

**Local Development Framework:
Preparation of Site Specific Policies Development Plan Document
Report on Preferred Options Consultation and
Proposed Development Plan Document**
Report by Planning Policy Officer

Summary: This report carries forward the process of preparing the Site Specific Policies Development Plan Document (DPD). It advises members of the results of the consultation on 'Issues, Options and Preferred Options' carried out in the spring, and presents for consideration a draft 'Proposed DPD' which takes into account the results of that consultation and further research.

The recommended DPD is to be reported to the full Authority for its approval as firm proposals for adoption. The Planning Committee is invited to support that recommendation.

Recommendation: That the Committee:

- (i) notes the contents of the Consultation report;
- (ii) notes the contents of the recommended Site Specific Policies DPD;
- (iii) recommends that the Authority:
 - (a) approves the attached draft as its formal 'Proposed Site Specific Policies DPD' for publication, and submission to examination, with a view to eventual adoption; and
 - (b) delegates appropriate authority to make minor changes to the DPD, complete with accompanying documentation, and to recommend any changes to the inspector conducting the examination.

1 Introduction

- 1.1 The Authority began preparation of a 'Site Specific Policies Development Plan Document' (Sites DPD for short) in December 2010. This is provided for in the Authority's adopted Local Development Scheme. The Sites DPD will complement the already adopted Core Strategy and Development Management Policies DPDs, and replace the last of the remaining 'saved' Broads Local Plan policies. It will also provide the initial content for the Authority's Adopted Policies Map (replacing the Local Plan Proposals Map).

- 1.2 An initial consultation was held in 2011, and the suggestions received then informed the Authorities 'Draft Site Specific Policies: Issues, Options and Preferred Options'. This document was subject to consultation with the public and key stakeholders early this year. The range and content of site specific policies has been revised in the light of the consultation responses received, further detailed negotiation and investigation, and the publication of the National Planning Policy Framework.
- 1.3 The Authority is shortly to be recommended to approve these revised policies as its formal 'Proposed Sites DPD', and would no doubt wish to be advised on the matter by the Planning Committee. Subject to the Authority's approval of the Proposed Sites DPD, this would then be formally published to allow the public to make comments to the planning inspector who will examine the soundness and legal compliance of the DPD.
- 1.4 Following the Localism Act and associated regulations it is now up to local planning authorities to decide what to call their development plans individually and collectively. The Government tends to refer to 'local plan' (though this name is not used in the legislation), and this is interpreted as meaning what was until recently called the local development framework, whether this comprises one or more development plan documents. Once the Sites DPD is adopted it will be clearer and less wordy to refer to the Authority's development plan(s) as 'the local plan'. However, while the 1997 Broads Local Plan is still in place, and having consulted on the Sites DPD (and others) as replacing 'the local plan', it is likely to be less confusing to retain the 'DPD' terminology in the interim.
- 1.5 The following section below reports on the consultation on the Draft Site Specific Policies, and the responses to this.
- 1.6 The third section of the report explains the recommended 'Proposed DPD' and sets out the procedural steps that will follow approval.

2 Report on 'Draft Site Specific Policies: Issues, Options and Preferred Options Consultation'

- 2.1 The Planning Committee, at its meeting of 4 March 2011, endorsed a programme of preparation which involved two stages of full public consultation in advance of formal publication of a Proposed Sites DPD. This is in conformity with the Authority's adopted Statement of Community Involvement which guides the way that it involves members of the public in its plan-making and meets its obligations under the Planning Acts in these matters. The Authority approved the Consultation documents, including draft site specific policies, and provisionally rejected options.
- 2.2 The first stage of consultation took place in spring 2011, and the Planning Committee and Authority received reports on the results of this first stage in December 2011 and January 2012 respectively.

- 2.3 The second stage of consultation, titled 'Draft Site Specific Policies: Issues, Options and Preferred Options', formally ran from 23 February to 5 April 2012, a period of six weeks. This consultation was announced by widespread publicity to a range of relevant audiences. Consultees were invited to make any comments they wished, but were particularly asked whether they agreed, or not, with
- the choice and detail of the listed Draft Site Specific Policies, and why;
 - the provisional rejection of the other options considered, and why;
 - the range of issues considered for the document and each option, and the way they have been assessed.

2.4 Announcement of the consultation included:

- formal notices in the local press;
- consultation highlighted and detailed on the Broads Authority's website;
- presentations, and question and answer sessions, on the consultation in the Planning Parish Forum and Broads Forum;
- posters provided to the local councils' offices and libraries in the area, as well as displayed in the Broads Authority's office reception and visitor information centres;
- announcement in the Broads Bulletin; and
- highlighted in a small number of informal meetings on other topics with parish councillors and others.

Around 680 letters were sent direct to:

- a wide range of individuals and organisations who have expressed an interest in the LDF or planning in the Broads, including local and special interest groups; plus
- statutory consultees including
 - parish, town, district, city, borough and county councils;
 - Government agencies and departments; and
 - utility companies, etc.

Further information and advice on the consultation was provided to parish clerks and others by email and telephone.

- 2.5 44 parties responded to the consultation, and these are listed in Appendix 1a. Ten of these responses were received shortly after the formal close of consultation, but have also been included in the following assessments. Some of the responses made comments on a range of issues, resulting in a total of 248 'comments' on individual draft policies, rejected options or other parts of the consultation documentation. These are summarised in Appendix 1b, which gives an officer summary of each 'comment', and the respondent who sent it. A fuller schedule of these comments (which space precludes inclusion here), including the respondents own words, and the response the Authority is recommended to make, will be made available on the Authority's website, and available in hard copy to Authority members on request.

- 2.6 In summary the consultation responses can be said to be largely:
- (a) numerous comments on specific areas and issues by parish councils, individuals and local organisations;
 - (b) a very small number of specific proposals received from landowners, etc; and
 - (c) a number of consultees, including statutory bodies, highlighting in considerable detail their specialist issues, concerns and suggestions.
- 2.7 The main issues arising from this consultation may be summarised as follows (in no particular order):
- a significant level of support for the Draft Policies in general, and for specific policies;
 - a number of concerns about the meaning or implementation of particular aspects of certain policies;
 - a small number of objections to specific policies, including from those whose proposals of allocation for development have not been favoured;
 - a range of technical advice and comment, largely positive, from statutory agencies and specialist bodies, especially on the Draft Sustainability Appraisal Report and Draft Habitats Regulations Assessment Report.
- 2.8 Following on from these representations meetings, discussions were held with a number of the respondents to clarify their concerns and comments, or to investigate further the potential for revised policies or developments. Of particular note is additional consultation subsequently undertaken in response to a Parish Council representation on the Draft Site Specific Policies for West Somerton (see following).
- 2.9 **Additional Consultation for West Somerton**
- 2.9.1 A proposal by Somerton Parish Council to 'extend the existing development boundary' to include the garden of The Firs, Staithe Road, West Somerton was included in the consultation document as a 'provisionally rejected option'. (Note also that no development boundary at all was proposed for West Somerton once the 1997 Local Plan is superseded, in common with most other small settlements in the Broads.)
- 2.9.2 Somerton Parish Council's proposal to allow development of this land predates adoption of the 1997 Local Plan. The Authority at that time considered the proposal, and also the Inspector's non-binding recommendations on it, and decided not to include it within the development boundary. The Parish Council has felt greatly aggrieved about this decision ever since, and has repeatedly sought to have the issue re-visited. In the interim the owner of the land has been refused planning permission for residential development of the land, and lost an appeal against this refusal, on the grounds that it was outside the development boundary.

