

Planning Committee

Agenda 07 February 2025

10.00am

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

John Packman, Chief Executive – Friday 31 January 2025

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

Introduction

1. To receive apologies for absence
2. To receive declarations of interest (see [Appendix 1](#) to the Agenda for guidance on your participation having declared an interest in the relevant agenda item)
3. **To receive and confirm the minutes of the Planning Committee meeting held on 10 January 2025** (Pages 4-11)
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:**
There are no applications for consideration.
8. **Enforcement update** (Pages 12-18)
Report by Development Manager

Policy

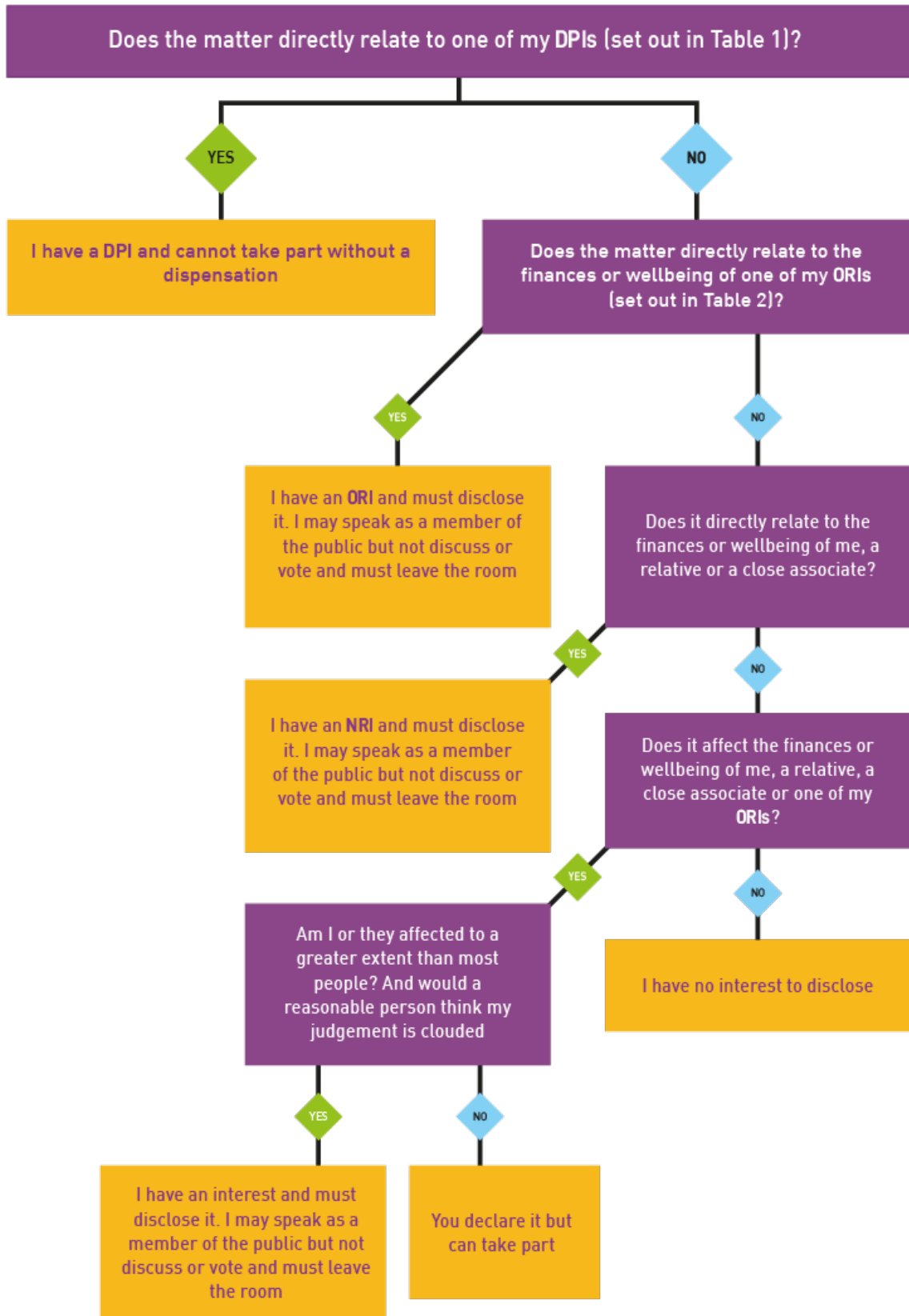
9. **Great Yarmouth Borough Council Statement of Common Ground** (Pages 19-34)
Report by Planning Policy Officer
10. **Consultation responses** (Pages 35-42)
Report by Planning Policy Officer
11. **Local Plan - Preparing the publication version** (Pages 43-74)
Report by Planning Policy Officer
12. **National Planning Policy Framework - Briefing** (Pages 75-82)
Report by Planning Policy Officer

Matters for information

13. **Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q4 (1 October to 31 December 2024)** (Pages 83-90)
Report by Planning Technical Support Officer
14. **Appeals to the Secretary of State update** (Pages 91-93)
Report by Development Manager
15. **Decisions made by Officers under delegated powers** (Pages 94-96)
Report by Development Manager
16. **To note the date of the next meeting – Friday 07 March 2025 at 10.00am at The King’s Centre, 63-75 King Street, Norwich, NR1 1PH**

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

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



Planning Committee

Minutes of the meeting held on 10 January 2025

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Present

Tim Jickells – in the Chair, Stephen Bolt, Andrée Gee, Tony Grayling, James Harvey, Martyn Hooton, Gurpreet Padda, Matthew Shardlow, Vic Thomson and Melanie Vigo di Gallidoro.

In attendance

Natalie Beal – Planning Policy Officer (items 10-14), Jason Brewster – Governance Officer, Stephen Hayden – the Authority’s Arboricultural Consultant (item 9), Steve Kenny – Development Manager, Kate Knights– Historic Environment Manager (item 9), Ruth Sainsbury – Head of Planning and Sara Utting – Senior Governance Officer

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 Harry Blathwayt, Leslie Mogford and Fran Whymark.

Openness of Local Government Bodies Regulations 2014

The Chair explained that the meeting was being audio-recorded. All recordings remained the copyright of the Broads Authority and anyone wishing to receive a copy of the recording should contact the Governance Team. The minutes remained the record of the meeting. He added that the law permitted any person to film, record, photograph or use social media in order 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 06 December 2024 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 (DM) on enforcement matters previously referred to the Committee. Further updates were provided at the meeting for:

Holly Lodge, Church Loke, Coltishall (Unauthorised replacement windows in listed building)

– The DM confirmed that the Enforcement Notice would be served before the next meeting.

9. BA/2024/0015/TPO The Island, Yarmouth Road, Thorpe St Andrew

The Historic Environment Manager (HEM) presented the report recommending confirmation of a provisional Woodland Tree Preservation Order (TPO) for a mixed broadleaved woodland located on Thorpe Island, Yarmouth Road, Thorpe St Andrew (located within the Thorpe St Andrew Conservation Area). The site owner had submitted an application for Works to Trees in a Conservation Area (a Section 211 notice) relating to 15 trees on this site, that following negotiation, had been amended to carry out revised works to 12 trees. To ensure that the agreed work was carried out at an appropriate time could only be achieved by a TPO, so a Tree Evaluation Method for Preservation Orders (TEMPO) assessment was carried out and it was considered that the woodland met the criteria for a TPO to be served. A provisional Woodland TPO had been served on 15 August 2024 which would need to be confirmed by 15 February 2025.

The applicant had objected to the provisional woodland TPO stating that it was unnecessary as they had been effectively managing the woodland, that a Woodland Management Plan would be produced and the trees were already protected through the conservation area. The objection 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. Members had agreed at the meeting on 6 December 2024 that, given the nature of the objection, there was no value in undertaking a site visit in this instance.

The HEM presented location maps showing the site within the eastern outskirts of Norwich and its location to the east of Thorpe Island bounded to the north by the River Yare and to the south by a railway line and Thorpe New Cut, a site map showing the site bounded by woodland to the west and a cluster of buildings to the east and a series of photographs of the subject woodland viewed from vantage points on Yarmouth Road located along the northern bank of the River Yare at Thorpe Green.

The HEM indicated that their submission of the Section 211 notice and their willingness to revise the tree works were a positive reflection of the owner's management of the woodland, as was their offer to produce a Woodland Management Plan (the Authority had not yet received a copy of this plan). The imposition of a Woodland TPO would protect everything within the site that could become a tree and, unlike a Section 211 notice, the TPO would enable the timing of appropriate tree works to be controlled. The Woodland TPO would ensure a robust means of protecting the woodland should ownership of the site change. The woodland contributed greatly to the amenity of the Thorpe St Andrew Conservation Area (as demonstrated by the photographs), to Whitlingham Country Park (on the southern bank of Thorpe New Cut) and from the river itself and Thorpe New Cut.

In response to a question the HEM confirmed that the Woodland TPO only related to the woodland owned by the applicant and that the neighbouring woodland, to the west of the site, would be protected by a separate TPO if it were considered necessary and expedient to do so. The subject site had moorings along its northern boundary which was not the case for the adjacent woodland to the west of the site. The Authority's Arboricultural Consultant (AAC) added that the woodland was at risk from people who had access to the site and who were cutting away and clearing the understorey. This activity was undermining the regeneration of the woodland and would be prohibited by the Woodland TPO. The HEM confirmed that people mooring on the site would be notified of the Woodland TPO assuming Members confirmed it.

Members were concerned that the imposition of the TPO could jeopardise the owner's willingness to manage the woodland. The AAC had consulted with the owner on a number of occasions and he believed that they understood that, although this was not a typical scenario for making a TPO, the TPO would provide the most effective mechanism for protecting the long term future of the woodland.

Members noted the amenity value of the woodland and welcomed the additional protection afforded to it by the Woodland TPO.

Andrée Gee proposed, seconded by Melanie Vigo di Gallidoro

It was resolved unanimously to confirm Tree Preservation Order BA/2024/0015/TPO The Island, Yarmouth Road, Thorpe St Andrew.

10. Loddon and Chedgrave Neighbourhood Plan – adoption

The Planning Policy Officer introduced the report on the adoption of the Loddon and Chedgrave Neighbourhood Plan. The PPO confirmed that the plan had successfully completed its referendum and was ready to be made (adopted).

Melanie Vigo di Gallidoro proposed, seconded by Andrée Gee

It was resolved unanimously to recommend to the Broads Authority that the Loddon and Chedgrave Neighbourhood Plan was made/adopted.

11. Trowse with Newton Neighbourhood Plan – adoption

The Planning Policy Officer introduced the report on the adoption of the Trowse with Newton Neighbourhood Plan. The PPO confirmed that the plan had successfully completed its referendum and was ready to be made (adopted).

Martyn Hooton proposed, seconded by Stephen Bolt

It was resolved unanimously to recommend to the Broads Authority that the Trowse with Newton Neighbourhood Plan was made/adopted.

12. Consultation Responses

The Planning Policy Officer (PPO) introduced the report, which documented the response to the Regulation 16 version of the Great Yarmouth Local Plan. The PPO indicated that along with some minor comments she had raised some objections relating to an inconsistency in reflecting the potential for development to impact the Broads. The PPO was mindful that these changes would be made at the discretion of the Local Planning Authority of Great Yarmouth Borough Council; she had taken steps to simplify the revision work by highlighting policy wordings that correctly referenced a possible impact to the Broads and then suggested the possible re-use of this wording in the context of policies that omitted this possible impact. The PPO indicated that the miss-spelling of Burgh Castle on the last page of Appendix 1 of the report would be corrected.

Members supported the consultation response.

Tony Grayling proposed, seconded by James Harvey

It was resolved unanimously to endorse the nature of the proposed responses to the Regulation 16 version of the Great Yarmouth Local Plan.

13. Neighbourhood Planning – Approval process

The Planning Policy Officer (PPO) introduced the report, which proposed delegating some stages of the neighbourhood planning approval process to officers. The HoP highlighted that these changes were intended to improve the efficiency of this process and the timeliness of responses to neighbourhood plans and would result in a cost saving to the Authority. The PPO confirmed that if Members were inclined to endorse these changes the corresponding Scheme of Delegation and Terms of Reference for the Planning Committee changes would be proposed at a future Broads Authority meeting for approval.

Members welcomed the streamlining of this process associated with these changes.

Matthew Shardlow proposed, seconded by Stephen Bolt

It was resolved unanimously to endorse the updated Neighbourhood Planning approval process.

14. Local Plan - Preparing the publication version

The Planning Policy Officer (PPO) presented the report which detailed three new or amended items of evidence for reference by the publication version of the Local Plan. The PPO proposed to discuss each section of the report in turn and welcomed members' feedback.

Fine Particulate Matter (PM2.5) targets topic paper

In response to recent government guidance regarding targets for fine particulate matter, particulates with a diameter less than 2.5 micrometres, the PPO had drafted a topic paper to reflect their consideration within the Local Plan for the Broads.

Broads Authority Gypsy and Traveller Accommodation Assessment Review

The PPO reminded Members that they had previously endorsed the Great Yarmouth Gypsy and Traveller Accommodation Assessment (GTAA) that incorporated the two Local Planning Authority (LPA) areas of Great Yarmouth Borough and the Broads. The Authority commissioned consultants to perform a similar assessment for the remaining LPA areas that constituted the Broads namely North Norfolk, Broadland, Norwich, South Norfolk and East Suffolk. This assessment had concluded that, apart from short-term, transient encampments, there was no current or future requirement for Gypsy and Traveller Accommodation beyond that previously identified for Great Yarmouth.

Development Boundaries Topic Paper

Following consultations with the Planning Inspectorate of England, the PPO had updated the Development Boundaries Topic Paper to remove the proposed consultation question regarding the inclusion of a development boundary for Filby (previously endorsed by the Planning Committee on 13 September 2024). The PPO reminded Members that this was a suitable area within Filby for development, it mirrored the development boundary already defined within the part of Filby inside Great Yarmouth Borough Council's local planning area and the Filby development boundary had been supported by various stakeholders including the parish council.

In response to a question the PPO confirmed that there would be scope to resolve any questions arising from the examination of the Local Plan.

Members supported these three new or amended items of evidence for the Broads Local Plan.

James Harvey proposed, seconded by Gurpreet Padda

It was resolved unanimously to endorse the Fine Particulate Matter (PM2.5) Targets Topic Paper, Gypsy and Traveller needs assessment for the rest of the Broads and Development Boundaries Topic Paper as evidence for the Local Plan for the Broads

15. Notes of the Heritage Asset Review Group meeting held on 13 December 2024

The Committee noted the minutes of the Heritage Asset Review Group meeting held on 13 December 2024.

The Chair indicated that the next HARG meeting would be on Friday 21 March 2025.

16. 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 confirmed that the appeal against refusal of planning permission for the installation of UPVc double-glazed windows at Bureside, 6 Skinners Lane, Wroxham had been dismissed. The appellant had subsequently indicated to the Authority that they would be seeking permission to install timber framed windows.

17. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 25 November to 20 December 2024 and any Tree Preservation Orders confirmed within this period.

18. Date of next meeting

The next meeting of the Planning Committee would be on Friday 07 February 2025 at 10.00am at The King's Centre, 63-75 King Street, Norwich, NR1 1PH.

The meeting ended at 10:56am.

Signed by

Chair

Appendix 1 – Declaration of interests Planning Committee, 10 January 2025

Member	Agenda/minute	Nature of interest
Martyn Hooton	10	South Norfolk Councillor - other registerable interest.
Vic Thomson	10	South Norfolk Councillor - other registerable interest.

DRAFT

Planning Committee

07 February 2025

Agenda item number 8

Enforcement update

Report by Development Manager

Summary

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

Recommendation

To note the report.

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

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

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

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Listed for hearing on 9 August 2023 at 12pm at Norwich Magistrates' Court [17/05/2023] • Operator pleaded 'not guilty' at hearing on 9 August and elected for trial at Crown Court. Listed for hearing on 6 September 2023 at Norwich Crown Court [09/08/2023] • Hearing at Norwich Crown Court adjourned to 22 September 2023 [01/09/2023] • Hearing at Norwich Crown Court adjourned to 22 December 2023 [26/09/2023] • Hearing postponed at request of Court, to 8 April 2024 rescheduled date [16/01/2024] • Hearing postponed at request of Court, to 14 May rescheduled date [10/04/2024] • Court dismiss Defendants' application to have prosecution case dismissed. Defendants plead 'not guilty' and trial listed for seven days commencing 23 June 2025 [14/05/2024]
13 May 2022 BA/2022/0023/ UNAUP2	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised operation development comprising erection of workshop, kerbing and lighting	<ul style="list-style-type: none"> • Authority given by Chair and Vice Chair for service of Temporary Stop Notice requiring cessation of construction 13 May 2022 • Temporary Stop Notice served 13 May 2022. • Enforcement Notice and Stop Notice regarding workshop served 1 June 2022 • Enforcement Notice regarding kerbing and lighting served 1 June 2022 • Appeals submitted against both Enforcement Notices [12/07/2022] • Appeals dismissed and Enforcement Notices upheld 29 July 2024.

