of planning had occurred.

The Member asked for clarification regarding Mrs Brown's characterisation of the site largely consisting of waterlogged, dead and dying trees. The AAC explained that dead and dying trees were a normal feature of wet woodland habitats and they were an important part of the site's biodiversity. The presence of dead or dying trees was not necessarily an indication that the wood was in poor condition. If the owner wished to remove dead trees, the Authority could not control these removals but, in keeping with the TPO legislation, would ask for evidence to verify the condition of the trees.

Members asked whether there was any evidence to support Mrs Brown's claim that the site was subject to an increased frequency and duration of flooding. The AAC noted the evidence of flooding within the wood as shown by a line of debris deposited on the understory marking high water (as shown by a photo in the HDM's presentation). The tree species within the site, the majority being alder and oak, could survive this form of flooding and would adapt to any changes to the hydrology. There may be additional dying trees but subsequently more willow and alder would grow.

The AAC responded to Mrs Brown's assertion that the TEMPO assessment had focused only on the new owner's site by confirming that he had assessed the whole woodland when conducting this assessment.

A Member asked whether the claim, by the TPO supporters, that the new owner had other plans for the site was correct. The HDM explained that the Authority had not received any formal proposals regarding this site. If the new owner wished to increase his mooring basin for example, this would require planning permission.

Members noted the objectors' misconceptions that a TPO precluded any necessary tree works and prevented the removal of unsafe trees. Members acknowledged the amenity value of the subject site noting that it included wet woodland, a habitat unique to the Broads. Members recognised the need to protect the whole woodland and not to restrict the TPO to the plot under new ownership. A Member spoke of the indiscriminate felling undertaken and the example this set to any future owners if further plots of the wider woodland were to be sold. Members welcomed the additional protection afforded by the woodland TPO with its promotion of good woodland management from the existing and future owners of the site.

Matthew Shardlow proposed, seconded by Stephen Bolt

It was resolved unanimously to confirm Tree Preservation Order BA/2026/0001/TPO Woodland To The North Of Long Dyke, Wayford Bridge.

10. National Planning Policy Framework - 2026 version

The Planning Policy Officer (PPO) presented the report which provided a summary of the revisions associated with the latest version of the National Planning Policy Framework (NPPF) published on 17 August 2026.

The assessment undertaken so far had highlighted that the purpose of many existing topic areas remained unchanged. The topics were now referred to as policies and they had been assigned a specific reference number. A number of new areas had been included in the NPPF including Spatial Development Strategies and a list of evidence requirements required to support applications.

This was the third version of the NPPF to be released during the development of the emerging local plan. Under transitional arrangements, the ongoing examination of the emerging local plan would be assessed against the 2024 version of the NPPF. But the 2026 NPPF would need to be considered to ensure the new Local Plan policies were deliverable.

The new NPPF provided support to the emerging local plan in a number of ways:

- It supported water efficiency targets beyond those required by building regulations
- It provided greater emphasis on overheating than the 2024 NPPF
- It included stronger protection for peatlands and pubs than the 2024 NPPF
- It supported policy PUBDM48 on elderly and specialist housing needing to be in development boundaries
- It was generally supportive of the policy on rural exception sites
- It was consistent with a marketing period of 12 months, protecting tranquillity and biodiversity enhancements
- It referenced special qualities in the context of protected landscapes. The PPO added that the emerging local plan would be updated to refer to future iterations of the Broads Plan (where the special qualities were defined).

In other areas, the emerging local plan was not consistent with the new NPPF.

The new NPPF added a clarification to the use of Building Regulations M4(2) standard (accessible and adaptable dwellings) limiting it to major development which was defined as 10 dwellings or more. The emerging local plan referred to this standard in the context of all dwellings which was consistent with an ageing population and supported by census data. The PPO proposed not to update the emerging local plan but this issue might be discussed through the Examination.

A Biodiversity Net Gain (BNG) target of greater than 10% was limited to specific sites in the new NPPF, it was not applicable area-wide as stated in the emerging local plan. As the new NPPF would take precedence, the PPO proposed to update the emerging local plan's BNG policy to be consistent with the new NPPF.

The emerging local plan had a single test for the loss of community services and facilities. The new NPPF included three discrete criteria; it was no longer needed or it would be replaced or alternative provision was available. As the new NPPF would take precedence the Local Plan would need to be updated.

The emerging local plan proposed a hierarchy of uses which needed to be addressed when converting a building. This hierarchy prioritised change of use of buildings and structures to employment, tourism (including holiday accommodation for short stay occupation on a rented basis), recreation and community above residential use. This hierarchy contradicted the new NPPF which allowed residential use where previously it was not permitted. What this meant for the emerging local plan was still being considered.

The emerging local plan required the location of gypsy and traveller sites to be well related to settlements i.e. to consider access to doctors, supermarkets, schools and other services. The new NPPF indicated that a location that is not well related to a settlement may still be appropriate if it addresses an unmet need. The PPO proposed that the emerging local plan

would maintain the existing gypsy and traveller site location criteria but it would be updated to request a justification, consistent with the new NPPF, when a location outside a settlement was proposed.

The Heritage and Design Manager had undertaken a comparison between the new and previous NPPF versions which had highlighted some technical changes regarding the use of historic buildings:

- The emerging local plan stated "Wherever possible, the [historic] building or structure should remain in the use for which it was originally designed". The new NPPF stated historic buildings should "maintain or secure a use consistent with their conservation".
- The emerging local plan proposed a hierarchy of uses when converting historic buildings. The new NPPF listed reuse of a redundant or disused building, including listed buildings, as one of the circumstances under which isolated homes in the countryside could be allowed.
- There was a minor word change required to replace "public benefits" with "benefits".

The emerging local plan would be updated to address these differences with the new NPPF.

The new NPPF provided little detail regarding renewable energy in contrast to the emerging local plan which provided a list of considerations. The new NPPF required sites for various types of renewable energy to be identified which was not the case in the previous NPPF version and consequently the emerging local plan. As these differences did not contradict the new NPPF the proposal was not to update the emerging local plan.

The new NPPF permitted some forms of new employment development and tourism development within rural areas whereas the emerging local plan confined these forms of development within development boundaries. The emerging local plan would be updated to address these differences with the new NPPF.

There was a minor word change for transport network which required "residual impact" to be replaced with "adverse impact" to match the new NPPF. The new NPPF required parking standards to be set within a development plan. The Authority presently defers to the parking standards set by the district or county councils and it was not proposed to change this.

Given that the emerging local plan had been submitted for examination, a Member asked for clarification as to when the changes indicated would be applied. The PPO responded that the Planning Inspectors had submitted 187 questions under the Matters, Issues and Questions (MIQs) phase of the examination. The Authority had to respond to all these questions and some of these responses would encapsulate the proposed changes to the emerging local plan arising from the Authority's assessment of the new NPPF. These responses would be the subject of the examination hearings planned for February 2027.

Members were disappointed that the new NPPF restricted BNG targets greater than 10% to specific sites given that 10% was a low target and the statutory obligations of the Broads Authority. Members asked whether there was any mechanism to express the Authority's aim

of 20% BNG wherever possible. The PPO would try to keep the 20% but she reminded Members that the new NPPF would take precedence.

A Member questioned whether the change in the wording of protected landscapes was meaningful. The PPO believed the impact could only be measured as applications were received in the coming months.

The Member asked whether the Authority could suggest a list of employment types for consideration within rural areas. The PPO would raise this with the Head of Planning for possible inclusion in MIQs.

A Member asked whether the new NPPF included a duty to cooperate. The PPO explained that this responsibility was now encapsulated by two policies: PM10 Maintaining cooperation between plan-making authorities and PM11 Demonstrating cooperation between plan-making authorities.

A Member asked whether the Authority should identify possible areas for renewable energy sites especially in the context of community energy. The PPO agreed that, as per the new NPPF, the Authority would undertake this investigation at the next revision of the local plan.

Members asked about British Sugar's decommissioning of the Cantley Sugar Factory and its impact on the local plan. The PPO confirmed that it was too early to reach any conclusions as there was a consultation. The PPO had been in touch with the Agent, but nothing had been confirmed. This will be a matter to discuss through the examination.

The report was noted.

11. Suffolk Water Recycling, Transfer and Storage Project update

The Nationally Significant Infrastructure Projects Officer (NSIPO) presented the report which provided an update on the Suffolk Water Recycling, Transfer and Storage Project and the Authority's consultation response to the project's Environmental Impact Assessment Scoping Submission. The NSIPO's presentation included a map of the pipeline corridors associated with this project and detailed maps focusing on the proposed pipeline near Somerleyton.

The project would provide an advanced water recycling plant near Lowestoft that would be capable of purifying up to 11 million litres per day. Once purified, the recycled water would be released into the River Waveney through an underground pipeline and outfall structure where it will mix with the river's natural flow. The river will transport this water to another proposed Essex & Suffolk Water advanced water recycling plant. There would potentially be two new drinking water storage reservoirs, one in Eye and the other near Saxmundham, to manage seasonal demands and ensure supply during dry periods.

The main focus from the Authority's perspective was the underground pipeline and outfall structure on the River Waveney near Somerleyton.

Given the scale of the work this was considered to be a Nationally Significant Infrastructure Project (NSIP) which would be determined by the Planning Inspectorate (PINS) on behalf of the Secretary of State.

The Broads Authority would be a consultee in this process. Members of the Authority had previously been engaged in non-statutory consultations in October 2025. Since then, Essex and Suffolk Water and their consultants have undertaken further consultations with statutory consultees, with local authorities and local communities. In July 2026 the project announced their preferred options which was followed by the Environmental Impact Assessment Scoping submission to PINS in August 2026. The scoping submission asked for an opinion on what the Environmental Impact Assessment should include. PINS engaged the statutory consultees, including the Broads Authority, to express their opinions before the end of September 2026. The Authority's response to this consultation can be found in Appendix 1 of the report.

The Authority was meeting regularly with Essex and Suffolk Water and separately with other local authorities engaged on this project.

The next milestone would be a public consultation mid 2027 in readiness for the Development Consent Order application to be submitted to PINS early/mid 2028.

In response to questions the NSIPO confirmed that the transporting of water using the river would improve the net river flow, that the water chemistry of the purified water would be assessed to ensure there were no adverse impacts on the river's biodiversity and that the Authority was engaged on assessing possible ecological impacts including possible impacts to peat soils.

The report was noted.

12. Appeals to the Secretary of State

The Committee received a schedule of appeals to the Secretary of State since the last meeting. The Development Manager explained the technical reason for an Enforcement Notice being served at 18 Long Dyke, Wayford Bridge to the incorrect owner. The owner appealed this notice which the Authority subsequently conceded, and the appeal was expected to be allowed by the Planning Inspectorate. This had no impact on the Enforcement Notice which had been appealed by the correct owner.

13. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 24 July to 25 September 2026 and any Tree Preservation Orders confirmed within this period.

14. Other items of business

There were no other items of business.

15. Date of next meeting

The next meeting of the Planning Committee would be on Friday 6 November 2026 at 10:00am at National Centre for Writing, Dragon Hall, 115-123 King Street, Norwich.

The meeting ended at 11:53am.

Signed by

Chair

DRAFT

Appendix 1 – Declaration of interests Planning Committee, 9 October 2026

Member	Agenda/minute	Nature of interest
Tim Jickells on behalf of all members	9	Lobbied: Receipt of email from objector

DRAFT

Planning Committee

6 November 2026
Agenda item number 7.1

BA/2026/0191/ADV Broads Authority Information Centre, Station Road, Hoveton

Report by Assistant Planning Officer

Proposal

55" Outdoor PCAP Freestanding Multi Touch screen digital poster

Applicant

Mr Andrew Hird

Recommendation

Approve Subject to Conditions

Reason for referral to committee

Broads Authority Involvement

Application target date

01 November 2026

Application documents

BA/2026/0191/ADV Associated Planning Documents

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1. Description of site and proposals

1.1. The application site is an area of hardstanding adjacent to Hoveton Visitor Centre, Station Road, Hoveton. The visitor centre fronts Station Road, with its main entrance opening onto the hardstanding to the side, between the building and the road.

1.2. The building has a prominent glazed entrance beneath a pitched roof, with a covered area and toilet facilities to the rear. There is cycle parking alongside the building, bollards within the frontage with trees close to the main entrance and Station Road frontage.

1.3. Advertisement consent is sought for the installation of a freestanding illuminated digital information display unit, known as a PCAP (Projected Capacitive Touch Technology) on the hardstanding adjacent to Hoveton Visitor Centre. The unit would be positioned alongside the building, close to the main entrance, and angled approximately 20 degrees from the adjacent external wall.

1.4. The unit would measure 2.03m in height, 0.96m in width and 0.20m in depth, with a base footprint of approximately 0.99m by 0.50m. It would incorporate a 55-inch interactive touchscreen, with a display area measuring approximately 1.21m by 0.68m, housed within a weatherproof black steel enclosure.

1.5. The display would provide visitor information, including walking and cycling routes, sustainable transport information, public transport timetables and environmental information. Its digital format would enable the information to be updated electronically, and the touchscreen would allow users to interact with the content.

1.6. The specification includes a maximum display brightness of 2,500 cd/m² and an ambient light sensor to adjust brightness in response to surrounding light levels.

1.7. The display will operate between the hours of 06:00 and 23:00 and will be switched off, outside of these hours.

2. Site history

2.1. BA/2015/0321/FUL - Installation of cycle hire docking stations – Approved with Conditions

2.2. BA/2016/0449/FUL - Replacement window frames – Approved with Conditions

3. Consultations received

Parish Council

3.1. No response received.

Norfolk County Council (NCC) Highways

3.2. Whilst minded the display would be visible from the highway, it is not considered it would cause any undue distraction or give rise to an overriding highway safety concern and therefore no objection is raised. However, notwithstanding that, the LPA may wish to be minded of the guidance given the in the Institution of Lighting Professionals Professional Lighting Guide 05/23 “The Brightness of Illuminated Advertisements Including Digital Displays” and its recommendation on the maximum night-time permitted values of display luminance and consider appropriate conditions to any grant of permission.

North Norfolk Council

3.3. The application site is located within Hoveton’s Town Centre and primary shopping area. As such there would be no in principle objection to the proposed development. Notwithstanding this, the LPA may wish to be minded of the guidance given the in the Institution of Lighting Professionals Professional Lighting Guide 05/23 “The Brightness of Illuminated Advertisements Including Digital Displays” and its recommendation on the maximum night time permitted values of display luminance and consider appropriate conditions to any grant of permission. A similar display on Stalham Road, Hoveton has been conditioned accordingly, please see PF/25/2777 for details.

North Norfolk Environmental Health Officer

3.4. No further comments than returned on 25th August 2026 by the NNDC LPA

BA Historic Environment Manager

3.5. The site is away from the more sensitive river frontage and is proposed to be situated in a commercial part of the village, where such signage is considered more appropriate. It is set back from the street in a courtyard adjacent to the TIC and public WCs where there should be passing traffic who can make use of the facility. The design is simple and the casing is black coloured, which will provide some consistency with the fenestration on the neighbouring building and the location set back from the street, should also ensure that it is not too visually intrusive. I therefore have no objection to the proposal in terms of design.

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:

- HOV5 – Hoveton Town Centre and areas adjacent to the Town Centre
- SP7 – Landscape Character
- DM16 – Development and Landscape
- DM21 – Amenity
- DM22 – Light Pollution and Dark Skies
- DM23 – Transport, highways and access
- DM43 - Design
- DM49 – Advertisements and signs

6. Assessment

Principle of development

6.1. Policy DM49 of the Local Plan for the Broads requires advertisements and signs to be sensitively designed and located, having regard to the character of the associated building and the general characteristics of the locality. Their size, design, positioning, materials and degree of illumination must not adversely affect the built or landscape character of the Broads or have a detrimental effect on public safety.

6.2. The proposed display would be located alongside the established visitor centre, within a commercial part of the village covered by site-specific Policy HOV5. Its use to provide visitor information is consistent with the visitor centre's function and the site's role under Policy HOV5. The supporting text to Policy DM49 also recognises the important role that advertisements and signs can play in informing visitors to the Broads.

6.3. The principle of the proposal is therefore considered acceptable, subject to consideration of its effects on amenity and public safety, in this case highway safety.

Design, siting and amenity

6.4. Policy DM49 requires advertisements to respect the character of their surroundings and complement existing architecture. The policy also requires consideration of cumulative effects arising from other signage in the vicinity. The relevant provisions of Policies SP7, DM16 and DM43 seek to protect landscape character and ensure that proposals

integrate appropriately with their surroundings. DM21 requires consideration of neighbour amenity.

6.5. The proposed unit would be modest in scale relative to the neighbouring visitor centre and would sit comfortably alongside its entrance. Its slim profile and simple black enclosure would give it a restrained appearance, while its positioning on existing hardstanding would ensure that it is read as an ancillary feature of the visitor centre. The unit would not appear unduly prominent or visually intrusive within its surroundings.

6.6. The display would be visible from Station Road but would be set back within the courtyard and viewed against the visitor centre building. Its relatively narrow form and position alongside the building would limit its prominence within the street scene. The black casing would provide consistency with the fenestration of the neighbouring building and help integrate the unit with its immediate surroundings. There are no residential properties that would be affected and the sign is tucked back within the existing courtyard so there is no wider amenity impact from the unit or the illumination.

6.7. The Historic Environment Manager raises no objection to the design, noting that the proposal is situated within a commercial part of the village, where this type of signage is more appropriate, and away from the more sensitive river frontage. Also the simple design and position set back from the street limits its visual impact.

6.8. The unit's scale and position would not result in an unacceptable accumulation of signage or dominate the building frontage. Therefore, subject to satisfactory illumination controls, the proposal is considered acceptable in terms of design and visual amenity, having regard to Policy DM49 and the relevant provisions of Policies SP7, DM16, DM 21 and DM43.

Illumination and light pollution

6.9. Policy DM49 requires the degree of illumination to be appropriate to the character of the locality. Policy DM22 seeks to conserve and enhance the tranquillity and dark sky experience of the Broads through good lighting management, the minimisation of light spillage and the elimination of unnecessary artificial outdoor lighting. It also requires proposals to demonstrate that relevant lighting guidance and standards are met or exceeded.

6.10. The manufacturer's specification identifies a maximum screen brightness of 2,500 cd/m². This reflects the equipment's capability for visibility in daylight. The screen incorporates an ambient light sensor to enable its brightness to respond to surrounding light levels.

6.11. NCC Highways and North Norfolk District Council recommend consideration of the maximum night-time display luminance advised in the Institution of Lighting Professionals' Professional Lighting Guide PLG05/23, The Brightness of Illuminated Advertisements Including Digital Displays. The Environmental Health Officer provides

no further comments beyond those previously returned by North Norfolk District Council.

6.12. Lighting Guide 05/23, *The Brightness of Illuminated Advertisements Including Digital Displays*, recommends maximum luminance levels of 5,000 cd/m² during daylight hours and 300 cd/m² at night. A condition will limit the proposed display to 2,500 cd/m² during daylight hours, reflecting the equipment's stated maximum brightness, and 300 cd/m² at night. A further condition will restrict operation to between 06:00 and 23:00, requiring the display to be switched off outside these hours. These controls will ensure that brightness is reduced after dark and that the display does not remain illuminated throughout the night, protecting neighbouring amenity and limiting light pollution.

6.13. Subject to these conditions, the proposal is considered acceptable in terms of Policies DM21(e), DM22 and DM49.

Highways and public safety

6.14. Policy DM49 requires advertisements to avoid detrimental effects on public safety on land and water, including the operational safety of the highway, railway and water network. The highway safety and access provisions of Policy DM23 are also relevant.

6.15. The Highway Authority acknowledges that the display would be visible from the highway but considers that it would not cause undue distraction or give rise to an overriding highway safety concern And no objection is raised. Its advice regarding night-time brightness can be addressed through the proposed luminance condition.

6.16. The siting will retain adequate space for pedestrians to pass and for users to access the visitor centre and public toilets.

6.17. The unit will be restricted to the operating hours of 06:00 – 23:00 and these hours have been confirmed by the applicant.

6.18. Having regard to the proposed siting and the Highway Authority's response, the display does not have an unacceptable highway safety impact. Subject to appropriate illumination controls and adequate pedestrian clearance, the proposal is considered acceptable in respect of public safety, having regard to Policy DM49 and the relevant provisions of Policy DM23.