- 2.9.3 Somerton Parish Council objected to the provisional rejection of its earlier proposal in the Draft Site Specific Policies consultation documents. Discussions were held with the Chairman and other members of the Parish Council to seek to clarify the issues and identify any possible resolution.
- 2.9.4 The Parish Council was advised that it could use its new planning powers under the Localism Act to either grant planning permission for the development through a neighbourhood development order or include it within a development boundary through a neighbourhood plan. Any such plan or order would be subject to the proposal gaining over 50% of the votes in a local referendum. The Parish Council were of the opinion that the procedures and work involved in producing such a plan or order were unduly burdensome, and that the matter could be resolved more simply by the Broads Authority agreeing to its request.
- 2.9.5 The proposal had strong support from the Parish Council. It was also apparent, however, that there was a range of local views on the desirability, or otherwise, of developing this piece of land, and also whether additional land adjacent should also be included in any such development.
- 2.9.6 Your officers' judgement was that while this proposal was not one which was likely to be recommended to the Authority in purely land use planning terms, the proposed development under discussion was not of a scale which would, of itself, undermine the overall strategy for the Broads as expressed by the Broads Core Strategy. The latter is a test an inspector would have to apply before approving any neighbourhood plan or order. National Planning Policy now places a high value on the responsiveness of planning to community wishes for additional development.
- 2.9.7 A simple survey was devised to provide the Authority with a broad measure of the degree of local support for the Parish Council's proposal. After some negotiation on precise wording, the Parish Council kindly agreed to help with the survey.
- 2.9.8 It is important to emphasise that the intention of the survey was not to replicate the referendum of local electors which would be undertaken by the Borough Council in the event of a neighbourhood plan. The funds and time involved was not available, and the Authority does not have access to the Electoral Register for such purposes. Rather, the survey was intended to provide an approximate indication to the Authority of the general level of support for the proposal among the local community for the proposal. To this end a questionnaire was sent to each household (not each elector) in the immediate locality (taken to be that part of Somerton Parish within the designated Broads area, i.e. the main part of West Somerton).
- 2.9.9 The Parish Council provided a count of the number of dwellings in the area, publicised the survey, and delivered a questionnaire to each household. It also added the Parish Council's name to the questionnaire in support of the survey, and provided Parish Councillor contact details to sit alongside those of the Broads Authority officer for those who wished to discuss the survey.

- 2.9.10 60 survey forms were issued on 15 May and responses were requested by 31 May, a period of just over two weeks, but late responses were also counted. Further details of the survey responses are attached as Appendix 2.
- 2.9.11 The responses received indicate a very high level of support for some housing development on the land proposed by the Parish Council, even allowing for various concerns and qualifications mentioned by respondents. Responses in support of development outnumbered those against by almost 4 to 1.
- 2.9.12 In the light of these results the Authority is now recommended to allocate part of the land concerned for a limited number of dwellings, on the basis of the level of local support in the context of national planning policy's support for 'localism' and the promotion of more housing development. However, the Authority's decision on this recommendation will need to balance this against the wider strategic approach to development in the Broads, including the recommended absence of a development boundary for West Somerton, the implications for the character and appearance of the village and neighbouring occupier's amenity, and the opinion of those who opposed development here.
- 2.9.13 The area of land recommended for allocation is reduced from that proposed by the Parish Council and consulted on in the survey, to now exclude land owned by one respondent who was opposed to its development, hence development here is unlikely to take place and its inclusion would be difficult to justify. The policy is also worded to ensure that some of the issues raised by respondents are carefully considered in dealing with any planning application for development on the site.

2.10 **Conclusion to Consultation Report**

- 2.10.1 The Committee is asked to note the comments received in the main consultation, and in the additional consultation undertaken at West Somerton, and to have regard to them in considering the Proposed Sites DPD in the next stage of this report.

3 **Recommendations for the Proposed Sites DPD**

- 3.1 The contents and recommendations for the Proposed Sites DPD are the culmination of extensive work, including:
- the two formal stages of public consultation, as set out above;
 - a process of sustainability appraisal of all the options considered, carried out in-house and involving the input and expertise of a wide range of Authority officers and Natural England, incorporating a strategic environmental assessment of the recommended Proposed DPD;
 - a habitats assessment of all the draft and recommended policies, undertaken by specialist consultants;

- extensive consultation on detailed policy proposals with a range of specialist staff across the Authority (including development management, cultural heritage, ecology, landscape, waterways and access);
 - detailed discussions with a range of external consultees to address their concerns, obtain specialist advice, or explore the potential for revised proposals; and
 - consideration of the implications of the publication in March 2012 of the National Planning Policy framework.
- 3.2 As a result of the continuation of this work, but primarily the consultation reported above, greater confidence can now be placed in the general thrust of proposals put forward in the Draft Site Specific Policies. However, numerous detailed changes and improvements are considered necessary. Appendix 3 sets out the principal changes to the draft site specific policies now recommended. The overall changes include:
- two sites previously provisionally rejected now recommended for inclusion;
 - a number of policy boundaries amended, including extensions and reductions;
 - numerous detailed changes to wording to improve clarity and robustness, and to address issues raised in consultation; and
 - addition of a Government ‘model policy’ on the approach to determining planning applications, now expected to be adopted by every local planning authority.
- 3.3 The Proposed Sites DPD will be accompanied by a Habitats Regulations Assessment Report, Sustainability Appraisal Report, Equalities Impact Assessment, and Statement of Consultation, etc. Delegated authority is sought from the Authority for the Chief Executive to approve the finalisation of these documents for the required publication and submission of these alongside the Proposed DPD.
- 3.4 The recommended Proposed Sites DPD is attached to this report as Appendix 4 (4a – text, 4b – maps). This incorporates all the changes mentioned above and in Appendix 3. It is considered that this is an appropriate and sound set of policies which, in all the circumstances, will be a useful complement to the Broads Core Strategy and the Development Management Policies DPDs. The justification for each of the recommended policies is set out in the document itself.
- 3.5 Note that upon eventual adoption of the Proposed DPD, the last of the remaining policies in the 1997 Broads Local Plan will cease to have effect, as will the Local Plan Proposals Map. The policies to be deleted are listed at the end of the recommended DPD.
- 3.6 The Proposals Map will be replaced by a new statutory ‘Adopted Policies Map’ showing all the adopted Site Specific Policies in a single document, likely to be an overall map of the Broads, with insets. This simply indicates the same areas shown on the Proposed Sites DPD maps shown in Appendix

4. However, some adjustments are required for compliance with regulations, e.g. no overlap of any of the maps is allowed. It is also intended to prepare a companion 'constraints and opportunities' map, to identify flood risk areas, conservation areas, designated habitats sites, etc. Work is continuing to resolve these issues, and delegated authority is sought from the Authority for the Chief Executive to approve the final format of the Proposed Adopted Policies Map.

4 Next steps: Publication and Submission

- 4.1 Publication involves making the Proposed DPD, along with the appropriate supplementary documentation, publicly available for comment for a period of 6 weeks. It is anticipated that this will be concluded by Christmas this year. It is advertised by formal notice in newspapers and on the Authority's website, and in writing to statutory consultees and all those previously contacted in consultation. Comments received are recorded and forwarded to the inspector conducting the public examination. The purpose of publication is not to provide a further opportunity for revision of the Proposed DPD, either for the Authority or interested parties, but to help inform the inspector in reaching a judgement on the soundness of the DPD. In practice, however, it usually becomes desirable to suggest to the inspector a number of minor changes that address issues that come up after formal publication. In order to facilitate this, it is recommended that authority to approve such minor changes is delegated to the Chief Executive in consultation with the Chairmen of the Planning Committee and the Authority or, if time allows, to the Planning Committee.
- 4.2 Following publication and collation of the responses the published documents are then formally submitted to the Secretary of State and to the Planning Inspectorate. An independent planning inspector is appointed to conduct an examination of the legal compliance and the soundness of the Proposed DPD. This examination will usually include a public hearing to discuss the proposals, the objections and expressions of support received as a result of publication.
- 4.3 The Authority may only adopt the Proposed DPD if the inspector finds it is legally compliant and sound, and the Authority must, in practice, include any changes the inspector may recommend to make it so. A formal resolution of the Authority is required for adoption. The Authority will be provided with a report on this following receipt of the inspector's decision letter.

5 Final Conclusions

- 5.1 A second round of public consultation has enabled feedback on the Authority's draft site specific policies, provisionally rejected options, and approach to various issues. The publication of the National Planning Policy Framework has also revised the national policies which are important factors in the preparation and detail of plans and policies. These inputs have been used to review and refine the earlier proposals, and the resulting draft Proposed Site Specific Policies DPD is recommended for approval by the

Authority. The Planning Committee is invited to add its support to this recommendation.

- 5.2 Subject to the Authority's approval, and finalisation of a range of supplementary documentation for which delegated authority is sought, the Proposed DPD will be published for comment, and then submitted with the comments received for public examination by an independent inspector.
- 5.3 The inspector must judge whether the Proposed DPD and its preparation is legally compliant and 'sound', and rule whether the Authority may adopt the DPD, and if any changes are required before it may do so. It is anticipated that the Authority will be in a position to adopt the Sites DPD by the summer of 2013.