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Workshop to be dismantled and removed off site within two months; all associated structures and fixtures to be removed off site, services (electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months • Kerbed structure and lighting columns to be taken down and electricity connections to be taken up, all within two months; all structures, materials and associated debris arising from the above to be removed off site and the land to be made good within three months [30/07/2024] • Site visit to be carried out and owner reminded of compliance periods [27/09/2024] • Discussions continuing, held up by court case on other issue. [19/12/2024]
<p>21 September 2022</p> <p>BA/2017/0006/UNAUP1</p>	<p>Land at Loddon Marina, Bridge Street, Loddon</p>	<p>Unauthorised static caravans</p>	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravans. • Enforcement Notice served [04/10/2022] • Enforcement Notice withdrawn on 19 October due to minor error; corrected Enforcement Notice re-served 20 October 2022 • Appeals submitted against Enforcement Notice [24/11/2022] • Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024. • Residential use of the caravans to cease, the caravans and associated structures, fixtures, fittings and domestic paraphernalia to be removed off site, services (including water and electricity) to be disconnected and infrastructure to be removed off-site and the land to be made good, all within six months [30/07/2024]

Committee date & Case number	Location	Infringement	Action taken and current situation [date of update]
			<ul style="list-style-type: none"> • Owner to be reminded that notice to be complied with by 29 January 2025 [27/09/2024] • Discussions continuing [26/11/2024]
<p>9 December 2022</p> <p>BA/2018/0047/UNAUP3</p>	<p>Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter</p>	<p>Unauthorised static caravan (Unit Z)</p>	<ul style="list-style-type: none"> • Planning Contravention Notice to clarify occupation served 25 Nov 2022. • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravan • Enforcement Notice served 11 January 2023 [20/01/2023] • Appeals submitted against Enforcement Notice [16/02/2023] • Appeals dismissed and Enforcement Notices amended and upheld 29 July 2024. • Residential use of the caravan to cease within two months; the caravan and associated structure or fixtures to be removed off site, services (electricity and water) to be disconnected and infrastructure to be removed off-site and the land to be made good within three months [30/07/2024] • Site visit to be carried out and owner reminded of compliance periods [27/09/2024] • Discussions continuing, held up by court case on other issue. [19/12/2024]

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	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of the caravans • Enforcement Notice served 12 April 2023 • Enforcement Notice withdrawn on 26 April 2023 due to error in service. Enforcement Notice re-served 26 April 2023 [12/05/2023] • Appeal submitted against Enforcement Notice [25/05/2023] • Discussions continuing, held up by court case on other issue. [19/12/2024]
2 February 2024 BA/2022/0007/ UNAUP2	Holly Lodge. Church Loke, Coltishall	Unauthorised replacement windows in listed building	<ul style="list-style-type: none"> • Authority given to serve a Listed Building Enforcement Notice requiring the removal and replacement of the windows and the removal of the shutter. Compliance period of 15 years • LPA in discussions with agent for landowner [10/04/2024] • No resolution achieved through discussion. Legal advice sought [29/08/2024] • Case review – Listed Building Enforcement Notice to be served, in process of content being considered and drafted. • Listed Building Enforcement Notice served by hand on Friday 24th January.

Author: Steve Kenny

Date of report: 24 January 2025

Background papers: Enforcement files

Planning Committee

07 February 2025

Agenda item number 9

Great Yarmouth Borough Council Statement of Common Ground

Report by Planning Policy Officer

Summary

This Statement of Common Ground (SoCG) is between Great Yarmouth Borough Council and the Broads Authority for the purposes of:

- demonstrating compliance with the ‘duty to cooperate’;
- recognising joint working and evidence; and
- understanding and addressing cross-boundary planning issues.

Recommendation

To endorse the Statement of Common Ground to form part of our approach to the Duty to Cooperate.

1. Introduction

- 1.1. For a Local Plan to be considered sound by an independent planning inspector during examination, one of the key legislative requirements is that the Authority will have to demonstrate its compliance with the ‘duty to cooperate’.
- 1.2. The duty to cooperate was introduced by Section 110 of the Localism Act and requires authorities to ‘engage constructively, actively and on an ongoing basis’ on all strategic and cross boundary planning matters. To demonstrate that local planning authorities have discharged this duty, the National Planning Policy Framework (where necessary) requires strategic policy-making authorities to prepare and maintain Statements of Common Ground (SoCGs) to document the cross-boundary matters that have been addressed as well as any progress made in cooperating to address such matters.
- 1.3. The Authority maintains a Statement of Common Ground with the other Norfolk Planning Authorities through the Norfolk Strategic Planning Framework (NSPF) SoCG. This document demonstrates how the Norfolk Local Planning Authorities have addressed strategic and cross-boundary matters across the County.
- 1.4. While the NSPF provides one of the principal mechanisms to demonstrate how the Council has complied with the ‘duty to cooperate’, a further SoCG between Great

Yarmouth Borough Council and the Broads Authority has been prepared (see Appendix 1). Both local planning authorities are at a similar advanced stage of preparing their new Local Plans, and there is a need to demonstrate how both authorities have continued to address specific cross-boundary matters relating to future housing and to gypsy and traveller needs across the borough.

2. What the SoCG covers

- 2.1. This SoCG is between Great Yarmouth Borough Council and the Broads Authority for the purposes of: demonstrating compliance with the duty to cooperate, recognising joint working and evidence, and understanding and addressing cross-boundary planning matters, pursuant to the emerging Great Yarmouth Local Plan and Local Plan for the Broads.
- 2.2. After explaining the geography and commonality between Great Yarmouth Borough Council and the Broads Authority, the SoCG provides evidence of current and historic joint working and notes other complementary agreements and joint working practices between the two authorities.
- 2.3. The SoCG identifies the strategic priorities for the two local authority areas, with each relevant topic or strategic matter having its own section and with an agreement or conclusion demonstrating the cooperation. The full SoCG is attached to Appendix 1.
- 2.4. In summary, to address strategic and cross-boundary planning issues, the authorities agree:
 - 1) That the emerging Great Yarmouth Local Plan is not reliant on the Broads Authority to deliver its part of its housing need to meet the full housing needs of the borough. Should any remaining housing needs within the Broads Authority area of the borough not be met within the emerging Broads Local Plan, both authorities agree that the full housing needs of the borough will be otherwise met through the emerging Great Yarmouth Local Plan.
 - 2) Each authority has identified its own gypsy and traveller needs and will plan to meet individual needs through their respective Local Plans in the first instance. In recognition of the special qualities and environmental constraints of the Broads, both authorities will continue to cooperate with each other to ensure that any remaining identified need is met within the borough of Great Yarmouth through an appropriate criteria-based policy approach or potential review of the Local Plan(s).
- 2.5. The final section is for the signatures to confirm the agreements. The portfolio holder for Economic Development and Growth at Great Yarmouth Borough Council will sign the documents and it is recommended that the Chair of Planning Committee signs it on behalf of the Broads Authority.

3. Next steps

- 3.1. Once signed, this SoCG will form part of the Broads Authority's Duty to Cooperate Statement which will come to a future Planning Committee for endorsement.
- 3.2. Of relevance, the Norfolk Strategic Planning Framework is undergoing an update and this will be overseen by the Norfolk Strategic Planning Member Forum before coming back to Planning Committee for endorsement.
- 3.3. As necessary, in order to support the Local Plan for the Broads, we may undertake bespoke Duty to Cooperate with our other districts.

Author: Natalie Beal

Date of report: 15 January 2025

Appendix 1 – [SoCG between the Broads Authority and Great Yarmouth Borough Council](#)

**Statement of Common Ground
between
Great Yarmouth Borough Council
and the Broads Authority
on strategic planning matters that
are cross-boundary**



1. Purpose

- 1.1. This Statement of Common Ground (SoCG) is between Great Yarmouth Borough Council and the Broads Authority for the purposes of:
- demonstrating compliance with the ‘duty to cooperate’;
 - recognising joint working and evidence; and
 - understanding and addressing cross-boundary planning issues.

2. Background

- 2.1. Section 110 of the Localism Act sets out that local planning authorities have a ‘duty to cooperate’ in relation to planning of sustainable development. This duty requires authorities to ‘engage constructively, actively and on an ongoing basis’ on all cross-boundary strategic planning matters. The National Planning Policy Framework (December 2024), paragraph 28, requires policy-making authorities to prepare statements of common ground (SoCG’s) to document the cross-boundary matters that have been addressed as well as any progress made in cooperating to address such matters. National Planning Practice Guidance sets out further detailed guidance as to what may be included in a SoCG.

Geography

- 2.2. The two local planning authorities represented in this SoCG are Great Yarmouth Borough Council (GYBC) and the Broads Authority, as mapped in Appendix 1.
- 2.3. The Broads Authority is the local planning authority for the whole of the designated Broads Area, part of which lies within Great Yarmouth Borough. Great Yarmouth Borough Council is the local planning authority for the Borough excepting that part within the designated Broads area. The Borough Council is also the local housing authority for the whole of the Borough, including the areas of the Broads Authority that lie within it.

Great Yarmouth Borough

- 2.4. The Great Yarmouth Borough Council plan area includes a centrally positioned urban conurbation comprising the towns of Great Yarmouth and Gorleston-on-Sea and the parish of Bradwell. The area extends northwards along the coast to Winterton-on-Sea and southwards to Hopton-on-Sea. Inland, the plan area spans to Repps with Bastwick and Thurne in the northwest, Stokesby and Burgh Castle in the west, and Fritton and St Olaves in the southwest.
- 2.5. Inland, the majority of the western extent of Great Yarmouth directly interfaces with the Broads Area. Elsewhere, the majority of the villages and smaller hamlets within the rural part of the planning area are closely linked with the Broads, and in some cases, such as Stokesby, Thurne, Filby and Ormesby St Michael, part of the settlement lies within the Broads planning area.

Broads Area

- 2.6. The Broads is an internationally important wetland and designated protected landscape of the highest order, with a status equivalent to that of a National Park and one of Europe’s finest and most important wetlands for nature conservation. Its rich mosaic of habitats comprises, among other things, saltmarshes, intertidal mudflats, shallow lakes, fens, drained marshland, wet woodland, relict estuary and coastal dunes. The Broads’ iconic features include 125 miles of lock free waterways, over 25% of the UK’s conservation priority wildlife, and more than 60 drainage mills that are still intact.
- 2.7. The Broads Authority Executive Area covers parts of 6 Council areas: Broadland District, East Suffolk, Great Yarmouth Borough, North Norfolk District, Norwich City and South Norfolk District. Generally, the part of settlements and parishes that fall within the Broads tends to be rural in nature. There are some areas where part of the urban areas falls within the Broads, for example in Great Yarmouth, Norwich, Beccles, Horning, Wroxham, Hoveton and Filby. There are two settlements whose urban area falls entirely within the Broads; Stokesby and Thurne, both in Great Yarmouth Borough.

Historic evidence of joint working

- 2.8. There is extensive history of joint working between GYBC and the Broads Authority over a range of strategic planning issues including regular cooperation throughout the preparation of their respective local plans.
- 2.9. This has most recently included the preparation of joint evidence base documents to inform the emerging Local Plans for each authority, such as the ‘Great Yarmouth Borough Council and The Broads Authority Local Housing Needs Assessment’ (2022) and the ‘Great Yarmouth Gypsy and Traveller Accommodation Assessment Update (2024).
- 2.10. Strategic planning officers from the two authorities also meet quarterly to discuss strategic planning and cross-boundary matters and to consider the timelines for emerging evidence, policies and plans.
- 2.11. In 2017, a formal Duty to Cooperate Agreement was signed and adopted by the two authorities to summarise that the Borough Council will meet the full housing needs of the Borough and that any dwellings delivered within the Broads area of the Borough will be counted towards meeting that need.
- 2.12. Since 2017, all the Norfolk Local Planning Authorities (including the Broads Authority) have collaborated to produce and endorse the Norfolk Strategic Planning Framework (NSPF). The NSPF fulfils the requirement for the Norfolk Local Planning Authorities to produce a statement of common ground setting out the effective and

on-going joint working across the county on strategic planning matters. The most recent version of the NSPF was adopted in 2021 and endorses 31 agreements. The most relevant agreements to this statement are explored further in the section below.

- 2.13. The preparation and review of the NSPF is overseen by a member forum which is made up of councillors from each Norfolk authority and a member of the Broads Authority. The member forum is supported by the Norfolk Strategic Planning Officers Group (NSPG) which comprises strategic planning officers from the respective Norfolk Planning Authorities and meets monthly to review the progress of the NSPF.
- 2.14. It is the intention of this document to ensure that previous agreements between the two authorities are updated in line with the latest legislative requirements and to address any remaining cross-boundary issues relevant to the new Local Plan for the borough of Great Yarmouth.

Complementary agreements in place

- 2.15. There are a number of existing agreements and working arrangements in place that support cross-boundary matters beyond just the two authorities. These include:
- The [Norfolk Strategic Planning Framework SoCG \(2021\)](#)
 - [Norfolk and Suffolk Coastal Authorities SoCG Coastal Zone Planning \(2018\)](#)
 - [Planning in Health – Protocol \(2024\)](#)
- 2.16. The Norfolk Strategic Planning Framework (NSPF) lies at the heart of ensuring that the Borough Council and the Broads Authority (alongside the other Norfolk Local Planning Authorities) demonstrate on-going working and cooperation on strategic cross boundary planning matters. Of the 31 agreements included within the current NSPF, the ones of most relevant to this SoCG are:
- Agreement 1 – That when preparing new Local Plans which seek to identify levels of Objectively Assessed need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.
 - Agreement 3 - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):
 - To realise the economic potential of Norfolk and its people*
 - To reduce Norfolk’s greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change*
 - To address housing needs in Norfolk*
 - To improve the quality of life and health for all the population of Norfolk*
 - To improve and conserve Norfolk’s rich and biodiverse environment*

- Agreement 4 – To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of **Great Yarmouth**, Central Norfolk and West Norfolk
- Agreement 5 – That **Great Yarmouth** and King’s Lynn and West Norfolk will continue to prepare separate Local Plans for their areas.
- Agreement 7 – That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone **Broads** Local Plan
- Agreement 11 – When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need in the most up to date evidence. Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.
- Agreement 12 – The **Broads Authority** will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.
- Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk and **Great Yarmouth Councils** will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be within the Broads Local Plan.
- Agreement 15 – The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, **gypsy and travelling Show People**, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

2.17. The current NSPF was endorsed by the Norfolk Planning Authorities in 2021, and work is currently underway to review the NSPF. This is expected to be completed by Spring 2025.

3. Strategic priorities

3.1. Each of the local planning authorities have identified strategic priorities for their areas. The local plans seek to address these, and in preparing their plans the authorities have engaged positively to ensure that any cross-boundary matters are addressed in their respective plans.

Emerging Great Yarmouth (Draft) Local Plan (2024)

3.2. The emerging Local Plan sets out the following priorities through its objectives:

- To ensure at least 38 hectares of land is available in the right locations to support the economic growth of the borough

- To enhance the vitality and viability of the borough’s town centre as important community and cultural hubs where people live, work, shop, learn and undertaken leisure activities
- To revitalise the waterfront of Great Yarmouth and Gorleston through new housing and commercial development and maximise the use of previously development land to meet development needs
- To improve and grow the year-round tourist offer of the Borough, including the enhancement of Great Yarmouth and Gorleston seafronts
- To encourage efficient patterns of movement and the use of sustainable transport options
- To improve the quality and provision of all types of infrastructure
- To improve the health and wellbeing and education opportunities for the whole population
- To ensure sufficient land is available to deliver at least 6,640 new homes by 2041 and maximise the delivery of affordable housing and specialist housing to meet specific needs
- To reduce overall greenhouse gas emissions on the pathway to net zero by 2050 and support adaptation to minimise the risks from climate change
- To deliver net-gains for biodiversity and protect and enhance designated habitat sites
- To protect and enhance the landscape and the built and historic environment of the borough
- To significantly improve the quality of urban design

Emerging Broads Authority (Draft) Local Plan (2024)

- 3.3. The emerging Local Plan sets out the following priorities through its objectives:
- The Broads remains a key national and international asset and a special place to live, work and visit
 - There are areas of true tranquillity and wildness and dark skies, giving a real sense of remoteness
 - The Broads is a unique, highly valued and attractive environment where the landscape character and setting is protected, maintained and enhanced
 - The rich and varied natural environment is conserved, maintained, enhanced and sustainably managed. Nature can recover (more, bigger, better, joined)
 - The coastal section of the Broads is used and managed in a beneficial and integrated way for people and wildlife using nature-based solutions.
 - Water quality is improved, and water is managed using appropriate measures to increase capture and efficiency, prevent pollution and reduce nutrients. Flood risk to people, property and landscapes is managed effectively.
 - ‘Climate-smart thinking’ minimises future adverse impacts and makes use of opportunities in an area vulnerable to a changing climate and sea level rise. The Local Plan helps the path to net zero, adaptation and resilience.

