



Local Plan for the Broads Affordable Housing Topic Paper March 2025

Broads Authority
Yare House
62-64 Thorpe Road
Norwich NR1 1RY

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1: Introduction

The current Local Plan for the Broads includes a policy that seeks off-site affordable housing contributions from schemes between 6 and 9 dwellings. The proposed policy in the emerging Local Plan seeks to continue off-site affordable housing contributions from schemes of fewer than 10 dwellings, but changes the threshold (see section 3). This Topic Paper seeks to justify the proposed approach.

2: Current policy

The current adopted affordable housing policy in the [2019 Local Plan](#) is policy DM34. This says:

Developments of 6-9 dwellings will be required to contribute a commuted sum (off-site contribution) towards the provision of affordable housing. This contribution will be calculated in accordance with the full requirements of the adopted standards and policies of the relevant District Councils. The commuted sum will be calculated in relation to thresholds and proportion of dwellings which should, subject to viability, be affordable. The commuted sum should reflect the subsidy required to deliver the affordable housing requirement off site (to include the cost of land and construction).

3: Proposed policy

The proposed affordable housing policy in the emerging Local Plan continues the approach of seeking off-site affordable housing contributions, but changes the threshold as follows:

- Sites on brownfield land, off-site contributions sought on schemes of 5 to 9 dwellings inclusive.
- Sites on waterfront brownfield land, off-site contributions sought on schemes of 3 to 9 dwellings inclusive.
- Sites on greenfield land, off-site contributions sought on schemes of 3 to 9 dwellings inclusive.

4: Justification for proposed policy

4.1 Average size of permissions

The Broads Authority has permitted the following numbers of net new dwellings over the last ten years (from 2014 to 2024). This data excludes holiday homes and replacements dwellings.

Table key:

Waterfront brownfield	Brownfield	Greenfield
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Application Number	Proposal	Net New
BA/2015/0148/FUL	Change of use of outbuilding to residential dwelling	1
BA/2015/0246/FUL	Proposed conversion of part of a redundant barn complex to form 2no dwellings.	2
BA/2015/0277/FUL	Demolition of detached bungalow and garage and construction of 4 no. Dwellings, associated car parking bays and associated works.	4
BA/2016/0065/FUL	New dwelling.	1
BA/2016/0408/FUL	Demolition of two existing buildings and erection of a new detached dwelling	1
BA/2017/0103/OUT	Outline application to redevelop Hedera House to form 6 residential dwellings and 10 new holiday cottages.	6
BA/2017/0151/FUL	Single storey dwelling and associated garden and walls.	1
BA/2017/0191/FUL	The conversion of a redundant agricultural building to a single dwelling, including associated building and landscaping works and the change of use of an existing dwelling to provide a dedicated tourism use.	1
BA/2017/0474/FUL	2 new dwellings and associated hard & soft landscaping	2
BA/2018/0248/FUL	Replace cottage with new dwelling and holiday unit.	1
BA/2018/0359/FUL	Demolition of shed, erect timber clad boat workshop, 3 residential dwellings, car park, flood defence wall and landscaping	3
BA/2018/0374/FUL	New dwelling.	1
BA/2019/0018/FUL	Conversion of 1 x 4-bed flat to 1 x 2-bed and 1 x 1-bed flats. Replace 3 windows, install 3 rooflights (retrospective).	1
BA/2019/0112/FUL	Erection of 3 terraced houses and associated parking & storage	3
BA/2019/0118/FUL	Erection of 7 residential dwellings, 12 permanent residential moorings, 9 resident moorings, 10 visitor moorings, 1 mooring for Broads Authority, the redevelopment of the Marina building as offices & storage with associated landscaping & parking	7
BA/2020/0053/FUL	Demolition of former marina building & erection of 2 residential dwellings with parking & residential moorings.	2
BA/2020/0408/FUL	Demolition of existing dwelling (Westerley) & erection of replacement dwelling and erection of new dwelling on neighbouring plot (The Moorings).	1
BA/2021/0084/FUL	Sub-divide shop into 2 units, new shop fronts and 1x flat to the rear	1
BA/2021/0181/FUL	Residential development of 2no. semi-detached townhouses and 2no. detached houses	4
BA/2021/0233/FUL	Three bedroom detached bungalow.	1

The total number of net new dwellings is: 44 dwellings

The total number of applications for net new dwellings is: 21 applications

The average size of schemes for net new dwellings that came forward over the last ten years in the Broads is: 2.10 dwellings.

The most common size of schemes that come forward in the Broads is: 1 dwelling.

The largest scheme for net new dwellings that has come forward in the last ten years is: 7 dwellings.