- Background papers:
- Broads Local Development Framework
 - Core Strategy DPD (adopted 2007)
 - Development Management Policies DPD (adopted 2011)
 - Statement of Community Involvement (adopted 2008)
 - Local Development Scheme (Mar 2010)
 - Broads Site Specific Policies DPD preparation documents
 - Sustainability Appraisal Report (Working Draft, Aug 2012)
 - Habitats Assessment Report (Working Draft, Aug 2012)
 - National Planning Policy Framework
 - East of England Plan (Regional Spatial Strategy)
 - Greater Norwich Development Partnership Joint Core Strategy
 - Great Yarmouth Draft Core Strategy (Amendment to the Core Strategy)
 - Great Yarmouth Local Plan
 - North Norfolk Core Strategy
 - Waveney Core Strategy

Author: John Clements

Date of report: 31 August 2012

Broads Plan Objectives: CC1, CC2, CC3, CC4, LC1, LC2, LC3, LC4, BD2, BD5, AL2, NA1, NA2, PE3, TR1, TR2, TR3

Appendices: APPENDIX 1 - Responses to Consultation on 'Draft Site Specific Policies'
(1a) List of Respondents
(1b) Schedule of summaries of comments received.

APPENDIX 2 -West Somerton Supplementary Consultation
(2a) Details of survey
(2b) Letter to local households
(2c) Survey Form
(2d) Letter of thanks to respondents, replying to some comments received.

APPENDIX 3 -Table of key recommended changes from Draft Site Specific Policies

Enclosure: APPENDIX 4 – Recommended Site Specific Policies DPD
(4a) Text (also showing policy text changes from Draft Site Specific Policies)
(4b) Maps – Please follow this link <http://www.broads-authority.gov.uk/authority/meetings/planning-committee/recommended-site-specific-policies-dpd.html>

Appendix 1a - List of Consultation Respondents – ‘Draft Site Specific Policies’ (I&O and PO)		
Respondents		Respondents
Acle Parish Council		Natural England
Acle War Memorial Recreation Centre		Nichols, Mr and Mrs J
Anglian Water		Norfolk and Suffolk Boating Association
Ashby, Herringfleet and Somerleyton Parish Council		Norfolk County Council
Broadland District Council		Norfolk Heritage Fleet Trust
Brundall Parish Council		Norwich Frostbite Sailing Club
Brundall Riverside Association		PURE Architecture
Charlesworth, R (Agent - Lanpro)		Repps with Bastwick Parish Council
Clarke, Mr J		Rockland St Mary with Hellington PC
Crown Point Estate (Agent - La Ronde Wright)		Ropes Hill Dyke Residents Association
Dilham Boating Club		RSPB
Environment Agency		Salhouse Parish Council
Essex and Suffolk Water		Somerton Parish Council
Fritton with St Olaves Parish Council		Sport England
Grahame, Lesley (Ward Councillor, Thorpe Hamlet)		Suffolk County Council
Harrison, Sir M		Suffolk County Council Archaeological Service
Highways Agency		Trowse with Newton Parish Council
Horning Parish Council		Walpole, Mr R
Horning Sailing Club		Water Management Alliance
Hoveton Parish Council		Waveney District Council
Ivy House Country Hotel (Agent - Wheatman Planning)		Wickham, Mrs S and Sofroniou, Mr C
Lanpro		Wroxham Parish Council
LANPRO (agent)		

Appendix 1b - Schedule of summaries of comments received.

ACL/DSSP-a Acle - Cemetery Extension

Acle Parish Council Representation:

Broads Authority Officer Summary of Representation:

The Parish Council's letter is part of a correspondence on the progress of its proposals, and is taken as a representation indicating:

- 1) That the Parish Council supports the allocation of the site for a cemetery;
- 2) The Parish Council has demonstrated commitment to, and potential feasibility of, the project, but does not have ownership of the site and the timescale for resolution of this matter is uncertain;
- 3) Details of the site area proposed have been amended from those previously under discussion, and proposed boundary treatment clarified.

ACL/DSSP-a Acle - Cemetery Extension

Broadland District Council Representation:

Broads Authority Officer Summary of Representation:

Supports the provision of such community facilities. Queries the immediate allocation of the whole site originally identified.

ACL/DSSP-a Acle - Cemetery Extension

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

States that EA generally accepts the suitability of the site for cemetery use in terms of water environment protection, but cautions that this assessment is based on some site investigation information previously provided. Highlights that the Agency's stance may change if future information, accompanying a planning application for this use, were to differ from that already assessed. Also sets out the Agency's normal requirements and justifications for investigation and approval of cemetery extensions in terms of water environment protection. It is implied that the Agency's requirements of information in support of a planning application are more onerous than the investigative work carried out to date.

ACL/DSSP-a Acle - Cemetery Extension

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Advises no minerals or waste safeguarding affecting this site.

ACL/DSSP-b Acle - Acle Playing Field Extension

Acle Parish Council Representation:

Broads Authority Officer Summary of Representation:

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

The Parish Council unanimously supports the draft policy. Further details of the proposals are provided, including a reduction in area from that previously discussed, relationship to the proposed cemetery extension adjacent, potential boundary treatment. Details of the need for additional sports area and intended provision are also provided.

ACL/DSSP-b Acle - Acle Playing Field Extension

Broadland District Council Representation:

Broads Authority Officer Summary of Representation:

Supports the provision of such facilities. Looks for clarification of approach to area, etc.

ACL/DSSP-b Acle - Acle Playing Field Extension

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Proposed use considered acceptable in flood risk terms.

ACL/DSSP-b Acle - Acle Playing Field Extension

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Site is partially on safeguarded mineral resources. No objection to allocation, in light of proposed use, provided no permanent buildings are proposed.

ACL/DSSP-b Acle - Acle Playing Field Extension

Sport England Representation:

Broads Authority Officer Summary of Representation:

Supports the sport facility enhancement in principle. Highlights that additional pitches may give rise to additional changing rooms and other ancillary facilities.

BEC/DSSP-a Beccles - Beccles Development Boundary

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Welcomes the requirement of retention of an open margin to the riverside, in the interests of protecting and enhancing the water environment..

BEC/DSSP-a Beccles - Beccles Development Boundary

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

Points out the mistaken use of the term 'lokes' instead of 'scores' in the Draft Policy text (but not planning summary assessment) relating to Beccles.

BEC/DSSP-a Beccles - Beccles Development Boundary

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Confirms no safeguarded minerals features within the Draft Beccles development boundary. (Note this relates only to the minority of the Draft development boundary which lies in Norfolk - the larger part is within Suffolk, where Suffolk County Council is the Minerals Planning Authority.)

BEC/DSSP-a Beccles - Beccles Development Boundary

RSPB Representation:

Broads Authority Officer Summary of Representation:

Suggests management and monitoring of water quality.

BEC/DSSP-a Beccles - Beccles Development Boundary

Suffolk County Council Representation:

Broads Authority Officer Summary of Representation:

Draws attention to high archaeological potential, and to national policy supporting this being addressed in any grant of planning permission. Has no objection, as highway authority, to development of the scale/location envisaged, subject to normal assessment & control of development proposals. The County Council may seek developer contributions towards transport improvements in the town.

BEC/DSSP-a Beccles - Beccles Development Boundary

Suffolk County Council Archaeological Service Representation:

Broads Authority Officer Summary of Representation:

Draws attention to the high potential for encountering archaeological remains in the area, and the potential for damage to this from construction works. Recommends that any planning permission here is subject to condition requiring archaeological investigation and recording.

BEC/DSSP-a Beccles - Beccles Development Boundary

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Corrects the adoption date of the Article 4 direction mentioned in the supporting text and documentation.

BRU/DSSP-a Brundall Riverside - Riverside Chalets and Mooring Plots

Brundall Riverside Association Representation:

Broads Authority Officer Summary of Representation:

Has no fundamental reservations about the draft policy. Expresses concern about the impact of national planning policy for areas at risk of flooding on the Brundall Riverside area, and the impact of this on local people, businesses and wildlife. Believes that adequate flood protection for this particular area can be achieved by raised floor levels, but that a maximum level should be stated in the policy to ensure that buildings are not raised excessively. Believes that minor development should be unconstrained by the policy, as the Association does not believe this could either affect flood risk or harm the nearby SSSI.