- The area’s historic environment, archaeology and cultural heritage are protected, maintained and enhanced. Local cultural traditions are kept alive
- The housing needs of the community are met including safe, warm, energy efficient homes in the right place. The Local Plan address the issue of second homes.
- Development and change are managed to protect and enhance the special qualities of the Broads as well as the needs of those who live in, work in and visit the area. The Broads Authority maintains close cooperation with the Local Planning Authorities adjoining its executive area.
- The Broads offers communities and visitors opportunities for a healthy and active lifestyle and a ‘breathing space for the cure of souls’
- There is a buoyant and successful rural economy
- The Broads is renowned for sustainable tourism and supports a prosperous tourism industry.
- People enjoy the special qualities of the Broads on land and on water. Access and recreation are managed in ways that maximise opportunities for enjoyment without degrading the natural, heritage or cultural resource. Navigation is protected, maintained and appropriately enhanced, and people enjoy the waterways safely.
- The Broads continues to be important for the function, identity and recreation of the local community as well as over a wider area.
- Waste is managed effectively so there is no detriment to the environment.

4. Housing Needs

Great Yarmouth Borough’s Housing Need

- 4.1. The NSPF (2021) has established that the borough of Great Yarmouth constitutes its own housing market area and requires the authority to produce and maintain an assessment of local housing need within its area.
- 4.2. The Great Yarmouth and Broads Local Housing Needs Assessment (2021) derives the overall housing requirement for the borough. This includes the area of the Broads Authority which lies within it. The study also includes an assessment of need for affordable housing provision across the whole borough.
- 4.3. The 2021 assessment was based upon the previous government’s ‘standard method’ approach under the 2023 National Planning Policy Framework and previous (2020) Planning Practice Guidance (PPG). Whilst it is recognised that the most recently published 2024 NPPF and PPG derives a different housing requirement for the borough, the emerging Great Yarmouth Local Plan appropriately uses the former ‘standard method’ approach under the transitional provisions of the paragraph 235 of the 2024 NPPF.

- 4.4. Under the ‘standard method’ (in the 2020 version of the PPG) the borough’s calculated housing need figure is 6,001 homes (353 homes per annum) between the plan period 2024 and 2041. However, this housing requirement would be lower than that provided through the current adopted Great Yarmouth Local Plan at 363 homes per annum.
- 4.5. Therefore, Policy OSS1 of the emerging Local Plan sets out a housing requirement of 380 per annum (6,640 homes overall) which provides for a 5% uplift on the previous housing requirement figure to ensure that housing delivery is boosted as per national planning policy. It is important to note that the housing need figures for the Broads Authority are part of the housing need figures for the six councils and not additional to. That is to say that this housing requirement also accommodates the need generated from the Broads Authority part of the borough only, which is very small at approximately 3 per annum over the plan period.
- 4.6. The emerging Local Plan seeks to provide 6,640 homes over the plan period, providing a small uplift on the calculated housing requirement to provide resilience in housing delivery should sites not come forward. The emerging Great Yarmouth Local Plan does not rely upon the Broads Authority to deliver their part of their calculated housing need in their own emerging Local Plan as there are sufficient homes planned through the emerging Great Yarmouth Local Plan to meet this need.

Broads Authority Housing Need

- 4.7. The Broads Authority’s assessment of housing needs is also derived through the Great Yarmouth and Broads Local Housing Needs Assessment (2021) which sets a housing need of 358 homes between 2021 and 2041.
- 4.8. This overall housing need figure is inclusive of need identified within all areas of the Broads Authority which overlap with Norwich City, South Norfolk, Broadland, North Norfolk and Great Yarmouth Councils. Disaggregated, the Broads Authority’s housing need within the borough of Great Yarmouth is 59 dwellings. Since 2021, 14 new homes have either been consented or completed within the Broads Area of Great Yarmouth.
- 4.9. The majority of the Broads Area which lies with the borough of Great Yarmouth is very rural in nature and either separate from existing settlements or includes settlements that reflect this rural nature, which little or no services and amenities, and where it is unlikely that further future housing development could appropriately take place.
- 4.10. Consideration is being given through the emerging Broads Local Plan to add a new development limit around a part of Filby which lies within the Broads Area. Whilst this may increase potential for future windfall development, there is unlikely to be

other significant opportunities to meet the future housing needs of the Broads Authority within its own area.

- 4.11. As indicated previously, the housing need for the Broads is part of, and not additional to, the need for whole borough of Great Yarmouth. As the emerging Great Yarmouth Local Plan seeks to deliver more than its overall housing requirement, it is considered that the remaining Broads Authority housing need can be accommodated through the Great Yarmouth Local Plan.
- 4.12. The above approach is therefore consistent with Agreements 1, 3, 5, 7, 11, 12 and 13 of the NSPF (2021).

Housing Needs Agreement

Each authority agrees that the emerging Great Yarmouth Local Plan is not reliant upon the Broads Authority to deliver their part of their housing need to meet the housing full needs for the Borough of Great Yarmouth.

Should any remaining housing needs within the Broads Authority area of the borough not be met within the emerging Broads Local Plan, both authorities agree that the full housing needs of the borough will be otherwise met through the emerging Great Yarmouth Local Plan.

5. Provision for Gypsy and Traveller Needs

- 5.1. The Great Yarmouth Gypsy and Traveller Needs Assessment (GTAA) Update derives the assessment of need for gypsies and travellers within the borough of Great Yarmouth, disaggregating this future need between the respective local planning authority areas of Great Yarmouth and the Broads Authority.
- 5.2. The GTAA was published in 2024 and prepared in line with the requirements of 2023 Planning Policy for Traveller Sites (PPTS). In that, it assessed the future needs of gypsies and travellers which either met the 2023 PPTS definition of ‘gypsies and travellers’ and those that did not.
- 5.3. On 12th December 2024, the government published a new PPTS (2024 PPTS) which redefined the definition of ‘Gypsies and Travellers’ for the purposes of planning. This change occurred after Great Yarmouth Borough Council had commenced its Regulation 19 (pre-submission) consultation on the Final Draft Local Plan.
- 5.4. Paragraphs 29-30 of the 2024 PPTS include implementation arrangements for the policy, and set out that the implementation policies within the National Planning Framework will also apply to plan-making and decision-taking for traveller sites. Therefore, under these transitional arrangements, the Great Yarmouth Local Plan will be assessed under the 2023 Planning Policy for Traveller Sites (PPTS).

- 5.5. The Local Plan for the Broads will be assessed under the December 2024 NPPF and December 2024 PPTS.

Great Yarmouth Borough's Gypsy and Traveller Needs

- 5.6. The 2024 GTNAA identifies a need for 3 additional pitches (which met the 2023 PPTS definition) within the Great Yarmouth planning authority part of the borough, by 2029. No additional need is identified over the remaining plan period.
- 5.7. Policy GYT2 of the emerging Local Plan safeguards the existing authorised Gypsy and Traveller Site located off Gapton Hall Road, which provides for 18 permanent pitches and 6 transit pitches. At present, 6 of the permanent pitches are currently vacant on the site, therefore there is sufficient vacant pitches available to meet the (2023 PPTS) identified need.
- 5.8. The GTNAA also identifies a need for 8 additional pitches (which did not meet the 2023 PPTS definition) by 2041. Of this need, 5 pitches are required within the first five years of the plan to 2029. By deducting the remaining existing 3 vacant pitches at Gapton Hall from this immediate need, there would remain a balance of 2 pitches to be met within the first five years of the plan, with a further 3 pitches required between 2029 and 2041. Therefore, under the provisions of the 2024 PPTS, the Borough Council would have a remaining total unmet need of 5 pitches, of which 2 pitches would be required in the first five years of the Local Plan.
- 5.9. During the preparation of the emerging Local Plan, no sites were expressly put forward for potential gypsy and traveller use, despite opportunities to submit during two rounds of 'call for sites' and at any other time during the plan's preparation.
- 5.10. Policy GYT3 of the emerging Local Plan provides a criteria-based approach to assess any future planning applications for gypsy and traveller uses which may come forward as windfall sites during the plan. The above policy also lends support to potential intensification or extension proposals of the existing safeguarded Gapton Hall Gypsy and Traveller Site, which is recognised as being in an area of high flood risk, requiring both Sequential Testing and being subject to a site-specific flood risk assessment.
- 5.11. In summary, there would be no unmet need within the Great Yarmouth planning area under the 2023 PPTS provisions. Under the 2024 PPTS, a very small, immediate need (of two pitches) remain within the first five years of the plan. However, it is considered that if required, this could be met through the provisions of emerging Policies GYT2 and GYT3.

Broads Authority Gypsy and Traveller Needs

- 5.12. The 2024 GTNAA identifies a need for 20 additional pitches (which met the 2023 PPTS definition) within the Broads Authority part of the borough of Great Yarmouth, by 2029. It also identified an additional (2023 PPTS) need for 4 pitches between 2029 and 2034 arising from new household formation.

- 5.13. The 2024 GTNAA furthermore identified a very small need of 2 additional pitches (which did not meet the 2023 PPTS definition) between 2024 and 2029. Therefore, to reflect the changes in the 2024 PPTS, the Gypsy and Traveller need for the Broads Authority is 26 pitches.
- 5.14. All of the above need within the Broads Authority part of the borough of Great Yarmouth arises from the Cobholm Island area where there have been historical unauthorised residential uses of caravans. The Broads Authority has been recently investigating the unauthorised residential uses of caravans with the help of a representative from Cobholm Island and has established that at least 11 pitches are immune from enforcement action by way of the length of time they have been in place and occupied.
- 5.15. Further work is being undertaken to ascertain the status of the remaining pitches on Cobholm Island and potential for regularising their existing use over the plan period of the emerging Broads Local Plan.
- 5.16. The Broads Authority has undertaken a ‘call for sites’ on a number of occasions as part of the emerging Local Plan review, most recently between November and December 2024. No expressions of interest for potential gypsy and traveller use has been received to date.

Gypsy and Traveller Needs Agreement

Each authority has identified its own gypsy and traveller needs and will plan to meet individual needs through their respective Local Plans in the first instance.

In recognition of the special qualities and environmental constraints of the Broads, both authorities will continue to co-operate with each other to ensure that any remaining identified need is met within the borough of Great Yarmouth through an appropriate criteria-based policy approach or potential review of the Local Plans.

6. Review

- 6.1. This SoCG will be kept under regular review and will be discussed as an agenda item at the quarterly meetings.

7. Summary of Agreements

- 7.1. To address strategic and cross-boundary planning issues, the authorities agree:
1. Each authority agrees that the emerging Great Yarmouth Local Plan is not reliant upon the Broads Authority to deliver their own housing need to meet the full housing needs for the borough of Great Yarmouth. Should any remaining housing needs within the Broads Authority area of the borough not be met within the emerging Broads Local plan, both authorities agree that the full housing needs of

the borough will otherwise be met through the emerging Great Yarmouth Local Plan.

2. Each authority has identified its own gypsy and traveller needs and will plan to meet individual needs through their respective Local Plans in the first instance. In recognition of the special qualities and environmental constraints of the Broads, both authorities will continue to cooperate with each other to ensure that any remaining identified need is met within the borough of Great Yarmouth through an appropriate criteria-based policy approach or potential review of the Local Plans.

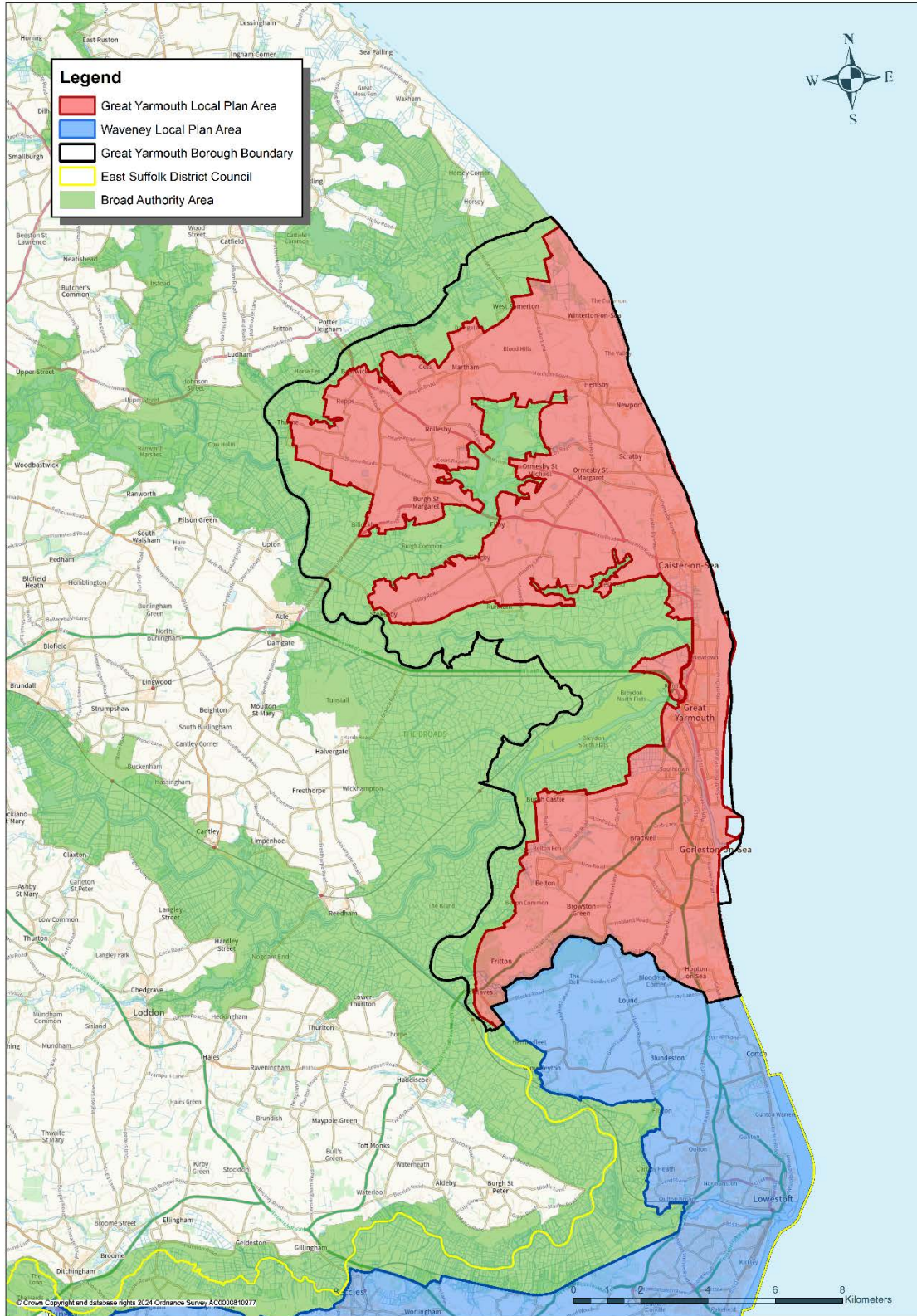
- 7.2. As a result of the needs met and agreed, there are no strategic matters of unmet needs or disagreements between the two authorities.

8. Signatories

On behalf of Great Yarmouth Borough Council	On behalf of Broads Authority
Signed:	Signed:
Name:	Name:
Position:	Position:
Date:	Date:

Appendix 1 – Map of administrative areas

For the purpose of this SoCG, the areas coloured red and green (within the Great Yarmouth Borough Boundary) are the areas subject to the addressed strategic planning matters



Planning Committee

07 February 2025

Agenda item number 10

Consultation responses

Report by Planning Policy Officer

Summary

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

Recommendation

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

1. Introduction

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

Author: Natalie Beal

Date of report: 10 January 2025

Appendix 1 – [Postwick with Witton Neighbourhood Plan Pre-Submission Regulation 14 Consultation](#)

Appendix 2 – [Planning Reform Working Paper: Development and Nature Recovery](#)

Appendix 1 – Postwick with Witton Neighbourhood Plan Pre-Submission Regulation 14 Consultation

Postwick with Witton Parish Council

Document: [Postwick with Witton Neighbourhood Plan Pre-Submission \(Reg 14\) Consultation](#).

Due date: 29 January 2025

Draft comments have been sent in and will be confirmed following Planning Committee.

Status: Regulation 14

Proposed level: Planning Committee endorsed

Notes

Postwick with Witton Parish Council, as the qualifying body, is now consulting on the Pre-Submission Draft of the neighbourhood plan for Postwick with Witton Parish. This consultation is in line with Regulation 14 of the Neighbourhood Planning Regulations (2012) and will run for a period of 6 weeks from Wednesday 18th December 2024 to Wednesday 29th January 2025.

Proposed response

Summary of response

The Neighbourhood Plan is welcomed. There are some clarifications sought and some amendments suggested.

Comments on the Neighbourhood Plan

Para 2 says this which does not read well: There is also a number of businesses are Small to Medium Sized Enterprises, though there are some large employers including Broadland and South Norfolk Council.

Para 4 – Park not Pk

Vision, para 2, second sentence is written bluntly when compared to the rest of the vision.

Policy PW1 – the last bit says that proposals should use design and access statements to demonstrate how the priorities have influenced development. But what if there is no design and access statement? Do you want a proportionate statement submitted with applications for example?