7. Conclusion

7.1. The proposed display would be situated alongside an established visitor centre within a commercial part of Hoveton, set back from Station Road and away from the more sensitive river frontage. Its scale, simple design and black enclosure are considered appropriate to its immediate setting. The Historic Environment Manager raises no objection in terms of design, and NCC Highways identifies no highway safety concern.

7.2. Subject to conditions controlling illumination and operating hours, the proposal is considered acceptable in terms of amenity and public safety and would accord with

Policies HOV5, DM16, DM21, DM22, DM23, DM43, and DM49 of the Local Plan for the Broads. Approval of advertisement consent is therefore recommended.

8. Recommendation

8.1. Approve subject to the following conditions:

1. Time limit
2. Approved plans
3. Landowner consent
4. Highway safety requirements
5. Maintain visual amenity
6. Maintain public safety
7. Remove when no longer required
8. Operation hours
9. Illumination restriction

9. Reason for recommendation

9.1. The Local Planning Authority considers that the scheme proposed is in accordance with Policies HOV5 – Hoveton Town Centre and areas adjacent to the Town Centre, SP7 – Landscape Character; DM16 – Development and Landscape; DM21 – Amenity; DM22 – Light Pollution and Dark Skies; DM23 – Transport, highways and access; DM43 – Design DM49 – Advertisements and signs

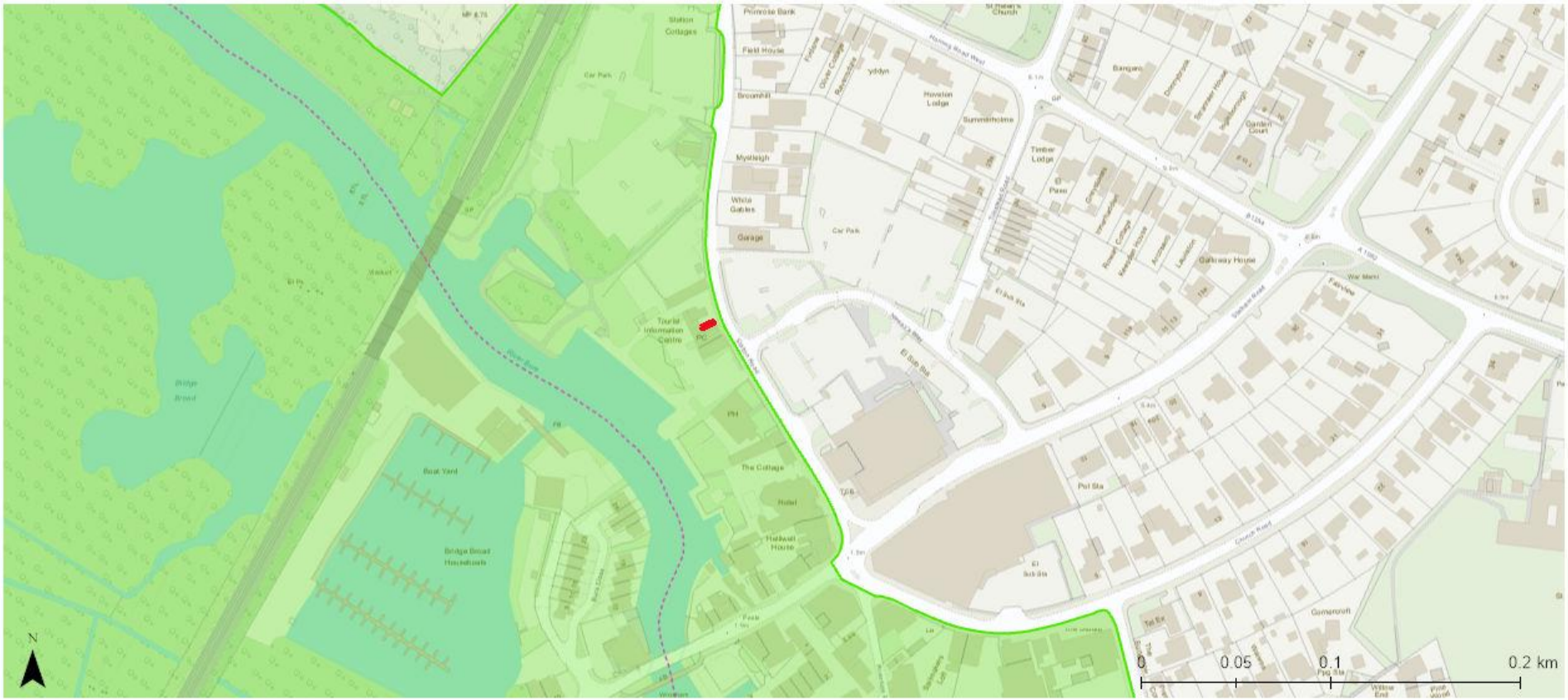
Author: Callum Sculfor

Date of report: 15 October 2026

Appendix 1 – Location Map

Appendix 1 – Location map

BA/2026/0191/ADV - Broads Authority Information Centre, Station Road, Hoveton



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Planning Committee

6 November 2026
Agenda item number 7.2

BA/2026/0208/FUL Bridge Stores, Main Road A1064, Acle Bridge

Report by Assistant Planning Officer

Proposal

The demolition and reconstruction of the existing chalet building, raised up above the flood level. New windows added and existing doors and windows replaced. New external ramps and steps for access.

Applicant

Broads Authority

Recommendation

Approve Subject to Conditions

Reason for referral to committee

Broads Authority development

Application target date

01 November 2026

Application documents

BA/2026/0208/FUL Associated Documents

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1. Description of site and proposals

1.1. The application site is on the north bank of the River Bure, immediately west of Acle Bridge. It contains a detached, single-storey timber chalet previously used as Bridge Stores and, more recently, a seasonal café. The building is locally listed and is a non-designated heritage asset.

1.2. The main building dates from the 1920s. It has white-painted horizontal timber weatherboarding and a hipped reed-thatched roof. There is a flat-roofed kitchen extension on its western end. Much of the original joinery has been replaced with uPVC windows and doors.

1.3. Paving separates the building from the piled river edge to the south. Mown grass lies to the north, with a reedbed beyond. Storage buildings and public toilets occupy the wider site to the east and north-east. The surrounding area includes moorings, boatyards and the Bridge Inn on the opposite bank.

1.4. Vehicular and pedestrian access is from Main Road, through the existing parking area and across the flood-defence embankment. The site is also accessible from the river via the adjacent moorings. Weavers Way, recorded as Fleggburgh Footpath 17, passes behind the chalet and continues west along the riverbank.

1.5. The building stands on the riverward side of the flood-defence embankment. The FRA and Environment Agency identify the site as Flood Zone 3b, functional floodplain. The embankment does not protect the chalet from river flooding.

1.6. Full planning permission is sought to demolish the existing chalet and reconstruct it as a café. The proposal includes new foundations, a raised floor, replacement timber windows and doors, additional windows, external steps, decking and a new accessible ramp. The application concerns the chalet and its access works only. The wider landscaping, removal of adjacent sheds, public toilet improvements and quay-heading works detailed in the supporting statement are not included in this application.

1.7. The replacement broadly retains the existing building form and footprint. It is moved approximately 1 metre north, away from the river, and raised by approximately 0.67m. The proposed finished floor level is 1.60 metres Above Ordnance Datum (AOD).

1.8. The main roof is reed thatch. The lower kitchen element has a felt roof. White-painted horizontal shiplap boarding is proposed, with narrower boarding to the kitchen element. Windows and doors are timber. External balustrades are painted black.

1.9. The building is supported on a steel frame and concrete pads. Spaced vertical timber boarding encloses the area beneath the floor while allowing floodwater to pass through. The internal layout provides a café area, serving counter and kitchen. New windows face east and north, and an existing window is repositioned in the western elevation.

2. Site history

2.1. No History available.

3. Consultations received

Parish Council

3.1. Fleggburgh Parish Council supports this application.

Environment Agency

3.2. 26th August 2026 - We have reviewed the documents, as submitted, and are raising an objection due to concerns over potential impacts on flood defences. We have set out our position below, as well as detailing how the applicant can overcome our objection. Our letter also includes information regarding environmental permitting and flood risk.

3.3. 2nd October 2026 - We have reviewed the 'Response to Environment Agency consultation response' email, dated 11 September 2026, and consider it sufficient to overcome our previous concerns. We therefore withdraw the objection set out in our letter dated 26 August 2026. We are satisfied that the remaining details can be confirmed as part of the flood risk activity permit application. No works should take place on flood defence assets until the final design is received and agreed with the

Environment Agency. This includes tracking over, demolition and realignment, and future maintenance responsibilities.

Norfolk County Council (NCC) Highways

3.4. Given the nature of the proposals in that there are no material changes in terms of size or use, nor any evidence to suggest that the proposals would generate any significant changes in vehicle trips from that already occurring (if at all), the Highway Authority raise no objection.

BA Ecologist (Summarised)

3.5. The nearest designated site is Burgh Common and Muckfleet Marsh SSSI, SAC, SPA and Ramsar, approximately 1.35 km from the building. Damgate Marshes SSSI, SAC and Ramsar lies approximately 1.6 km away, with Upton Broads and Marshes SSSI, Bure Broads and Marshes SSSI, SAC, SPA and Ramsar, and Trinity Broads SSSI and SAC also within the wider area. A Habitats Regulations Assessment (HRA) has been undertaken. This was concluded at the Screening stage with no likely significant effect determined.

3.6. The site is bordered by paving slabs to the south and regularly mown amenity grassland to the north, beyond which lies a Phragmites australis reedbed. Pampas grass is present to the west, with the River Bure to the south and boatyards and businesses on both sides of the river. Habitats immediately surrounding the building are of low to negligible ecological value. However, the building may support roosting bats within the roof or behind timber cladding, and the River Bure provides a foraging and commuting corridor. The pampas grass and Phragmites australis reedbed may also provide refuge and nesting habitat for birds.

3.7. Demolition and reconstruction works could result in pollutants entering the river and adjacent habitats. A Pollution Prevention Plan should therefore be implemented during works, alongside precautionary method statements to prevent protected species entering the site. Peat may also be present at the surface; please refer to the Broads Authority Peat Policy for guidance. No objection is raised, subject to compliance with the recommendations, mitigation measures and enhancements set out in the Ecological Assessment Record. Further comments and potential conditions may be provided following review of the bat emergence report findings and recommendations.

3.8. Kepwick Ecological Services completed a Potential Roost Assessment of the chalet and surrounding sheds, and two emergence bat surveys in August and September 2026. No evidence of bat roosts was found in the chalet or sheds. However, given the possible access into cladding and the interior of the sheds, they conclude there is potential for the wooden buildings to be used at any time of year as opportunistic roosts by individual bats and care should be taken when they are demolished. Given these findings, the following should be conditioned, as per recommendation 6.2 of the bat report: The buildings must be removed carefully as a soft demolition, with a licenced bat worker present when the sheds are demolished. The sheds should be cleared internally first and checked for bats as works progress. Roofing material should be

removed carefully. If bats are discovered during works, it should be checked for injury and condition by the licensed bat worker and either released in suitable weather conditions to the same area or taken into care. All other previous comments stand.

BA Landscape

3.9. The site is located to the north-east of Acle and south-east of Upton Green and comprises an existing chalet style building located just off the River Bure. The building has previously been in use as a café. The site is bound to the north by marshes, to the east by Acle Bridge, to the south by the River Bure and to the west by the river embankment. The chalet is of local historic significance and is therefore locally listed. The Weavers Way long distance footpath (Public Right of Way Fleggburgh FP17) passes behind the site following along the river further west. Other nearby Public Rights of Way include Upton with Fishley FP4 and Acle FP10 which are located to the south of the river. The proposals are to demolish and rebuild the chalet on more robust foundations due to modern standards not being met with the current construction. The proposals will slightly raise the building to sit above the flood level and will still be in use as a café.

3.10. We have no major concerns from a landscape perspective. We note that the Design and Access Statement shows aspirations for wider redevelopment outside of the red line boundary. This is welcomed and we would be happy to comment on this further should it come forward as an application.

BA Historic Environment Manager (Summarised)

3.11. No objection, subject to conditions. The locally listed chalet has historical, aesthetic and communal significance, principally derived from its location, design, relationship with the river and established use. Its physical materials have limited significance, having been substantially replaced over time. The structural evidence justifies reconstruction due to extensive timber decay and recurring flooding.

3.12. The replacement closely replicates the existing building, with timber joinery, improved access and raised floor levels providing enhancements. The proposal maintains the building's heritage values and accords with Policies DM11 and DM43 and NPPF heritage policies.

3.13. Conditions are recommended to secure details of extraction and ventilation equipment; timber windows, doors and balustrades at 1:5 scale or larger; reconstruction following demolition; and an internal and external photographic record deposited with the Norfolk Historic Environment Record before works commence.

Broads Society

3.14. The Broads Society supports this application for the rebuilding of the Chalet Cafe and its relocation, along with the reconfiguration of the outside seating area. It is, obviously, disappointing that the original building cannot be retained but it is recognised that it is not practical in this instance and that the re-build will echo the building that is being replaced. It is also welcomed that this popular cafe will be able to receive visitors to Acle Bridge in the future to help maintain the vitality of the local economy.

Furthermore, it is considered to be of particular significance to water borne users in the vicinity of Acle Bridge as this area is important for 24hr moorings, de-masting and general access to the waterway. The Society also feels that this development could be the catalyst for wider improvements to the 1 surrounding area, including the public toilets and access paths to and through the site as well as the maintenance and upgrading of existing quay headings.

4. Representations

4.1. None received.

5. Policies

5.1. The relevant policies in the NPPF (2026) are;

- E4 – Rural business development
- DP3 – Key principles for well-designed places
- N2 – Improving the natural environment
- N4 – Protected Landscapes
- P3 – Living conditions and pollution
- F4 – Assessing flood risk for decision-making
- F7 – Ensuring development is safe from flooding
- HE7 - Decisions on non-designated heritage assets
- HE10 - Loss or removal of heritage assets

5.2. The adopted development plan policies for the area are set out in the Local Plan for the Broads (adopted 2019).

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

- SP2 – Strategic flood risk policy
- SP5 – Historic environment
- SP6 – Biodiversity
- SP7 – Landscape character
- SP9 – Recreational access around the Broads
- SP10 – A prosperous local economy
- SP11 – Waterside sites
- SP12 – Sustainable tourism

- DM5 – Development and flood risk
- DM11 – Heritage assets
- DM13 – Natural environment
- DM16 – Development and landscape
- DM21 – Amenity
- DM22 – Light pollution and dark skies
- DM23 – Transport, highways and access
- DM29 – Sustainable tourism and recreation development
- DM43 – Design
- DM44 – Visitor and community facilities and services

6. Assessment

Principle of development

6.1. Policies SP10 and SP12 of the Local Plan support the local economy and sustainable tourism. Policy DM29 supports tourism and recreation development of an appropriate scale associated with existing visitor facilities and accessible by sustainable transport. NPPF Policy E4 also supports facilities serving rural leisure and tourism and the retention of accessible local services.

6.2. The application seeks permission to demolish and reconstruct the existing café at Acle Bridge. The replacement retains the established café use to continue to provide refreshments for boaters, walkers and visitors using the adjacent moorings and Weavers Way. The proposal therefore maintains an existing visitor facility within an established riverside destination. Its continued use, scale and location accord with the policy objectives.

6.3. Policy DM44 seeks to protect visitor and community facilities that meet local needs or contribute to the network of facilities across the Broads. Reconstruction enables the café to continue serving this function. The retention of the café use is therefore acceptable in principle.

6.4. The proposal also involves the demolition of a locally listed building, which is a non-designated heritage asset. Retention and repair would therefore be the preferred approach, but structural evidence has been submitted identifying deterioration of the building, and the extent of replacement works required. If all other details discussed below are acceptable then a condition would be required to secure the replacement chalet and timescale for this following demolition. The effect on the building's significance, the justification for demolition and the benefits of reconstruction are assessed in the heritage section against Policy DM11.

Design, heritage and landscape

6.5. Policy DM43 requires development to respond to its surroundings through appropriate siting, scale, form, materials and detailing. NPPF Policy DP3 similarly requires development to respond positively to its context and integrate with its surroundings. Policies SP7 and DM16 seek to conserve the landscape character of the Broads. NPPF Policy N4 requires development within protected landscapes to be sensitively located and designed, giving substantial weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads. Policy DM11 and NPPF Policy HE7 require a balanced judgement where development affects a non-designated heritage asset, having regard to its significance, the scale of harm or loss and the benefits of the proposal.

6.6. The chalet is a locally listed building dating from the 1920s, with a later flat-roofed kitchen extension dating from around the 1950s. It is locally listed as a good example of a Broads' waterside chalet, built to serve the growing tourist trade of the 1920s. Its traditional construction and design, relationship with the river and longstanding use as a shop and café give it historical, aesthetic and communal significance. It also has group value with the remaining waterside chalets across the Broads.

6.7. Although retention and repair would be the preferred approach, the submitted structural report, informed by opening-up investigations, identifies extensive decay in the sleeper foundations, wall studs, sole plate, floor joist ends and weatherboarding. To bring it back into use, a new foundation system is required, and the report concludes that the extent of repairs and access constraints make the loss of most original fabric inevitable. This provides a clear justification for demolition.

6.8. Demolition results in the loss of the existing structure and its surviving fabric. However, the Heritage and Design Manager identifies that the building's principal significance derives from its location, design, character and use. Many individual components have already been replaced. The proposal reinstates those principal values through its traditional form, continued riverside presence and café use.

6.9. The chalet occupies a prominent position beside the River Bure and Acle Bridge, visible from the river, bridge and Weavers Way. Its small scale, thatched roof and painted timber boarding contribute positively to the developed riverside frontage.

6.10. The replacement retains the single-storey form, hipped thatched roof and lower flat-roofed kitchen element. This maintains the established roof profile and the distinction between the main chalet and its subordinate western element. It preserves the characteristic appearance of a Broads waterside chalet, the symmetrical design of the main part of the chalet and remains proportionate to the surrounding development.

6.11. The proposal moves the building one metre north and raised by approximately 0.67m to provide a finished floor level of 1.60m AOD. The increased height makes the building more visible and introduces an exposed supporting structure beneath the floor. Nevertheless, the increase is limited, and the building remains a small-scale feature

within the existing riverside group. It does not dominate views from the river or bridge or materially erode the open character of the adjoining marshland. The raising of the building will make it more resilient to flooding which is beneficial to its fabric and will secure its long-term future.

6.12. The northward relocation of the chalet accommodates the river-facing entrance steps and landing. The accessible ramp introduces an additional horizontal feature alongside the building. These structures increase the extent of development around the chalet, but their low profile and close relationship with the building contain their visual effect. Improved access with the ramp also supports the building's continued use as a visitor facility.

6.13. Norfolk reed thatch and white-painted horizontal timber boarding maintain the established materials and appearance. Narrower boarding distinguishes the kitchen element and reinforces its subordinate form. Replacing uPVC windows and doors with timber joinery will be beneficial and improves the architectural detailing and strengthens the traditional character of the building. Additional windows are accommodated in the elevations without altering its overall form.

6.14. Black-painted balustrades and spaced vertical boarding beneath the floor-level provide a recessive finish to the access structures and supporting frame. This reduces their prominence beneath the white elevations and avoids a visually solid plinth. Conditions securing detailed drawings of the windows, doors and balustrades will ensure that their proportions, profiles and finishes complement the chalet.

6.15. If it is required, external extraction and ventilation equipment could detract from the simple elevations and roof profile if not well located. This can be dealt with by condition in case it is required so that Its location, dimensions, materials and finish can be properly considered.

6.16. External lighting is also controlled to protect the darker river corridor and adjoining marshland. Retention of the reedbed beyond the northern boundary maintains the transition between the developed frontage and the wider landscape.

6.17. The Heritage and Design Manager has no objection to the reconstruction, and the Landscape Consultant raises no landscape objection. The structural evidence justifies replacement, while the design maintains the principal characteristics through which the building's heritage significance is expressed. The benefits of securing its continued café use, improving accessibility, reinstating timber joinery and increasing flood resilience provide benefits that outweigh the loss of surviving fabric. The proposal therefore satisfies the balanced judgement required by Policy DM11 and NPPF Policy HE7.

6.18. Conditions secure reconstruction following demolition and an internal and external photographic record deposited with the Norfolk Historic Environment Record before works commence. These measures address the risk of losing the building without delivering its replacement and secure a publicly accessible record of the existing asset, in accordance with NPPF Policy HE10.