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Believes, in the light of the experience of members of the Association and the recent improvements to Station Road, that the limitations of the road access have been overstated.

BRU/DSSP-a Brundall Riverside - Riverside Chalets and Mooring Plots

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

EA pleased that flood risk has been given particular consideration here. Supports the specific reference in the policy to flood risk as whole area is in high flood risk zone. General comments (under separate heading) may also apply.

Expresses concern that the Draft Policy might permit new holiday accommodation and other development not compatible with national planning policy on flood risk, suggesting that this is explicitly addressed.

Suggests consideration of the ground floor level restriction in relation to the need to meet flood risk requirements. (Presumably meaning to suggest that flood requirements likely to require raised floor levels which might be incompatible with the height limitations in the Policy.)

Highlights that the draft policy appears not as restrictive in terms of the comparative size of replacement chalets as the Broads 'Development and Flood Risk Supplementary Planning Document'.

States that future planning applications should consider opportunities to reduce flood risk and manage residual risk. It also states 'betterment should be sought within replacement buildings'. (The latter is understood to suggest that improvements in terms of flood risk and management should be sought.)

Supports the policy intention to keep buildings back from the water's edge.

BRU/DSSP-a Brundall Riverside - Riverside Chalets and Mooring Plots

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Confirms no minerals or waste safeguarding affecting this site.

BRU/DSSP-b Brundall Riverside - Riverside Estate Boatyards, etc., including land adjacent to railway line

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

EA pleased that flood risk has been given particular consideration here. Supports the specific reference in the policy to flood risk as whole area is in high flood risk zone. General comments (under separate heading) may also apply.

Identifies that the proposed continued boatyard use is compatible with national policy, but suggests clarification of alternative development that may be permitted

BRU/DSSP-b Brundall Riverside - Riverside Estate Boatyards, etc., including land adjacent to railway line

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Confirms no minerals or waste safeguarding affecting this site.

BRU/DSSP-b Brundall Riverside - Riverside Estate Boatyards, etc., including land adjacent to railway line

RSPB Representation:

Broads Authority Officer Summary of Representation:

Wishes to see clearer guidance on planting, inclusion of nectar-rich plants, and a broader range of species than just trees.

BRU/DSSP-c Brundall Riverside - Mooring Plots

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

EA pleased that flood risk has been given particular consideration here. General comments (under separate heading) may also apply.

Welcomes the use of the area for mooring, and the presumption against permanent and seasonal occupation and the stationing of caravans, on flood risk grounds.

BRU/DSSP-c Brundall Riverside - Mooring Plots

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

Concern that the element of the policy seeking retention of trees and encouragement of new planting could have a harmful effect on sailing in the vicinity, including that associated with Coldham Hall Sailing Club just downstream. [Note that the reference to the Sailing Club being downstream, rather than upstream as it is from the defined area of this policy, suggests that the Association may have meant its comments in relation to the area covered by the policy BRU/DSSP-a (rather than c), and hence this will be treated a comment on both policies unless this can be clarified with the Association.]

Association considers that existing management of trees on the river corridor is inadequate to protect the interests of sailing and that this aspect of the policy could exacerbate these problems.

BRU/DSSP-c Brundall Riverside - Mooring Plots

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Confirms no minerals or waste safeguarding affecting this site.

BRU/DSSP-d Brundall Riverside - Brundall Marina

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

EA pleased that flood risk has been given particular consideration here. Supports the specific reference in the policy to flood risk as whole area is in high flood risk zone. General comments (under separate heading) may also apply.

Identifies that the proposed continued boatyard use is compatible with national policy, but suggests clarification of alternative development that may be permitted under already adopted Development Management Policies for the protection of employment sites and waterside commercial use sites.

BRU/DSSP-d Brundall Riverside - Brundall Marina

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

Concerned that the element of the policy seeking retention of trees and encouragement of new planting could have a harmful effect on sailing in the vicinity.

BRU/DSSP-d Brundall Riverside - Brundall Marina

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

BRU/DSSP-d Brundall Riverside - Brundall Marina

RSPB Representation:

Broads Authority Officer Summary of Representation:

Wishes to see 'SMART' indicators, baseline data, etc. to enable impact of the policy to be 'easily assessed'.

BRU/DSSP-e Brundall Riverside - Land east of the Yare Public House

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

EA pleased that flood risk has been given particular consideration here. General comments (under separate heading) may also apply.

Pleased that the area will be kept free of built development, because of the flood risk to the area concerned.

BRU/DSSP-e Brundall Riverside - Land east of the Yare Public House

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Advises no minerals or waste safeguarding affecting this site.

BUN/DSSP-a Bungay & Ditchingham - Development Boundary

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Suggests that, through the planning application process, sites elsewhere in Bungay (outside the area of this plan and planning authority) should be preferred locations for development to that covered by this Draft Policy.

BUN/DSSP-a Bungay & Ditchingham - Development Boundary

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Advises no minerals or waste safeguarding affecting this site.

BUN/DSSP-a Bungay & Ditchingham - Development Boundary

Suffolk County Council Archaeological Service Representation:

Broads Authority Officer Summary of Representation:

Draws attention to the high potential for encountering archaeological remains in the area, and the potential for damage to this from construction works. Recommends that any planning permission here is subject to condition requiring archaeological investigation and recording.

BUN/DSSP-a Bungay & Ditchingham - Development Boundary

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Corrects references to Article 4 Direction and rail service.

BUN/DSSP-b Bungay & Ditchingham - Ditchingham Maltings

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Refers to the then current planning application for development of the site as demonstrating the flood risk to the site as more limited than indicated by the EA and SFRA maps. Suggests that built development should be located in the lower risk areas, and reference is made to this in policy.

BUN/DSSP-b Bungay & Ditchingham - Ditchingham Maltings

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is on a safeguarded minerals resource (sand and gravel).

BUN/DSSP-b Bungay & Ditchingham - Ditchingham Maltings

RSPB Representation:

Broads Authority Officer Summary of Representation:

Policy may be appropriate. Water quality must be shown to not be adversely affected. No evidence is provided to support statement that Anglian Water has confirmed adequate capacity. Such evidence should be presented in the DPD.

BUN/DSSP-b Bungay & Ditchingham - Ditchingham Maltings

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Supports the building refurbishment and quality environment requirements of the Policy.

BUN/DSSP-c Bungay & Ditchingham - Maltings Meadow Sports Ground, Ditchingham

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights the flood risk to the site, and the distinction between sports facilities including changing rooms, which are classified as 'water-compatible', and assembly and leisure uses, which are classified as 'less vulnerable' and incompatible with the apparent flood risk to much of the site. Recommends that any such uses are restricted to that part of the site at a specified lower level of flood risk.

BUN/DSSP-c Bungay & Ditchingham - Maltings Meadow Sports Ground, Ditchingham

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

BUN/DSSP-c Bungay & Ditchingham - Maltings Meadow Sports Ground, Ditchingham

Sport England Representation:

Broads Authority Officer Summary of Representation:

Supports the Policy in its protection of the sports facility and the need to take into account its sensitive environment.

BUN/DSSP-c Bungay & Ditchingham - Maltings Meadow Sports Ground, Ditchingham

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Supports Policy and considers this will increase recreational facilities in the area.

CAN/DSSP-a Cantley - Sugar Factory

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Draws attention to the level and uncertainty of the Strategic Flood Risk Assessment (SFRA) about the flood risk to parts of the policy area. Suggests consideration of highlighting the flood risk constraints to development of the site, and outlines the application of national policy classifications to the policy.

CAN/DSSP-a Cantley - Sugar Factory

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Suggests addition of caveat regarding highway capacity and safety to the Policy.

CAN/DSSP-a Cantley - Sugar Factory

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Advises policy area is within the consultation area of a safeguarded waste management site, but this waste management is part of the sugar works and hence compatible with the draft policy provided no development unconnected with the sugar works is included.

CAN/DSSP-a Cantley - Sugar Factory

RSPB Representation:

Broads Authority Officer Summary of Representation:

Considers that the policy should require all developments to improve residential amenity and wildlife habitats.

Policy should include avoidance of harm to Natura 200 sites, given proximity of SPA and SCA.