Page 14 – there are two local plans. So calling one ‘the local plan’ could get confusing. Why not say ‘Greater Norwich Local Plan (GNLP)’ and ‘Local Plan for the Broads (LPB)’ or something similar. That way, you say which Local Plan you are referring to.

Para 16: Further land for commercial growth **is** also allocated in this area.

Para 17: Any proposal that is operational beyond daylight hours will impact on the nocturnal environment and create additional light additional pollution.

Policy PW3: Not in our area, but some thoughts for you to consider.

Some proposed amendments to the existing wording to consider.

Proposals for the mixed-use development of Land South of Smea Lane ~~are~~will be strongly supported where they can be shown to provide a mix of housing to meet local need and associated social infrastructure. This includes a new school, creche, community hall and nursery, as detailed in the Growth Triangle Area Action Plan, unless it can be demonstrated that these are no longer required to meet local need.

But I feel it could be written more clearly. Something to consider:

Proposals for the mixed-use development of Land South of Smea Lane will be strongly supported where they can be shown to provide a mix of housing to meet local need. Proposals need to provide social infrastructure, which includes a new school, creche, community hall and nursery, as detailed in the Growth Triangle Area Action Plan, unless it can be clearly demonstrated through a bespoke, local assessment, that these are no longer required to meet local need. Proposals need to include a phasing plan for the delivery of the social infrastructure.

Para 23 – some development is exempt from CIL.

Para 23 – last para – the Broads does not have CIL in place.

Page 25

Consider additional biodiversity enhancements:

Linking up of existing greenspace

Swift and other bird and bat boxes/integrated bricks in housing developments (and rather than or)

Inclusion of ponds/open water as part of developments (there are core areas identified in the Great Crested Newt opportunity maps for the Postwick area)

Page 26 - Inclusion of importance of mature trees for roosting bats and trees/hedgerow corridors for commuting bats. Emphasis on avoidance of loss and recognition of bats as a protected species, reliant upon these key habitat features.

Para 32 - where there is a fairly extensive network ~~of~~of cycleways

Para 34 – first sentence doesn't read well

Para 43 – first sentence – maybe say you are referring to within the parish.

Font error on word 'six' on page 43

All images need alt text

Policy PW5 – do you plan to have a community action that works with the landowners to deliver paths A and B? Do you want the routes to be safeguarded from development proposals?

Para 61 sounds important, but I do not understand it. What are you trying to say and identify here? Are these areas mapped? What status do you want these areas to have? It is not clear.

PW6 – the areas in Figure 10 need to be identified on a map.

PW6 – what size buffer zones? What do you class as sensitive sites?

Para 68 – if no design and access statement required, how do you want an applicant to demonstrate they meet these requirements relating to trees?

PW7 – did you want to use the mantra of the right tree in the right place?

PW7 para 2, second sentence: is this clearer: An Arboricultural Impact Assessment is required to accompany applications where trees are present or could be impacted by proposals. ~~on a site for new built development or where trees could be impacted through a householder application.~~

Para 70 This includes barn owl, water vole, otter, hedgehog, soprano pipistrelle and barbastelle bats.

Should the text at para 79 be near the dark skies policy PW12 which is around para 85?

PW12 – why do you use the word ‘encouraged’ in the first sentence rather than a stronger term like ‘must’? The second sentence is stronger as it uses the phrase ‘need to’.

Para 93: Off-white render is another common ~~M~~umaterial.

PW13 says: ‘For all new development it must be demonstrated how water management solutions have been considered at an early stage of the planning process’. What are ‘water management solutions’? What is water management in this instance?

PW13 says: ‘Extensions or modifications should retain the existing number of parking spaces on a site’. Extensions or modifications to what?

General: Feedback from our LCWIP consultation regarding Postwick was around safer roads for cycling and having segregated cycle paths leading into the countryside and into the city. The Countywide LCWIP has been written and only mentions a cycle link between Postwick park and ride and Brundall station so I would like more emphasis to be put on safe cycle routes in Postwick. The plan mentions it but it feels like an afterthought at the end of the plan.

Evidence base

Should Appendix A be updated as it runs to September 2023?

Design Guide

1.1 – Broadland District and the Broads Authority

Say somewhere that the Broads has a status equivalent to a National Park.

3.1.7 – refer to Broads Authority intrinsically dark skies

03.AM.3 – parked cars on the road slow vehicles down and so can be a good thing. There is also no mention of preventing pavement parking.

Page 41 – 4.4.5 incorporates another 4.4.1. Looks like a formatting and numbering issue.

04.AM.5 – how about justifying the need for lighting in the first place?

The questions from page 48 onwards – where relevant, mention the Broads specifically.

Appendix 2 – Planning Reform Working Paper: Development and Nature Recovery

Ministry of Housing, Communities and Local Government and
Department for Environment, Food and Rural Affairs

Document: [Planning Reform Working Paper: Development and Nature Recovery](#)

Due date: None

Proposed level: Planning Committee endorsed

Notes

This paper invites views on proposals for a new approach to how housing and infrastructure development can meet its environmental obligations and contribute to nature recovery. The Government wants to accelerate development while going beyond simply offsetting harm to unlock the positive impact this development can have in driving nature recovery. This new approach would use funding from development to deliver environmental improvements at a scale which will have the greatest impact. These working proposals reflect feedback already received from representatives of the development industry, nature conservation organisations, nature service providers, and local government. If taken forward, the Government would use the Planning and Infrastructure Bill to make the necessary legislative changes with the intention of establishing a more efficient and effective way for the Habitats Regulations and other environmental obligations to be discharged, pooling individual contributions to deliver the strategic interventions necessary to drive nature recovery. A series of questions are posed at the end of the paper to inform further discussions before determining whether these proposals are taken forward

Proposed response

General comments

Generally, we can see where the principle of this more strategic approach would be beneficial. It follows the thinking of many current conservation initiatives with the need to think bigger and more joined up to address the scale of biodiversity loss. That being said, it needs to be acknowledged that paying into a nature restoration pot is just step 1. The concern is that the working paper lacks detail particularly around the implementation of this approach.

Natural England as the delivery body would need to be appropriately resourced to be able to ensure this funding is spent on achieving real environmental benefits. Appropriate funding would need to be secured for NE to retain their resources.

We also note that National Parks/The Broads are in a good position to be receptacles for nature recovery.

Local Nature Recovery Strategies should provide a guiding framework for targeting and spending ear-marked development money, but ‘positive environmental outcomes’ such as securing habitats are often dependent on private landowners and other competing land

uses/schemes. These are not guaranteed. Once the development is granted and the tariff paid, what assurance is there that a suitable spend can and will occur? The governance, resources and separate core funding for NE need to be in place before such a scheme comes into effect.

Answers to questions:

- a. Do you consider this approach would be likely to provide tangible improvements to the developer experience while supporting nature recovery?

This approach has the potential to improve better nature recovery outcomes through a strategic, landscape-scale focus. It could enable larger-scale restoration projects, benefiting nature in the long term. However, there is a risk that local communities may experience negative consequences from developments with few local benefits. It is essential that the Government's plans do not undermine the mitigation hierarchy, which prioritises avoiding environmental harm first. Effective funding for agencies such as Natural England (NE) and local authorities is crucial to help facilitate engagement with developers, farmers, and landowners. Currently, the system's shortcomings—particularly the lack of resources for planning officers and ecologists—have hindered effective environmental management. A long-term funding model, coupled with ongoing collaboration and consensus-building, is key to delivering tangible environmental outcomes and coping with climate adaptation challenges.

- b. Which environmental obligations do you feel are most suited to this proposed model, and at what geographic scale?

The primary focus of any development should be on avoiding negative impacts on the natural environment, especially in protected landscapes and sites. For example, nutrient neutrality is critical in such areas, and the government's Nature Restoration Fund should not replace existing environmental protections or the responsibility of developers to avoid harm. This model should focus on avoiding adverse impacts first and then ensuring mitigation measures where necessary. The geographic scale of the model should ideally align with catchment areas or broader landscapes, particularly where upstream land management is essential for protecting environmental outcomes.

- c. How if at all could the process of developing a Delivery Plan be improved to ensure confidence that they will deliver the necessary outcomes for nature?

A catchment-scale Delivery Plan, particularly for nutrient mitigation, could offer an effective way forward. By taking a holistic, landscape-scale approach to planning, we can better address cumulative environmental impacts, enhance ecosystem resilience, and ensure that nature recovery strategies are tailored to specific local needs. This will help build confidence that the necessary outcomes for nature are being met, as it addresses multiple factors within a cohesive framework.

- d. Are there any additional specific safeguards you would want to see to ensure environmental protections and / or a streamlined developer experience?

While landscape-scale nature restoration projects are important, particularly in National Parks/The Broads, it is equally crucial to deliver local habitat creation. Local projects ensure that environmental protections are in place close to the development sites and can deliver immediate, tangible benefits. Safeguards should include a clear requirement for developers to demonstrate how they will minimise harm to the local environment and provide specific, measurable actions for biodiversity restoration at the local level. Additionally, ensuring robust long-term monitoring and engagement will help mitigate unintended consequences and foster a stronger relationship between developers and local communities.

- e. Do you support a continued role for third parties such as habitat banks and land managers in supplying nature services as part of Delivery Plans?

Yes, habitat banks and land managers play an essential role in supplying nature services as part of Delivery Plans. Their involvement can ensure that ecological restoration projects are implemented effectively and provide tangible benefits for the environment. They can also help scale nature recovery by facilitating the necessary land management and habitat creation, and by offering valuable expertise in managing natural resources. Continuing to include them in the process will enhance the overall effectiveness of the Delivery Plans.

- f. How could we use new tools like Environmental Outcomes Reports to support this model?

Environmental Outcomes Reports (EORs) can be used to track and document the effectiveness of mitigation measures, ensuring that environmental obligations are being met. These reports could also provide developers and other stakeholders with a clear understanding of the environmental impacts of their projects and guide future decision-making. By using EORs to assess the success of interventions and adjust strategies as needed, the model will have greater transparency, and stakeholders will have more confidence that the required outcomes are being achieved.

- g. Are there any other matters that you think we should be aware of if these proposals were to be taken forward, in particular to ensure they provide benefits for development and the environment as early as possible

It is important to address the long-term funding and support for the agencies involved in delivering environmental protections and mitigation. Without adequate resources, the risk exists that nature recovery will be undermined or delayed. Furthermore, clear and consistent communication with stakeholders—including landowners, developers, and local communities—is key to ensuring that environmental benefits are achieved early in the process. Effective collaboration and long-term planning, including around enforcement, will be necessary to ensure that these proposals support both development and environmental recovery in a balanced and sustainable way.

Planning Committee

07 February 2025

Agenda item number 11

Local Plan – Preparing the publication version

Report by Planning Policy Officer

Summary

This report sets out the updated Local Development Scheme. It also introduces some updated evidence that will support the next version of the Local Plan. These are the Peat Topic Paper and the amended Biodiversity Net Gain (BNG) Topic Paper.

Recommendation

It is recommended that members endorse:

- i. The Local Development Scheme.
 - ii. The Peat Topic Paper and BNG Topic Paper as evidence to support the Local Plan.
-

1. Introduction

- 1.1. This report sets out the updated Local Development Scheme. It also introduces some updated evidence that will support the next version of the Local Plan. These are the Affordable Housing Topic Paper, Peat Topic Paper and the amended Biodiversity Net Gain (BNG) Topic Paper.

2. Local Development Scheme

- 2.1. The Local Development Scheme (LDS) is the timeline for producing the Local Plan. On release of the NPPF, the Government has requested that all Local Planning Authorities (LPAs) update their LDS. The updated LDS is at Appendix 1. The updated LDS reflects the transition arrangements to the new local plan system published in December 2024 – the deadline to submit under the current local plan system is December 2026 (rather than June 2025 which was our working assumption).

3. Peat Topic Paper

- 3.1. Members will be aware of the proposed strengthening of the currently adopted peat policy in the emerging Local Plan, that seeks to keep peat in situ unless there are exceptional circumstances. The Peat Topic Paper seeks to emphasise the importance of peat and to justify this proposed policy approach. See Appendix 2.

4. BNG Topic Paper - amended

- 4.1. Members recently endorsed the BNG Topic Paper that sought to justify 20% BNG rather than the statutory 10% BNG. Some amendments are proposed to strengthen the justification for this approach. See Appendix 3. The declaration of a biodiversity emergency by the Broads Authority meeting November 2024 is included, so too is the Broads Nature Recovery Strategy and Norfolk & Suffolk Local Nature Recovery Strategies.

Author: Natalie Beal

Date of report: 23 January 2025

Appendix 1 – [Local Development Scheme](#)

Appendix 2 – [Peat Topic Paper](#)

Appendix 3 – [BNG of more than 10% Topic Paper](#)

**Local Development Scheme
Timeline for producing the Local Plan for the Broads
Adopted February 2025**

Local Plan for the Broads

	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26		
Preparing REG19 Local Plan																						
Planning Committee to endorse consultation						18																
Broads Authority to endorse consultation						25																
Submission version consultation (REG19)						8 weeks																
Assess REG19 representations																						
Planning Committee to endorse submission										7												
Broads Authority to endorse submission										28												
Submission to Planning Inspector																						
Examination																						
Adoption																		

Local Plan for the Broads Peat Topic Paper

January 2025

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

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1: Introduction

Peat is an abundant soil typology in the Broads and an important asset. The current 2019 Local Plan for the Broads introduced a peat protection policy (DM10). The emerging Local Plan for the Broads seeks to take a stronger stance of development proposals that affect peat.

Peat was once mined as a fuel and then the land was drained for grazing and agriculture, which released carbon dioxide from the peat and lowered the land levels. Peatlands are now a nationally recognised wetland home to many priority species. The peat in the Broads stores vast amounts of carbon in its fens and wetlands.

2: About peat

Peat is one of the main soil types in the Broads and an important asset with important qualities, providing many **ecosystem services**¹. In the UK at least 80% are damaged².

The total amount of carbon stored in peat in the Broads National Park is estimated at 12 to 14 teragrams or 12 to 14 million metric tonnes of carbon³. Peat soils release stored **carbon** if they are drained and allowed to dry out. The protection of peat soils is therefore critical to help address climate change. Lowland peat soils, such as those in the Broads, emit 85% of the UK's greenhouse gases from peatlands. Lowland emissions contribute over 4% to the UK's carbon emissions making them an important single source of global warming⁴.

Peat soils support internationally important fen, fen meadow, reedbed, wet woodland and lake **habitats**. For example, milk parsley, the food plant of the Swallowtail caterpillar, tends to grow only on peat soils in the Broads.

Historic England has identified the Broads as an area of 'exceptional waterlogged heritage'⁵. Because of the soil conditions in the Broads, there is great potential for **archaeology** to be well preserved, giving an insight into the past.

The peat has accumulated over time and incorporates a **record** of past climatic and environmental changes that can increase knowledge of the evolution of the landscape.

Peaty soils help prevent flooding by absorbing and holding **water** like a sponge as well as filtering and purifying water. But that does not mean that peat soils should be considered as a water treatment process.

¹ The diverse benefits that we derive from the natural environment are sometimes referred to as ecosystem services. Examples of these services include the supply of food, water and timber (provisioning services); the regulation of air quality, climate and flood risk (regulating services); opportunities for recreation, tourism and education (cultural services); and essential underlying functions such as soil formation and nutrient cycling (supporting services). [Payments for Ecosystem Services: A Best Practice Guide](#)

² [Peatland Leaflet ONLINE V2 1.pdf](#)

³ [Assessing carbon stocks within the peat of the Broads National Park](#)

⁴ [Human activity means UK peatlands contribute to climate change | UK Centre for Ecology & Hydrology](#)

⁵ Historic England has identified the Broads as an area of exceptional waterlogged heritage. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past.

3: Current Local Plan policy on peat

The current [Local Plan for the Broads 2019](#) includes policy DM10 that seeks to reduce the amount of peat excavated as a by-product of development. If peat is excavated, it seeks an appropriate re-use. There is also an adopted [Guide](#) that seeks to expand on this policy.

4: Government's peat policies

The [England Peat Action Plan](#) was published in 2021. The England Peat Action Plan sets out the government's long-term vision for the management, protection and restoration of our peatlands, so that they provide a wide range of benefits to wildlife, people and the planet.

Some key parts of the action plan are:

- 'All uses of peatland should keep the peat wet and in the ground'.
- 'Some areas of peatland are potentially susceptible to development pressure and it is vital that planning policies reflect the importance of managing peatlands and avoid detrimental climate, water and biodiversity impacts from development'.

The [Lowland Agricultural Peat Task Force Chair's report](#) was published in 2023. This emphasises the importance of peat saying 'When peat degrades, the landscape subsides, and the carbon once stored in the soil is lost to the atmosphere primarily as carbon dioxide; so much so that the process of peat degradation places England's lowland peat soils amongst the largest sources of greenhouse gas emissions in the UK's land use sector'. The report makes 14 recommendations to ensure lowland peat soils can be managed more sustainably.