6.19. The proposal achieves an acceptable balance between heritage conservation, continued use and adaptation to the riverside environment. Its siting, scale, form and materials respect the landscape setting and local distinctiveness. Giving substantial weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads, the replacement is acceptable subject to the identified conditions. The proposal accords with Policies DM11, SP7, DM16 and DM43 and NPPF Policies DP3, N4, HE7 and HE10.

Amenity of residential properties

6.20. Policy DM21 addresses the effects of overlooking, dominance, noise, odour, lighting and construction activity. NPPF Policy P3 requires development to avoid unacceptable pollution effects on occupiers, neighbouring uses and the natural environment. The immediate setting comprises public riverside space, moorings, storage buildings and visitor facilities. There are no nearby residential properties that would be adversely affected by the proposal. The replacement building would remain single storey and of a similar scale to the existing building, and its siting and form would not result in unacceptable overlooking, overshadowing or dominance.

6.21. Kitchen extraction can affect neighbouring amenity and the appearance of the building. As extraction details have not been submitted, a condition will require approval of the equipment, discharge points and measures to control noise and odour before installation. The approved measures must be implemented before the café use resumes. This will ensure that the extraction system is acceptable in terms of Policies DM21, DM11 and DM43.

6.22. External lighting requires control because of the river corridor and dark setting. A condition requires approval of the location, design, direction and operating controls of external lighting. Together with the controls on kitchen extraction, these measures prevent unacceptable effects from noise, odour and artificial light. Subject to these conditions, the proposal accords with Policies DM21 and DM22 and NPPF Policy P3.

Highways and public rights of way

6.23. Vehicular access remains through the existing parking area off Main Road with no new highway access proposed. The Highway Authority confirms that the replacement does not materially change the use or generate significant additional trips. The proposal will therefore not have an adverse impact on highway safety and is acceptable under Policy DM23.

6.24. The public right of way remains an important route through the wider site. Planning permission does not authorise its obstruction or diversion and construction access must be managed without interference with the route. This is the responsibility of the applicant.

6.25. Tracking construction machinery over the flood-defense embankment is a flood-defense permitting issue. The Environment Agency has accepted that the detailed arrangements can be resolved through the flood risk activity permit.

Ecology

6.26. A Habitats Regulations Assessment has been undertaken to consider the proposal's effects on nearby internationally designated sites under the 2017 Regulations. The nearest is Burgh Common and Muckfleet Marsh, approximately 1.35 km from the building, with Damgate Marshes approximately 1.6 km away. The assessment concluded at the screening stage that the proposal would have no likely significant effect on the designated sites. An appropriate assessment was therefore not required.

6.27. Policy DM13 and NPPF Policy N2 require development to protect biodiversity, minimise adverse effects and incorporate appropriate features supporting wildlife. The site comprises the existing chalet, paving and regularly mown grass. The adjacent reedbed and River Bure provide habitat and a corridor for wildlife movement.

6.28. The updated bat assessment by Kepwick Ecological Services, dated 11 October 2026, covers the chalet and surrounding sheds. The chalet was assessed as having low roosting potential because of a possible access point beneath the eaves. This was investigated but no evidence of bats was found internally or externally, and no bats emerged from the chalet during the emergence surveys. Noctule, soprano pipistrelle and Daubenton's bats were recorded nearby.

6.29. The emergence surveys were undertaken outside the maternity period. Although no roost was identified, individual bats could occupy concealed spaces opportunistically before demolition. Precautionary demolition methods are therefore recommended. The Authority's ecologist has reviewed the completed survey and confirmed that the demolition precautions are appropriate. An informative advises careful soft demolition of the chalet under the supervision of a licensed bat ecologist, including internal inspection and checks of roof coverings, cladding and potential roosting features as works progress. It also advises that affected works must stop if bats are discovered, allowing the ecologist to assess their condition and determine the appropriate action. The required survey information has been provided, and no further bat survey requirement remains outstanding.

6.30. The River Bure provides a foraging and commuting corridor. A condition controls the location, design and operation of external lighting to avoid illumination of the river, reedbed and bat and bird boxes. Temporary construction lighting must also avoid illuminating adjoining habitats. These measures protect the dark corridor used by bats.

6.31. Demolition and construction present a risk of sediment, debris and other pollutants entering the river. A condition requires approval and implementation of a Pollution Prevention Plan before works commence, covering material storage, refuelling, waste management, spill response and incident reporting. The reedbed beyond the northern boundary is retained and protected from construction activity.

6.32. One bat box and two house martin nest cups can be secured by condition. These provide additional roosting and nesting opportunities and must remain unlit, retained and maintained.

6.33. Precautionary working methods protect amphibians, reptiles and other wildlife during clearance and construction. These include staged vegetation clearance, maintaining short grass within the working area, storing materials above ground and covering excavations or providing suitable escape routes. Excavations must be checked before backfilling, and vegetation clearance must avoid harm to active bird nests.

6.34. The ecology consultation confirms that Habitats Regulations Assessment screening concluded with no likely significant effect on the designated sites. The updated survey and final ecological comments resolve the previous requirement for chalet-specific bat evidence. Conditions secure pollution prevention, wildlife and habitat protection, sensitive lighting and biodiversity enhancements. An informative advises on precautionary soft demolition and the action to take if bats are discovered. On this basis, the proposal safeguards protected species and adjacent habitats and accords with Policy DM13 and NPPF Policy N2.

Flood risk and mitigation

6.35. Policies SP2 and DM5 require development to minimise flood risk, remain safe for its lifetime and avoid increasing flood risk elsewhere. NPPF Policy F4 requires a site-specific Flood Risk Assessment, while Policy F7 requires consideration of lifetime safety, residual risk, safe access and escape, flood resilience and effects on flood risk elsewhere. The application is supported by a Flood Risk Assessment prepared by Rossi Long Consulting, reference 251457 Rev 01, dated July 2026.

6.36. The site lies within Flood Zone 3b, functional floodplain, on the riverward side of the existing flood-defence embankment. The existing café is therefore exposed to flooding from the River Bure. The proposal replaces that building with a café of a similar scale and retains its established use.

6.37. The replacement incorporates a finished floor level of at least 1.60m AOD, approximately 670mm above the existing floor level and 280mm above the recorded crest of the adjacent embankment. This reduces the building's exposure to flooding and provides betterment compared with the existing arrangement.

6.38. The raised building is supported on a steel frame and concrete pads. The space beneath the floor, including the gaps between the proposed vertical boarding, allows floodwater to pass through. The Environment Agency confirms that compensatory flood storage is not required.

6.39. The Environment Agency initially objected because insufficient information had been provided about construction access and the potential effects of vehicles and machinery on its flood-defence assets. Following further information from the agent, the Agency withdrew that objection on 2 October 2026. It confirmed that the remaining construction details can be addressed through the flood risk activity permit process. There is therefore no outstanding Environment Agency objection.

6.40. The Agency's final position supports the proposed development subject to the separate permitting requirements. A standard informative can be added that planning

permission does not authorise works affecting flood-defence assets and that construction access, tracking arrangements and relevant works must be agreed with the Agency before they take place.

6.41. The FRA assesses the risk of groundwater flooding affecting the raised building as low and surface water flood risk as very low. It identifies no significant flood risk from reservoirs, canals or other artificial sources.

6.42. The replacement provides a clear reduction in flood risk to the building through its raised floor level and maintains floodwater movement beneath it. The Environment Agency has withdrawn its objection, and the identified mitigation can be secured through conditions and the separate permitting process. The proposals are therefore acceptable in terms of DM5 – Development and Flood risk.

7. Conclusion

7.1. The proposal secures the continued use of an established riverside café serving boaters, walkers and visitors to Acle Bridge. Reconstruction provides improved accessibility and flood resilience while retaining the building's traditional form, scale and relationship with the River Bure.

7.2. The demolition of the locally listed chalet is justified by the submitted structural evidence. Although surviving historic fabric would be lost, the replacement maintains the principal characteristics through which the building's heritage significance is expressed. The benefits of continued café use, improved access, reinstated timber joinery and increased flood resilience outweigh that loss.

7.3. The replacement respects the landscape character of the Broads and would not result in unacceptable effects on neighbouring amenity, highway safety, protected species or adjacent habitats. The raised floor and open supporting structure reduce the building's exposure to flooding while maintaining floodwater movement beneath it. The Environment Agency has withdrawn its objection, with separate permitting requirements remaining applicable.

7.4. Subject to conditions securing the reconstruction, café use, detailed design, flood mitigation and environmental safeguards identified in this report, the proposal accords with the development plan and relevant national planning policy. Planning permission is therefore recommended for approval subject to conditions.

8. Recommendation

8.1. Approve Subject to Conditions:

1. Time limit
2. Approved Plans
3. Flue and Extractor Details

4. Windows and Doors External Details
5. Historic Record
6. Timescale for replacement chalet following demolition
7. Pollution Prevention Plan
8. External Lighting
9. Bird and Bat Boxes
10. Use of Building

9. Reason for recommendation

9.1. The proposal maintains an established visitor facility, preserves the principal heritage values of the locally listed chalet and respects the landscape character of the Broads. The structural evidence justifies demolition, and the benefits of reconstruction outweigh the loss of surviving historic fabric. Subject to conditions, the development improves accessibility and flood resilience without unacceptable effects on amenity, highway safety or biodiversity. The proposal accords with the development plan and relevant national planning policy.

Author: Callum Sculfor

Date of report: 1 October 2026

Appendix 1 – Location map

Appendix 1 – Location map

BA/2026/0208/FUL - Bridge Stores, Main Road A1064, Acle Bridge, Fleggburgh



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Planning Committee

6 November 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]
31 March 2023 BA/2023/0004/ UNAUP2	Land at the Berney Arms, Reedham	Unauthorised residential use of caravans and outbuilding	• 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. • 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.
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	• 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]. • Works have not been completed, owner warned of possible direct action. [12/04/2026] • Owner agreed to comply within a month [20/10/2026]
BA/2025/0063/I NFENF	18 Long Dyke Wayford Bridge Norfolk	Unauthorised siting of shipping container	• Enforcement Notice served 29/06/2026. Compliance period 28 days. [26/08/2026] • Appeal submitted and valid. • Start date 20/07/2026. Will be dealt with by the compliance officer. • Two appeals now submitted – see Appeal Update for further information. LPA statements submitted, awaiting site visit [21/09/2026]

Author: Steve Kenny

Date of report: 20 October 2026

Background papers: Enforcement files

Planning Committee

6 November 2026
Agenda item number 9

Norfolk Environmental Delivery Plan

Report by Environment Policy Adviser

Summary

Natural England's proposed Norfolk Environmental Delivery Plan (EDP) would provide a strategic mechanism for addressing nutrient pollution associated with up to 15,780 new homes in the Yare, Bure and Wensum catchments. The mapped area takes in Norwich and parts of central and eastern Norfolk. Developers could voluntarily pay an index-linked Nature Restoration Levy of £2,675 per dwelling to fund conservation measures and their long-term maintenance. The Broads Authority supports the EDP in principle as a groundbreaking strategic approach, and is seeking some further details on transparent prioritisation, and effective monitoring to secure long-term delivery. Areas for greater understanding and discussion relate to the Overall Improvement Test, the additionality and placement of conservation measures and arrangements for remedial action.

Recommendation

(i) Note the Norfolk Broads Environmental Delivery Plan and the Nature Restoration Levy; and

(ii) Note the Broads Authority's consultation response, including its support in principle for a strategic EDP subject to transparent prioritisation, robust evidence and effective monitoring of material improvement.

1. Introduction

1.1. Natural England is consulting on a ten-year Environmental Delivery Plan (EDP) for nutrient pollution affecting the Broads Special Area of Conservation, Broadland Ramsar site and River Wensum SAC. The EDP could support up to 15,780 new homes in parts of Norfolk. Participating developers would pay an index-linked Nature Restoration Levy of £2,675 per dwelling, enabling Natural England to deliver and maintain strategic conservation measures for 100 years.

1.2. The EDP is a new strategic mechanism under the Planning and Infrastructure Act 2025. It is intended to address the additional nutrient pollution arising from eligible housing development within the defined Yare, Bure and Wensum catchments. Developers could participate voluntarily by paying the levy, thereby discharging the specific environmental obligation covered by the EDP; all other planning and environmental

requirements would continue to apply. New requests to use the levy would close after year six of the ten-year plan.

1.3. Natural England proposes a phased programme linked to three tranches of approximately 5,000 homes. Measures include fen creation, restoration and management; conversion to semi-natural habitat; catch-dyke and river restoration; removal of river structures; deer management; and a planning condition for non-mains drainage. No avoidance measures are identified, and most measures are categorised as compensation, although some of the compensation measures will offer mitigation.

1.4. Before the EDP can be made, the Secretary of State must be satisfied that the package passes the Overall Improvement Test: by the end of the plan, its benefits must materially outweigh the development's negative effects on each identified habitat and species feature. Natural England would monitor development, levy income, delivery and ecological effectiveness, with formal reports at years five and ten and back-up measures available if required.

2. Broads Authority response

Strategic approach and environmental safeguards

2.1. The Authority supports the EDPs strategic, catchment-scale approach to nutrient mitigation, recognising the potential to facilitate development while delivering environmental improvements. Given the ecological importance and complexity of the Broads, the EDP should provide robust evidence for the Overall Improvement Test, address uncertainty and demonstrate that conservation measures deliver measurable, additional benefits.

Governance and local delivery

2.2. The Authority recommends a Local Delivery Model, supported by appropriate governance. A local approach could separate strategic oversight from operational delivery. Measures should align with existing Broads management programmes, the Local Nature Recovery Strategy and wider catchment priorities.

Conservation measures and location

2.3. The Authority recommends a flexible, evidence-led approach to identifying sites for conservation measures, including larger hydrologically suitable sites near, adjacent to or downstream of designated sites where these offer better connectivity, resilience, deliverability and value for money. Measures should complement existing environmental programmes and demonstrate clear additionality.

Financial sustainability and wider benefits

2.4. Greater transparency is needed around whole-life costs, levy assumptions and long-term financial viability, including the potential impact of changing nutrient treatment standards on developer uptake. Opportunities to combine developer contributions with public, private and water-sector investment, including complementary funding such as

Defra's peatland grants, should be explored. Future EDPs could also address wider environmental obligations, including recreational impacts and protected species.

Implementation and future development

2.5. As one of the first EDPs, Norfolk has an opportunity to establish a credible and replicable model that supports housing delivery alongside nature recovery. The Authority considers that further development of the safeguards, monitoring and governance arrangements is necessary to ensure that the EDP delivers its intended environmental improvements and maintains stakeholder confidence.

Development management

2.6. The introduction of the EDP will provide another means for developers to mitigate nutrient impacts within the Broads Authority Executive Area alongside existing nutrient credit providers. Initially the scheme has the potential to facilitate development for new dwellings only (including flats), therefore it is likely that some development within the Broads could respond to the EDP and use the associated Nature Restoration Levy to mitigate relevant development. The mechanisms to do this are primarily administered by Natural England with Local Planning Authorities (LPAs) becoming involved once a developer has purchased the relevant mitigation certificate from Natural England and provided the evidence as part of a planning application. Discussions are continuing with Natural England in terms of how the levy process will operate in practice with LPAs.

3. Financial implications

3.1 No direct Broads Authority expenditure is identified at this consultation stage.

3.2 Any future officer input, partnership working or land-management commitments may have resource implications and should be assessed before any agreement is made.

4. Risk implications

4.1 There are no risk implications for the Broads Authority that arise from the EDP. Should the Broads Authority tender for delivery of Broads Authority approved conservation measure/s, the risk register would need review at that point.

5. Conclusion

5.1. The Committee is invited to note the EDP and the Authority's consultation response. The Authority supports the principle of a strategic approach to nutrient mitigation, subject to greater clarity on financial resilience, transparent prioritisation of conservation measures, robust and clearly defined remedial triggers where delivery, environmental outcomes or underlying assumptions fall short of expectations. These safeguards are essential to ensure that the EDP delivers demonstrable and lasting environmental improvements that outweigh the adverse effects of development and protect the integrity of designated sites.

Author: Andrea Kelly

Date of report: 15 October 2026

Background papers: Nutrient Pollution – draft Norfolk Environmental Delivery Plan consultation - Defra Consultations

Broads Plan strategic objectives: Theme B

Appendix 1 – Norfolk EDP Consultation full response to questions

Appendix 2 – Norfolk EDP Consultation response summary

Consultation questions on draft Environmental Delivery Plan

Nutrient Pollution

Norfolk: Broads Special Area of Conservation (SAC) (Yare and Bure), Broadland Ramsar and River Wensum SAC

Consultation questions

Date: 17 September 2026

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Consultation questions

The consultation questions are set out below. While you may wish to review all questions in advance, we prefer that you submit your responses via Smart Survey.

Please note only the first 300 words of your answer to each question (apart from Q35 and Q36) will be taken into consideration.

Confidentiality

1. Would you like your response to be confidential?

- Yes
- No

If you answered Yes to this question, please give your reason(s), in no more than 300 words.

About you

These questions are designed to develop an understanding of the breadth of respondents interested in the Environmental Delivery Plan (EDP) and the wider Nature Restoration Fund (NRF)

2. Key information

- What is your name?
- Email address
- Organisation
- What is your role?
- Where are you located?

3. What best describes your interest in this consultation?

- I am mainly interested in the Norfolk Environmental Delivery Plan
- I am interested in Environmental Delivery Plans more widely
- Other — please specify (no more than 50 words)

The Broads Authority, as the statutory authority responsible for conservation, planning and navigation in the Broads, has a strong interest in the Norfolk EDP. It helps convene local policy through the Broads Plan and brings practical experience of delivering wetland restoration and management measures across the area at scale.

4. **Which of the following best describes you or the capacity in which you are responding? You may select more than one:**
   - a resident in Norfolk
   - a resident outside of Norfolk
   - landowner in Norfolk
   - landowner outside of Norfolk
   - interested party
   - Environmental Non-Government Organisation member/employee
   - central government employee
   - local government employee
   - representative of an organisation
   - nature market provider
   - developer
   - consultant
   - academic
   - lawyer
   - other
     National Park

5. **If you are a developer how likely is your organisation to be proposing a development within the development area of the Norfolk EDP?**
   - Very unlikely
   - Unlikely
   - Neutral (or Undecided)
   - Likely
   - Very likely

N/A

The following questions relate directly to the Draft Environmental Delivery Plan (EDP) for public consultation, which can be found on Smart Survey. Title: 'Nutrient Pollution, Norfolk: Broads Special Area of Conservation (SAC), Yare & Bure, Broadland Ramsar & River Wensum SAC'.

Please read this document in conjunction with responding to the following consultation questions. We have provided a summary of each chapter below.

Chapter 1 - Executive summary

This chapter provides a high-level overview of the Norfolk EDP, the environmental issues it is intended to address, and how the EDP will operate in practice. It is intended to provide readers with a concise overview before moving into the detailed chapters that follow. It summarises the environmental challenges affecting the protected sites, the amount of development covered by the EDP, the conservation measures proposed, and how developers can participate.

It also introduces the central concept that conservation measures funded through the Nature Restoration Levy are intended not simply to address development impacts, but to contribute to an overall improvement in the conservation status of the identified environmental features.

Key messages

- The Broads Special Area of Conservation (SAC), Broadland Ramsar and River Wensum SAC are affected by nutrient pollution and other environmental pressures
- Up to 15,780 homes may use the EDP over a ten-year period
- Developers may pay the Nature Restoration Levy to discharge their relevant environmental obligations on a voluntary basis
- The levy rate is £2,675 per house or flat, plus indexation
- Natural England will use levy funding to deliver a strategic programme of conservation measures
- All conservation measures will be maintained for 100 years
- Natural England considers the package of measures will materially outweigh the negative effect of the EDP development on the conservation status of the environmental features.

EDP reference pages
Refer to chapter 1 pages 3 to 8

Chapter 2 - Introduction

This chapter explains the context for the EDP. It describes the protected sites involved, explains nutrient pollution and its ecological consequences, describes the policy context and sets out the structure of the EDP.

Key messages

- Nutrient pollution affects water quality, habitats and species across the protected sites
- Nutrient inputs come from several sources including agriculture, wastewater treatment works, urban runoff and non-mains drainage systems
- The EDP will address the negative effect of nutrient pollution from the EDP development only. The EDP introduces a strategic catchment-scale approach funded through the Nature Restoration Levy
- The Planning and Infrastructure Act introduces a new and more ambitious test (the Overall Improvement Test) than that applied under the Habitats Regulations.