The number of schemes for net new dwellings, permitted over the last ten years, that could have resulted in off-site affordable housing contributions, if the proposed policy had have been in place is set out in the following table. Please note that one of the waterfront brownfield schemes did result in an off-site affordable housing contribution using the currently adopted threshold (see section 4.3).

Location	Number of schemes
Waterfront brownfield	2
Greenfield	2
Brownfield	1

The data shows that there are some schemes of 3 dwellings and above that have come forward over the last ten years, even though the most common scheme size for net new dwellings is 1 dwelling. The current threshold of 6-9 dwellings resulted in 1 scheme providing off-site affordable housing contribution. The proposed thresholds would have resulted in 5 schemes providing off-site affordable housing contributions.

4.2 Viability

The [Viability Assessment](#) of the emerging Local Plan assessed the proposed threshold for off-site affordable housing. The study concludes that: *'An affordable contribution of at least 33% is achievable on most typologies across the Broads Authority, including on those of fewer than 10 dwellings. The clear exceptions to this in viability terms are developments of 1-unit on any site type and older persons housing apart from on waterfront sites. For the typologies of 3-units a contribution is realistic on waterfront sites and greenfield sites – on general (inland) brownfield sites collection is still feasible but could be compromised if there are additional development cost pressures such as higher environmental costs'*.

The Viability Assessment of the Local Plan concluded that with all the policy requirements, the policy thresholds as set out in section 3 were viable (giving headroom to mitigate for nutrient enrichment).

4.3 Success of current policy

Since 2019, the current policy has been used at one site. Two applications were combined to give a total of 9 new dwellings which triggered the 6-9 dwelling threshold for a commuted sum and affordable housing contributions were secured.

Planning Application	Location	Description of development	Amount
BA/2019/0118/FUL	Port Of Yarmouth Marina, Caister Road, Great Yarmouth, NR30 4DL	Erection of 7 residential dwellings, 12 permanent residential moorings, 9 resident moorings, 10 visitor moorings, 1 mooring for Broads Authority, the redevelopment of the Marina building as offices & storage with associated landscaping & parking	£39,000
BA/2020/0053/FUL	Port Of Yarmouth Marina, Caister Road, Great Yarmouth, NR30 4DL	Demolition of former marina building & erection of 2 residential dwellings with parking & residential moorings.	£3,788

The current policy has delivered some off-site affordable housing contributions.

4.4 Support from previous Inspector

The [Report](#) (page 13) by the Inspector who examined the current 2019 Local Plan concluded the following in relation to policy DM34 seeking off-site affordable housing contributions for schemes of 6 to 9 dwellings: ‘overall I am satisfied that, in the case of the Broads, the proposal to seek commuted sums towards affordable housing from schemes of 6-10 dwellings is justified’. The following are the relevant paragraphs from the Report.

57. Policy PUBDM33 specifies that developments of 6 to 10 dwellings in the Broads are required to contribute a commuted sum towards affordable housing. This is Broads Authority Local Plan, Inspector’s Report 15 April 2019 14 lower than the national threshold for seeking affordable housing, as established in the Written Ministerial Statement dated 28 November 2014. However, most development in the Broads is likely to be relatively small scale and opportunities for development are limited due to the National Park equivalent status of the Broads. In this context such sums, although modest in scale, would be proportionally significant and would make an important contribution towards additional affordable housing in the Broads.

58. The viability evidence shows that schemes of 6+ dwellings could support affordable housing contributions, based on a percentage of 33% as established in the Greater Norwich Core Strategy, and the policy allows flexibility to deal with circumstances where viability is an issue. The Greater Norwich rate falls within the range of different percentages sought by other districts, albeit towards the upper end. As such it represents a reasonable basis for assessment. North Norfolk is a designated rural area, and therefore lower thresholds may be explored through the review of the North Norfolk Local Plan. Overall I am satisfied that, in

the case of the Broads, the proposal to seek commuted sums towards affordable housing from schemes of 6-10 dwellings is justified. The Authority has proposed that the commuted sum threshold should be adjusted to align with the amended threshold of 10+ for seeking affordable housing, as set out in the NPPF 2019. Although the Plan is being examined under transitional arrangements and against the 2012 NPPF, I consider this approach provides clarity and is justified. The policy as modified in M52 therefore seeks commuted sums from schemes of 6-9 units.

59. I have amended M52 as published to clarify that commuted sums from schemes of 6-9 units will be sought consistently across the Broads Executive Area. This reflects the approach specified in the supporting text, the table in Policy PUBDM33 and in the Authority's evidence base, and removes the inconsistent and unclear text relating to North Norfolk.