Draft Monitoring Indicators should better specify measures used to assess Natura 2000 impacts, including baseline data and SMART indicators.

DIL/DSSP-a Dilham - Tyler's Cut Moorings

Dilham Boating Club Representation:

Broads Authority Officer Summary of Representation:

Queries detailed wording of draft policy, and questions rationale for elements of it.

DIL/DSSP-a Dilham - Tyler's Cut Moorings

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Supports the intended uses as compliant with national flood risk policy.

DIL/DSSP-a Dilham - Tyler's Cut Moorings

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

Concerned that the element of the policy seeking retention of trees and encouragement of new planting could have a harmful effect on sailing in the vicinity, obstruct light, and reduce security. The Association would object unless such planting was of a suitable type and position.

The Association considers the justification and assessment of the Policy is insufficiently clear.

The Association considers that existing management of trees on the river corridor is inadequate to protect the interests of sailing and that this aspect of the policy could exacerbate these problems.

Policy has been refined in consultation with the Dilham Boat owners Association to address this issue and clarify the Authority's intentions in this regard.

DIL/DSSP-a Dilham - Tyler's Cut Moorings

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Advises no minerals or waste safeguarding required for this site.

FIL/DSSP-REJ/1 Filby - Provisionally Rejected Option - Development Boundary for Filby

PURE Architecture Representation:

Broads Authority Officer Summary of Representation:

Objects to the rejection of this option, argues that there should be a development boundary for Filby, and suggests that such a boundary should include a specific identified piece of land. Offers the following justifications for continued provision of a development boundary: Good range of facilities in village, which additional development would help support; 1997 Local Plan development boundary has resulted in good development and architectural enhancement; there is further scope for infilling in the 1997 development boundary; residential use in this location would pose little risk to water quality in the Trinity Broads, development at Great Yarmouth is more significant in this respect, and it is preferable to remedy existing problems rather than allow these to stifle development; alignment of 1997 development boundary has protected the water's edge, and this could be continued; development boundary should not be lost on basis of infrastructure deficiency because Development Management Policy DP3 controls development in relation to this and would allow development that used innovative sustainable methods to deal with drainage issues; existing policies control development in relation to flood risk, and additional measures are not necessary.

GTU/DSSP-a Great Yarmouth - Newton - Development Boundary

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Advises that more up-to-date flood risk analysis shows that these policy areas are at greater risk of flooding than identified in the Broads SFRA, and that these policies should thus be reconsidered.

GTU/DSSP-a Great Yarmouth - Newton - Development Boundary

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

GTU/DSSP-b Great Yarmouth - Newton - Marina Quays

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Advises that more up-to-date flood risk analysis shows that these policy areas are at greater risk of flooding than identified in the Broads SFRA, and that these policies should be reconsidered in the light of this.

GTU/DSSP-b Great Yarmouth - Newton - Marina Quays

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

GTY/DSSP-b Great Yarmouth - Newton - Marina Quays

RSPB Representation:

Broads Authority Officer Summary of Representation:

Recommends policy includes no adverse impact on Natura 2000 sites, particularly Breydon Water SPA and Ramsar site.

GTY/DSSP-b Great Yarmouth - Newton - Marina Quays

Walpole, Mr R Representation:

Broads Authority Officer Summary of Representation:

Suggests development of a riverside path to Bure Park.
Queries the absence of reference to, or investigation of, Fleggburgh.

HLV/DSSP-REJ/1 Halvergate - Provisionally Rejected Option - Proposed Housing Development - Land at Halvergate

Anglian Water Representation:

Broads Authority Officer Summary of Representation:

Development of the site would be constrained by wastewater treatment facilities and sewerage network that are inadequate to meet the needs of the proposed development. Capacity and detailed design of development of this site would be constrained by the proximity of the existing pumping station. Water supply unlikely to be a constraint.

HOR/DSSP-a Horning - Development Boundary

Horning Parish Council Representation:

Broads Authority Officer Summary of Representation:

Supports policy.

HOR/DSSP-a Horning - Development Boundary

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

HOR/DSSP-b Horning - Car Parking

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Suggests that although the site lies in a lower flood risk zone, the proximity of identified higher flood risk areas should result in consideration of flood risk if a change of use is proposed in future.

HOR/DSSP-b Horning - Car Parking

Horning Parish Council Representation:

Broads Authority Officer Summary of Representation:

Supports policy. Suggests contribution from the proceeds of car parking here to improvements in the surrounding area.

HOR/DSSP-b Horning - Car Parking

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

HOR/DSSP-c Horning - Open Space

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Confirms appropriateness of proposed designation.

HOR/DSSP-c Horning - Open Space

Horning Parish Council Representation:

Broads Authority Officer Summary of Representation:

Policy supported.

HOR/DSSP-c Horning - Open Space

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

HOR/DSSP-d Horning - Waterside plots

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Welcomes the reference to the need for compliance with flood risk policies. Provides detailed advice regarding the guidance available to achieve this and proposes that opportunities to reduce and manage flood risk should be addressed in flood risk assessments for proposed developments, including replacement buildings.

HOR/DSSP-d Horning - Waterside Plots

Horning Parish Council Representation:

Broads Authority Officer Summary of Representation:

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Policy supported.

HOR/DSSP-d Horning - Waterside Plots

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

HOR/DSSP-d Horning - Waterside Plots

Ropes Hill Dyke Residents Association Representation:

Broads Authority Officer Summary of Representation:

Considers that the properties on Ropes Hill Dyke should not be included within this Policy area, and are more appropriately included within the development boundary, on the grounds of permanence, proximity to the village, infrastructure, etc.

HOR/DSSP-e Horning - Horning Sailing Club

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Notes site is in high flood risk zones, but that the supported use is compatible with this under national policy, and is pleased to note that dwellings and holiday accommodation will not be permitted. Suggests addition of flood risk as a constraint and monitoring indicator for the Policy.

HOR/DSSP-e Horning - Horning Sailing Club

Horning Parish Council Representation:

Broads Authority Officer Summary of Representation:

Policy supported.

HOR/DSSP-e Horning - Horning Sailing Club

Horning Sailing Club Representation:

Broads Authority Officer Summary of Representation:

Suggests amended wording to the policy to preclude business use in the policy area.

HOR/DSSP-e Horning - Horning Sailing Club

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

HOR/DSSP-f Horning - Crabbett's Marsh

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Supports the protection of the area for conservation, and the prohibition of caravans etc., as in accordance with the flood risk to the site.

HOR/DSSP-f Horning - Crabbett's Marsh

Horning Parish Council Representation:

Broads Authority Officer Summary of Representation:

Policy supported.

HOR/DSSP-f Horning - Crabbett's Marsh

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

HOR/DSSP-g Horning - Boatyards, etc. At Ferry Rd. & Ferry View Rd.

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Suggests consideration of inclusion of high flood risk status of the site in Policy and SA.
Recommends identification of alternative uses that might be acceptable under other policies applying to the site.

HOR/DSSP-g Horning - Boatyards, etc. At Ferry Rd. & Ferry View Road

Horning Parish Council Representation:

Broads Authority Officer Summary of Representation:

Policy supported.

HOR/DSSP-g Horning - Boatyards, etc. At Ferry Rd. & Ferry View Rd.

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

HOR/DSSP-g Horning - Boatyards, etc. At Ferry Rd. & Ferry View Rd.

RSPB Representation:

Broads Authority Officer Summary of Representation:

Clearer landscaping guidance should be provided. Planting should include nectar-rich species and not focus solely on trees.

HOR/DSSP-h Horning - Woodbastwick Fen moorings

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Supports proposed restriction of buildings, removal of houseboats and residential moorings where possible, on the basis of the flood risk to the site and national planning policy.

HOR/DSSP-h Horning - Woodbastwick Fen moorings

Horning Parish Council Representation:

Broads Authority Officer Summary of Representation:

Policy supported.

HOR/DSSP-h Horning - Woodbastwick Fen Moorings

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

LUD/DSSP Ludham

Norfolk Heritage Fleet Trust Representation:

Broads Authority Officer Summary of Representation:

Considers the policies for the Womack area acceptable.

LUD/DSSP-a Ludham - Development Boundary

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

LUD/DSSP-a Ludham - Development Boundary

RSPB Representation:

Broads Authority Officer Summary of Representation:

Development in Ludham must not worsen water quality. Seeks evidence that water supply and sewerage system can accommodate new development, to show no adverse impact on nearby Natura 2000 sites.