EDP reference pages
Refer to chapter 2 pages 9 to 14
Refer to annex 2A page 113

Questions – chapter 1 and 2

6. **To what extent do you think the overall purpose of the EDP is sufficiently clear?**
    - Very clear
    - Clear
    - Not very clear
    - Not clear at all

7. **To what extent does the Executive summary and the Introduction (chapters 1 and 2) clearly set out the approach the EDP will take to deliver a material improvement that outweighs the negative effect of development?**
    - Very clear
    - Clear
    - Not very clear
    - Not clear at all

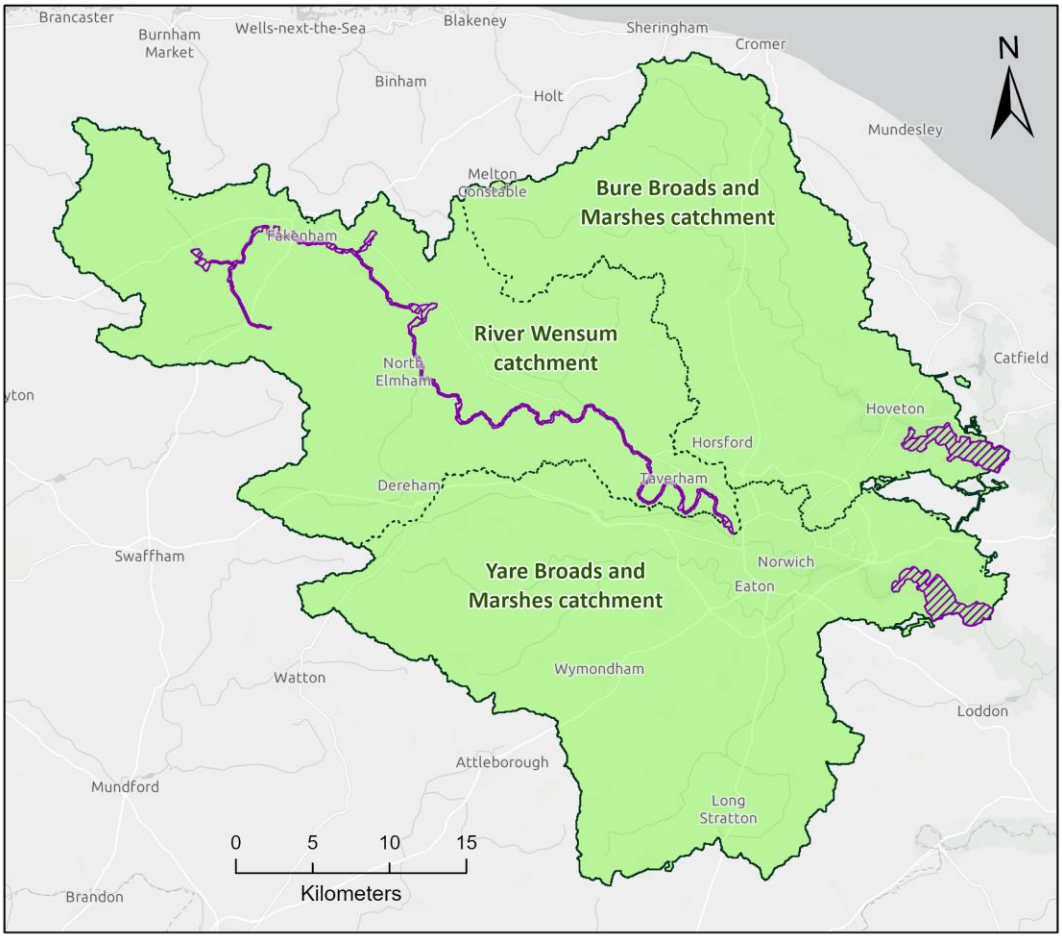
Chapter 3 – Scope of the EDP

This chapter defines the geographic area of the EDP, the environmental obligation discharged by this EDP, the kind of development that may use it, the time period of the EDP and the maximum amount of development enabled by the EDP.

Key messages

- The development area predominantly comprises surface water catchments associated with the Broads Special Area of Conservation (SAC) (Yare and Bure), Broadland Ramsar and River Wensum SAC protected sites.
- Certain locations, including the protected sites themselves and surrounding buffer zones, are excluded from this EDP.
- The EDP time period is ten years.
- The kind of development that can use the EDP is new dwellinghouses including flats, up to a maximum amount of development of 15,780 units.
- Development using the EDP can only discharge environmental obligations as set out in the EDP and will remain subject to all other existing environmental obligations. See Figure 4 below for a map of the EDP development area.

EDP reference pages
Refer to chapter 3 pages 15 to 19
Refer to annex 3A pages 114 to 115





Environmental Delivery Plan (EDP) Development Area

Nutrient Pollution - Norfolk

Development area
Catchment boundaries
Excluded areas

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Wastewater Treatment Works data derived from Hoffman et al. (2022) © Till Hoffman

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Questions – chapter 3

8. **Is the EDP period clearly set out?**
   - Yes
   - No
   - Somewhat
   - Maybe
   - Unsure

9. **To what extent do you agree that the geographic scope of the EDP has been clearly defined?**
   - Very clear
   - Clear
   - Not very clear
   - Not clear at all

Explain your choice (optional), in no more than 300 words.

The developer eligibility area is clearly defined at the strategic level, but the sub-catchments of the Bure Ant, Thurne and Trinity Broads are excluded and thus development within these parts of Norfolk will not be able to utilise the EDP.

The geographic area for conservation measures is not specified beyond the Lawton principles of "bigger, better and joined". For fen creation, restoration and management, areas close to the Broads SAC should be prioritised because they are more likely to have comparable soils, hydrology and other supporting conditions.

Water availability and management are fundamental to successful fen and "Broads-type mosaic" measures. In the upper Bure and Yare, normal river levels are often substantially below adjoining land, making it difficult to create and maintain summer-wet habitats with suitable Wetland Water Supply Mechanisms. Potential sites are also often small, fragmented, confined to parts of fields or constrained by roads and properties. They may therefore be technically challenging, deliver limited ecological benefit and offer poorer value for money than larger sites adjacent to, or slightly downstream of, the Broads SAC.

Natural England should adopt a flexible, evidence-led approach to locating compensation measures. The search area should include larger, hydrologically suitable sites close to existing SACs, including downstream locations outside the tightly defined consultation-map boundary. Sites should be prioritised according to hydrological feasibility, ecological connectivity, scale, deliverability, long-term resilience and value for money. This would increase the likelihood of achieving the intended conservation outcomes and ensure effective, sustainable use of Nature Restoration Levy funding.

REPEATED QUESTION

10. To what extent do you agree that the geographic scope of the EDP has been clearly defined

- Very clear
- Clear
- Not very clear
- Not clear at all

Explain your choice (optional), in no more than 300 words.

REPEATED QUESTION

11. To what extent is the methodology used to define the maximum development capacity (15,780 dwellings) under this Norfolk EDP clearly set out?

- Very clear
- Clear
- Not very clear
- Not clear at all

Explain your choice (optional), in no more than 300 words.

Chapter 4 - Plans and strategies considered during EDP preparation

The Planning and Infrastructure Act requires EDPs to identify the strategies and plans considered by Natural England in their preparation, and to provide an overview of measures being taken or likely to be taken by Natural England or other public authorities.

The EDP is not intended to operate in isolation. This chapter demonstrates how conservation measures align with wider environmental objectives and helps ensure that activities funded through the EDP are genuinely additional rather than duplicating work already required through other mechanisms.

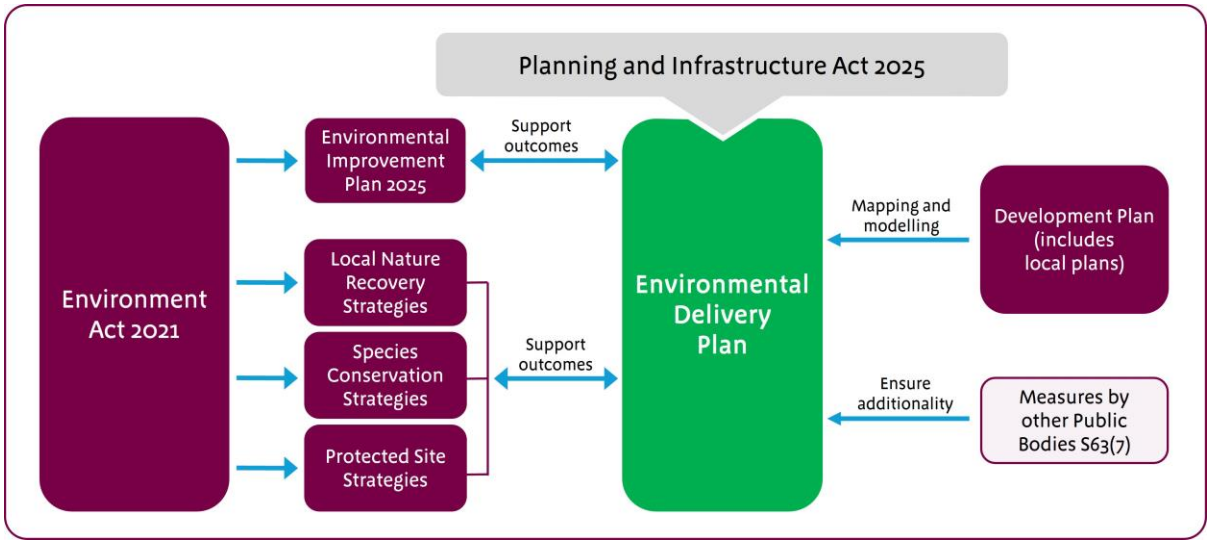


Figure 5: Summary of main interactions between the Environmental Delivery Plan and other strategies and plans

Key messages

- The EDP has been prepared with reference to local plans, the current Environmental Improvement Plan, the Norfolk Local Nature Recovery Strategy and other relevant environmental strategies or plans
- The EDP provides an overview of any other measures (in addition to the conservation measures set out in the EDP) that are being taken or are likely to be taken by Natural England or another public authority with the aim of improving the conservation status of each identified environmental feature. This is to avoid double counting, duplicate funding, or reliance on actions that would occur regardless of the EDP
- Wastewater treatment upgrades required through other legislation and agri-environment schemes are recognised but are not counted as EDP conservation measures

- The Local Nutrient Mitigation Fund is active in this area. Natural England will seek opportunities, where appropriate, to incorporate these measures into EDP conservation measure delivery
- Conservation measures are intended to complement wider nature recovery efforts across Norfolk.

EDP reference pages
Refer to chapter 4 pages 20 to 28

Questions – chapter 4

12. Are there any other relevant plans and strategies you think this EDP should take into account?

- Yes
- No
- Somewhat
- Maybe
- Unsure

Explain your choice (optional), in no more than 300 words.

The EDP should take account of several related initiatives to support a coordinated, strategic approach and avoid missed opportunities or duplication.

The Broads Peat Partnership Discovery Project is identifying potential sites for peatland restoration that could contribute to the programme of conservation measures, although most opportunities currently volunteered by landowners and farmers are downstream of the target areas. The EDP should consider how these opportunities could complement measures within the target catchments.

The EDP should also align with the Broadland Futures Initiative, particularly where flood alleviation objectives could support or enable hydrological and fen restoration. Coordination could help identify opportunities for joint delivery and funding while ensuring that benefits are additional and appropriately attributed.

There may also be relevant overlap with Water Resources East's water-resource mapping. This evidence should be reviewed to inform the spatial targeting and prioritisation of measures and to ensure consistency with wider water-resource and flood alleviation planning.

13. To what extent has the EDP provided a clear overview of the measures currently being taken or likely to be taken by other public authorities?

- Very clear
- Clear
- Not very clear
- Not clear at all

Chapter 5 - Environmental features: Conservation status and negative effect

This chapter identifies the environmental features (habitats and species of the protected sites) relevant to this EDP, how conservation status is defined, the conservation status of each environmental feature at the EDP start date and how nutrient pollution from EDP development negatively affects the environmental features.

Key messages

- The environmental features likely to be negatively affected by development to which the EDP applies are listed in Table 4 – page 33 of the EDP
- The conservation status, at the EDP start date, of all identified environmental features (habitats and species) is assessed as being in deteriorating condition
- Additional housing development will contribute further nutrient pollution and if no intervention took place, this would increase pressure on deteriorating environmental features.

EDP reference pages
Refer to chapter 5 pages 29 to 34
Refer to annex 5A pages 116 to 156
Refer to annex 5B pages 157 to 170

Questions – chapter 5

14. To what extent do you agree that all environmental features (habitats and species designated under The Broads SAC, Broadland Ramsar, and River Wensum SAC) likely to be negatively affected by nutrient pollution from development have been identified in the EDP?

- Very clear
- Clear
- Not very clear
- Not clear at all

Explain your choice (optional), in no more than 300 words.

The environmental features likely to be negatively affected by nutrient pollution from development appear to have been comprehensively identified with the exception of:

The Ramsar Wetland invertebrate assemblage in the Yare Broads and Marshes. Please clarify why it has not been identified as an environmental feature potentially affected by nutrient pollution.

Although the precise, feature-specific effects of additional nutrient loading are not described in detail, establishing these impacts would require a substantial body of further work. The Broads Authority considers that the evidence presented is sound and proportionate for the purpose of identifying the relevant features and provides a sufficiently robust baseline for the EDP.

15. To what extent do you agree with the approach of defining current conservation status of environmental features using habitat structure and function and their future prospects?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

We support this approach because it considers the biological, chemical, physical and hydrological factors that determine how habitats function. It also appropriately uses the best available evidence to assess habitat structure, function and future prospects, rather than relying on subjective judgement.

Where recent survey results or data are unavailable, the assessment should clearly state the level of confidence and whether its conclusions are supported by robust evidence or reflect an appropriately precautionary approach. Uncertainty should also be treated consistently when assessing the scale and certainty of improvements expected from conservation measures through the Overall Improvement Test.

The assessment should also distinguish more clearly between the condition of river and lake features. The Rivers Yare and Bure are generally in better condition for nutrients than the lakes. For example, the relevant reach of the River Bure achieves high ecological status for phosphorus under the Water Framework Directive classification. Reflecting this variation would provide a more accurate and transparent account of current conservation status. It would also ensure that the baseline and assessment of future prospects are sufficiently specific to each feature.

16. To what extent do you agree with the description of how the negative effect of additional nutrient loading from new development impacts the environmental features of the protected sites?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

This is a high level and accurate assessment.

The overall impact of further housing development and associated nutrient pollution appears relatively small compared with other nutrient sources. However, the Nature Restoration Fund requires environmental features to be left in a better state.

Recently published Environment Agency catchment statistics suggest that nutrient-reduction measures alone, such as package treatment plants, are unlikely to deliver material improvements to the designated features. This is particularly relevant to the Broads SAC, where many features lie outside the main river channels. For the Bure and Yare catchments, the Environment Agency estimates that point sources account for 26% and 46% of phosphate inputs respectively, while diffuse sources account for 74% and 41% under the 2014–2020 “Actual” scenario. Wastewater also contributes relatively little nitrate compared with rural land use.

The assessment would be strengthened by quantifying wider nutrient mitigation measures, including wastewater treatment upgrades, agricultural interventions and measures delivered through the Water Industry National Environment Programme. Greater transparency about the contribution, timing and certainty of these measures would help demonstrate how effectively they will address the wider nutrient pressures affecting the protected sites.

17. Do you think the approach used to assess the environmental impacts of additional nutrient loading from EDP development on the conservation status of the environmental features is appropriate and proportionate?

- Yes
- No
- Somewhat
- Maybe
- Unsure

Explain your choice (optional), in no more than 300 words.

The assessment is through and precautionary and covers the likely effects on the features of the Broads SAC.

Greater clarity would make the assessment more transparent and easier to scrutinise. In particular, it should explain how the modelled increase in nutrients, the existing condition of each feature, ecological sensitivity and uncertainty are brought together to produce the final negative-effect score. Grouping habitats is a reasonable and proportionate approach, provided the assessment demonstrates that it reflects differences in the location, condition and sensitivity of individual features.

The timing of effects should also be examined more fully. Although scenarios have been modelled for the periods before and after 2030, the assessment is largely based on the post-2030 position. An additional transition scenario should reflect the gradual delivery of new housing alongside the timing and demonstrated performance of Water Recycling Centre upgrades up to 2030. This would provide greater confidence that the assessment captures the greatest environmental effect likely to arise during the EDP period, rather than focusing only on the eventual position.

The assessment should also take account of wider changes that may occur during the lifetime of the EDP. Climate change, variations in rainfall, flows, and changing catchment conditions could affect the condition and resilience of environmental features and alter their sensitivity to additional nutrient inputs. A clearer account of how these pressures and associated uncertainties have been considered would strengthen confidence that the assessment remains robust throughout the EDP period.

Chapter 6 - Conservation measures

The chapter sets out the conservation measures to be taken by, or on behalf of, Natural England. It explains how Natural England has identified selected and sequenced these measures. This has been done in accordance with the Environmental Delivery Plans (Appropriate Prioritisation) Regulations 2026. These regulations define the terms avoidance measures, mitigation measures and compensation measures. This chapter also explains how much the conservation measures are expected to cost and how they will be delivered and maintained. See Figure 6, below, to see the process for conservation measure selection.

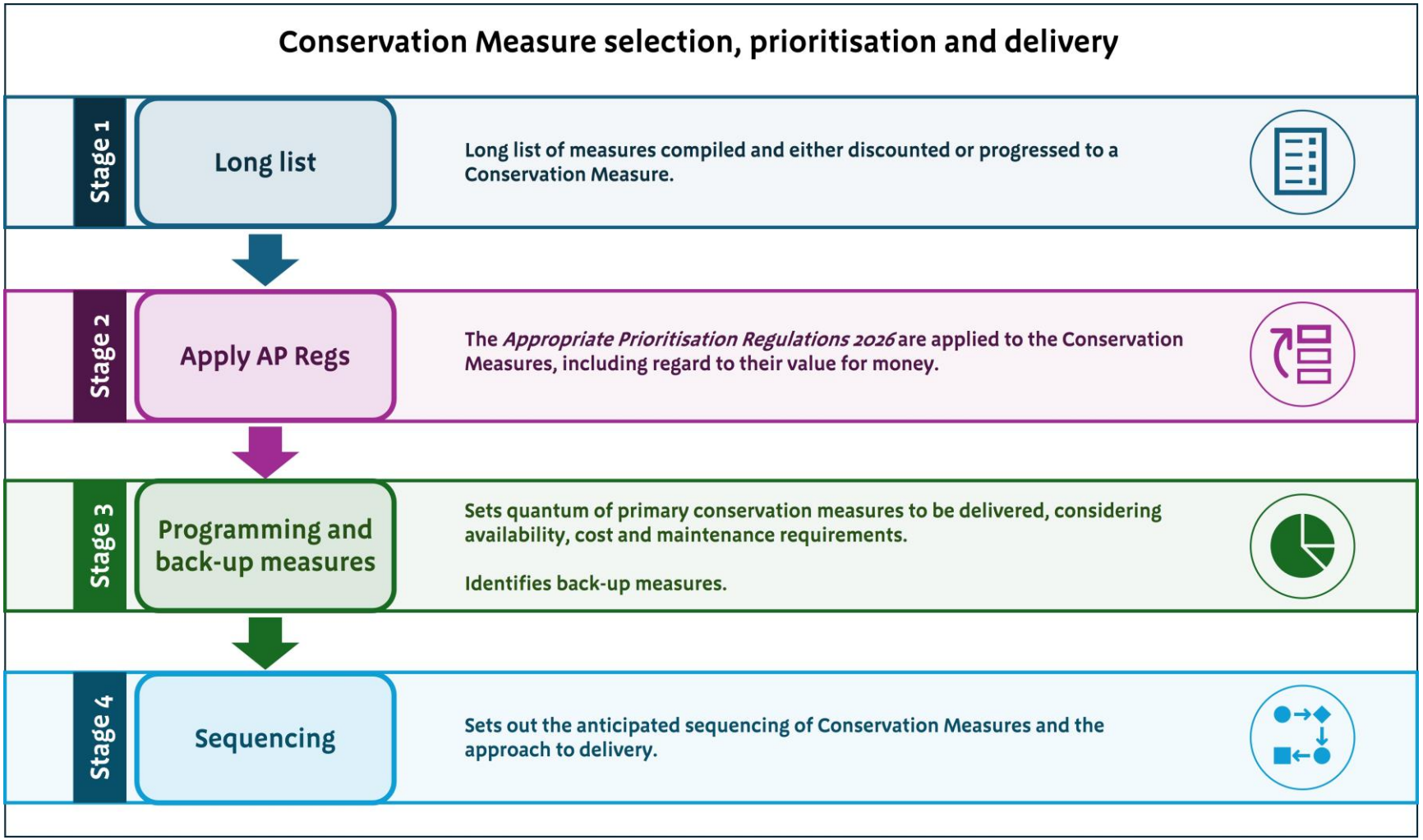


Figure 6: Diagram showing the process for conservation measure selection, prioritisation and deliver

Key messages

- A wide range of possible measures was considered against the criteria set out in this chapter. Measures that did not perform sufficiently against these criteria were discounted
- The remaining conservation measures were categorised as avoidance measures, mitigation measures and compensation measures and their value for money was assessed.
- No avoidance measures have been identified. One mitigation measure in the form of a planning condition was chosen. The remaining conservation measures have been categorised as compensation measures, but may take the form of mitigation depending on their timing of delivery relative to when the environmental impact of development occurs
- Table 9, page 63, of the EDP sets out the programme of conservation measures. These include fen creation and restoration, fen management, land use change to semi-natural habitat, catch-dyke restoration, deer management, river restoration, removal of structures in rivers, and a planning condition securing non-mains drainage standards
- Table 10, page 70, of the EDP sets out the sequencing of conservation measures equating to three phases of 5,000 homes per phase
- Conservation measures will be maintained for 100 years
- The expected cost of each type of conservation measures is set out in Table 9, page 63, of the EDP
- Procurement of conservation measures will be in line with public procurement regulations, creating opportunities for local and national partners and suppliers
- The backup conservation measures are identified, should they be required.