Published by the Government in January 2024, the [Protected Landscapes Targets and Outcomes Framework](#) (PLTOF) establishes ambitious targets for National Parks and National Landscapes. It recognises the crucial role these nationally important landscapes play in achieving positive changes for nature, climate, people and place. One of the targets is: Target 7: Restore approximately 130,000 hectares of peat in Protected Landscapes by 2050. We have locally apportioned 200ha of peat restoration in the Broads to 2050 - see [Broads Nature Recovery Strategy 2024-29](#). Peat restoration is about protecting it in situ, which involves managing or raising the water table.

In November 2022, ahead of COP27, the UK joined the **Net Zero Government Initiative** as a partner and signatory. This Initiative is led by the United States and participants agreed to develop and publish a roadmap laying out how they would bring their government emissions to net zero by 2050. The 2008 Climate Act committed the UK to reducing its greenhouse gas emissions by 80% by 2050 compared to 1990 levels formed the Committee on Climate Change, and established UK carbon budgets. In June 2019, this was strengthened, committing the UK to bring all greenhouse gas emissions to net zero by 2050. This is referred to as the UK net zero target. A [study](#), led by the Centre for Ecology & Hydrology (CEH) and the [James Hutton Institute](#), found that the overall greenhouse gas

emission from peatlands could exceed the equivalent of around 20 Megatonnes of CO₂ emissions each year – around 4% of the UK’s total annual greenhouse gas (GHG) emissions.

4: Broads Authority projects relating to peat

The Authority has projects that relate to the restoration of peat:

- [The Peat Discovery Project](#) was funded through the government Nature For Climate Peatland Grant Scheme.
- Two Lowland Agricultural Peatland Projects received funding in 2024/25: Water Discovery Pilot and a Small Infrastructure Pilot.
- [Fibrebroads](#) was funded through the Paludiculture⁶ Exploration Fund.
- Through our [Farming in Protected Landscapes](#) (FiPL) programme, we have supported projects that support reed cutters to maintain the fen habitat that grows on peat soils, providing a viable farming system, a vibrant ecosystem, and storing carbon.

With 24 peat cameras now installed in the Broads (2024), we are tracking sub-millimetre peat movements to monitor areas for peat-water levels and surface shrinkage measurement. Our water table modelling tools provide unparalleled assessments for lowland peatlands, which will help understand peat processes for sites across the UK. The key aim is to help farmers make informed decisions that support both Net Zero and Nature Recovery goals. With the data, land managers can explore the potential effectiveness of different management practices (involving raising water tables), enabling better-informed decision-making.

This funding has been provided to the Broads Authority and its partners to develop peatland restoration and wetland farming projects, as well as working with farmers, land managers and regulators to engage about project feasibility and water management in complex drained floodplain environments. The Broads Peat Projects are funded by Defra and supported by Natural England, the Association of Drainage Authorities (ADA), and the Environment Agency. They are delivered by the Broads Authority, Cranfield University, Broadland Water Abstractors Group, the UK Centre for Ecology & Hydrology, Norfolk FWAG, Norwich University of East Anglia, Hudson Architects, and Wetland Projects. The modelling tools have been shared with about 200 land managers and farmers.

5: Risks to peat in the Broads

In the Broads, the peat is at risk of degradation and drying out. This ultimately affects its special qualities. Indeed, if peat dries out, rather than being a carbon dioxide sink, it becomes a carbon dioxide source.

⁶ Paludiculture is a farming and forestry system that involves rewetting peatlands to grow wetland crops and produce biomass.

Peat is a finite resource. It takes thousands of years for peat to form.

There are many risks to peat in the Broads: drainage, conversion to arable, overgrazing and compression due to machinery or too many livestock, contamination and development.

In terms of development which the Local Plan can influence/guide, the following table shows the applications that resulted in the excavation of peat as a by-product of development. This information is from May 2019 to end of March 2024.

Application number	Description	Volume of peat excavated
BA/2021/0456/FUL	Extend mooring basin, replace existing buildings	10,160 m ³
BA/2023/0180/FUL	Slipway	85m ³
BA/2021/0074/COND	Erection of boathouse in alternative location on site, variation of condition 2 of permission BA/2020/0078/HOUSEH	13 m ³
BA/2021/0105/FUL	Replace quayheading, widen wet dock and install finger jetty.	35 m ³
BA/2021/0444/FUL	New pontoon and access ramp	6.8 m ³
BA/2021/0235/FUL	Installation of ground source collector & 90 solar panels	1m ³
BA/2020/0378/HOUSEH	Replacement quay heading and boat house, installation of half-slip.	2m ³
BA/2020/0321/HOUSEH	Creation of a domestic slipway	1m ³
BA/2020/0309/FUL	Excavation of 3mx10m mooring cut	32.54m ³
BA/2020/0404/HOUSEH	Extension to mooring cut (retention)	60m ³
BA/2020/0055/FUL	2 plots Quay heading, mooring cut and replacement day hut	Not confirmed.
BA/2018/0514/FUL	Extension to mooring basin	1,595 m ³
BA/2020/0266/HOUSEH	Replace 14.6 metre of timber quayheading with steel piling and timber capping and whaling. Enlarge dock by 5m x1m	No exact figures. If any peat is found it will be sent to a receptor site in Brundall.
BA/2019/0384/HOUSEH	Mooring cut in quay heading	21.8m ³
BA/2020/0078/HOUSEH	Proposed erection of boathouse including the installation of quayheading and restoration of reed bed.	100.7m ³
BA/2019/0294/FUL	Replacement dwelling	97.2m ³
BA/19/0105/OUT	Erection of a Dairy and milking parlour building	Details were resolved as part of the REM application
Total	-	Around 12,211.04 m³

The following application relates to habitat restoration and because of the environmental benefits it brings, was deemed to be acceptable. The proposed policy would likely still approve such a scheme.

Application number	Description	Volume of peat excavated
BA/2020/0238/FUL	Habitat restoration - Crassula Helmsii eradication	2,700 m ³

Over the past 5 years, permitted schemes that result in peat excavated as a by-product of development are set out in the above table. This amounts to around 12,200m³ of peat that has been or will be excavated. The current Local Plan policy would have been followed and so it is expected that not all of that volume of peat would have dried out and thus become a source of carbon dioxide. This does however present a large volume of peat excavated and the aim is to restore peat, leaving it in situ.

6: Proposed policy on peat

Given the clear importance of peat in the Broads, and given that one of the areas that puts peat at risk is development, a stronger policy stance is proposed.

Peat is not a habitat, but it is a key component to some habitats and the Authority considers it irreplaceable in that it is very technically difficult and takes a very long time (perhaps thousands of years) to recreate once destroyed. Furthermore, peat can support lowland fen which is an irreplaceable habitat as defined by the NPPF⁷. And in terms of priority habitats, it can also support wet woodland, purple moor grass and rush pasture, coastal floodplain grazing marsh and reedbed.

A site in Salford that formed part of Greater Manchester’s local spatial framework Places for Everyone was removed by Inspectors (February 2024) due to the development proposal’s public benefits not outweighing the loss of deterioration of peat⁸.

It is therefore proposed to have a policy in the Local Plan that takes the general thrust of the decision made by the Inspector who examined Greater Manchester’s local spatial framework Places for Everyone and elevates the importance of peat to that of irreplaceable habitats.

See [Appendix 1](#) for the proposed policy.

7: Wind turbines and peat – proposed policy

In the [NPPF consultation document](#) (summer 2024), there was a question relating to renewable energy on peat:

⁷ See glossary: [National Planning Policy Framework - GOV.UK](#)

⁸ [IN37-Further-Action-Points-July-2023-Final-Publication.pdf \(hwa.uk.com\)](#) and the [final Inspector’s Report](#)

Question 74 – *Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?*

In the [response to the consultation](#) (December 2024), the Government said:

‘The government welcomes the views provided in response to this question. Some habitats that include peat soils are already protected by the National Planning Policy Framework definition of irreplaceable habitats, including blanket bog and lowland fen. Given the breadth of further habitats which could be considered irreplaceable, including those containing peat, the government plans in due course to review and ensure the robustness of the definition of irreplaceable habitats to ensure it is comprehensive to support decision makers.

The government plans to publish a 12-week consultation on land use early in the New Year. The consultation will inform the development of a Land Use Framework for England, to be published in 2025. This will set out the government’s vision for long-term land use change and focus on the principles for land use decision making and priority areas for policy change’.

There is also **emerging scientific work** relating to the impact of peatland windfarms on carbon emissions. For example, work undertaken by the University of Aberdeen: [Planning peatland windfarms with carbon calculations](#) – this website says: *“When wind turbines are installed, carbon is not only released from the peat, but also during all stages of the process and it’s important that we can understand how this process affects the amount of carbon dioxide being released into the atmosphere.*

“Although land restoration can help to mitigate further carbon release, often the payback time is calculated to be longer than the lifetime of the windfarm. If this is the case, developers, planners and campaigners can use this data to determine if the windfarm installation should go ahead’.

This document, [Clean Power 2030 Action Plan: A new era of clean electricity](#) (December 2024), sets out our first major steps towards clean power. In relation to peat, it says: *‘We should therefore ensure delivery of our climate and nature targets wherever possible, in an integrated and joined up way. This means ensuring habitats like peatlands store rather than emit greenhouse gas emissions; or restoring salt marshes and sea grasses so that they are sequestering carbon as well as protecting our coastal communities from rising sea levels and extreme weather. This means that new energy infrastructure should be built in a way that protects the natural environment by following a “mitigation hierarchy” to do what is possible to avoid damage to nature, and then minimising, restoring and delivering compensation when damage is impossible to avoid’.*

Ultimately, the deeper the soil, the more carbon will be emitted during construction, which also rapidly decomposes the peat and creates large holes in the land. As the surrounding

peat drains into the holes, the peatland dries out, and huge quantities of carbon dioxide are released

It is therefore proposed to add the following under the wind turbine section of Policy PUBDM21: Renewable and low carbon energy:

Proposals for turbines or access routes located on peat soils are likely to not be supported.

8: Summary and conclusion

Peat is clearly an important soil type locally and nationally. It is at risk of excavation as a by-product of development. There is a clear direction to restore peat, and this is best done by keeping in situ. It is proposed that that emerging Local Plan has strong policies that protect peat, and the above wording is added to policy PUBDM21.

Appendix 1: Proposed policy on peat soils

Policy PUBDM12: Peat soils

See map: [Appendix 10: Location of peat soils](#)

1. Sites of peat soils⁹ will be protected, enhanced, and preserved.
2. There will be a presumption in favour of preservation in-situ for peat soils.
3. Development resulting in the loss or deterioration of peat will be refused, unless there are wholly exceptional reasons (see supporting text), and a suitable compensation strategy is put in place by the applicant/developer, and it is demonstrated that:
 - i) There is not a less harmful viable option; and
 - ii) The amount of harm has been reduced to the minimum possible; and
 - iii) An evaluation is submitted to assess the impact of the proposal in relation to palaeoenvironments, archaeology, biodiversity provision and carbon content; and
 - iv) Satisfactory provision is made for the evaluation, recording and interpretation of the peat before commencement of development; and
 - v) The peat is disposed of in a way that will limit carbon loss to the atmosphere.
4. Development that seeks to enhance biodiversity but may result in some peat removal will still need to demonstrate the criteria i) to v) and that the biodiversity benefit will outweigh carbon loss.
5. Proposals to enhance peat and protect its qualities will be supported.

Reasoned Justification

Peat is an abundant soil typology in the Broads and an important asset. While there is a certain irony in protecting the peat soils in an area where the lakes originated from peat extraction, peat is a finite resource. This policy seeks to address schemes that result in the excavation of peat as a result of development. The Authority has other projects that relate to the restoration of peat such as [The Peat Discovery Project](#) and [Creating a New Approach to Peatland Ecosystems](#).

Ecosystem services

Peat has many qualities and provides many ecosystem services:

- **Climate change:** The total amount of carbon stored in peat in the Broads National Park is estimated at 12 to 14 teragrams or 12 to 14 million metric tonnes of carbon¹⁰. Peat soils release previously stored carbon when they are dry. UK peats therefore represent both a threat and an opportunity with respect to greenhouse gas emissions. Correct

⁹ Peat is a partially decomposed mass of semi-carbonised vegetation which has grown under waterlogged, anaerobic conditions, usually in bogs or swamps

¹⁰ [Assessing carbon stocks within the peat of the Broads National Park](#)

management and restoration could lead to enhanced storage of carbon and other greenhouse gases in these soils, while mismanagement or neglect could lead to these carbon sinks becoming net sources of greenhouse gases.

- **Biodiversity:** Peat soils support internationally important fen, fen meadow, wet woodland, and lake habitats. 75% of the remaining species-rich peat fen in lowland Britain is found in the Broads. Milk parsley, the food plant of the Swallowtail caterpillar, grows only on peat soils. Fen orchids have their UK stronghold in the Broads, so the peat soils are critical for the survival of this species. Other rare and important plant and invertebrate communities (collection of species) are supported by the peaty soils.
- **Archaeology:** Historic England has identified the Broads as an area of *exceptional waterlogged heritage*. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past. Archaeology is discussed in more detail in the [Heritage section](#) of this Plan.
- **Palaeoenvironments:** The peat has accumulated over time and thus incorporates a record of past climatic and environmental changes that can be reconstructed through, for example, the study of its stratigraphy and pollen content, leading to increased knowledge of the evolution of the landscape.
- **Water:** Peaty soils help prevent flooding by absorbing and holding water like a sponge as well as filtering and purifying water. Peat can absorb large quantities of nutrient and other pollutants, although peat soils can under certain conditions release these chemicals back into the surrounding water.

How peat quality can be impacted

Land management that could impact on the quality of the peat soil includes land drainage, introduction of polluted water, burying the peat under hard surfaces or gardens, compacting peat and peat removal to change the land use.

Peat. Priority habitat. Irreplaceable habitat.

NPPF (2024) para 193c) says ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶⁷ and a suitable compensation strategy exists’.

Footnote 70 says ‘For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat’.

The NPPF glossary defines ‘irreplaceable habitats’ as ‘habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, considering their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen’.

Priority habitats and species are defined by the NPPF as ‘Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006’. Lowland fen is a priority habitat under the UK Biodiversity Action Plan and the EU Habitats Directive because of the quality and diversity of species it supports. Lowland Fen is also classed as an ‘irreplaceable habitat’ in the NPPF. The Joint Nature Conservation Committee (JNCC) says ‘fens are peatlands which receive water and nutrients from the soil, rock and ground water as well as from rainfall: they are minerotrophic’.

Peat is not a habitat, but it is a key component to some habitats and the Authority considers it irreplaceable in that it is very technically difficult and takes a very long time (perhaps thousands of years) to recreate once destroyed. Furthermore, peat can support lowland fen which is an irreplaceable habitat as defined by the NPPF. And in terms of priority habitats, it can also support wet woodland, purple moor grass and rush pasture, coastal floodplain grazing marsh and reedbed. The tests set out in the NPPF will need to be passed for development that negatively impacts peat to go ahead.

A site in Salford that formed part of Greater Manchester’s local spatial framework Places for Everyone was removed by Inspectors due to the development proposal’s public benefits not outweighing the loss of deterioration of peat¹¹.

Biodiversity enhancements schemes

On occasion, for nature conservation benefits, peat can be removed to create shallow turf ponds or scrapes (areas of temporary open water) on areas of fen or scrub habitat to maximise the biodiversity value and hold back succession to woodland habitat. The removal of peat can also be necessary for conservation management – for example, the most biodiverse areas of UK fen occur in areas where the turf has been stripped and vegetation subsequently grown back. This policy allows for such operations, provided they can justify the proposal against the criteria set out in the policy.

Excavation of peat as a mineral resource

The NPPF and NPPG mentions peat soils specifically in relation to its excavation as a mineral resource, rather than the issue in the Broads relating to impact due to groundworks from development and inappropriate land management.

If the public benefit of a scheme is proved to clearly outweigh the loss or deterioration of peat

The policy and NPPF seeks protection of peat soils through changes in the location of development in the first instance and then designing proposals to minimise disturbance to the qualities of the peat and the amount of peat removed. Development proposed on areas of peat would require justification for the need to site the development on peat, and subsequently a peat assessment that shows how efforts have been made to reduce adverse

¹¹ [IN37-Further-Action-Points-July-2023-Final-Publication.pdf \(hwa.uk.com\)](#) and the [final Inspector’s Report](#)

impacts on peat. Proposals that would result in removal of peat are required to assess the archaeological and paleoenvironmental potential of peat and make adequate recordings prior to removal.

To prevent the loss of carbon to the atmosphere that is sequestered in peat soils, disposal is of great importance. The Authority expects peat to be disposed of in a way that maintains the carbon capture properties. Peat needs to go somewhere where it can remain wet (and hence retain its function to lock up carbon and prevent it being released into the atmosphere) or potentially provide a seedbank (the potential for ancient peat to provide a viable seedbank may need to be evidenced) or be reused for local benefit (for example by boosting organic matter in degraded arable soils). When dry, peat changes its properties and oxidizes, so transfer to the receiving site would need to be immediate.