M52 can be found here: [Broads-Local-Plan-SCHEDULE-OF-Main-Modifications.pdf](#).

The Inspector who examined the current Local Plan for the Broads was supportive of a threshold for off-site affordable housing lower than national policy. She acknowledged that most development in the Broads is likely to be relatively small scale and opportunities for development are limited due to the National Park equivalent status of the Broads. These circumstances have not changed and are relevant for this emerging Local Plan.

4.5 Affordable housing need

PPG notes that affordable housing need is based on households “who lack their own housing or who cannot afford to meet their housing needs in the market” [ID 67-006-20190722]; though goes on to say that this should include the needs of those that can afford market rent but who want to own but can't afford to buy.

The [Local Housing Need Assessment](#) for the Broads identifies an affordable housing need of 4 dwellings per year for the period 2021 to 2041.

The data in section 4.1 shows that larger schemes are very rare. Without the off-site threshold being lower than national policy, given the very small size of permissions for net new dwellings in the Broads it is unlikely that any affordable housing will come forward in the Broads between 2021 and 2041 and therefore the identified need will not be met.

4.6 Future supply of housing

With much of the Broads Authority Executive Area covered by nutrient enrichment constraints, applications for net new dwellings have been lower than would have been expected, even given the erratic nature of windfall in the Broads. With more nutrient enrichment mitigation schemes coming into place (through Norfolk Environment Credits as well as potentially through Natural England), more schemes for net new dwellings could come forward.

Whilst there are no projections for what windfall over the coming years could be, the Authority considers there may be opportunities for schemes of three or more dwellings to come forward through the plan period.

4.7 Holiday Homes

The Broads Authority has permitted (2014 to 2024) 33 holiday homes as part of 14 planning applications for holiday homes or second homes (excluding camping and glamping sites).

The high demand for holiday homes inflates land and property prices and provides a disincentive for the provision of lower cost housing.

5: Policies of our Districts

The Local Plan for the Broads has regard to/defers to the affordable housing policies of the 6 districts/borough/city councils (the Districts). This is a long accepted approach and reflects that the Districts are the Housing Authority for the Broads and it is logical to have a consistent policy approach across a District, regardless of whether a scheme is in the District or the Broads for planning purposes.

Five of the six districts do not have policies that seek affordable housing below the NPPF threshold. North Norfolk District Council's emerging Local Plan seeks affordable housing on schemes fewer than 9 dwellings however, as some of their area, including parts of the Broads in North Norfolk, are Designated Rural Areas.

Given the justification set out in section 4 of this report, and to reflect that 5 out of 6 Districts do not have policies for less than 9 dwellings, it is prudent to have wording in our Affordable Housing policy to reflect the stance set out in this Topic Paper.

In practice, both our policy and the policy of the District's Local Plan will be used to determine the off-site contribution, working with the relevant Housing Team and their rates, thresholds and guidance.

6: Summary and conclusion

The 2024 NPPF says that *'Provision of affordable housing should not be sought for residential developments that are not major developments other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)'*.

However, there is a very limited supply of any suitable sites in the Broads for housing to meet local affordable housing need due to the protected landscape of the area, and to the extent and severity of flood risk. The opportunities for schemes of 9+ dwelling are significantly diminished by the rural character of the area and the environmental constraints. In addition, the high demand for second/holiday homes inflates land and property prices and provides a disincentive for the provision of lower cost housing.

In recent years (between 2014 and 2024), applications for dwellings have been on average 2.10 dwellings per application¹ (according to an assessment of the Authority's planning applications). Presuming that this size of windfall housing applications continues it is unlikely that any affordable housing will be delivered.

There is a clear need for affordable housing in the Broads and all possible reasonable measures should be taken to address the deficiency. It is acknowledged that the policy goes further than the NPPF by requiring off-site contributions to affordable housing for schemes of fewer than 9 dwellings. Five of the districts relevant to the Broads do not seek affordable housing on schemes of 9 or below and their policies reflect this, but North Norfolk's emerging Local Plan does seek affordable housing on schemes below 9 dwellings to reflect it part of the area being a Designated Rural Area. The Viability Study that assessed the Local Plan has concluded that the proposed policy approach to seeking off-site affordable housing contributions in the Broads is viable.

The Broads Authority will use the relevant council's methodology for the calculation of affordable housing contributions figure. The Authority will liaise with the relevant council to prioritise spend which will be first in the parish which generated the commuted sums, then to the adjoining parishes, and then to anywhere in the council area and the Authority/District will have ten years to spend or commit the monies. The Authority will however have regard to the approach of the relevant council in where the money is spent and for how long the money is held.

¹ Since April 2019, there have been 37 net new market dwellings permitted in 17 applications.