EDP reference pages
Refer to chapter 6 pages 35 to 74
Refer to annexes 6A to 6C pages 171 to 217

Questions – chapter 6

18. To what extent do you agree that the proposed programme of conservation measures is appropriate to outweigh the negative effect of development?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

The proposed programme presents a credible ecosystem-based approach that goes beyond simply offsetting additional nutrient loads. Measures aimed at improving environmental function could strengthen ecosystem resilience, support nature recovery and deliver wider landscape-scale benefits consistent with the Lawton principles. Land-use change, fen creation and restoration, biomass removal and catch-dyke restoration may also directly reduce nutrients.

However, apart from controls on non-mains drainage, the measures are classified as compensation. Although the EDP applies a precautionary approach, the Appropriate Prioritisation Regulations require avoidance and mitigation to be prioritised where appropriate. A programme consisting almost entirely of compensation could create an unintended precedent and weaken confidence that EDPs will deliver genuine nature recovery, particularly where future EDPs address impacts with a more direct relationship between development and environmental harm.

Greater emphasis should therefore be placed on measures that directly intercept or permanently reduce nutrient inputs, alongside habitat improvements. The EDP should qualify the expected nutrient reduction from each measure and explain what proportion of development-related loads will be addressed directly, compared with benefits arising from broader ecosystem improvements.

The distribution of benefits across environmental features also requires further consideration. The assessment should demonstrate that the programme will materially improve each feature, rather than relying on broad habitat-level assumptions.

Finally, the Overall Improvement Test remains predictive and dependent on expert judgement. Greater transparency is needed on evidence, confidence, uncertainty and the margin by which each feature is expected to pass. Clear delivery milestones, monitoring triggers and contingency measures should show how underperformance would be identified and corrected. This would provide greater assurance that improvements will be timely, durable, feature-specific and sufficient to materially outweigh the effects of development.

19. Do you have any comments on the conservation measures that were considered by Natural England but not included within the programme of conservation measures, or are there any additional measures that should have been considered?

Please add your answer, in no more than 300 words.

No additional measures are proposed at this stage.

There is no assessment that has been shared of what measures landowners are willing to deliver and secure for 100 years, however this is sensitive information and I understand that landowner discussions have underpinned the confidence that the measures will be tendered in the Broads.

We consider that Natural England has selected the most appropriate measures on the basis of the available evidence and has provided a reasonable justification for excluding the alternatives considered. However, the development of these measures feels rushed. In addition, the programme should retain sufficient flexibility to incorporate other measures if monitoring, site-specific evidence or changes in delivery circumstances indicate that they would provide greater or more durable benefits for the affected habitats and species. Any such measures should be additional, deliverable and clearly linked to the identified effects of the development.

The Authority supports the use of landscape-scale measures, but considers that the effectiveness of those measures will depend substantially on their location, connectivity, hydrological context and relationship with existing high-value habitats of the Norfolk Broads SAC. The Broads Authority would like to be part of a panel that assesses the selected conservation measures in the Broads.

The EDP should therefore provide greater clarity on the spatial principles that will govern site selection and prioritisation. Opportunities should be prioritised where intervention can restore ecological processes, improve habitat connectivity and strengthen the resilience of existing protected habitats, rather than simply meeting an area-based quantum.

Where a measure is delivered in partnership with an existing programme, the EDP should clearly identify which element represents additional delivery attributable to the NRF.

20. To what extent do you agree that the EDP clearly sets out the role of back-up conservation measures and the circumstances in which they will be implemented?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

21. To what extent do you agree with the proposed back up conservation measures?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

We agree that back up conservation measures may be required if the primary measures underperform or the Overall Improvement Test is at risk.

We consider that Natural England has selected the most appropriate measures based on the available evidence. However, further information on the trigger points and governance including the timings for the back up measures being used.

Over time it is possible that novel measures may arise that could improve practices or replace the existing measures. We recommend that a process for including such measures is considered. The programme should retain sufficient flexibility to incorporate other measures if monitoring, site-specific evidence or changes in delivery circumstances indicate that they would provide greater or more durable benefits for the affected habitats and species. Any such measures should be additional, deliverable and clearly linked to the identified effects of the development.

The 5% financial contingency for back-up measures appears modest given the programme's scale and duration. Further assurance is needed that adequate funding and delivery capacity will be available to implement alternative measures quickly and at sufficient scale if the primary measures significantly underperform.

22. To what extent do you agree that 100 years is the appropriate period to secure and maintain conservation measures?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

Securing permanent, 100-year measures for habitat creation, such as fen creation, creates a fundamental tension. Although long-term legal and structural commitments can safeguard enduring environmental benefits, overly restrictive terms may deter landowners from participating.

We are aware that the Local Nutrient Mitigation Fund (LNMF) to establish mitigation within affected catchments, including Norfolk has established and secured solutions for at least 80 years as being appropriate and deliverable. We recommend that Natural England consider this scheme and it transition to the EDP to avoid duplication and allowing the EDP to benefit from existing solutions as appropriate.

23. To what extent do you agree that Natural England has adequately considered the value for money offered by the conservation measures that have been selected?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

The proposed levy is £2,675 per dwelling, plus indexation, with the EDP covering up to 15,780 homes. Greater transparency on how the levy has been calculated, and how any surplus or underspend will be managed, would be welcomed.

The anticipated cost range per hectare for fen-type management appears low overall. However, restoration costs will depend on each site's starting condition, which will vary. Costs per hectare will also be influenced by site size; for example, a small fen site may still incur substantial preparatory costs, including approvals for protected species licences and water abstraction.

Notwithstanding concerns about the anticipated cost range, the value-for-money assessment appears sound and evidence-based in relation to delivering the compensation required by the EDP.

There is concern that the EDP's lower levy could undercut existing Nutrient Neutrality credit prices, creating a two-tier market. Although we are aware that the LURA duty on water companies places a statutory requirement to treat to Technically Achievable Limit and once this investment is complete in the coming years, the cost of nutrient neutrality credits from development may be difficult for developers to justify in terms of viability. The point is that these markets are not fixed and the EDP levy price is based purely on the delivery of the conservation measures and associated administration.

24. To what extent do you agree with the proposed approach to sequencing of conservation measures?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

Given the well-documented complexities of working in wetland environments, we agree that a measured approach, phasing habitat creation over time, is sensible.

There may be sensitivities with the actual housing delivery that might effect the sequencing. The EDP could be strengthened with triggers for altering measures to keep aligned with the development and minimise any lag between impact and the environmental benefits.

It is essential that the preparatory costs associated with habitat creation and restoration sites are adequately funded and eligible for tendering. This support will be critical to securing the best sites to deliver the material improvement of the features in the Broads via their location, it will also ensure participation of private landowners and identifying sufficient land to meet the EDP's projected habitat targets. Considerable preparatory work will be needed to develop robust project plans and obtain all relevant approvals ahead of the delivery windows, providing the assurance required for timely and effective implementation.

25. To what extent do you agree with the proposed approach for the delivery (including procurement) of conservation measures?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

The Environmental Delivery Plan (EDP) should make greater use of locally based organisations to coordinate and commission conservation measures, drawing on existing expertise, established partnerships and knowledge of local environmental priorities.

Natural England should continue to set the strategic direction, establish environmental standards and provide regulatory oversight. However, responsibility for commissioning and implementing projects could be undertaken by appropriate local delivery organisations, operating within a national framework. This would create a clearer distinction between those delivering conservation measures and those responsible for assessing their outcomes, strengthening transparency and accountability.

Norfolk Environmental Credits (NEC) provides an example of how this approach could work in practice. NEC is a not-for-profit company owned by five Norfolk local authorities. It has developed established governance and procurement arrangements, works collaboratively with a range of delivery partners and has a pipeline of nutrient mitigation projects. With over £23 million invested in environmental projects to date, NEC demonstrates the potential for existing local organisations to facilitate environmental investment and coordinate delivery without the need to create entirely new structures.

Building on this type of model could enable the EDP to draw together landowners, environmental organisations, private sector providers, water companies and other stakeholders through transparent commissioning arrangements. It could also help ensure that funded measures complement Norfolk's Local Nature Recovery Strategy, wider catchment priorities and other environmental initiatives. Opportunities to combine EDP funding with other investment sources and environmental markets could further increase the benefits achieved.

We recommend that the EDP considers enabling established local organisations, such as NEC, to commission and coordinate conservation measures on Natural England's behalf, subject to appropriate governance, reporting and assurance. This would make better use of existing capacity and investment, support more efficient delivery and strengthen local ownership of nature recovery, while ensuring that national environmental standards and oversight remain in place.

Chapter 7 – Overall Improvement Test

This chapter explains the Overall Improvement Test (OIT) and sets out how Natural England has assessed whether, by the EDP end date, the effect of the conservation measures will materially outweigh the negative effect of the EDP development on the conservation status of each identified environmental feature.

The Secretary of State can only make an EDP if satisfied that it passes the Overall Improvement Test.

Key messages

- Natural England recommends that this EDP passes the Overall Improvement Test
- The test has been applied individually to each identified environmental feature
- The evidence and expert judgement that has been used to inform Natural England's conclusions has been set out in this chapter and related annexes.

EDP reference pages
Refer to chapter 7 pages 75 to 95
Refer to annex 5B pages 157 to 170
Refer to annex 6C pages 192 to 217
Refer to annex 7A pages 218 to 221
Refer to annex 7B pages 222 to 244

Questions – chapter 7

26. To what extent do you agree with the methodology for assessing the Overall Improvement Test?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words.

We are confident that the conservation status of identified environmental features that could be assessed for overall improvement can be assessed. However, we recommend the EDP makes clearer how background pressures, including agricultural nutrient inputs, abstraction, hydrological modification, INNS species (including deer), climate change and other pressures, have been incorporated into assumptions about the effectiveness and timescale of conservation measures.

NE have worked with highly experienced organisations and their data to assess the negative effects of the EDP development on the Broads. In addition, NE have worked with local and national specialists who have deep understanding of the Broads wetlands to identify measures capable of addressing the negative effect on the conservation status of the identified environmental features. However, due to the short timescale has not secured the confidence of stakeholders due to the complexity of the scheme and the lack of shared understanding.

We recommend that further time and resource be set aside to review and validate the Overall Improvement Test against the monitored outcomes, allowing the assumptions, scoring and measures to be refined during the 10 years of the EDP development.

27. Would you suggest any improvements that can we made to strengthen the methodology for assessing the Overall Improvement Test?

Please add your answer, in no more than 300 words.

More time for through review and further consultation to help the understanding of this approach would be beneficial.

The strategic catchment approach is groundbreaking within ecosystem assessment and financial investment. Normally measures are directed to achieving single or focused benefit, such as nutrient, and additional benefits are noted as a bonus. Here the additional benefits are the focus.

The Overall Improvement Test approach could be strengthened by:

Defining the threshold for “materially outweigh”: Currently the methodology does not specify the minimum ecological margin, ratio or confidence level needed for benefits to materially exceed harm. This makes the conclusion heavily dependent on expert judgement alone.

Greater transparency of evidence: The EDP states that expert judgement and annex evidence support the conclusions, but the audit trail is difficult to follow. Each environmental feature could have a clear table showing predicted harm, expected benefit, assumptions, evidence quality and residual risk.

Impacts and benefits are different: Nutrient loading may be quantified, while benefits from fen creation, deer management or river restoration are less directly measurable. The methodology needs to clearly explain how these different effects are compared within this new legislation that focuses on material improvement.

28. To what extent does the EDP clearly set out the evidence that underpins Natural England’s assessment of the Overall Improvement Test?

- Very clear
- Clear
- Not very clear
- Not clear at all

Explain your choice (optional), in no more than 300 words

The EDP draws on a broad range of evidence and supporting research to inform the Overall Improvement Test. This includes information on existing conservation status, the effects of development, the anticipated effectiveness of proposed measures and relevant published literature. The incorporation of a modified Delphi process adds a valuable layer of expert scrutiny, helping to test assumptions and improve confidence in an assessment that inevitably involves a degree of uncertainty about future outcomes.

The weight of evidence approach for the measures is a sound way to judge the measures in their own right, however does not assess the contribution to an overall improvement in the conservation status of the identified environmental features. We suggest that to determine each feature a clear table showing predicted harm, expected benefit, assumptions, evidence quality and residual risk could support this test.

Chapter 8 – Nature Restoration Levy

This chapter explains how the Nature Restoration Levy is set, the components of the levy and the planning condition(s) necessary to use the levy.

Key messages

- The components of the levy include conservation measure delivery, conservation measure maintenance, monitoring, and administration
- A proportion of the funds will be invested to support future ongoing monitoring and maintenance of the conservation measures
- The levy rate is £2,675 per dwelling (index linked)
- New requests to pay the levy will not be possible after the end of the 6th year after the EDP start date.

EDP reference pages
Refer to chapter 8 pages 96 to 100 (includes the charging schedule).

Questions – chapter 8

29. To what extent do you agree that the allocation between (i) administration, (ii) delivery of conservation measure and (iii) long-term maintenance, (iv) management and (v) monitoring costs have been clearly set out?

- Very clear
- Clear
- Not very clear
- Not clear at all

Please explain your answer, in no more than 300 words

While Figure 6 provides an overview of costs across the programme, further detail is needed to understand the financial commitments associated with individual conservation measures.

Table 9 outlines estimated costs and maintenance requirements, but does not clearly distinguish initial expenditure, such as land acquisition and implementation, from ongoing management, maintenance and monitoring costs over the 100-year period.

This distinction is particularly important because future costs are expected to be funded through investment returns on levy income, with expenditure discounted to present value at the proposed rate of 2.05%. Greater clarity is needed to demonstrate that sufficient funding will be available to establish each conservation measure and sustain it throughout its required lifetime.

We recommend that the EDP provides a more detailed whole-life cost breakdown for each conservation measure, separating upfront costs from ongoing financial obligations. These figures should be clearly reconciled with the programme-level estimates in Figure 6 and the resulting charging schedule, enabling the assumptions underpinning the levy to be properly scrutinised.

Sensitivity analysis should also be undertaken to assess the implications of changes in key cost assumptions, particularly land acquisition and other significant upfront expenditure. This would help demonstrate whether the programme remains financially viable if costs increase and whether the levy provides sufficient resilience to accommodate unforeseen pressures.

Finally, projections of levy income over the programme period would help clarify the anticipated delivery timetable and identify any funding gap between initial implementation costs and the receipt of levy revenues. This would establish whether upfront or bridging finance is required and the potential costs involved, providing greater confidence in the programme's long-term financial sustainability.

30. Based upon the cost alone how likely are you to use or supply services to the EDP compared to other available mechanisms, for example, local private providers, local planning authority schemes, bespoke mitigation etc?

- Extremely likely
- Somewhat likely

- Neutral / Neither likely nor unlikely
- Somewhat unlikely
- Extremely unlikely

31.To what extent do you agree that the proposed EDP will accelerate decision making and delivery timescales compared with alternative nutrient mitigation approaches?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

32. Do you agree with the approach taken to aggregating the costs of conservation measures at plan level and then apportioning these evenly across all development?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words

We consider that this is the best approach to take for this strategic EDP.

Chapter 9 - Monitoring and reporting

This chapter explains how Natural England will monitor the EDP, options for corrective action (including the circumstances in which back-up measures need to be deployed or if an amendment of an EDP is required), and describes how progress will be reported throughout the lifetime of the EDP.

Key messages

- We will monitor development uptake, levy income and expenditure, the implementation of conservation measures, the ongoing effectiveness of conservation measures and validation of forecasts used in the EDP
- EDP monitoring will confirm if backup conservation measures or any amendments to an EDP are required
- Midpoint (year 5) and endpoint (year 10) reports will be published to assess whether the EDP remains on track to pass, or has passed, the Overall Improvement Test
- These reports will assess whether the EDP remains on track to satisfy, or has satisfied, the Overall Improvement Test.

EDP reference pages

Refer to chapter 9 pages 101 to 107

Refer to annex 9A pages 245 to 247

Questions – chapter 9

33. To what extent do you agree with the proposed monitoring themes as set out in chapter 9 of the EDP?

- Strongly Agree
- Agree
- Neither Agree nor Disagree
- Disagree
- Strongly Disagree

Explain your choice (optional), in no more than 300 words

The proposed monitoring themes cover the main areas required to assess delivery and effectiveness. However, some further detail would benefit understanding of how each theme will be implemented, including the indicators and the detail in the baselines to be used, monitoring frequency, responsibilities, governance and oversight arrangements, and the thresholds that would trigger corrective action or the deployment of back-up measures. Without this information, it is difficult to assess whether the monitoring framework will provide timely and robust evidence that the EDP remains on track to pass the Overall Improvement Test.

34. To what extent does the EDP clearly set out how the reporting requirements will be met?

- Very clear
- Clear
- Not very clear
- Not clear at all

General

35. Do you have any additional comments from the chapters above?

Please add your answer, in no more than 1,000 words

1. The Broads Authority welcomes the opportunity to comment on the draft Environmental Delivery Plan and strongly supports the principle of a strategic, catchment-scale approach to addressing the impacts of nutrient pollution associated with new development. The Authority considers that a strategic approach has considerable potential advantages over a purely site-by-site approach, particularly within the Broads, where nutrient input from relevant new development is relatively minor and ecological processes operate across interconnected wetlands, waterbodies, rivers, fens and catchments.

2. The Norfolk EDP has the potential to establish an effective model for reconciling housing delivery with meaningful environmental improvements. Given its position among the first EDPs to be developed, the lessons learned from its implementation are likely to shape future schemes elsewhere. Ensuring that Norfolk's approach is robust, transparent and capable of being replicated will therefore be essential to its long-term success and wider influence.

3. The Authority knows that the EDP sits alongside a wider range of existing measures and projects. An explicit demonstration that NRF-funded measures are additional, rather than funding work that would otherwise have happened through existing environmental programmes is missing from the EDP.

4. The impact of nutrient from EDP development is relatively minor compared to other sources and compared to other catchments. Each EDP will be different based on the baseline condition of features and the evidence. For example, the maximum amount of development to be addressed by the Environmental Delivery Plan is predicted to generate a maximum of 0.4% increase in phosphorus concentration in the River Wensum, a maximum increase of 2.4% in the Bure, and a maximum of 0.7% in the Yare. Nutrient pollution is itself one of many pressures on protected sites.

5. The EDP's long-term success will depend on financial sustainability and continued developer participation. Greater clarity is needed on the whole-life costs of conservation measures and how these inform the levy. Changes to nutrient treatment standards after 2030 could change the cost of mitigation, making the EDP less attractive and potentially reducing uptake and income. Regular monitoring of costs, developer participation and financial assumptions, alongside flexibility to respond to changing circumstances, will be essential to maintaining the programme's viability.