The Broads Authority has produced a guide to understanding and addressing the impact of new developments on peat soil. This [Peat Guide](#) (or successor document) provides additional information to help applicants meet the requirements of the related peat policy. It seeks to reduce the amount of peat excavated, ensure the [special qualities](#) are addressed, and that any peat excavated is disposed of in a way to ensure stored carbon is not emitted into the atmosphere.

More than 10% Biodiversity Net Gain for the Local Plan for the Broads - Topic Paper

February 2025

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1: Introduction

Biodiversity Net Gain (BNG) became mandatory for large schemes from 12 February 2024 and for smaller schemes, from 2 April 2024. The level of mandatory net gain is at least 10%. This Topic Paper explores justification for considering a BNG level of greater than 10% for the Local Plan for the Broads.

2: Local justification for recommending minimum Biodiversity Net Gain greater than 10%

2.1 Evidence from national cost/benefit analysis.

Within the evidence presented by Defra consulting on the introduction of Biodiversity Net Gain into the planning system (December 2018-February 2019), it was made clear that an increase of 10% would be the absolute minimum necessary to ensure confidence that a net loss in biodiversity would be avoided, and that any gain would actually be realised as an outcome of a development-related biodiversity ‘enhancement’ project.

Relevant findings from Defra’s Impact Assessment document¹ (21/11/2018) include (our emphases):

- “..In simple terms, [10%] is the lowest level of net gain that [Defra] could confidently expect to deliver genuine net gain, or at least no net loss, of biodiversity and thereby meet its policy objectives.”
- “..Advice from some Natural Capital Committee members suggests that a level of net gain at or above 10% is necessary to give reasonable confidence in halting biodiversity losses.”
- “..The department therefore favours as high a level of net gain as is feasible... The analysis undertaken in this Impact Assessment indicates that the level of requirement makes relatively little difference to the costs of mitigating and compensating for impacts.”

The level of requirement for BNG (be it 10% or more) makes relatively little difference to the costs of mitigating and compensating for impacts.

2.2 Evidence from Broads Biodiversity Audit 2011²

The project aims were as follows:

1. To quantify the national biodiversity importance of the Broads.
2. To quantify the relative numbers of priority species within different Broads habitat assemblages.
3. To understand the spatial distribution of these priorities.

¹ See; Biodiversity Net Gain Consultation Impact Assessment, Defra 2018 [181121 Biodiversity Net Gain Consultation IA FINAL for publication.pdf \(defra.gov.uk\)](#)

² [Broads Biodiversity Audit Report \(broads-authority.gov.uk\)](#)

4. To develop methodology and framework providing evidence for the spatial distribution, tolerance and sensitivity of priority species to saline incursion and flooding.
5. To apply this methodology to map tolerance and sensitivity of priority species to saline incursion and flooding throughout The Broads Executive Area and the wider area of The Broads Biodiversity Action Plan.

The Broads Biodiversity Audit 2011 concludes that the Broads is very important for biodiversity, with records (pooling pre- and post-1988) comprising:

- 11,067 species in total
- Nineteen Global Red Data Book (GRDB) species
- 1,519 priority species (GRDB, Red Data Books (RDB), Nationally Notable, Birds of Conservation Concern, BAP, regional specialties)
- 19% of total designated species in the United Kingdom (based on the JNCC only), occurring in an area only 0.4% of the United Kingdom
- 26% of the UK's BAP species, 13% of the UK's RDB, 17% of Notable and Scarce
- A very wide range of taxonomic groups: e.g. 403 species of beetle, 251 species of flies (Diptera) and 179 species of moth
- Very large numbers of priority bird species – 85% and 94% respectively of UK Bird: Red and Bird: Amber designated species
- 66 Broads Speciality species, 14 species entirely and 17 largely restricted to The Broads in the UK and 35 that have a primary stronghold in the region.

The majority (77%) of designated species recorded in the Broads are RDB or Notable (these include species designated as GRDB, RDB, Notable, Rare/Scarce).

2.3 Global Red Data Book species

The 19 Global Red Data Book³ species occurring in the Broads included six species of birds (although two species are vagrants to the area), four species of mollusc, the White-clawed Crayfish, *Austroptamobius pallipes* (GRB:EN, BAP) and a Hairy Fungus beetle, *Pseudotriphyllus suturalis*, a recent addition to the IUCN Red Data Book. The Medicinal Leech *Hirudo medicinalis* (GRDB:NT, BAP) is also listed, but was last recorded in 1981.

Only one Marine: Near Scarce species was recorded in the Broads, the Tentacled Lagoon Worm *Alkmaria romijni* (M:NS). This annelid has been recorded at a number of scattered southern locations from the Humber to Pembrokeshire, inhabiting lagoons and sheltered estuaries, and was found in Breydon Water, near Reedham Marshes. Although the last record was in 1987, marine and estuarine species are under-recorded, and it may still be present in the area.

There are 19 Global Red Data Book species occurring in the Broads.

³ Red data book is the document established by IUCN for documenting the rare and endangered species of plants, animals, fungi and also a few local species that exist within a state or country.

2.4 Evidence from Natural Capital Compendium⁴

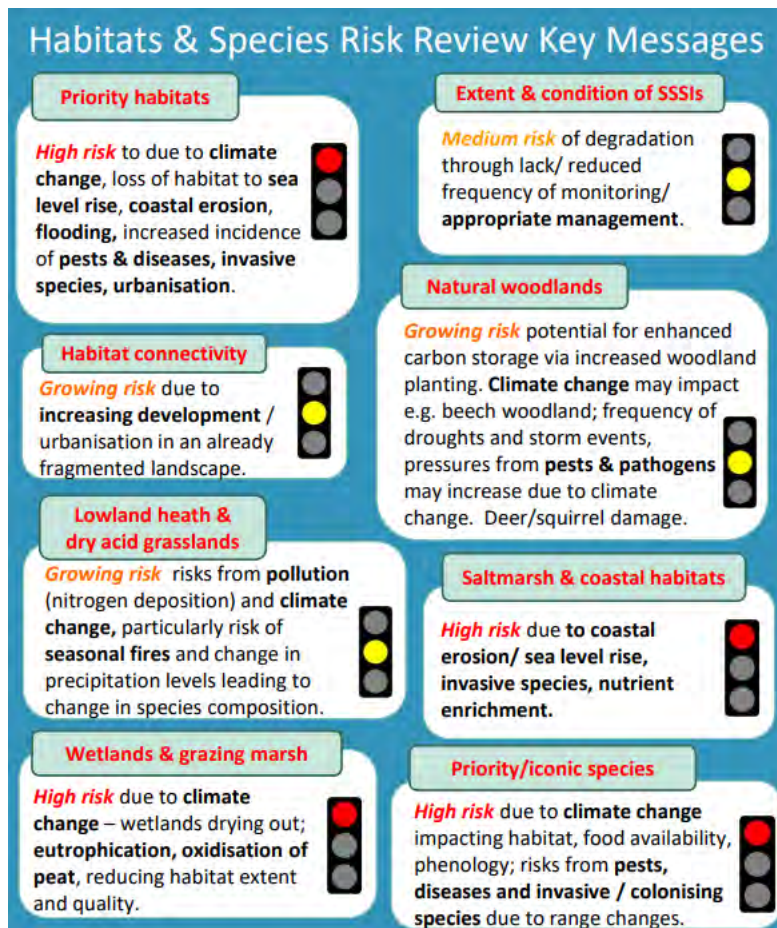
The purpose of the Compendium was to present information about natural capital assets in Norfolk and Suffolk and the potential risks to them, to provide an element of the preparatory work that will feed into a Norfolk & Suffolk 25 Year Environment Plan.

There is a section in the about risks to habitats and species, copied below, with some infographics about the key messages on the habitats and species risk review which is also available below. In addition to the habitats and species risk review, there are also sections about risks to freshwater, risks to coast and marine, and risks to atmosphere.

Risks to habitats and species are well documented and include habitat loss, fragmentation and loss of habitat quality resulting from pressures including climate change, land use change, intensive agriculture, nutrient enrichment, pollution, disturbance, pests & diseases and invasive species. The creation of a 'Nature Recovery Network' to provide a 'resilient and coherent ecological network' forms part of the government's 25 Year Environment Plan (DEFRA, 2018) and response to these pressures. This aims to provide an additional 500,000 hectares of wildlife habitat, more effectively linking current protected sites and landscapes, urban green spaces and waterways. Guidance for the development of Nature Recovery Networks has been published by Natural England (Crick et al., 2020). This will be facilitated through the planning system and delivered locally by a partnership of organisations and landowners supported by the new Environmental Land Management Scheme.

As a result of the reviews carried out in the Norfolk and Suffolk Natural Capital compendium, seven priority areas were defined for consideration in the development of the Norfolk and Suffolk 25-year environment plan, which include Priority E "Develop policy & programmes for partnership working **to increase species richness, abundance and ecological resilience** by managing existing habitats, improving habitat connectivity and enabling habitat & species migration".

⁴ Natural Capital Evidence Compendium for Norfolk and Suffolk October 2020 [PowerPoint Presentation \(norfolkbiobiodiversity.org\)](https://www.norfolkbiobiodiversity.org)



Priority E of the Natural Capital Compendium says “Develop policy & programmes for partnership working to increase species richness, abundance and ecological resilience by managing existing habitats, improving habitat connectivity and enabling habitat & species migration”.

2.5 Biodiversity Emergency

The Broads Authority has declared a biodiversity emergency. The statement, endorsed at [Broads Authority meeting November 2024](#) is as follows:

Biodiversity emergency statement - Broads Authority

Context

As part of the family of protected landscapes in England, we recognise that no single site or organisation can address the exacerbating impact of climate change on biodiversity loss.

The Broads Authority notes with concern reports from the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) on global species and habitat loss, and also that the Broads has been losing species at a rate of six per decade for half a century. Iconic species in the Broads are further at risk from the impact of climate change, including warmer, wetter winters, and sea-level rise.

The Broads Biodiversity Audit demonstrates the importance of the Broads for UK rare species. The Audit showed that nearly a third of the conservation priority species once found in the Broads have not been recorded since 1988, with many confirmed to be no longer existing in the Broads.

Healthy ecosystems, supported by good ecological condition and sustainable management, deliver vital public goods such as food, recreation, tourism, water, abundant wildlife, and landscape character. The Broads Authority aims to protect the biodiversity that underpins these ecosystems, benefiting visitors, communities, and businesses in the Broads.

Protected landscapes, like the Broads, hold unique cultural and personal significance, offering spaces for connecting with nature. The Broads Authority plays an influential role in addressing the biodiversity crisis by inspiring land use choices and fostering a deeper connection between people and nature.

Therefore, the Broads Authority resolves to:

- Declare its recognition of the global biodiversity emergency and the local impact this could have on Broads communities;
- Engage with a diverse range of partners: local authorities, environmental NGOs, farmers, the private sector, and local communities, to drive collective action;
- Adopt the Broads Nature Recovery Strategy and seek to implement the 2024-2029 delivery plan towards biodiversity recovery in the Broads;
- Inspire behavioural change, through educational activities, by informing visitors and local communities to take active roles in conservation efforts;
- Support the development of the Local Nature Recovery Strategies in Norfolk and Suffolk; and
 - Develop initiatives in partnership which achieve large-scale benefits, including:
 - Fostering collaboration and knowledge exchange;
 - Expanding networks to enable habitat restoration and connection;
 - Enhancing the Broads Authority estate to support native species;
 - Supporting nature-based solutions; and
 - Connecting with initiatives beyond the Broads to inspire conservation efforts elsewhere.

This approach highlights the Authority's commitment to reversing biodiversity loss while positioning the Broads as a leader in ecological resilience and nature recovery.

The BA has declared a biodiversity emergency.

2.6 Broads Plan⁵

The Broads Plan is the single most important strategy for the Broads National Park, setting out a long-term vision and strategic objectives to benefit its landscape, environment, local communities and visitors. As a high-level overarching plan, it draws together and guides a wide range of plans, programmes and policies relevant to the area. The Broads Plan is reviewed and updated on a regular basis, and this Plan covers the period 2022 to 2027. Part of the vision for the Broads Plan says ‘Biodiversity is at the heart of nature recovery. Our natural environment and the beneficial goods, services and cultural values it provides from food and energy to landscape character and recreation are in good condition, used fairly and sustainably, and valued by society. In particular, the precious nature of plentiful, clean, fresh water as a fundamental resource is understood and respected by all’.

One of the themes is Theme B: Improving landscapes for biodiversity and agriculture. There are ‘sub themes’ which are:

- B1** - Restore, maintain and enhance lakes and use monitoring evidence to trial and implement further innovative lake restoration techniques
- B2** - Promote best practice water capture and usage across the Broadland Rivers Catchment and reduce point and diffuse pollution into the floodplain and water courses
- B3** - Seek biodiversity net gain and enhance areas of fen, reed bed, grazing marsh and wet woodland, to protect peatlands as carbon sinks
- B4** - Define, implement and monitor management regimes for priority species and invasive non-native species
- B5** - Improve partnership coordination and communication of Broads biodiversity monitoring and research effort, linked to the National Biodiversity Network

A key aim of the Broads Plan is: *‘Opportunities are taken to establish more, bigger, better and more joined up ecological networks, and priority species and their habitat needs are well understood and well managed to halt and reverse biodiversity decline and loss, increase resilience and adaptive ability, and pursue environmental net gain’.*

The recovery and enhancement of biodiversity is seen as critically important to the Broads Authority and its partners.

2.7 Broads Authority Purposes

The Broads Authority is a Special Statutory Authority established under the [Norfolk and Suffolk Broads Act 1988](#)⁶. It has a statutory duty to manage the Broads for three purposes, none of which takes precedence:

- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;

⁵ [Broads Plan 2022 - 2027 \(broads-authority.gov.uk\)](#)

⁶ [Broads Authority Act 2009](#) is also of importance.

- Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
- Protecting the interests of navigation.

Additionally, in discharging its functions, the Broads Authority must have regard to:

- The national importance of the Broads as an area of natural beauty and one which affords opportunities for open-air recreation;
- The desirability of protecting the natural resources of the Broads from damage; and
- The needs of agriculture and forestry and the economic and social interests of those who live or work in the Broads.

Conserving and enhancing biodiversity is one of the purposes of the Broads Authority.

2.8 Biodiversity in the Broads

The Broads is one of Europe's finest and most important wetlands, with a rich mosaic of habitats comprising, among other things, shallow lakes, rivers, fens, drained marshland, wet woodland, estuary saltmarshes, intertidal mudflats and coastal dunes. Twenty-eight sites covering a total of more than 7200 hectares are nationally designated as Sites of Special Scientific Interest (SSSIs), a third of which are also National Nature Reserves, and there are numerous County Wildlife Sites within and near the Broads boundary. Most of the SSSIs are of international importance for their habitats and wildlife as the Broads Special Area of Conservation (SAC) and the Broadland Special Protection Area (SPA), and an area of the wetland is also designated as a Wetland of International Importance under the Ramsar Convention.

The Broads is a UK priority wetland area, with the largest expanse of species-rich peat fen in lowland Britain. Most of its fen sites are designated for nature conservation, with around 40% owned or managed by conservation organisations.

The Broads has the most extensive tract of wild wet woodland within Eastern England. It is of international significance and where not designated may, like other habitats located on peat soils, be at risk from drainage and from loss due to development. Natural regeneration of wild wet woodland in suitable low-quality habitats can support nature recovery.

Grazing marsh covers around half of the Broads. Some areas attract large and internationally important numbers of breeding and non-breeding birds, and there is a substantial area of internationally important dyke communities. The marshes provide a third of East Anglia's cattle grazing land, and local farmers and graziers rely on environmental land management support to optimise profit and protect the habitats.

There are more than 11,000 recorded species in the Broads, including 26% of all UK BAP¹⁴ priority species and 17% of all nationally notable or scarce species. Sixty-six species are either restricted entirely to the Broads or rarely seen elsewhere in Britain. Iconic species include the Bittern, Marsh Harrier, Otter, Fen Orchid, Norfolk Hawker Dragonfly and the

entire UK populations of the Swallowtail Butterfly, Dotted Footman Moth and Holly-Leaved Naiad.

The long-term aim for the Broads Plan is that: Biodiversity is thriving in the Broads, which remains a globally important wetland adapting to climate change. Sustainable land and water management practices support well-functioning ecosystems to provide multiple public goods including food, clean and plentiful water, carbon storage, abundant wildlife, landscape character, and recreation and tourism. The challenging targets to improve water quality, water supply and flood protection are being met. Opportunities are taken to establish more, bigger, better and more joined up ecological networks, and priority species and their habitat needs are well understood and well managed to halt and reverse biodiversity decline and loss, increase resilience and adaptive ability, and pursue environmental net gain. Invasive non-native species are under control and eradicated where possible. A profitable agriculture sector provides good food while maintaining or restoring habitats to good ecological condition. Robust evidence and monitoring guide good decision making in all aspects of natural resource management.

The Broads Authority Executive Area is clearly of great importance to habitats and species, including those that are visitors.