NOR/DSSP Norwich

Lanpro Representation:

Broads Authority Officer Summary of Representation:

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Proposes a conceptual 'development strategy' to use various parts of the Wensum and Yare in and close to Norwich for floating office (or business) space, houses, etc. Identifies a number of opportunities in the area, as follows:

1. Port of Norwich: River walk
2. Corporation Quay: Floating hi-tech business units
3. Deal Ground: Floating restaurants
4. Cary's Meadow: Activity and visitor centre
5. Thorpe island: Contemporary floating homes within marina
6. Thorpe Island: City centre moorings
7. Whitlingham Country Park: Riverside weddings, café and theatre
8. Thorpe Marshes: Activity and visitor centre
9. Griffin Lane: High quality floating homes, tourism and river bus centre.

Accompanying conceptual graphical material relates page by page to Vision, Strategic Master plan, Corporation Quay and Thorpe Island.

NOR/DSSP Norwich

Walpole, Mr R Representation:

Broads Authority Officer Summary of Representation:

Discusses the potential for access improvements around Norwich, and impacts of potential green infrastructure related to planned growth around Norwich. Suggests policies could be extended to cover riverside paths in Norwich, connections to other routes and locations, and the potential links with historical sites.

NOR/DSSP-a Norwich - Utilities Site

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Supports Draft Policy requirement for flood risk to be addressed.

Highlights the need for Flood Defence Consent from the EA in relation to the development addressed in the policy, and any bridge across the Wensum.

NOR/DSSP-a Norwich - Utilities Site

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is within an area of safeguarded mineral resources (sand and gravel).

NOR/DSSP-a Norwich - Utilities Site

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Suggests the Policy should include planning obligations for community facilities, and reference made to the Development Management Policy (DP30) on this topic.

NOR/DSSP-b Norwich - Riverside Walk

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights the need for the Agency's Flood Defence Consent for development and trees in the vicinity of the river, and flood defences maintenance access to be maintained.

NOR/DSSP-b Norwich - Riverside Walk

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is in the area of a safeguarded minerals (sand and gravel) resource.

ORM/DSSP-a Ormesby St Michael - Ormesby Waterworks

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights that part of the area is identified by EA as in a high flood risk zone, and the flood risk should be addressed in any future planning applications. Suggests that this might be referred to in the policy.

ORM/DSSP-a Ormesby St Michael - Ormesby Waterworks

Essex and Suffolk Water Representation:

Broads Authority Officer Summary of Representation:

Supports the protection afforded to the water treatment works by this policy. Suggests some slightly amended wording for that part of the policy setting out the approach to development of the waterworks.

ORM/DSSP-a Ormesby St Michael - Ormesby Waterworks

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

ORM/DSSP-a Ormesby St Michael - Ormesby Waterworks

RSPB Representation:

Broads Authority Officer Summary of Representation:

Wishes to see more information on monitoring measures, specifically in relation to Natura 2000 sites & SSSIs, and use of 'SMART' approach.

OUL/DSSP-a Oulton Broad - Development Boundary

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights the desirability of undertaking topographical surveys to inform flood risk assessment of sites close to identified higher flood risk zones.

OUL/DSSP-a Oulton Broad - Development Boundary

Suffolk County Council Archaeological Service Representation:

Broads Authority Officer Summary of Representation:

Draws attention to the high potential for encountering archaeological remains in the area, and the potential for damage to this from construction works. Recommends that any planning permission here is subject to condition requiring archaeological investigation and recording.

OUL/DSSP-b Oulton Broad - Development off Marsh Road

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Notes that part of the area included within the draft policy lies within a high flood risk zone, and any development here would need to take this into account.

OUL/DSSP-b Oulton Broad - Development off Marsh Road

Ivy House Country Hotel (Agent - Wheatman Planning) Representation:

Broads Authority Officer Summary of Representation:

Supports the policy. Wishes to see it amended to include a potential secondary access to the policy area from Ivy Lane.

OUL/DSSP-b Oulton Broad - Development off Marsh Road

Suffolk County Council Representation:

Broads Authority Officer Summary of Representation:

Draws attention to the high archaeological potential in the area, and suggests that planning applications should include archaeological assessment.

OUL/DSSP-b Oulton Broad - Development off Marsh Road

Suffolk County Council Archaeological Service Representation:

Broads Authority Officer Summary of Representation:

Draws attention to the high potential for encountering archaeological remains in the area, and the potential for damage to this from construction works. Recommends that any planning permission here is subject to condition requiring archaeological investigation and recording. Refers (erroneously) to the Draft Policy as a large Greenfield allocation.

OUL/DSSP-b Oulton Broad - Development off Marsh Road

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Expresses concern that the Policy 'extends the development boundary' significantly without justification.

OUL/DSSP-c Oulton Broad - Boathouse Lane Leisure Plots

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Part of the policy area is in high flood risk zone. National and local flood risk policies will need to be applied in the area. Development in such areas should be limited to 'essential infrastructure' and 'water compatible' development categories.

BA may consider development associated with moorings to be water compatible. Suggests highlighting flood risk considerations. Any raised car parking provision should incorporate void underneath to avoid reduction in flood water capacity. Supports exclusion of seasonal or permanent occupation, and stationing of caravans.

OUL/DSSP-d Oulton Broad - Former Pegasus/Hamptons Site

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Supports reference to the flood risk to the site. Advises that this will require detailed assessment through any planning application for the site and in relation to national and local policies on flood risk. Reiterates parts of national policy. Suggests reference to the uses acceptable under this in functional flood plain areas of site, and recommends identifying flood risk as a potential constraint to development of the site and as a monitoring indicator.

OUL/DSSP-d Oulton Broad - Former Pegasus/Hamptons Site

RSPB Representation:

Broads Authority Officer Summary of Representation:

Wishes to see more information on monitoring measures, specifically in relation to Natura 2000 sites and SSSIs, and use of 'SMART' approach.

POT/DSSP Potter Heigham

Repps with Bastwick Parish Council Representation:

Broads Authority Officer Summary of Representation:

Would like to see a car park developed to ease congestion on the Staithe at Repps (Pug Street), and suggests that forthcoming EA flood relief works in the vicinity could present an opportunity for this to be achieved.

POT/DSSP-a Potter Heigham Bridge - Bridge Area

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Identifies error in map number reference. Notes the identified flood risk to the area and supports reference to flood risk in the policy. Mentions future development proposals will need to have regard to national and local flood risk policies. Suggests further clarification of acceptable uses in view of the flood risk. Re-states parts of national flood risk policy. Supports exclusion of residential uses. Notes that any additional holiday accommodation permitted under the policy should be in accordance with national policy and the variation in flood risk across the area.

POT/DSSP-a Potter Heigham Bridge - Bridge Area

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

POT/DSSP-b Potter Heigham Bridge - Waterside plots

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Pleased to note that the policy does not permit additional dwellings or holiday accommodation, and also that maintenance/upgrading/replacement of existing buildings is subject to consistency with policies on flood risk.

Recommends that policy should provide for reductions in flood risk as a condition of replacements and upgrades.

Queries how the tension between the policy limitations on height of replacement buildings and the likely need for raised floor levels to reduce flood risk can be compatible.

Identifies differing requirements between the policy and the Broads Development and Flood Risk SPD in relation to whether additional extent of building is acceptable.

Urges the Authority to consider the sustainability of continued development in this high flood risk area and draws attention to the NPPF encouragement of seeking opportunities to relocate existing development to land with a lower risk of flooding.

POT/DSSP-b Potter Heigham Bridge - Waterside Plots

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

POT/DSSP-b Potter Heigham Bridge - Waterside Plots

RSPB Representation:

Broads Authority Officer Summary of Representation:

Wishes to see more information on monitoring measures, specifically in relation to Natura 2000 sites and SSSIs, and use of 'SMART' approach.

POT/DSSP-c Potter Heigham Bridge - Green Bank Zones

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Welcomes the prohibition of development in these areas, and considers the use compatible with the flood risk.

POT/DSSP-c Potter Heigham Bridge - Green Bank Zones

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

REE/DSSP-a Reedham - Development Boundary

Broadland District Council Representation:

Broads Authority Officer Summary of Representation:

Seeks revision of the development boundary at the rear of properties to provide continuity with the development area in the Broadland District Council planning area. Suggests that the basis of the exclusion of this area from the boundary is ill-founded, and that area would be suitable for development.