6. EDPs could offer wider benefits by addressing multiple environmental requirements rather than focusing solely on nutrients. Subject to confidence in their environmental outcomes, future plans could incorporate recreational impacts and relevant protected-species obligations. A more integrated approach would simplify the planning process, reduce duplication and provide developers with greater certainty, making EDPs a more attractive alternative to project-level mitigation.

7. Given the international importance and ecological complexity of the Broads, the Authority considers that the EDP has selected the well understood local measures that provide a high degree of confidence that the proposed conservation measures will deliver genuine, measurable and additional environmental improvement. However, the Authority recommends strengthening the EDP in relation to further detail on Overall Improvement Test. The Broads Authority consider that this could be supported by a local panel that supports Natural England with the assessment of the selected conservation measures in the Broads.

8. EDP delivery should be linked with wider nature recovery initiatives and environmental markets, including carbon, water, flood management and species protection. Aligning with future water reforms could also create opportunities for coordinated regional investment. Combining developer contributions with public, private and water-sector funding could reduce project risks, improve financial viability and deliver multiple environmental benefits.

9. The Broads Authority supports the Norfolk EDP and emphasises the need for robust ecological safeguards, clear accountability and effective monitoring to demonstrate additionality. We recommend a Local Delivery Model that separates strategic oversight from operational delivery, strengthens stakeholder confidence and aligns conservation measures with the Local Nature Recovery Strategy, Broadland catchment priorities and complementary funding opportunities, including Defra's peatland grants. Delivery should also integrate with existing Broads management and monitoring programmes, with appropriate governance and assurance arrangements, supporting both ecological outcomes and the Government's ambition to devolve decision-making locally.

10. The Government's stated intention is that EDPs should both deliver environmental improvement and unlock development. The EDP offers a ground breaking opportunity, but given the Norfolk Plan is leading the way, it needs more time to develop the safeguards and governance to make the promised win-win work.

1. Public Sector Equality Duty

We would like to hear about any potential impacts of any of the above proposals on businesses, or of any differential impact on persons with a relevant protected characteristic as defined by the Equality Act 2010 compared to persons without that protected characteristic, together with any appropriate mitigation measures, which may assist in deciding final policy approaches in due course. Is there anything that could be done to mitigate any impact identified?

Please add your answer, in no more than 1,000 words

DRAFT Consultation Response (v02)
Environmental Delivery Plan
Nutrient Pollution

Broads National Park

Norfolk: Broads Special Area of Conservation (SAC) (Yare and Bure), Broadland Ramsar and River Wensum SAC



Broads National Park Summary Information

RESPONSE SUMMARY

Q1 **Would you like your response to be confidential?** No

Q2 **Key information**

What is your name?	Andrea Kelly
Email address	Andrea.Kelly@broads-authority.gov.uk
Organisation	Broads Authority
What is your role?	Environment Policy Adviser
Where are you located?	Norwich, Norfolk

Q3 **What best describes your interest in this consultation?** The Broads Authority, as the statutory authority responsible for conservation, planning and navigation in the Broads, has a strong interest in the Norfolk EDP. It helps convene local policy through the Broads Plan and brings practical experience of delivering wetland restoration and management measures across the area at scale.**Q4** **Which of the following best describes you or the capacity in which you are responding?**

a landowner in Norfolk ; interested party ; representative of an organisation ; other (National Park Authority)

Q5 **If you are a developer how likely is your organisation to be proposing a development within the development area of the Norfolk EDP?**

N/A

Introduction; Scope of EDP; Plans and strategies

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
6	To what extent do you think the overall purpose of the EDP is sufficiently clear?				
7	To what extent does the Executive summary and the Introduction clearly set out the approach the EDP will take to deliver a material improvement that outweighs the negative effect of development?				
9&10	To what extent do you agree that the geographic scope of the EDP has been clearly defined?				
11	To what extent is the methodology used to define the maximum development capacity (15,780 dwellings) under this Norfolk EDP clearly set out?				
13	To what extent has the EDP provided a clear overview of the measures currently being taken or likely to be taken by other public authorities?				

Number	Question	Yes	No	Somewhat	Maybe	Unsure
8	Is the EDP period clearly set out?					
12	Are there any other relevant plans and strategies you think this EDP should take into account?					

RESPONSE SUMMARY

Q9 The developer eligibility area is clearly defined at the strategic level, but the sub-catchments of the Bure Ant, Thurne and Trinity Broads are excluded and thus development within these parts of Norfolk will not be able to utilise the EDP.

Q12 The EDP should take account of several related initiatives to support a coordinated, strategic approach and avoid missed opportunities or duplication. For example The EDP should also align with the Broadland Futures Initiative, and the Broads Peat Partnership Discovery Project. There may also be relevant overlap with Water Resources East's water-resource mapping

Broads National Park Environmental features and conservation status

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
14	To what extent do you agree that all environmental features (habitats and species designated under The Broads SAC, Broadland Ramsar, and River Wensum SAC) likely to be negatively affected by nutrient pollution from development have been identified in the EDP?				

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
15	To what extent do you agree with the approach of defining current conservation status of environmental features using habitat structure and function and their future prospects?					
16	To what extent do you agree with the description of how the negative effect of additional nutrient loading from new development impacts the environmental features of the protected sites?					

Number	Question	Yes	No	Somewhat	Maybe	Unsure
17	Do you think the approach used to assess the environmental impacts of additional nutrient loading from EDP development on the conservation status of the environmental features is appropriate and proportionate?					

RESPONSE SUMMARY

Q14 The apparent omission of The Ramsar Wetland invertebrate assemblage in the Yare Broads and Marshes. should be addressed.

Q15 We are supportive of the overall approach of defining conservation status habitat structure and function. Greater transparency is required around evidence gaps, confidence levels and the treatment of uncertainty and species-specific considerations when assessing conservation status.

Q16 The overall impact of further housing development and associated nutrient pollution appears relatively small compared with other nutrient sources. However, the NRF requires environmental features to be left in a better state. Greater transparency about the contribution, timing and certainty of these measures would demonstrate how effectiveness for the protected sites.

Q17 The methodology is broadly supported, but greater assurance is required around feature-specific sensitivities, timing of effects and the treatment of wider environmental pressures and uncertainty over the EDP period.

Broads National Park Conservation Measures

Number	Question
19	Do you have any comments on the conservation measures that were considered by Natural England but not included within the programme of conservation measures, or are there any additional measures that should have been considered?

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
18	To what extent do you agree that the proposed programme of conservation measures is appropriate to outweigh the negative effect of development?					
20	To what extent do you agree that the EDP clearly sets out the role of back-up conservation measures and the circumstances in which they will be implemented?					
21	To what extent do you agree with the proposed back up conservation measures?					
22	To what extent do you agree that 100 years is the appropriate period to secure and maintain conservation measures?					
23	To what extent do you agree that Natural England has adequately considered the value for money offered by the conservation measures that have been selected?					
24	To what extent do you agree with the proposed approach to sequencing of conservation measures?					
25	To what extent do you agree with the proposed approach for the delivery (including procurement) of conservation measures?					

RESPONSE SUMMARY

Q18 The programme could outweigh development impacts but its reliance on compensation rather than mitigation needs to be clearly set out for the Broads.

Q19 The Authority supports the use of landscape-scale measures, but effectiveness will depend substantially on a number of factors that need to be controlled including landowner participation; greater flexibility would improve resilience.

Q21 Further information on the trigger points and governance including the timings for the back up measures being used.

Q22 A rigid 100-year requirement could be overly restrictive terms may deter landowners from participating.

Q23 Greater transparency on how the levy has been calculated, and how any surplus or underspend will be managed, would be welcomed.

Q24 There may be sensitivities with the actual housing delivery that might effect the sequencing. The EDP could be strengthened with triggers for altering measures.

Q25 A Local Delivery Model should use established, locally accountable bodies to deliver conservation measures within NEs strategic and regulatory framework, building on existing local partnerships, capability and investment.

Broads National Park Overall Improvement Test (OIT)

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
26	To what extent do you agree with the methodology for assessing the Overall Improvement Test?					

Number	Question
27	Would you suggest any improvements that can we made to strengthen the methodology for assessing the Overall Improvement Test?

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
28	To what extent does the EDP clearly set out the evidence that underpins Natural England's assessment of the Overall Improvement Test?				

RESPONSE SUMMARY

Q26 We are confident that conservation status of identified environmental features that could be assessed for OIT can be assessed. However, we recommend the EDP makes clearer how background pressures, have been incorporated into assumptions about the effectiveness and timescale of conservation measures.

Q27 The OIT methodology would be strengthened by clearer causal links between measures and outcomes, greater transparency around uncertainty and the margin of improvement, and translating theoretical triggers into practical, observable indicators and thresholds to demonstrate that predicted benefits are being achieved and maintained over time.

Q28 The weight of evidence approach for the measures is a sound way to judge the measures in their own right, however does not assess the contribution to an overall improvement in the conservation status of the identified environmental features. We suggest that to determine each feature a clear table showing predicted harm, expected benefit, assumptions, evidence quality and residual risk could support this test.

Broads National Park Nature Restoration Levy

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
29	To what extent do you agree that the allocation between (i) administration, (ii) delivery of conservation measure and (iii) long-term maintenance, (iv) management and (v) monitoring costs have been clearly set out?				

Number	Question	Extremely Likely	Somewhat Likely	Neutral	Somewhat Unlikely	Extremely Unlikely
30	Based upon the cost alone how likely are you to use or supply services to the EDP compared to other available mechanisms, for example, local private providers, local planning authority schemes, bespoke mitigation etc?					

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
31	To what extent do you agree that the proposed EDP will accelerate decision making and delivery timescales compared with alternative nutrient mitigation approaches?					
32	Do you agree with the approach taken to aggregating the costs of conservation measures at plan level and then apportioning these evenly across all development?					

RESPONSE SUMMARY

Q29 The EDP should provide a detailed whole-life cost breakdown for each conservation measure, separating upfront expenditure from ongoing management, maintenance and monitoring costs over the 100-year period. Costs should be reconciled with programme estimates and the levy, supported by sensitivity analysis of key assumptions and projections of levy income to identify potential funding gaps, bridging finance requirements and risks to long-term financial sustainability.

Q32 We support plan-level aggregation and a common levy, recognising the benefits of consistency and certainty ans the We consider that this is the best approach to take for this strategic EDP.

Monitoring and Reporting

Number	Question	Strongly Agree	Agree	Neither	Disagree	Strongly Disagree
33	To what extent do you agree with the proposed monitoring themes as set out in chapter 9 of the EDP?					

Number	Question	Very Clear	Clear	Not Very Clear	Not Clear At All
34	To what extent does the EDP clearly set out how the reporting requirements will be met?				

RESPONSE SUMMARY

Q33 The monitoring themes cover the main areas required, but further detail is needed on indicators, baselines, monitoring frequency, responsibilities, oversight and thresholds for corrective action. This would help demonstrate that the framework can provide timely, robust evidence that the EDP remains on track to pass the OIT.

Broads National Park Additional Comments

- **Strategic, catchment-scale approach**: The Broads Authority supports the EDP's strategic approach to nutrient pollution, recognising its advantages over site-by-site mitigation, particularly in the Broads, where development-related nutrient inputs are relatively minor and ecological processes operate across interconnected wetlands, rivers, fens and catchments.

- **Environmental improvement and additionality**: The EDP must demonstrate that NRF-funded measures deliver genuine, measurable and additional environmental benefits beyond existing programmes. The Overall Improvement Test should be strengthened, with a potential local panel supporting Natural England's assessment of conservation measures affecting the Broads.

- **Financial sustainability and developer participation**: Greater transparency is needed around whole-life costs, levy assumptions and long-term funding. Changes to nutrient treatment standards after 2030 could affect mitigation costs, developer uptake and levy income, requiring regular review and flexibility.

- **Governance, monitoring and accountability**: Establish a Local Delivery Model separating strategic oversight from operational delivery, with clear responsibilities, effective monitoring and appropriate assurance arrangements to maintain stakeholder confidence and demonstrate ecological outcomes.

- **Integration with wider environmental priorities**: Align conservation measures with the Local Nature Recovery Strategy, Broadland catchment priorities, existing Broads management and monitoring programmes, and complementary funding, including Defra's peatland grants. Future EDPs could also address recreational impacts and protected-species obligations where robust environmental outcomes can be demonstrated.

- **Partnership funding and nature recovery**: Link EDP delivery with wider initiatives and environmental markets covering carbon, water, flood management and species protection. Coordination with future water reforms and combined developer, public, private and water-sector funding could reduce risks and deliver multiple environmental benefits.

- **A pioneering model requiring further development**: As one of the first EDPs, Norfolk could establish a replicable model for reconciling housing delivery with nature recovery. However, sufficient time is needed to establish robust safeguards, transparent governance and effective delivery arrangements to ensure the promised environmental and development benefits are realised.

Planning Committee

6 November 2026
Agenda item number 10

Consultations submitted

Report by Planning Policy Officer

Summary

This report informs the planning committee of consultation submissions from 10 June 2026 to 4 September 2026. The report details consultations submitted under delegated powers and those consultations where the Committee has previously been invited to comment during the draft stage (either via email or at a previous committee meeting).

Recommendation

To note the report.

1. Introduction

1.1. Appendix 1 shows consultation responses on planning matters submitted under delegated powers. For further information on delegated powers, please refer to the Scheme of powers delegated to Chief Executive and other authorised officers and, in particular, clauses 66(iv), 66(v) and 67.

1.2. Appendix 2 shows consultation responses on planning matters where the committee has previously been invited to provide comments and guidance via email.

1.3. Appendix 3 shows consultation responses on planning matters where the committee has been invited to provide comments and guidance at a previous Planning Committee meeting.

Author: Natalie Beal

Date of report: 4 September 2026

Appendix 1 – Consultations submitted under delegated powers

Appendix 2 - Consultations submitted where members have previously been engaged via email

Appendix 1 – Consultations submitted under delegated powers

Brundall Parish Council

Document: Brundall's Neighbourhood Plan – Brundall Parish Council

Due date: 10 August 2026

Submission date: 15 July 2026

Status: Regulation 14

Proposed level: Officer level

Notes

The modified Brundall Neighbourhood Plan is a planning policy document prepared by the Parish Council on behalf of the community to guide future development in the parish until 2040. It has been updated since it was last written and adopted in 2016. The Steering Group wishes to know your views on the new Plan.

Submitted response

Neighbourhood Plan

- 1.16 – you refer to policies that start with 'PUB' – they are in the REG19 Local Plan that is being examined. You are referring in this to the adopted Local Plan and those policies do not have 'PUB'.
- 1.17 – you may want to refer to the Mayoral elections in 2028 and the Combined Mayoral Authority as well as Spatial Development Strategies (SDS). And the Broads Authority will remain as is.
- Page 15, para 2.1 and 2.2 the references to the Norfolk and Suffolk Broads should be replaced with the Broads.
- Page 19, para 2.26 the reference to the Norfolk and Suffolk Broads should be replaced with the Broads.
- Para 2.20 – take care using the 2021 Census for travel to work. I am aware that Norfolk County Council tend to not use it due to lockdown restrictions. Or also quote 2011 Census data.
- Policy BRU1 – how do the first and second paragraph interact with each other? The first says development in the settlement boundary, but then the second says that housing can go elsewhere. So are you promoting housing outside of the settlement boundary? The later on, parts a and b go on to talk about housing outside of settlement boundaries. That may be contrary to GN Local Plan and is contrary to our Local Plan. But then the last sentence talks about development outside of the settlement boundary only where is accords with local and national policy. A very confusing policy with mixed messages and potential for objections. I strongly recommend this is checked and clarified.

- Page 33, policy BRU1e – would suggest a slight reword to: ‘where the development would not have an adverse impact on important views or the historic or natural assets of the parish, including listed buildings and the Broads’.
- Page 36, Policy BRU2 in the second to last para on landscape, I would suggest that the ‘wherever possible’ should be removed. Developers can still argue why they can’t fulfil this requirement in their planning application if they don’t think they can for a valid reason.
- Page 20, listed buildings are mentioned but would it also be worth identifying locally listed buildings? The chalet at Brundall Gardens Marina is locally listed by the Broads Authority.
- Page 31, figure 11 – what is ‘parent shell’ on the key for the map?
- Figure 13 – A is on a railway line it seems whereas the policy (BRU3) implies it should be on Strumpshaw Road. Figure 14 shows this gateway in the right place.
- Figure 14 – the key is a bit small and blurry and difficult to read.
- Policy BRU5 – says ‘identifies’ and should be ‘identities’.
- Policy BRU6 – suggest this mentions that the need for lighting needs to be justified in the first place.
- 6.35 – second sentence – I don’t think it reads right. Maybe remove ‘which’.
- 6.43 – BNG is not mandatory for all sites; there are exemptions.
- *6.55 Correction:* The moorings in Brundall Gardens Marina are not Broads Authority 24 hour free moorings.
- The moorings at Eastwood Marina and Swancraft are privately managed but accessible to the public for periods of 24 hours as DM33 moorings as part of planning conditions. The mooring allocation for Brundall Gardens Marina is also DM33 - this section of mooring is a section adjacent to, but upstream of the Brundall Church Fen BA 24hr free mooring.
- The BA 24hr free mooring at Brundal Church Fen is 35m in length.
- Policy BRU8 says ‘a minimum increase of 10% net gain’ I think ‘increase’ is superfluous as it is a net gain.
- Policy BRU10 – Last para and bullet points – First bit is about Lackford Run and then second is about other locations. Should they be in the same paragraph or separated out?
- AMENDED Policy BRU11:p64. Please acknowledge the requirements for wheeled access - pushchairs/ buggies, wheelchairs, mobility scooters, walkers/ walking aids.
- Figure 30 key is blurry.
- Policy BRU14 paragraph 2 is different to our equivalent policy, Our 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; and b) It can be demonstrated through an assessment of viability that the current use is economically unviable. 2. In all instances, details of consultation with the community regarding the change of use or redevelopment need to be provided'. Your policy does not refer to no need and includes providing an equivalent facility.

- 7.26 'parish as a whole'
- Policy BRU6 says 'Proposals should provide or an contribute' – does not read right.
- 8.2 'main rivers These are also' – missing a full stop.
- 9.1 – and the Broads Authority
- BRU1, 10, 19 – all need to mention that they could result in more people accessing protected sites and therefore project level HRAs will probably be required. This is set out in the HRA screening and needs to be followed through into the Plan.

Statement to accompany pre-submission version – May 2026

The plan is much changed and should have a referendum.

Data Profile

- Update data document prior to REG16. Not all will need updating. But this should be up to date. The vast majority of the document won't change.
- The Broads Landscape Character Assessment is now a SPD and was adopted in May 2026: Broads Authority Design Guide and Code SPD (PDF)
- Figure 64 – EA updated flood risk data around March 26.

Design Guide

- Refers to items A – J but ends at G.
- Page 8, the latest version of the NPPF (at the moment) is 2024, not 2023
- Page 11, para 3.1 replace the Norfolk Broads with the Broads
- Page 13, para 4.4 reference to Salhouse parish – should be Brundall
- 4.4 – feasures – think you mean features
- 4.4 – refers to Salhouse Parish
- If this refers to Salhouse, it implies it is a cut and paste job – how is this design guide reflective of and relevant to Brundall?
- Page 14 j says 'New community provision: all community facilities must be within easy walking, cycling and wheeling distance of residential development and public transport, that are attractive and safe'. The last bit in green does not fit with the wording of the sentence. Should it be something like 'and routes need to be attractive and safe'. What

makes a route attractive? Do you mean pretty to look at or well designed so people want to use it? How does a route become safe?