2.9 Special Qualities of the Broads

Over the years, the Authority has asked people to identify the special qualities or features of the Broads they value most. Common responses include:

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

The special qualities of the Broads include the variety of habitats and diversity of wildlife.

2.10 Environmental impacts and biodiversity gains and losses

Some of the most significant environmental impacts and biodiversity gains and losses over the last five years include:

- Tidal surges into the Broads' freshwater ecosystem. Environment Agency water level monitoring in 2023 showed the lowest and the highest water levels on Hickling Broad since monitoring began twenty years earlier, creating high water in the floodplain fens. The winter flooding of 2023/24 was prolonged and exceptional, with certain impacts on species and habitats.
- Longer and more intense droughts, such as in summer 2022, drying out fens and marshes, threatening species, releasing carbon stocks and further shrinking land levels.
- Rising temperatures, pushing species into different climate envelopes and making the Broads unsuitable for many species, and suitable for new species. There is insufficient species monitoring ongoing to know the precise changes in the Broads over the last five years, but these years have been warmer than previous years. Shade from trees will be more important for wetland wildlife.
- The rivers and broads are relatively cleaner compared to the 1970s, but there has been little change in the nutrient concentration in the past five years, although water plants and clarity continues to improve in upper river reaches. New hazardous chemicals and microplastics compound the well documented nutrient pollution.
- Improved reedbed restoration and management (including harvesting reed and sedge for traditional thatch) have seen a continued growth in populations of Broadland species such as Bittern, Crane and Marsh Harrier. Fen Orchid translocation success is being assessed.
- The Swallowtail butterfly continues to disappear from sites. In 2023, it was reported to be breeding on just 16 sites in the Broads, down from 22 sites a few years ago
- Species translocation and investigations such as Fen Raft Spider, Lesser Whirlpool Ramshorn Snail, Nathusius Pipistrelle and Milk Parsley are positive, improving knowledge, development and action to support species recovery.
- There is evidence that agri-environment schemes are benefiting breeding Lapwing and Redshank, both inside and outside nature reserves.
- The BA's direct grant from the Department for Environment, Food and Rural Affairs (Defra) has shrunk by 40% in real terms since 2010. Many other Government funded bodies and NGOs working in the Broads have been similarly impacted.
- There has been ongoing nature recovery and land acquisition by the Wildlife Trusts, RSPB and BA in the past five years (notably around extending the Halvergate Fleet, Hickling, Carlton Marsh, Worlingham Marsh and fen at Hulver Ground).

2.11 DEFRA Outcomes Framework

To support Protected Landscapes in meeting their huge potential for nature, climate, people and place, Government has established targets for National Parks and National Landscapes with the Outcomes Framework which as published in January 2024⁷. These targets promote the actions that are most needed to achieve positive changes. They set the ambition for

⁷ [Protected Landscapes Targets and Outcomes Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/protected-landscapes-targets-and-outcomes-framework)

how we expect Protected Landscapes to achieve 3 outcomes from our Environmental Improvement Plan (EIP) 2023:

- Goal 1: Thriving plants and wildlife
- Goal 7: Mitigating and adapting to climate change
- Goal 10: Enhancing beauty, heritage and engagement with the natural environment

Thriving plants and wildlife targets are set to motivate more activity on the components needed to ensure wildlife can thrive.

Protected Landscape bodies and partners should seek to increase the amount of land in favourable management in Protected Landscapes through meeting the targets below and other available means. This will maximise the contribution that Protected Landscapes can make towards our national targets for nature recovery.

- Target 1 - Restore or create more than 250,000 hectares of a range of wildlife-rich habitats within Protected Landscapes, outside protected sites by 2042 (from a 2022 baseline).
- Target 2 - Bring 80% of SSSIs within Protected Landscapes into favourable condition by 2042.
- Target 3 - For 60% of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition by 31 January 2028.
- Target 4 - Continuing favourable management of all existing priority habitat already in favourable condition outside of SSSIs (from a 2022 baseline) and increasing to include all newly restored or created habitat through agri-environment schemes by 2042.
- Target 5 - Ensuring at least 65% to 80% of land managers adopt nature friendly farming on at least 10% to 15% of their land by 2030.

The thriving plants and wildlife targets set by Government demonstrate the great importance to habitats and species in the Broads Authority Executive Area and the great potential the area has to benefitting wildlife.

2.12 Campaign for National Parks Health Check Report on National Parks

[National Parks Health Check Report - Campaign for National Parks \(cnp.org.uk\)](https://cnp.org.uk) was completed in 2024. This report sets out the first full assessment of how well the National Parks of England and Wales are supporting nature recovery. It provides evidence of the current situation and identifies the changes needed to policy, legislation and practice in order to secure the step-change in progress that is so urgently needed.

National Parks also have a critical role to play in delivering national level targets for restoring certain habitats and in achieving targets to halt and reverse the declines in the abundance of species in both England and Wales.

Put simply, making National Parks better is fundamental to tackling species extinction and biodiversity loss.

National Parks and The Broads have a critical role to play in delivering national level targets for restoring certain habitats and in achieving targets to halt and reverse the declines in the abundance of species.

2.13 Pressures on land use

Within Norfolk, there are **pressures on land use**, the biggest being significant and unprecedented levels of growth. The population of the Norfolk is projected to increase from 916,120 in 2021 to 1,029,249 by 2043⁸, an increase of around 11%. In addition to these homes is the infrastructure needed to support this – transport, education, health and social care, utilities and community facilities. This all requires space (land) and resources.

The continuous growth in development and urbanisation means the county now has a **highly fragmented landscape** with small pockets of habitat supporting rare and vulnerable species. The Lawton Report “Making Space for Nature”⁹ has emphasised the importance of networks and connectivity for biodiversity. Fragmentation impairs species movement and migration, meaning these isolated populations are less able to survive or adapt to changing climate conditions and are put at further risk.

Pressures on land use and fragments landscapes are affecting wildlife.

2.14 A changing climate

The changing climate puts wildlife at further risk¹⁰; for example, with warming of 2°C, 72% of bumblebees in Norfolk could be lost, along with 75% of grasshoppers and bush crickets, and 68% of larger moths. The new climate, at this level of warming, potentially becomes unsuitable for 15 species of birds 7 species of mammal. The Swallowtail Butterfly, found in the UK only in the Norfolk Broads, and Red Admirals are among 11 species of butterfly which could be affected¹¹.

The changing climate puts wildlife at further risk.

2.15 The Broads Nature Recovery Strategy

The [Broads Nature Recovery Strategy \(BNRS\) \(2024-2029\)](#) replaces the Broads Biodiversity and Water Strategy (2019-2024) and was adopted in November 2024. It includes a 5-year Delivery Plan which outlines priority actions, either led by the Broads Authority or in partnership with others, as well as projects managed by other organisations working in the

⁸ [Population - UTLA | Norfolk | Report Builder for ArcGIS \(norfolkinsight.org.uk\)](#)

⁹ Lawton, et al. (2010) Making Space for Nature: A review of England’s Wildlife Sites and Ecological Network. Report to DEFRA.

¹⁰ Price, J. 2017. Trans. Norfolk Norwich Nat. Soc. 2017 50 (1) – [The potential impacts of climate change on the biodiversity of Norfolk](#)

¹¹ [Norfolk’s iconic Swallowtail Butterfly at risk from climate change - Tyndall Centre for Climate Change Research](#)

Broads. The strategy will be monitored by the Broads Biodiversity Partnership (BBP), a network of organisations, businesses, and individuals working collaboratively to enhance habitats and species.

The BNRS includes a vision, guiding principles, and details on available resources and mechanisms, such as biodiversity net gain. It assesses the state of the Broads natural environment, including biodiversity gains and losses, drivers of change, pressures, risks, and opportunities. The headline of the vision is for Biodiversity to be thriving in the Broads, which remains a globally important wetland adapting to climate change.

The BNRS 5-year Delivery Plan will be implemented alongside other relevant plans such as the Broadland Rivers Catchment Plan, the Authority's strategies for managing waterways, tourism, education and integrated access, and site-based plans.

The delivery actions are organised under four foci:

- i. Water quality and quantity
- ii. Habitats (wet grassland, fen, fen meadow, reedbed, woodland)
- iii. Species
- iv. Monitoring and research (across all three focus above)

To support the new national and regional provisions, the BA is working with key partners to prepare and deliver the Broads Nature Recovery Strategy (BNRS).

2.16 Norfolk and Suffolk Local Nature Recovery Strategy (LNRS)

LNRS are one of the mechanisms to achieve the Nature Recovery Network, a growing national network of wildlife-rich sites, supported by green and blue spaces that buffer and connect these sites. Preparation of each LNRS is led by a 'responsible authority' (County or Unitary Council) appointed by the Defra Secretary of State. The Broads is covered by the Norfolk LNRS and the Suffolk LNRS, and the BA is a 'Supporting Authority'. The emerging LNRS identifies the Broads as having extensive important biodiversity areas and significant opportunity areas that could be further enhanced for biodiversity.

The emerging LNRS identifies the Broads as having extensive important biodiversity areas and significant opportunity areas that could be further enhanced for biodiversity.

2.17 Summary of the local justification section

- a) The level of requirement for BNG (be it 10% or more) makes relatively little difference to the costs of mitigating and compensating for impacts.
- b) The majority (77%) of designated species recorded in the Broads are RDB or Notable (these include species designated as GRDB, RDB, Notable, Rare/Scarce).
- c) There are 19 Global Red Data Book species occurring in the Broads.
- d) Priority E of the Natural Capital Compendium says, "Develop policy & programmes for partnership working to increase species richness, abundance and ecological resilience by

managing existing habitats, improving habitat connectivity and enabling habitat & species migration”.

- e) The BA has declared a biodiversity emergency.
- f) The recovery and enhancement of biodiversity is seen as critically important to the Broads Authority and its partners.
- g) Conserving and enhancing biodiversity is one of the purposes of the Broads Authority.
- h) The Broads Authority Executive Area is clearly of great importance to habitats and species, including those that are visitors.
- i) The special qualities of the Broads include the variety of habitats and diversity of wildlife.
- j) Droughts and tidal surges and species disappearing from sites.
- k) The thriving plants and wildlife targets set by Government demonstrate the great importance to habitats and species in the Broads Authority Executive Area and the great potential the area has to benefit wildlife.
- l) National Parks and The Broads have a critical role to play in delivering national level targets for restoring certain habitats and in achieving targets to halt and reverse the declines in the abundance of species.
- m) Pressures on land use and fragments landscapes are affecting wildlife.
- n) The changing climate puts wildlife at further risk.
- o) To support the new national and regional provisions, the BA is working with key partners to prepare and deliver the Broads Nature Recovery Strategy (BNRS).
- p) The emerging LNRS identifies the Broads as having extensive important biodiversity areas and significant opportunity areas that could be further enhanced for biodiversity.

3: Viability evidence

A viability study has been produced to support the Local Plan for the Broads update. At the time of producing this note, it was being finalised, but the consultants assessed 20% BNG and have concluded this is viable.

The viability testing has used a 20% BNG contribution throughout for brownfield development, including a service charge, this represents a cost of £304 per dwelling and for development on a greenfield site, £1,272. For a 10% contribution, costs will be 19% lower (at £255 and £1,069 respectively). Costs are taken from the government’s impact assessment – biodiversity net gain and local nature recovery strategies (using the Central estimates for the East region) plus a 5% service charge. The extra costs of moving from a 10% to a 20% contribution for a brownfield site is £49 per dwelling which is minimal in terms of the total development costs for a new home.

Viability evidence indicates that 20% BNG policy requirement is viable.

4: Conclusion

The importance of the Broads as one of Europe's finest and most important wetlands for biodiversity and nature conservation is borne out by its many sites afforded international, national or local nature conservation status. A quarter of the executive area is designated as 'Wetland Habitats of International Importance' under the Ramsar Convention for its incredibly rich biodiversity. This includes around 75% of the remaining species-rich peat fen in lowland Britain, wet woodland (almost entirely confined to East Anglia) and Breydon estuary, which supports the highest density of wintering birds of any UK estuary. The tens of thousands of birds that visit the estuary and surrounding grazing marshes create a rich spectacle, with Pinkfooted Geese, Wigeons, and Black-tailed Godwit on the water, and Redshanks, Avocets and Lapwings foraging in the mud and wet grasslands. Birds of prey, such as peregrine and harriers, also use the vast stretches of wet grassland and estuary. The Broads supports a number of Local Nature Reserves and local wildlife sites.

Fundamentally, given the information in this topic paper that describes the losses of wildlife in the Broads, the importance of the Broads to wildlife and the opportunities the Broads offers to wildlife, it is clear that increasing the threshold for BNG is essential to help deliver biodiversity gains. Increasing BNG to 20% provides opportunities to aid habitat/species adaptability and maximise these to help compensate for losses arising from development (as one of the threats/opportunities). Increasing the BNG threshold also creates higher likelihood of gains in habitat connectivity.

Planning Committee

07 February 2025

Agenda item number 12

National Planning Policy Framework - Briefing

Report by Planning Policy Officer

Summary

The new National Planning Policy Framework (NPPF) has been published. This paper highlights the main changes.

Recommendation

That Members note the report and commentary.

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1. Introduction

- 1.1. On 12 December 2024, the new [National Planning Policy Framework \(NPPF\)](#) was released. This paper highlights some key changes and provides some commentary in italics where appropriate.

- 1.2. The wording in this report is taken from the Planning Resource article: [33 things you need to know about the final version of the revised NPPF | Planning Resource](#) (log in required).

2. Standard method for assessing local housing need

- 2.1. The **new NPPF**, at paragraph 62, directs that strategic policies should be informed by a **local housing need assessment conducted using the government’s standard method**. The changes propose to remove reference to the method being ‘an advisory starting point’, as well as removing reference to the ability of councils to use ‘exceptional circumstances’ to argue for the use of alternative approaches to assess need.
- 2.2. **Local planning authorities are instructed to “meet an area’s identified housing need”**. This is in comparison with the previous wording in paragraph 60, which instructed councils to “meet as much of an area’s identified housing need as possible”. The word ‘sufficient’ in the context of providing for housing is removed from paragraph one.

The Government’s standard method does not apply to the Broads. We have produced our own Local Housing Need Assessment.

3. Five-year housing land supply

- 3.1. **Changes made to the five-year housing land supply policy in December 2023 - including the ability to show a four rather than five-year housing land supply in certain cases - are reversed with the deletion of former paragraphs 77 and 78.** The general requirement for local planning authorities to include a buffer of five per cent on top of their five-year housing land supply, is retained in paragraph 78, “to ensure choice and competition in the market for land”.
- 3.2. **A 20 per cent buffer will be applied on top of local authorities’ five-year housing supply in some cases, for decision-making.** This will apply where there has been significant under-delivery of housing over the previous three years, the NPPF says.
- 3.3. **A 20 per cent buffer on top of five-year housing supply will also apply more widely for some authorities for decision-making purposes from 1 July 2026.** It will apply where a local planning authority has a housing requirement adopted in the last five years examined against a previous version of the NPPF, and whose annual average housing requirement is 80 per cent or less of the most up-to-date local housing need figure.
- 3.4. **The new NPPF removes the wording on past oversupply in paragraph 77, which was introduced to set out that previous over-supply could be set against upcoming supply.** The new framework also removes the option for LPAs to ‘fix’ their five-year housing land supply through annual position statements.

These buffers will apply to us when we produce the Five Year Land Supply Statement, but the ‘punishment’ of the presumption in favour of sustainable development does not apply to the Broads.

4. Green belt

- 4.1. **LPA’s should undertake a green belt review where they are unable to meet their identified needs for housing, commercial or other development through other means, the NPPF says.** “If that is the case, authorities should review green belt boundaries...and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”
- 4.2. **The revised document introduces the concept of ‘grey belt’ land within the green belt and clarifies that it would not include land which “strongly” contributes to three of the green belt purposes.** Wording in the glossary of the NPPF defines grey belt as land in the green belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) (as set out in paragraph 143). These are the purposes which seek to check unrestricted sprawl, prevent merging of towns and preserve the setting of historic towns. (However, it does not include the purpose of safeguarding the countryside from encroachment.) ‘Grey belt’ would also exclude land covered by key constraints such as national landscapes and SSSIs.
- 4.3. **Where it is necessary to release green belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other green belt locations,** the framework says in paragraph 148. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate, it adds.
- 4.4. **The development of homes, commercial and other development in the green belt should not be regarded as inappropriate in certain circumstances,** the NPPF says. This is where the following criteria apply:
 - The development would be on grey belt land and would not fundamentally undermine the purposes of the remaining green belt across the area of the plan.
 - There is a “demonstrable unmet need for the type of development proposed” (defined in relation to housing supply and delivery).
 - The development would be “in a sustainable location”.
 - The development proposed meets the ‘golden rules’ requirements.
- 4.5. **The following ‘golden rules’ would be applied to major housing development on land released from the green belt (set out in paragraph 156):**

- Affordable housing contribution which would be 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50 per cent. In the absence of a pre-existing requirement for affordable housing, a 50 per cent affordable housing contribution should apply by default. The use of site-specific viability assessment for land in or released from the green belt should be subject to the approach set out in planning practice guidance, the framework states.
- Necessary improvements to local or national infrastructure,
- The provision of new, or improvements to existing, local green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their homes, whether through onsite provision or through access to offsite facilities, the framework says.