REE/DSSP-a Reedham - Development Boundary

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that safeguarded minerals (sand and gravel) lie in the area, but that the nature of development likely would not be constrained by this.

SOL/DSSP St. Olaves

Fritton with St Olaves Parish Council Representation:

Broads Authority Officer Summary of Representation:

Expresses support for no new houses in the area, unless exceptional circumstances.

SOL/DSSP-a St. Olaves - Riverside Area and Moorings

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Considers the proposed (continued) use compatible with the flood risk to the area.

SOL/DSSP-a St. Olaves - Riverside Area and Moorings

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

SOL/DSSP-b St. Olaves - Land adjacent to A143 Beccles Road and the New Cut (Former Queen's Head Public House)

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Pleased that the Policy requires future development to address the flood risk to the site.

SOL/DSSP-b St. Olaves - Land adjacent to A143 Beccles Road and the New Cut (Former Queen's Head Public House)

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

STA/DSSP-a Stalham - Land at Stalham Staithe (Richardson's Boatyard)

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Notes that the proposed continued boatyard use is compatible with the anticipated higher future flood risk to the site.

STA/DSSP-a Stalham - Land at Stalham Staithe (Richardson's Boatyard)

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

Concerned that the element of the policy seeking retention of trees and encouragement of new planting could have a harmful effect on sailing in the vicinity.

STA/DSSP-a Stalham - Land at Stalham Staithe (Richardson's Boatyard)

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

STA/DSSP-a Stalham - Land at Stalham Staithe (Richardson's Boatyard)

RSPB Representation:

Broads Authority Officer Summary of Representation:

Concerned that future increases in watercraft at the boatyard may increase mooring near the RSPB's Sutton Fen Reserve. Suggests that activity in the adjacent area should be included in the monitoring indicators of this policy.

STK/DSSP Stokesby

Nichols, Mr and Mrs J Representation:

Broads Authority Officer Summary of Representation:

Seeks allocation of identified land for development of a three-bedroomed bungalow with double garage.
Recounts dissatisfaction with the history of unsuccessful attempts to gain planning permission for the site.

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

In favour of the proposal it is stated that the proponent is a farmer's daughter from the village, but who could not afford to stay there, now wishes to return and this is the only way she could afford to do so. The village is now in the hands of incomers who have no interest in country and community life. The decision should be made on country folk feelings, not policies and lines.

TSA/DSSP Thorpe St. Andrew

Charlesworth, R (Agent - Lanpro) Representation:

Broads Authority Officer Summary of Representation:

Although the response is in part an objection to Draft Policy TSA/DSSP-a regarding Carey's Meadow (and that is dealt with under that Draft Policy), the submission text and graphics also refer to areas outside that Draft Policy boundary. The submission promotes (a) the allocation of a site for residential development and (b) the delivery of a range of access infrastructure.

The site key infrastructure related to the wider area, includes a pedestrian/cycle link between the city centre and Whitlingham Country Park, and road access to the nearby Utilities and Deal Ground sites (including NOR/DSSP-a, but also areas outside the Broads planning area).

TSA/DSSP-a Thorpe St. Andrew - Cary's Meadow and adjoining land

Broadland District Council Representation:

Broads Authority Officer Summary of Representation:

Suggests that the draft policy is too vague and, comparing this to a rejected site, suggests that it is probably lacking clear proposals, justification or assessment.

TSA/DSSP-a Thorpe St. Andrew - Cary's Meadow and adjoining land

Charlesworth, R (Agent - Lanpro) Representation:

Broads Authority Officer Summary of Representation:

Objects to the draft policy on the grounds it should be amended to facilitate the construction of a vehicular access to the Utilities site. Suggests that residential development of an adjacent site (dealt with separately under General Comments) would provide a contribution to infrastructure (presumably including this road), and for Cary's Meadow a car park and funding for its long-term management.

TSA/DSSP-a Thorpe St. Andrew - Cary's Meadow and adjoining land

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Pleased that valuable wildlife areas are being protected.

TSA/DSSP-a Thorpe St. Andrew - Cary's Meadow and adjoining land

Grahame, Lesley (Ward Councillor, Thorpe Hamlet) Representation:

Broads Authority Officer Summary of Representation:

Commends the protection afforded by the Policy.

TSA/DSSP-a Thorpe St. Andrew - Cary's Meadow and adjoining land

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site lies in an area of minerals (sand and gravel) safeguarding, but this would not affect the intended (continued) use, provided that no new buildings were proposed.

TSA/DSSP-a Thorpe St. Andrew - Cary's Meadow and adjoining land

RSPB Representation:

Broads Authority Officer Summary of Representation:

Supportive of the policy.

Wishes to see more specific monitoring indicators, and makes a number of detailed proposals in this regard, including reference to County Wildlife Site Assessments.

TSA/DSSP-b Thorpe St. Andrew - Thorpe Island

Broadland District Council Representation:

Broads Authority Officer Summary of Representation:

Suggests that part of the draft policy is inappropriate and better included elsewhere.

TSA/DSSP-b Thorpe St. Andrew - Thorpe Island

Clarke, Mr J Representation:

Broads Authority Officer Summary of Representation:

Supports the draft policy. Suggests wording revised slightly to avoid unintended consequences in the event of a change in ownership.

TSA/DSSP-b Thorpe St. Andrew - Thorpe Island

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Advises that the site is indicated to be predominantly within a high flood risk zone, and that future planning application decisions will need to have regard to this and relevant national and local policy. Refers to wording of Draft Policy and notes that boatyard operations and minor extensions are compatible with high flood risk area, but likely to still need a site flood risk assessment.

R

TSA/DSSP-b Thorpe St. Andrew - Thorpe Island

Grahame, Lesley (Ward Councillor, Thorpe Hamlet) Representation:

Broads Authority Officer Summary of Representation:

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Would welcome some support for the customary usage of Thorpe Island, including clarification of rights to use the bridge, and support for improving facilities for boat users. Suggests provision of dinghy storage area on the road side of the river.

TSA/DSSP-b Thorpe St. Andrew - Thorpe Island

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that safeguarded minerals (sand and gravel) lie in the area, but that the nature of development likely would not be constrained by this.

TSA/DSSP-b Thorpe St. Andrew - Thorpe Island

Wickham, Mrs S and Sofroniou, Mr C Representation:

Broads Authority Officer Summary of Representation:

Offers thanks for the policy's attention to flood risk, road and river access problems, the Conservation Area, and the rights of the local community. Refers to and reproduces a letter in relation to an enforcement appeal on the island.

TSA/DSSP-c Thorpe St. Andrew - Griffin Lane - boatyards and industrial areas

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Unable to identify the site on the map. Requests an additional map to enable further comments.

TSA/DSSP-c Thorpe St. Andrew - Griffin Lane - boatyards and industrial areas

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Suggests reference is made to the Development Management Policy (DP30) on this topic.

TSA/DSSP-c Thorpe St. Andrew - Griffin Lane - boatyards and industrial areas

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that safeguarded minerals (sand and gravel) lie in the area, but that the nature of development likely would not be constrained by this.

TSA/DSSP-c Thorpe St. Andrew - Griffin Lane - boatyards and industrial areas

RSPB Representation:

Broads Authority Officer Summary of Representation:

Highlights that the two sites mentioned are not shown on the maps.

TSA/DSSP-d Thorpe St. Andrew - Bungalow Lane - mooring plots and boatyards

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights that the two sites mentioned are not shown on the maps and requests a copy of the map.

TSA/DSSP-d Thorpe St. Andrew - Bungalow Lane - mooring plots and boatyards

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that safeguarded minerals (sand and gravel) lie in the area, but that the nature of development likely would not be constrained by this.

TSA/DSSP-d Thorpe St. Andrew - Bungalow Lane - Mooring Plots and Boatyards

RSPB Representation:

Broads Authority Officer Summary of Representation:

Highlights that the two sites mentioned are not shown on the maps.

TSA/DSSP-e Thorpe St. Andrew - Development Boundary

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Was uncertain whether there was any further area within the development boundary on another map (the EA had two copies of Map 20a and none of 20b), and wished to be consulted again if this was the case.