- Page 15 k – what aspects of M4(2) are needed? I don't think the phrasing is useful – maybe it is that they should be designed to M4(2) standard? I note that such a requirement does not make it into the Neighbourhood Plan itself – if you want all new dwellings to be designed to M4(2) I would suggest it needs to be in a policy.
- What is so good about the images in Figure 5?
- Page 16 – anything about heat resilient design, particularly public realm?
- Page 17, f: 'into development layouts as part of a connected green corridors and water courses' – delete 'a'
- Page 19, b – 'around motor vehicle use'. What are access points?
- Page 19 h – how does this relate to building regulations?
- Page 19, Code, i) Bundall typo
- Page 24, title – Identity typo
- Page 24, Guidance d) palette not pallet – also should it be an appropriate colour palette (as shown in figure 26).
- Page 25, m) Riverside development, add natural materials
- Page 31 Areas 4 Marina Areas, second row (Identity) – please delete 'Broads Authority compliant' – not sure what this means? Some of the buildings will have been erected before the Broads Authority dealt with planning and may not be compliant in terms of our current expectations and planning policies etc.
- Figure 19 and 20 – are these good or bad?
- 5.2 'Where feasibly' – think that should be feasible
- 1.4. Include 'wheeling' into references to walking and cycling.
- D. p.19 - typo 'ease' to move around
- D.b.path widths to include space/ width for passing, supported walking (ie. One person alongside another). Where possible, segregated and safe cycle routes should be incorporated into design.
- D.d.add *with no barriers restricting access to wider mobility needs such as pushchairs and wheelchairs.*
- D. i.walking, *wheeling* and cycling routes
- D.k.to encourage walking *and wheeling*

North Norfolk District Council

Document: North Norfolk Local Plan Scoping Consultation

Due date: 31 August 2026

Submission date: 19 August 2026

Status: Scoping consultation

Proposed level: Officer level

Notes

North Norfolk District Council is preparing a new Local Plan. The Scoping Consultation is the first formal consultation stage in the local plan making process and is being carried out under Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2026. We are also running a second 'Call for Sites', which provides a further opportunity to suggest land that could be considered for a range of uses, including housing, employment, infrastructure, open space or community uses. Details of how to respond are available at the end of this notice.

Submitted response

At this stage, given this is early on in the process, I do not have any detailed comments on the context of the document. But please do see the following points.

Question 1, 2, 3: Generally welcome the reference to the Broads and/or nationally important/protected landscapes or similar wording. This shows that you appreciate the impact development can have on the Broads and its setting. Climate Adaptation to either be a standalone issue or, if they are basing it on being broken down into several areas as they seem to with reference to water resources, then it needs a separate category of withstanding heat.

Question 12: Going forward, early consultation with us on any sites that have come forward that are near to our boundary would be welcomed.

Question 10: Please ensure you keep us informed of any evidence base you intend to produce as generally, it should cover the entire district of North Norfolk, regardless of the area of the Broads.

General: As a reminder, we intend to continue having regard to/deferring to the open space, affordable housing and retail approaches of our districts' Local Plans.

Question 12 As you are aware, some settlements in North Norfolk are 'shared' between us and you for planning purposes. We would welcome continued collaborative working in relation to such settlements. For example, the restriction in development in Horning due to the water recycling centre capacity issues as well as working together in terms of Hoveton village centre.

There are some areas of the current Local Plan which we would like you to re-consider – we have raised these comments before as part of our consultation responses to that Local Plan and are raising them now, early on in the process. We are happy to meet to discuss there to hopefully come up with an acceptable way forward early on in the Local Plan process:

- The best thing, to meet the LUR Act 2023 provisions to further the purposes of the Broads, is to mention the Broads when the National Landscape is mentioned. In particular in relation to E7 and E8, special qualities of the Broads and also the impact of major development on the Broads.
- Identifying areas suitable potentially for onshore wind turbines that are right up next to our boundary.
- HC6 and the impact of telecommunications apparatus and infrastructure on the Broads.
- The changes to CC12 that removed 'native' from, the requirement for new trees: 'The planting of suitable native or appropriate new trees, hedgerows and woodland …… will be encouraged'

SWOT Analysis – The Climate Threats needs to be much more developed in the finished article. We are well beyond simply listing "extreme weather" – there needs to be actual consequences of that spelled out in terms of heat deaths, added houses flood, crop failure, accelerated coastal erosion. In particular, the risk of heat to elderly populations.

Given how much of the local area is within a National Landscape and the Broads, the LURA duty of regard should be front and centre of these priorities

Minor typos:

P22 4.23 'when compact' - should be compared

P24 - 4.30 - 'Broad's' - no apostrophe

Salhouse Parish Council

Document: Salhouse Neighbourhood Plan **www.tinyurl.com/SalhousePlan**

Due date: 07 September 2026

Submission date: 18 August 2026

Status: Regulation 14

Proposed level: Officer level

Notes

The policies within the 2017 Salhouse Neighbourhood Plan were approved prior to the adoption of both Local Plans and also to the current National Guidance. It is therefore in need of review to maintain relevance in the determination of planning applications. Salhouse Parish Council decided to embark on a review with work getting underway in Summer 2025.

Submitted response

Neighbourhood Plan

- Page 15, para 2.10 the Salhouse Conservation Area Appraisal (2004) should be referenced. BDC are due to review this document.
- Page 16, para 2.16 'The Broad' do you means 'The Broads' e.g The Broads Authority, or Salhouse Broad? Maybe make clearer.
- Page 16, para 2.17 – add reference to the BA's LCA SPD of the part in the Broads Executive Area. This is defined as 'Carr Woodland'
- 22.25 - says 'Employment levels remain high, though rising living costs have increased pressure on some households'. I am not sure that 'though' is the intended linking word. I think 'and' is better.
- Policy SAL1, page 33, left hand column, Roman Numerals – I think these need mapping.
- Page 29, para 5.2 would it be worth explaining that some of the woodland in the BA area is carr woodland and the benefits that has in terms of biodiversity etc.
- 5.10 – starts with 'It' – what is 'it' in this instance?
- Policy SAL2 – left hand column, third para – need to refer to the Broads Landscape Character Assessment SPD.
- Policy SAL2, left hand column, fourth para – the two parts of this para contradict each other to me. The first talks about development along a road which may result in ribbon development and the second seeks to prevent ribbon development.

- Policy SAL3, para 1 – suggest this is split into two. The first part is an overarching stance. The second part then goes into street lighting.
- Policy SAL3, b – random) x2
- Figure 7 could usefully show the BA area.
- 5.22 – add 'the Broads' as the Broads is not a National Park.
- Policy SAL5 first para – you don't mention climate change resilience. You may want to do that.
- Policy SAL5 first para – climate change adaptation and mitigation is more than just low or zero carbon homes and buildings and high energy efficiency levels. I suggest checking this paragraph.
- Policy SAL5 – given the heat waves recently, you might want to refer to heat resilience in design.
- Policy SAL5, community energy schemes – do you want to caveat that you support these in principle, subject to meeting development plan policies? Otherwise, it could be seen as support even though a scheme may be contrary to other policies.
- Policy SAL5, community energy scheme – part 2 confuses me – community energy schemes are supported as long as they don't prejudice other community energy schemes. I don't understand how to use that bit of the policy.
- Policy SAL5, Surface water and pollution – please mention something about addressing quality of water before it enters the Broads. Our Members are keen that schemes address the quality of run off into the Broads.
- Para 6.2 – 'these tend to be located at more major centres on the Broads such as Horning,'
- Para 6.5 – one part says tourism development is not supported but another says tourist accommodation is.
- Policy SAL6, promotion of new employment – do you want to specify where new employment can go? As worded, this seems to support it anywhere…
- 7.5 – specify Greater Norwich Local Plan
- 7.8 - new development I in the parish
- Policy SAL7, first para – says Figure X – I think this is 6.
- Policy SAL7 – para 1 – say which Local Plan.
- Policy SAL7 – third para, second part of sentence – Is this major as in the current definition or major as in the proposed definition? I wonder if you want to check this part of the policy as what if a scheme for ten dwellings comes in that is in the settlement boundary or accords with local or national policy and is not within the North Rackheath allocation?

- Para 7.13 – when are the instances where social integration is not a priority?
- Para 7.20 – I don't understand what is being said here – are you saying that even if a developer proves that viability is an issue and this affects affordable housing provision, the Parish Council will not accept that? What are 'such measures'?
- 7.21 talks about self build and then adaptable homes as though they are the same thing. Para 7.22 then talks about accessible homes but also implies these are adaptable. This is confusing.
- Policy SAL9 – accessible and adaptable homes – which Local Plan policy is this referring to? Do you need to repeat that if it is already adopted policy?
- Policy SAL9 – objection – object to the last paragraph that talks about specialist housing being outside the settlement boundary. This is contrary to Local Plan policy DM41 that requires these to be within the development boundary. Staff and visitors need to access this housing and if outside of a development boundary, it is likely that the only choice will be single occupancy car use. Furthermore, residents need to access facilities and services and may want to do this independently and so by being outside of a settlement boundary, this will be hard to do.
- 7.29 – the last sentence says that fewer respondents prioritised a few things with the first things have a low % in brackets. But the remaining things have a high % in brackets. This is confusing as a higher % would mean greater support.
- SAL10, first para, second sentence – 'Proposals need to accord with the Salhouse Design Guidance and Codes 2026 and will be supported where they demonstrate that they have been designed in accordance with the following principles'
- SAL10, 2, f – you already have policy on dark skies. Why do you need SAL10 to talk about lighting? Also, SAL10 wording and stance is different to the dark skies policy which says 'the proposed lighting is necessary and proportionate to its intended function, with a clear justification provided'.
- Para 8.6 – 'New development should help to create safe, well-designed paths and crossings for everyone - including people with limited mobility - and does not harm the enjoyment or character of our public rights of way. was to develop an integrated village path network which links the core part of the village with the rural hinterland and the natural and built heritage features'. I think there are some words missing.
- 8.7 – 'Wherever practicable, the creation of new access arrangements should complement the existing routes in the neighbourhood area as shown in figure X'. Think this should be Figure 23.
- SAL12 – top two bullets on page 69 – should be 'ensure'.
- SAL12 - the HRA screening says 'Any proposals related to new connections may require a project level HRA to assess any potential impact' – this needs to be included in the policy. Potential objection otherwise.

- 8.14 - Improvements to the station building itself for or its ancillary amenities such as the waiting room will be supported.
- Page 61, figure 21: The northern boundary of the CA appears to be blue rather than black. Please could this be amended so that it is clear that this is the boundary?
- Page 61, para 7.38: this states: 'There is also a smaller conservation area centred on Park Farm and Vicarage Farm outside of the main built up area'. This is not a separate conservation area but a detached part of the main Salhouse Conservation Area.
- Page 62, para 7.41: could add at the end of the sentence that the conservation area is a designated heritage asset. That would then make sure people are aware that the end of PolicySAL11 (re requiring a heritage statement) would apply to any applications within the conservation area.
- Page 70, policy SAL14 Salhouse Station: this implies that the station building should be retained and improvements would be supported but should it make clear that demolition of the building would not be supported (assuming that is the case given its heritage value as set out in para 8.10).
- SAL15 – this is contrary to Local Plan for the Broads policy DM44. Parts A and B are not included in that policy. SAL15 does not include anything about no community need. DM44 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.
- SAL15 part b – says 'Other adequate facilities offering the same service exist within a reasonable walking distance of the majority of residents, to meet local needs and this would avoid a duplication of facilities' – the green bit does not fit or make sense. What is 'this' in this instance? This part is about loss of a facility so if a facility is lost, it cannot be duplicated.
- SAL15, new community facilities – 'make, expand'

Statement to accompany pre-submission version – June 2026

There are many changes to the Plan and it should go to referendum.

Data profile

1.6.1 – the emerging Local Plan for the Broads is at examination.

1.6.2 – the Design Guide is an SPD: Broads Authority Design Guide and Code SPD (PDF). This was adopted March 2025.

Design guide

Page 8 – NPPF is 2024 not 2023 (at time of writing!)

Page 20, C g – this only talks about street lighting. It needs to include other lighting. And needs to say that lighting needs to be justified in the first place.

Page 22, D a – what do you class as walking distance? This might been to say something about the route the pedestrian takes – a surfaced route perhaps.

Page 23, D i – there are building regulations relating to EV charging points. How does this wording relate to them?

Page 28: Code k: Should be the 'Salhouse Conservation Area Appraisal' document

Page 29: first bullet point re: variegated brick. There are examples in Salhouse (Barn Piece Close!) where the bricks are too varied and contrast greatly giving a 'salt and pepper' effect. Perhaps the wording here could be changed to suggest that brickwork should match the Norfolk red bricks predominantly found in the area, which are mainly a blend of different shades of orange and red. There doesn't tend to be too much yellow and brown traditionally

Page 34 – did you want to add the requirements of para 5.1 into policy?

MHCLG

Document: Permitted development rights: schools, assets of community value, defence and conservation https://www.gov.uk/government/consultations/permitted-development-rights-schools-assets-of-community-value-defence-and-conservation/permitted-development-rights-schools-assets-of-community-value-defence-and-conservation

Due date: 05 August 2026

Submission date: Date unknown – response sent in using online form.

Status: Government consultation

Proposed level: Officer level

Notes

This consultation seeks views on proposals relating to permitted development rights.

We are consulting on extending the existing temporary permitted development right that provides for temporary buildings on school land where buildings have ben affected by reinforced autoclaved aerated concrete (RAAC) for an additional 2 years.

We are also consulting on removing assets of community value from the permitted development right that allows for the demolition of certain buildings, so they would no longer be able to be demolished without first applying for planning permission.

We are also consulting on several changes to the permitted development right that allows for development by the Crown on closed defence sites, to support the delivery of a Defence estate that is fit for purpose, aligned to whole force needs, and that maximises the use of estate assets.

Finally, we are consulting on new permitted development flexibilities to support the development of conservation measures within Environmental Delivery Plans by Natural England as part of the Nature Restoration Fund.

Submitted response

Question 1

Do you agree that the existing temporary Class CB of Part 4 permitted development right should be extended by two years to 24 October 2028?

Yes

Question 2

Do you think that the proposed extension of the temporary permitted development right schools affected by RAAC could impact on: a) businesses b) local planning authorities c) communities?

Yes
a) Businesses -not particularly, except maybe more work for local contractors.
b) LPA's – not particularly maybe less work, but maybe more queries.
c) Communities – may produces worry about the reason for the works or confidence that the problem is being dealt with.

Question 3
Do you think that the proposed extension of the temporary permitted development right for schools affected by RAAC could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

No

Question 4
Do you agree that Class B of Part 11 should be amended to exclude assets of community value and, in future, sporting assets of community value?

Yes

Question 5
Do you think that the proposed change in relation to the Class B of Part 11 permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes
a) businesses – when a business fails and an alternative is proposed, an ACV could prevent this, making the building potentially unusable.
b) LPAs: the change would provide greater control to ensure that ACV which contribute to the local community (either by virtue of their use or community value and history) are only demolished when the LPA thinks it is appropriate;
c) communities: the proposed change would enable communities to have a say on the potential demolition of ACV through the planning process, thereby potentially reducing the number of ACV that are lost. ACVs are received with mixed emotions, those passionate about facilities are happy that they can potentially protect them, conversely those looking to re-developed failed sites dislike the fact that a premise that is unused due to viability can be held in uncertain limbo by red tape.

Question 6
Do you think that the proposed removal of assets of community value and, in future, sporting assets of community value from the Class B of Part 11 permitted development right could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

Yes – potentially a group of the listed persons may find an unused site that is protected by AVC and maybe not realistically be able to use it.

Question 7
Do you agree that the permitted development right is amended to allow an increase in the total floor space of any buildings for use as single living accommodation via erection or extension beyond 25% of the total floor space?

Yes

Question 8
If yes, should this be an increase to:

- 35%
- 50%
- Other. Please specify.

Please provide your reasons.

35% the approach should be cautionary, and the limit could be sought to be increased if necessary.

Question 9
Do you agree that the permitted development right is amended to allow an increase in the total floor space of any non-residential building via erection or extension beyond 35% of the total floor space?

Yes

Question 10
If yes, should this be an increase to:

- 45%
- 50%
- Other. Please specify.

Please provide your reasons.

45% the gap between 45 & 50% could be significant considering the large size of some building on a defence site.

Question 11
Do you agree that the prior approval should no longer be triggered by a cumulative footprint of 4,000 square metres and instead by the scale of individual proposals?

Yes - a finite size can be limiting when large buildings are developed.

Question 12
If yes, do you agree that the permitted development right is amended to instead require an application to the local planning authority for determination as to whether the prior approval

of the authority is required as to siting and scale where an individual development is above a threshold of:

- 2,000 square metres
- 2,500 square metres
- 3,000 square metres
- Other. Please specify.

Please provide your reasons.

2500m² - middle ground

Question 13
Do you agree that Class TA of Part 19 is amended to allow extensions or alterations within 15 metres of the perimeter of the closed defence site?

Yes – only if the existing building is closer than 15m, not if the extension is closer than 15m

Question 14
Do you agree that where the development is more than 25 metres from the perimeter of the closed defence site, Class TA of Part 19 is amended to allow:
i) the erection of new buildings from 12 metres to up to 18 metres in height?
ii) extensions or alterations of up to 18 metres or up to the height of the existing building, whichever is lesser?

i) Yes
ii) yes

The PD right needs to consider the potential for MOD sites to be near to protected landscapes. As such there needs to be consideration of the impact of any extension on the protected landscape.

Question 15
Do you agree that the definitions of 'closed defence sites' and 'non-residential buildings' should be amended so as to refer to sites and buildings (respectively) used wholly or mainly for purposes connected with defence'?

Yes – from experience, I know that other uses form a valuable part of the functioning of a defence site.

Question 16
Do you think that the proposed change in relation to the Class TA of Part 19 permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes
a) this could allow business to be located on a defence site, using otherwise unused premises.
b) LPA's should receive fewer applications

c) Local communities could be surprised that defence sites are allowed to extend building close to the boundary to such an extent.

Question 17
Do you think that the proposed changes to the permitted development right for Crown Development on a closed defence site could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

No

Question 18
It is proposed that Natural England and operators on its behalf benefit from a national grant of planning permission for the implementation and maintenance of conservation measures within an EDP amounting to development. Do you agree?

Yes – important projects should not be held up and other protections apply to ensure work is not harmful.
Para58: I would question if NE will be resourced for the assessment the PD via prior approval. The difficulty is that we don't know the magnitude of the work and how any burdens money might be allocated.
Para59 is suitably protective for the conservation enhancement measures.

Question 19
It is proposed that any national grant of planning permission would not apply on the site of a scheduled monument. Do you agree?

Yes

Question 20
It is proposed that if any part of the development is in a conservation area, prior approval on the impact of the siting and appearance of the development on the character and appearance of the conservation area would be required. Do you agree?

- yes
- no, development in a conservation area should be permitted without the need for prior approval
- no, development should not be permitted in a conservation area
- don't know

Please provide your reasons.

Yes

Question 21
It is proposed that if any part of the development is in a World Heritage Site, prior approval on the impact of the siting and appearance of the development on the Outstanding Universal Value of the World Heritage Site would be required. Do you agree?

- yes

- no, development in a World Heritage Site should be permitted without the need for prior approval
- no, development should not be permitted in a World Heritage Site
- don't know

Please provide your reasons.

Yes

Question 22

It is proposed that if any part of the development is on the site of a registered park, garden or battlefield, prior approval on the impact of the siting and appearance of the development on the special historic interest of the asset would be required. Do you agree?

- yes
- no, development on the site of a registered park, garden or battlefield should be permitted without the need for prior approval
- no, development should not be permitted on the site of a registered park, garden or battlefield
- don't know

Please provide your reasons.

Yes

Question 23

It is proposed that if any part of the development is on the site of a protected wreck, prior approval on the impact of the siting and appearance of the development on the historical, archaeological or artistic importance of the protected wreck would be required. Do you agree?

- yes
- no, development on the site of a protected wreck should be permitted without the need for prior approval
- no, development should not be permitted on the site of a protected wreck
- don't know

Please provide your reasons.

Yes

Question 24

It is proposed that if any part of the development is on the site of a listed building or land within its curtilage, prior approval on the impact of the siting and appearance of the development on the building, its setting or any feature of special or historic interest which it possesses would be required. Do you agree?

- yes
- no, development on the site of a listed building or land within its curtilage should be permitted without the need for prior approval
- no, development should not be permitted on the site of a listed building or land within its curtilage
- don't know

Please provide your reasons.

Yes

Question 25
Where development is subject to prior approval on the basis of land designation, this would apply in respect of most of the permitted development proposed in this consultation chapter (with the exception of temporary development for surveys and investigation, as set out in paragraphs 90 to 92). Do you agree?

Yes

Question 26
It is proposed that development be permitted in protected landscapes with no prior approval process. Do you agree?

- yes
- no, development in protected landscapes should be permitted subject to prior approval
- no, development should not be permitted in protected landscapes
- don't know

Please provide your reasons.

No - see above - it depends on resources. Requires detailed knowledge of National Park Local plans and Policies and long-term expertise of the NPA should be considered as an asset and not a constraint. We would welcome discussion on how this might locally work through consultation of the EDP process and most importantly as conservation measures come forward.