A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission, the NPPF states.

- 4.6. **Development proposed on previously developed land in the green belt, and limited infilling in the green belt, is now classed as ‘not inappropriate development’,** as long as it doesn't cause “substantial harm to the openness of the green belt”.

None of these changes affect the Broads as it does not have a green belt.

5. Local character and design coding

- 5.1. **Paragraph 130 of the previous NPPF**, which was added to state that local character can be taken into account when councils consider their ability to meet their housing needs, **is deleted.**
- 5.2. **Wording changes to in paragraph 138 state that the National Model Design Code is “the primary basis for the preparation and use of local design codes”** and removes the preference in the previous NPPF for the preparation of local design codes being the primary means for assessing and improving design of development.
- 5.3. **Changes made in 2023 to the NPPF that reference “beauty” and “beautiful” in relation to well-designed development are reversed, with the word removed from the title of chapter 12.** The framework also clarifies that national policy is strongly supportive of all upward extensions, including mansard roofs (in paragraph 125e).
- 5.4. **Brownfield developments should be viewed positively, the NPPF says.** Wording in the document to emphasise this point has, however, been tweaked from the suggestion in the draft framework that such proposals “should be regarded as acceptable in principle.” The new wording in the final document is that proposals should be approved “unless substantial harm would be caused”.

- 5.5. **The definition of previously developed land in the glossary now includes “large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed.”** But glasshouses are not included in the definition.

The Authority’s Design Guide continues to be produced and is currently out for consultation.

6. Presumption in favour of sustainable development

- 6.1. **In a tweak to the presumption in favour of sustainable development, the NPPF says that for decision-taking, schemes should be granted permission unless policies in the framework provide a “strong” reason for refusal.** The previous version stated that such policies should provide a “clear” reason for refusal.
- 6.2. **The new version of the presumption also adds explicit reference to the need to consider key policies.** These are listed as those for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes.

Noted.

7. Strategic planning

- 7.1. **Local planning authorities and county councils “continue to be” under a duty to cooperate with each other, the new NPPF says.** “Effective strategic planning across LPA boundaries will play a vital and increasing role in how sustainable growth is delivered, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience,” it says. Paragraph 25 sets out the relevant bodies for collaboration on strategic plans, with reference to local enterprise partnerships now deleted.
- 7.2. **Once the matters for collaboration have been identified, new paragraph 27 states that authorities “should make sure that their plan policies are consistent with those of other bodies** where a strategic relationship exists on these matters, and with the relevant investment plans of infrastructure providers, unless there is clear justification to the contrary”. In particular, plans should ensure that:
- a consistent approach is taken to planning the delivery of major infrastructure;
 - unmet development needs from neighbouring areas are accommodated; and
 - any allocation or designation which cuts across the boundary of plan areas “is appropriately managed by all relevant authorities.”

The NPPF acknowledges that plans come forward at different times and that there can be a degree of uncertainty over other plans. In such circumstances, it states, those preparing plans “will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities.”

We continue to work closely with our district and county councils. An updated Norfolk Strategic Framework is being produced. A duty to cooperate statement to support the emerging Local Plan for the Broads will come to a future Planning Committee.

8. Affordable housing

- 8.1. **Housing needs assessments should explicitly consider the needs of those requiring social rent, the NPPF says.** It states that authorities specify their expectations on social rent delivery as part of broader affordable housing policies. Reference is also added in the new document to assessing the needs of 'looked after children', which a footnote says can be evidenced in the relevant LPA's Children's Social Care Sufficiency Strategy.
- 8.2. **The requirement to deliver at least ten per cent of the total number of homes on major sites as affordable home ownership, as set out in the previous NPPF, is removed.**
- 8.3. **New wording in the framework expects LPAs to take a positive approach to development proposals that have a mix of tenures and types, through both plans and decisions.** New paragraph 69 states that mixed tenure sites can provide a range of benefits "including creating diverse communities and supporting timely build out rates". LPAs, it says, "should support their development through their policies and decisions." It recognises, however, that this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported.

Noted.

9. Supporting economic growth and clean energy

- 9.1. **Local planning authorities should pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics, the NPPF says.** Planning policies and decisions should make provision for new, expanded or upgraded facilities and infrastructure to support the growth of knowledge and data-driven, creative or high technology industries, including data centres and grid connections, it states.
- 9.2. **The framework, at paragraph 87, says storage and distribution operations should be provided for "that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation".** The same paragraph also includes new text that provision should be made for "the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience."
- 9.3. **Decision-makers should give "significant weight" to the benefits associated with renewable and low carbon energy generation, and proposals contributing to meeting a net zero future, it says at paragraph 164.** However, wording in the draft which stated

that local planning authorities should support planning applications for all forms of renewable and low carbon development has not been included in the final document.

- 9.4. **Authorities should consider identifying suitable areas for renewable and low carbon development when producing plans**, where it is likely that in allocating a site, it would help secure development, it states.
- 9.5. **The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications**, taking into account the full range of potential climate change impacts, new paragraph 163 of the document says.

Noted.

10. Infrastructure

- 10.1. **“Significant weight” should be placed on the importance of facilitating new, expanded or upgraded public service infrastructure when considering proposals for development, new wording in paragraph 101 says.** The framework also includes reference to post-16 education places to support the delivery of this type of education provision.
- 10.2. **Development proposals and allocation of sites should ensure that sustainable transport modes are prioritised, taking account of the vision for the site, the NPPF says.** Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residential cumulative impacts on the road network following mitigation, would be severe, “taking into account all reasonable future scenarios”, paragraph 116 states.

Noted.

11. Intervention, fees and transitional arrangements

- 11.1. **The new NPPF applies straight away for decision-making.** However, existing policies are not necessarily out of date and “due weight” should be given to them. Policies should not be regarded as out of date where LPAs meet certain criteria relating to housing supply and delivery. **Where** a local planning authority has confirmed its housing land supply position for a year through a published Annual Position Statement that has been examined by the Planning Inspectorate against the previous version of this Framework, this position will stand until the Annual Position Statement expires, the framework states.
- 11.2. **For plan-making, the new NPPF applies from 12 March 2025.** This is with the exception of the following cases:
- Where the plan has reached the Regulation 19 stage of consultation on or before 12 March 2025, and its draft housing requirement meets at least 80 per cent of local housing need

- Where the plan is submitted for examination on or before 12 March 2025
- Plans which include policies to deliver levels of housing and other development set out in a preceding local plan adopted since 12 March 2020
- The local plan is in an area where there is an operative Spatial Development Strategy and the local plan has reached Regulation 19 stage on or before 12 March 2025.

Our proposed timeline will be to submit in July 2025 so the Local Plan will be prepared under the current Local Plan system but assessed under this new NPPF.

12. Next steps

12.1. Officers will assess the changes to the NPPF and reflect them in the emerging Local Plan. It is intended to bring the Regulation 19 version of the Local Plan to Planning Committee and Broads Authority in March 2025 for endorsement for consultation.

Author: Natalie Beal

Date of report: 20 December 2024

Planning Committee

07 February 2025

Agenda item number 13

Circular 28/83 Publication by Local Authorities of information about the handling of planning applications Q4 (01 October to 31 December 2024)

Report by Planning Technical Support Officer

Summary

This report sets out the development control statistics for the quarter ending 31 December 2024.

Recommendation

To note the report.

1. Development control statistics

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

Table 1

Number of applications

Category	Number of applications
Total number of applications determined	43
Number of delegated decisions	37
Numbers granted	41
Number refused	2
Number of Enforcement Notices	0
Consultations received from Neighbouring Authorities	23

Table 2
Speed of decision

Speed of decision	Number	Percentage of applications
Under 8 weeks	26	60.6%
8-13 weeks	2	4.6%
13-16 weeks	0	0.0%
16-26 weeks	0	0.0%
26-52 weeks	0	0.0%
Over 52 weeks	0	0.0%
Within agreed extension ¹	15	34.9%
Outside of agreed extension	0	0.0%

- 1.2. Extensions of time were agreed for fifteen applications. All fifteen of these were required because further information was awaited, amendments had been made to the scheme, there had been other discussions which had taken it over time or because a re-consultation was underway.

Table 3
National performance indicators: BV 109 The percentage of planning applications determined in line with development control targets to determine planning applications.

National target	Actual
60% of Major applications ¹ in 13 weeks (or within agreed extension of time)	100%
65% of Minor applications ² in 8 weeks (or within agreed extension of time)	100%
80% of other applications ³ in 8 weeks (or within agreed extension of time)	96.3%

Author: Thomas Carter

Date of report: 03 January 2025

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

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

³ Other refers to all other application types

Appendix 1 – [PS1 returns](#)

Appendix 2 – [PS2 returns](#)

Appendix 1 – PS1 returns

Measure	Description	Number of applications
1.1	On hand at beginning of quarter	41
1.2	Received during quarter	31
1.3	Withdrawn, called in or turned away during quarter	2
1.4	On hand at end of quarter	27
2.	Number of planning applications determined during quarter	43
3.	Number of delegated decisions	37
4.	Number of statutory Environmental Statements received with planning applications	0
5.1	Number of deemed permissions granted by the authority under regulation 3 of the Town and Country Planning General Regulations 1992	0
5.2	Number of deemed permissions granted by the authority under regulation 4 of the Town and Country Planning General Regulations 1992	0
6.1	Number of determinations applications received	0
6.2	Number of decisions taken to intervene on determinations applications	0
7.1	Number of enforcement notices issued	0
7.2	Number of stop notices served	0
7.3	Number of temporary stop notices served	0
7.4	Number of planning contravention notices served	0
7.5	Number of breach of conditions notices served	0
7.6	Number of enforcement injunctions granted by High Court or County Court	0
7.7	Number of injunctive applications raised by High Court or County Court	0

Appendix 2 – PS2 returns

Table 1

Major applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	1	0	1	0	1	0	0	0	0	0
Offices/ Light Industry	0	0	0	0	0	0	0	0	0	0
Heavy Industry/Storage/Warehousing	0	0	0	0	0	0	0	0	0	0
Retail Distribution and Servicing	0	0	0	0	0	0	0	0	0	0
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Large-Scale Major Developments	0	0	0	0	0	0	0	0	0	0
Total major applications	1	0	1	0	1	0	0	0	0	0

Table 2

Minor applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Dwellings	3	2	1	1	0	0	0	0	0	2
Offices/Light Industry	0	0	0	0	0	0	0	0	0	0
General Industry/Storage/Warehousing	0	0	0	0	0	0	0	0	0	0
Retail Distribution and Servicing	0	0	0	0	0	0	0	0	0	0
Gypsy and Traveller Sites	0	0	0	0	0	0	0	0	0	0
All Other Minor Developments	12	12	0	6	0	0	0	0	0	6
Minor applications total	15	14	1	7	0	0	0	0	0	8

Table 3

Other applications

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Minerals	0	0	0	0	0	0	0	0	0	0
Change of Use	5	5	0	3	0	0	0	0	0	2
Householder Developments	17	17	0	13	1	0	0	0	0	3
Advertisements	0	0	0	0	0	0	0	0	0	0
Listed Building Consent to Alter/Extend	5	5	0	3	0	0	0	0	0	2
Listed Building Consent to Demolish	0	0	0	0	0	0	0	0	0	0
Certificates of Lawful Development ⁴	2	2	0	2	0	0	0	0	0	0
Notifications ⁴	0	0	0	0	0	0	0	0	0	0
Other applications total	29	29	0	21	1	0	0	0	0	7

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

Table 4

Totals by application category

Application type	Total	Granted	Refused	8 weeks or less	More than 8 and up to 13 weeks	More than 13 and up to 16 weeks	More than 16 and up to 26 weeks	More than 26 and up to 52 weeks	More than 52 weeks	Within agreed extension of time
Major applications	1	0	1	0	1	0	0	0	0	0
Minor applications total	15	14	1	7	0	0	0	0	0	8
Other applications total	27	27	0	19	1	0	0	0	0	7
TOTAL	43	41	2	26	2	0	0	0	0	15
Percentage (%)	-	95.3	4.7	60.5	4.6	0	0	0	0	34.9

Planning Committee

07 February 2025

Agenda item number 14

Appeals to the Secretary of State update

Report by Development Manager

Summary

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

Recommendation

To note the report.

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2023/0002/ENF BA/2023/0003/ENF BA/2023/0004/UNAUP2 APP/E9505/C/23/3322890 and APP/E9505/C/23/3322949	Jeanette Southgate and Mr R Hollocks	Appeals received by the BA on 24 and 26 May 2023 Appeals start dates 27 and 29 June 2023	Berney Arms Inn	Appeal against enforcement notice - occupation of caravan	Committee decision 31 March 2023 LPA Statements submitted 9 August and 11 August 2023

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2023/0291/TPOA BA/2023/0002/REF APP/TPO/E9505/9846	Mr J Calver	Appeal received by the BA on 23 August 2023 Appeal start date 2 July 2024	River Green Yarmouth Road Thorpe St Andrew	Appeal against refusal to grant permission for works to TPO tree: T1: Horse Chestnut - Reduce primary stems by approximately 6m & reduce limb at 5.5m.	Delegated decision 11 August 2023 Fast track appeal so no LPA Statement required Site Visit date TBC
BA/2024/0091/HOUSEH BA/2024/0003/HHAPP APP/E9505/D/24/3349349	Mr P Albon	Appeal received by the BA on 8 August 2024 Appeal start date 10 September 2024	Hill Crest, The Hill, Shipmeadow	Horizontal cladding attached to exterior wall surfaces of dwelling (retrospective)	Delegated decision 10 May 2024 Fast track appeal so no LPA Statement required
BA/2024/0092/FUL BA/2024/0002/REF APP/E9505/W/24/3353862	Mr P Albon	Appeal received by the BA on 16 October 2024	Hill Crest, The Hill, Shipmeadow	Erection of storage barn (retrospective)	Delegated decision 10 May 2024 LPA Statement submitted

Application reference Appeal reference PINS reference	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2024/0032/CLEUD BA/2024/0001/REF APP/E9505/X/24/3350415	Mr John Atkins	Appeal start date 26 November 2024	Driftwood, 104 Lower Street, Horning, Norfolk	Lawful Development Certificate for 10 years use as holiday accommodation	Delegated decision 8 May 2024

Author: Steve Kenny

Date of report: 21 January 2025

Background papers: BA appeal and application files

Planning Committee

07 February 2025

Agenda item number 15

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 23 December 2024 to 24 January 2025 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Horning Parish Council	BA/2024/0431/HOUSEH	Sherwood Ropes Hill, Horning Norfolk NR12 8PA	Mr & Mrs Jones	Proposed Cart lodge to provide undercover parking and general household storage	Approve Subject to Conditions
Hoveton Parish Council	BA/2024/0380/FUL	Royall Retreat Riverside Road Hoveton Norfolk NR12 8UD	Richard Hildred	Demolition of existing dwelling house and erection of new dwelling house	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Hoveton Parish Council	BA/2024/0407/HOUSEH	Aquarius Meadow Drive Hoveton Norfolk NR12 8UN	Mr Tony O`Neill	Proposed single storey side extension	Approve Subject to Conditions
Potter Heigham Parish Council	BA/2024/0436/HOUSEH	Little Quay, 7 North West Riverbank Potter Heigham Norfolk NR29 5ND	Mr Keith Thomas	Open structure pavilion / boathouse over mooring Retrospective	Refuse
Thurne Parish Council	BA/2024/0390/HOUSEH	Quackers The Street Thurne Norfolk NR29 3AP	Mr David Short	Extension to dwelling incorporating new garage roof, with new front porch.	Approve Subject to Conditions
Wroxham Parish Council	BA/2024/0310/FUL	Corbally Beech Road Wroxham Norfolk NR12 8TW	Mr J Ox	Replacement of 40.5m of timber quay heading with new timber quay heading	Approve Subject to Conditions

Tree Preservation Orders confirmed by officers under delegated powers

Parish	Address	Reference number	Description
Bungay Town Council	37 and 45 Bridge Street Bungay Suffolk NR35 1HD	BA/2024/0016/TPO	Trees [T1-3] Poplar [T4] Ash

Parish	Address	Reference number	Description
Oulton Broad Parish Council	Dabchick Broadview Road Lowestoft Suffolk NR32 3PL	BA/2024/0017/TPO	Groups [G1] Holly, Holm Oak, Scots Pine and Atlas Cedar [G2] Yew, Hawthorn and 2 x Holm Oak Trees [T1 & T2] Holm Oak
Oulton Broad Parish Council	Land At Plot 2 Boathouse Lane Lowestoft Suffolk NR32 3PP	BA/2024/0018/TPO	Tree [T1] Oak
Oulton Broad Parish Council	Ice House Quay Commodore Road Lowestoft Suffolk NR32 3QU	BA/2024/0019/TPO	Tree [T1] Sycamore

Author: Steve Kenny

Date of report: 27 January 2025