It is essential that anything Natural England want to do in a protected landscape is discussed with the managers of that land. It will not hold things up but will make sure you do not end up with perverse outcomes from the actions of Natural England and the national park or other relevant authority. You could imagine creation of wetlands in one area may have deleterious effects on something the national parks plans to do on adjacent land.

Question 27
Beyond the mechanisms already outlined in paragraph 59, should we seek to control the development of conservation measures on land where it may restrict future development and land uses?

No – this needs careful consideration of the importance of the conservation proposals weighed against future other developments.
No – there should be no further controls on development of conservation measures on land, as this would impose restrictions without any clear mechanism or clear benefit. The consultation of the EDP stage is adequate for this purpose.

Question 28

It is proposed that landscaping, including excavations and deposits, be permitted. Do you agree?

No
It must be assessed on the scale and type of deposits; a blanket permission is not acceptable. In some areas where peat soils are present these need to be protected and enhanced and not excavated. There is no mention the safeguards that will be put in place. The EDP for the Broads SAC for example may propose conservation measures that could result in excavation of peat soils. This may not be an issue if the excavations are small scale and result in certain peat rewetting. We recommend that the Broads Peaty Policy, or other suitable peat restoration policy document is conditioned and compiled with to ensure no unintended consequences for UKs Net Zero ambitions and Natural England's Lowland Peat Road Map.

Furthermore, scrapes and bunds can have impact on landscape. For example:
BA/2018/0463/FUL | Retain scrape | Land East Of Brograve Mill Coast Road Waxham Norfolk. This scheme was refused and this decision was upheld at appeal.
The delegated decision report concluded: 'The scrape and drainage ditch represent an incongruous and harmful intervention in the landscape which has an unacceptable impact on the landscape character of this area of the broads and on landscape appearance. The existence of the scrape is not justified, no evidence has been provided to demonstrate that it is required to contribute to land and water level management, make better or more efficient use of the land, or contribute to viability of the overall farm of which it forms a part. The presence of the scrape is to the detriment of wild birds in potentially drawing them away, from nearby designated sites and the network of habitats'.
The appeal decision report concluded: 'Nevertheless, despite the reduced visual accessibility, such an unnatural, engineered feature causes a significant degree of harm to the intrinsic character of the Broads landscape'.
Fundamentally, the landscape of the Broads is fairly open and features in the landscape can be seen for a long distance.

Question 29
It is proposed that removing minerals from the site and bringing waste materials on to the site should be conditioned as set out in paragraph 62. Do you agree?

No. the exclusion of deposits for paths etc, is unacceptable. Further controls on type and source of waste material must be included. Maybe prior consultation with LPAs as per EA.

Question 30
It is proposed that prior consultation with the Environment Agency on flood risks as set out in paragraphs 63 and 64 would be required. Do you agree?

Yes

Question 31
It is proposed that landscaping, including excavations and deposits, are not subject to any conditions or limitations on their overall size or scale. Do you agree?

No. this will lead to damage to the environment, landscape and peat. A proper assessment is essential. Maybe prior consultation with LPAs as per EA.

Question 32
It is proposed that a contamination screening assessment and, depending on the outcomes of the assessment, prior approval on contamination risk as set out in paragraphs 66 and 67 would be required. Do you agree?

Yes

Question 33
Are there any other conditions or limitations that should apply to landscaping, including excavations and deposits?

Yes – size , scale, type of deposits, source of deposits, suitability for the specific environmental needs of the area needs to be assessed. Excavations need to be assessed against local requirements or policies – such as peat in the Broads. Landscape impact needs consideration.

Question 34
It is proposed that the development of fences etc. as set out in paragraph 70 should be permitted. Do you agree?

Yes

Question 35
Are there any other conditions or limitations that should apply to the development of fences etc.?

No

Question 36
It is proposed that the development of footpaths, cycleways and bridleways as set out in paragraphs 72 and 73 be permitted. Do you agree?

No.
Introducing hard standing/surfacing in an area of protected landscape is a concern.
Also balance HRA implications of increasing access to protected sites.
Often have signage and interpretation with them – what about that?
What about lighting and light pollution and dark skies?

Question 37
Are there any other conditions or limitations that should apply to the development of footpaths, cycleways or bridleways?

Yes
Material
Scale

Signage and interpretation
Lighting
Further controls on type and source of waste material must be included.

Question 38
It is proposed that the development of structures should be permitted. Do you agree?

Potentially. Images of what is intended should have formed part of the consultation to understand what you are proposing.

Question 39
It is proposed that the development of a pole, post or mast and any associated structure (for the purposes of wildlife monitoring and habitat creation) to be mounted above ground level on it (or on a tree, existing structure or building) be limited in terms of size and height as set out in paragraphs 75 and 76. Do you agree?

Potentially. Images of what is intended should have formed part of the consultation to understand what you are proposing.
What about the impacts of the power source that may be needed?

Question 40
It is proposed that the development of structures at ground level for the purpose of providing a wildlife habitat (or a purpose ancillary to a wildlife habitat, such as access or monitoring) be limited in terms of size as set out in paragraph 77. Do you agree?

Potentially. Images of what is intended should have formed part of the consultation to understand what you are proposing.
What about the impacts of the power source that may be needed?

Question 41
It is proposed that the development of structures below ground level for the purposes of providing wildlife habitats and monitoring be limited in terms of size as set out in paragraph 78. Do you agree?

Para 78 – there could be peat removed. How will that be addressed through these proposed PD Rights?

Question 42
It is proposed that any structure developed at or below ground level for the purposes of blocking ditches, diverting watercourse or flooding land be limited to a maximum of 1 metre in height above the prevailing land level. Do you agree?

Potentially. How will the impacts on flood risk to an area be considered?

Question 43
It is proposed that the maintenance, improvement or other alteration of an existing structure should be conditioned as set out in paragraph 81. Do you agree?

Potentially. Images of what is intended should have formed part of the consultation to understand what you are proposing.

Question 44
Are there any other conditions or limitations that should apply to the development of such structures?

Impact on landscape
Impact of any power source
Peat removal

Question 45
It is proposed that the replacement, improvement or alteration of an existing above ground slurry store; and the erection, construction, improvement or alteration of above ground slurry store covers be permitted. Do you agree?

Yes

Question 46
It is proposed that the height, size and siting of above ground slurry stores and covers be limited to the parameters as set out in paragraph 84 and 85. Do you agree?

No 8 metres seem excessively high; a limit of 5 metres would make it less intrusive to the natural landscape and environment.

Question 47
Are there any other conditions or limitations that should apply to the development of above ground slurry stores or covers?

Impact on landscape
Impact of any power source
Peat removal

Question 48
It is proposed that the development of a single vehicular access, of up to 10 car parking spaces, structures for cycle parking, height barriers and pay and display machines in connection with an EDP SANG be permitted. Do you agree?

No
300 square meters is a large area of development in a protected landscape that is open in nature.
So this kind of scheme needs permission to consider the full impact on protected landscapes.
Exclude article 2(3) land from this PD right.
EV charging points and to some extent pay and display can introduce lighting to an area of dark skies – light pollution
Works to provide electricity as well

HRA implications
Impact on landscape
Peat removal.

Question 49
It is proposed that the development of any hard surfacing be conditioned as set out in paragraph 87. Do you agree?

Para 87 – by removing the need for it to be porous, what about the ensuing surface water run off and flood risk? That will need treating. You are saying that to protect water quality, the surface may be non-porous but then that means there will be run off into the area that is trying to be protected due to water quality – it is not logical.

Question 50
It is proposed that Natural England be required to seek prior approval on transport, highways and access impacts prior to commencing the development of a vehicular access or car park as set out in paragraph 88. Do you agree?

300 square meters is a large area of development in a protected landscape that is open in nature.
So this kind of scheme needs permission to consider the full impact on protected landscapes.
Exclude article 2(3) land from this PD right.
EV charging points and to some extent pay and display can introduce lighting to an area of dark skies – light pollution
Works to provide electricity as well
HRA implications
Impact on landscape
Peat removal

Question 51
It is proposed that the existing electric vehicle recharging permitted development rights (Class D and Class E of Part 2 of the General Permitted Development Order) be amended as set out in paragraph 89. Do you agree?
EV charging points and to some extent pay and display can introduce lighting to an area of dark skies – light pollution and impact on dark skies. Also, there will be the need to supply electricity; there could be impacts from the works to provide electricity in isolated areas.

Question 52
Are there any other conditions or limitations that should apply to the development of a single vehicular access, of up to 10 car parking spaces, structures for cycle parking, height barriers, and pay and display machines?
This PD right cannot apply to article 2(3) land. These developments can negatively impact a protected landscape. There are numerous and various issues:

- *Heights of structures must be limited so as not to have a detrimental effect on the landscape.*
- *Light pollution relating to lighting for car parking as well as the pay and display machines.*

- *Impaction of peat.*
- *Appropriate landscaping.*

Question 53
It is proposed the development of temporary buildings, plant, machinery and apparatus in, over, or under land, for the purposes of survey or investigation set out in paragraphs 91 and 92 should be permitted. Do you agree?
Such sites may be isolated and in areas of dark skies; light pollution and introduction of light, even temporarily, is an important consideration. There is also the negative impacts from impaction of peat that needs to be considered.

Question 54
Are there any other conditions or limitations that should apply to the development of temporary buildings, plant, machinery and apparatus for the purposes of survey or investigation?
Yes. Such sites may be isolated and in areas of dark skies; light pollution and introduction of light, even temporarily, is an important consideration. There is also the negative impacts from impaction of peat that needs to be considered.

Question 55
It is proposed that any land and buildings on that land, be permitted to be used for the purposes of conservation in accordance with proposals in an EDP, as set out in paragraphs 93 – 95. Do you agree?

The proposal is poorly worded. It is not clear what is meant.
Are you proposing demolishing barns for example to make way for habitat? Or that the barn could be improved to attract bats and owls for example or have other biodiversity enhancement features added?

Question 56
Are there any other conditions or limitations that should apply to the use of land, and buildings upon that land, for the purposes of conservation measures in accordance with proposals in an EDP?

Lighting and light pollution
Landscape impact
Peat removal.

Question 57
Should any other development be permitted to be undertaken by Natural England for the purposes of implementing conservation measures in accordance with proposals in an EDP and maintenance of the site?

No

Question 58

Are there any other conditions or limitations (including prior approvals or land exclusions) that should apply to development permitted for the purposes of implementing conservation measures in accordance with proposals in an EDP and maintenance of the site?

Lighting and light pollution
Landscape impact
Peat removal.

Question 59
Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could impact on: a) businesses b) local planning authorities c) communities?
Yes
a) don't know
b) additional resources may be needed
c) could be beneficial to visitors and promote awareness of environmental issue, but could be considered as overuse of protected landscapes.

Question 60
Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).
No

Question 61
Do you think that permitted development flexibilities proposed to support the development of conservation measures within an EDP could give rise to environmental impacts that should be considered against the five environmental principles? (integration, prevention, rectify at source, polluter pays, and precautionary).
Yes. There is potential for landscape impact, light pollution, impacts on peat, compaction as well as HRA concerns

Appendix 2 – Consultations submitted where members have previously been engaged via email

East Suffolk Council

Document: East Suffolk Local Plan Scoping Consultation

https://storymaps.arcgis.com/stories/42fcff95aef94dfc9ec194352ddf1771

Date of email to members: 29 June 2026

Due date: 29 July 2026

Submission date: 13 July 2026

Status: Scoping Report

Proposed level: Planning Committee Members received the draft response by email.

Notes

This was the first stage of new style Local Plan making. It sought answers to these general questions:



Submitted response

Questionnaire

Assuming the Data and Background document is what we should be looking at, my main comment is that the fact that the BA is the LPA for part of the area is not explicitly mentioned

anywhere and it should be, otherwise people will think their Local Plan will apply to the BA Executive Area. Even in the sections on Heritage and Landscape, where other protected landscapes are set out, no mention is made of the Broads. Bizarrely it is only on the maps in the section relating to 'Settlements' (towards the end of document, page 34 onwards) that the BA area is shown on the maps. This needs to be amended.

Question 2:

Data and background document: East Suffolk Local Plan - Data and Background

Broads not mentioned under landscape. Not shown on the mapping.

You need to ensure you meet the Districts' duty under the Section 245 of the Levelling up and Regeneration Act to seek to further the statutory purposes of protected landscapes.

Question 6:

The Broads Authority Executive Area covers part of East Suffolk. This is a protected landscape and as such the landscape impact of any potential development on the setting of the BA area will need to be considered. The Broads Authority LCA SPD has recently been approved and should be referred to. Section 245 of the LURA also put an obligation on public bodies to seek to further the purposes of the National Park. These are:

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

Question 12:

In terms of scoping, on Climate I would say;

- Should have express reference to the Well Adapted UK Report, and the Broadland Futures Initiative
- It needs to be more explicit that climate is a cross cutting theme and not a standalone thing – they come close to it with highlighting poor public transport for instance, but don't make the link to how that will impact where Tourism and Housing can be placed to minimise transport emissions.

Question 13

Data and background document: East Suffolk Local Plan - Data and Background

Broads not mentioned under landscape. Not shown on the mapping.

SEA Scoping

Section 3 – relevant plans and documents. You need to include:

- Broads Plan
- Local Plan for the Broads
- Broads Landscape Character Assessment
- Broads Landscape Sensitivity Study
- Broadland Future's Initiative
- LURA – for example the new duty to have further purposes of the Broads and National Landscapes
- Shared standards in water efficiency for local plans: anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf

No page numbers

Section 4, soils, 4.83 onwards – there is no mention of peat. The peat map for England England Peat Map (EPM) Portal shows peat in East Suffolk. Also, the NPPF that was recently consulted on, CC2, 1, f seeks to protect peatlands.

Section 4, water, 4.100 onwards – there is no reference to the shared standards for water efficiency for Local Plans.

Section 4, water, 4.106 onwards – there is no mention of surface water run off going into the Broads and affecting water quality.

Section 4, landscape, 4.172 onwards – title says 'nationally landscapes' – is that national landscapes or nationally important landscapes? In nationally important landscapes, then discuss the Broads. If national landscapes, then have a new title for the Broads. It is strange that the Broads, which is equivalent to a National Park, does not have a mention. You also don't mention the duty to further the purposes of the Broads and National Landscapes in this section. And the Broads is not mentioned under the likely evolution section.

There is no mention of light pollution.

Section 5 table

- Soils – need to mention peat
- Landscape – need to mention the Broads
- There is no mention of light pollution

Section 6 table 5

- Part 6 – refer to light pollution
- Part 7 – refer to peat

- Part 11 – refer to the Broads

Section 6, table 6

- Part 9 – refer to light pollution
- Part 10 – refer to peat
- Part 15, column 3 – refer to the Broads

You focus climate change mainly relating to coastal erosion, when there will be issues in the Waveney of salt intrusion threats as in the rest of Broads.

I am not sure if the proposed major drinking water reservoir and transfer scheme is relevant but I don't think I saw mention of it in the SEA or in terms of drinking water supply.

Sites

East Suffolk Local Plan Call for sites - All sites submitted

Site 18, 20, 184, 110, 454, 328, 366 ,123 and 273 are all next to or near to our area. I understand that you have not assessed these yet.

There is not much information about what is proposed on the above webpage.

You will need to consider the impact on the setting of the Broads in landscape terms. You will need to consider light pollution impact. You will need to consider the issue of run off into the Broads and water quality.

Those are some initial considerations.

In assessing the sites, you need to ensure you meet the Districts' duty under the Section 245 of the Levelling up and Regeneration Act to seek to further the statutory purposes of protected landscapes.

Some early, initial comments on sites:

Site 17, Somerleyton: Site 18, Somerleyton: This site sits immediately adjacent to the Broads Authority Executive Area and the Somerleyton Conservation Area and in close proximity to the Duke's Head PH and Brickfields Cottages, both of which would be considered locally identified heritage assets. Any development would need to consider the setting of both the Executive Area and the heritage assets. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 18, Somerleyton: This site sits immediately adjacent to the Broads Authority Executive Area and the Somerleyton Conservation Area. Any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 19, Somerleyton: This site sits in close proximity to the Broads Authority Executive Area and the Somerleyton Conservation Area. It is positioned on slightly higher ground overlooking the Broads and any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to seek to consider potential impacts on the Protected Landscape and further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 20, Somerleyton: This site is in close proximity to the Broads Authority Executive Area and the Somerleyton Conservation Area. It is positioned on slightly higher ground overlooking the Broads and any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 30, Somerleyton: This site sits immediately adjacent to the Broads Authority Executive Area and the Somerleyton Conservation Area. Any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 184, Flixton: This site sits immediately adjacent to the Broads Authority Executive Area and to the south of The Nebb, a grade II listed building. Any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 110, Flixton: This site sits immediately adjacent to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 454, Flixton: This site sits immediately adjacent to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 366, 328 and 217, Oulton Broad: This site is in close proximity to the Broads Authority Executive Area and the grade I listed Church of St Michael. It is positioned on slightly higher ground overlooking the Broads and any development would need to consider the setting of both the Executive Area and the designated heritage asset. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 123, Carlton Colville: This site sits immediately adjacent to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 273 and 314, North Cove: This site is in close proximity to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to consider potential impacts on the Protected Landscape and seek to further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Site 236, Bungay: This site sits immediately adjacent to the Broads Authority Executive Area. Any development would need to consider the setting of both the Executive Area. Any decisions made in relation to the site would need to seek to consider potential impacts on the Protected Landscape and further the statutory purposes of the Broads Authority as set out in section 245 of the LURA.

Planning Committee

6 November 2026

Agenda item number 11

Appeals to the Secretary of State update

Report by Development Manager

Summary

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

Recommendation

To note the report.

Application reference | Appeal reference | PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2026/0034/FUL | BA/2026/0002/REF | 6011930	Mr John Atkins	Appeal start date 14 July 2026 **Awaiting site visit 20 October 2026**	Driftwood 104 Lower Street Horning Norfolk NR12 8PF	Change of use of to allow short term holiday let accommodation	Delegated Decision 14 May 2026

Application reference | Appeal reference | PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2025/0063/INFENF | BA/2026/0003/ENF | 6013649	Mr D Rothwell	Appeal start date 18 August 2026 **LPA Final comments have been submitted 20 October 2026**	18 Long Dyke, Wayford Bridge	Unauthorised siting of a shipping container	Delegated Decision 29 June 2026

Author: Steve Kenny

Date of report: 20 October 2026

Background papers: BA appeal and application files

Planning Committee

6 November 2026
Agenda item number 12

Decisions made by officers under delegated powers

Report by Development Manager

Summary

This report sets out the delegated decisions made by officers on planning applications from 28 September 2026 to 23 October 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/2026/0108/FUL	The Old Boat Yard Hall Road Barton Turf Norfolk NR12 8AR	Mr Buddy Haward	Conversion of boatshed to residential dwelling	Approve Subject to Conditions
Barton Turf And Irstead Parish Council	BA/2026/0185/HOUSEH	Meadow Cottage Shoals Road Irstead Norfolk NR12 8XR	David Pierce	Proposed single storey extension	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Bramerton Parish Council	BA/2026/0225/HOUSEH	1 Mill Hill Cottages Mill Hill Bramerton Norfolk NR14 7EN	Mr Stuart Brand	Raising of ground level, installation of walls and fencing, raised patio area, landscaping and erection of shed PART RETROSPECTIVE	Approve Subject to Conditions
Ditchingham Parish Council	BA/2026/0173/HOUSEH	Homestead Falcon Lane Ditchingham Norfolk NR35 2JG	Mr And Mrs Fitzgerald	To extensively renovate and extend the bungalow	Approve Subject to Conditions
Fleggburgh Parish Council	BA/2026/0186/LBC	Farmhouse Common Farm Silver Street Fleggburgh Norfolk NR29 3DB	Mrs Amanda Flowerdew	Application for new/repaired roof structure	Approve Subject to Conditions
Horning Parish Council	BA/2026/0177/HOUSEH	Dutch Cottage Ferry Road Horning Norfolk NR12 8PS	Mr S O`Brien	Proposed single storey side extension	Approve Subject to Conditions
Ludham Parish Council	BA/2026/0246/FUL	Irstead Hall Farm St Benets Road Ludham NR29 5NU	Sir A Habgood	The erection of a covered handling area	Approve Subject to Conditions
Stalham Town Council	BA/2026/0182/HOUSEH	Staithe House The Staithe Stalham Norfolk NR12 9BY	Mr Knight	Proposed Cart Lodge	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: 26 October 2026