TSA/DSSP-e Thorpe St. Andrew - Development Boundary

Grahame, Lesley (Ward Councillor, Thorpe Hamlet) Representation:

Broads Authority Officer Summary of Representation:

Expresses concern about the proposed development boundary, its relationship to the development proposed in the Norwich, Broadland and South Norfolk Joint Core Strategy (for the adjacent planning areas), and suggests the development boundary area may be more suitable for employment than residential development.

TSA/DSSP-e Thorpe St. Andrew - Development Boundary

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that safeguarded minerals (sand and gravel) lie in the area, but that the nature of development likely would not be constrained by this.

TSA/DSSP-f Thorpe St. Andrew - River Green Open Space

Grahame, Lesley (Ward Councillor, Thorpe Hamlet) Representation:

Broads Authority Officer Summary of Representation:

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Commends the protection of River Green.
Suggests a small dinghy storage area on that side of the river (relates also to comments about Thorpe Island).

TSA/DSSP-f Thorpe St. Andrew - River Green Open Space

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that safeguarded minerals (sand and gravel) lie in the area, but that the open space use is compatible with this, provided no permanent buildings were constructed.

TSA/DSSP-REJ/1 Thorpe St. Andrew - Provisionally Rejected Option - Proposed housing at Yarmouth Road.

Norwich Frostbite Sailing Club Representation:

Broads Authority Officer Summary of Representation:

Objects to the rejection of the option. Suggests that the planning summary assessment recognises the suitability of the location for housing, and that it has only been rejected for two reasons; landscape and flood risk. Argues that (1) the landscape value of the site is overated in the Planning Summary Assessment, but that its value is recognised by the Club and redevelopment could allow for generous landscaping, open space and planting; and (2) while much of the site floods, the frontage is indicated by the EA to be at low enough risk to accommodate housing, and that the extent of housing would reflect the precise 'safe' area established by a future site flood risk assessment. Such an assessment is beyond the means of the club and it needs the confidence of an allocation to be able to carry this forward.

WES/DSSP-REJ West Somerton - Provisionally Rejected Options

Harrison, Sir M Representation:

Broads Authority Officer Summary of Representation:

Seeks allocation of land at Staithe Road for residential development on the grounds that it would round off the village in a logical way; be in accord with the wishes of the Parish Council; would not overload the road access; could be controlled by conditions to be of similar size to existing dwellings opposite; that planning permission is extant for 6 dwellings opposite.

Comments on the history of the planning policy for this area in terms the Authority would dispute.

WHI/DSSP Trowse, Whitlingham & Kirby Bedon

Crown Point Estate (Agent - La Ronde Wright) Representation:

Broads Authority Officer Summary of Representation:

Supports principles and approach to area (presumably including WHI/DSSP-a), but believes there is potential for additional recreational and tourism related uses. (This potential presumably relates primarily to the adjacent site subject of WHI/DSSP-REJ/1.)

WHI/DSSP-a Trowse, Whitlingham & Kirby Bedon - Whitlingham Country Park

Crown Point Estate (Agent - La Ronde Wright) Representation:

Broads Authority Officer Summary of Representation:

Reiterates proposal that this land should be allocated for a variety of uses. Elaborates the types of uses envisaged, and suggests wording for a policy.

WHI/DSSP-a Trowse, Whitlingham & Kirby Bedon - Whitlingham Country Park

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Notes that part of the area is at serious risk of flooding, and draws attention to the EA's general comments in respect of this.

Confirms that the principal use of the site supported by the policy is compatible with this zoning under national policy. Would wish to see any buildings required to be allocated within the lower, zone 1, flood risk area of the site.

WHI/DSSP-a Trowse, Whitlingham & Kirby Bedon - Whitlingham Country Park

Grahame, Lesley (Ward Councillor, Thorpe Hamlet) Representation:

Broads Authority Officer Summary of Representation:

Commends the protection of Whitlingham Country Park.

WHI/DSSP-a Trowse, Whitlingham & Kirby Bedon - Whitlingham Country Park

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

A small part of the site is within the consultation zone for the nearby Waste Water Treatment Works, and any development would need to comply with Norfolk Minerals and Waste Core Strategy Policy CS16.

WHI/DSSP-a Trowse, Whitlingham & Kirby Bedon - Whitlingham Country Park

RSPB Representation:

Broads Authority Officer Summary of Representation:

Highlights the biodiversity importance of the site and considers this should be highlighted in the policy, and supports the recreation aspect of the policy.

WHI/DSSP-a Trowse, Whitlingham & Kirby Bedon - Whitlingham Country Park

Trowse with Newton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Objects to any future development along Whitlingham Lane. Details great concern about traffic problems on Whitlingham Lane, stated to be caused by increased use of Whitlingham Country Park, and particularly during days of matches (at nearby Norwich City football club) and the working week.

Complains that existing restrictions are not enforced or monitored, and notes that the car parks are not used to the full, because people prefer not to pay.

WHI/DSSP-REJ/1 Trowse, Whitlingham & Kirby Bedon - Provisionally Rejected Option - Crown Point Estate Land

Trowse with Newton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Completely opposed to development such as this option (i.e. supports rejection), endorses Anglian Water's 'objection'. Claims there is no access or facilities available for any development.

Queries what form of development was being considered, how this relates to the recent car park and its apparent lack of use, whether there will be any change to the car park surfacing. Suggests potential problems of drainage and resultant pollution of the new broad. Hopes holiday homes will not be developed here.

WRX/DSSP Wroxham & Hoveton

Hoveton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Suggests a couple of corrections to minor errors in names. Requests that Hoveton be given precedence over Wroxham in the heading as most policies relate to the Hoveton area. Considers insufficient stress is laid on the traffic congestion problems around the bridge.

WRX/DSSP-a Wroxham & Hoveton - Development Boundary

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Notes that majority of the area within development boundary is at serious risk of flooding. Pleased that development within the area will be subject to policies on flood risk. Suggests consideration of whether the policy should specify the appropriate types of development, given the preponderance of highest flood risk zoning. Highlights national policy restriction to essential infrastructure and water compatible development categories in such areas.

WRX/DSSP-a Wroxham & Hoveton - Development Boundary

Hoveton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Broadly supports policy. Highlights the existing 'excessive traffic' in the village centre.

WRX/DSSP-a Wroxham & Hoveton - Development Boundary

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

WRX/DSSP-b Wroxham & Hoveton - Open Space

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Pleased that the policy includes ensuring flood capacity of the area will be maintained. Notes the flood risk zonings within the area.

WRX/DSSP-b Wroxham & Hoveton - Open Space

Hoveton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Broadly supports policy.

WRX/DSSP-b Wroxham & Hoveton - Open Space

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

WRX/DSSP-b Wroxham & Hoveton - Open Space

Wroxham Parish Council Representation:

Broads Authority Officer Summary of Representation:

Proposes inclusion of areas around Church Lane as 'public open space'.

WRX/DSSP-c Wroxham & Hoveton - Station Road Car Park

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights flood risk and potential change of use in future, and draws attention to other comments on managing flood risk.

WRX/DSSP-c Wroxham & Hoveton - Station Road Car Park

Hoveton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Broadly supports policy.

WRX/DSSP-c Wroxham & Hoveton - Station Road Car Park

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

WRX/DSSP-d Wroxham & Hoveton - Village Retail Core

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights the area is within a high flood risk zone, and the national policies and guidance on development in such areas. Recommends inclusion of flood risk in policy to ensure future developers aware.

WRX/DSSP-d Wroxham & Hoveton - Village Retail Core

Hoveton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Broadly supports policy. Highlights existing traffic congestion at peak times.

WRX/DSSP-d Wroxham & Hoveton - Village Retail Core

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Suggests the policy should include reference to developer contributions and the adopted Development Management Policy on this.

WRX/DSSP-d Wroxham & Hoveton - Village Retail Core

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Identifies that the site is not affected by minerals or waste safeguarding.

XYZ/DSSP-REJ/1 Provisionally Rejected Option - Haddiscoe-Beccles railway track-bed

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Notes need for EA's consent for any new bridge across a main river (which includes the Waveney).

ZYX/DSSP-a Non Settlement Based - Trinity Broads

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Pleased to note this area will be conserved and protected, given the aim of improving water quality.

ZYX/DSSP-a Non Settlement Based - Trinity Broads

Essex and Suffolk Water Representation:

Broads Authority Officer Summary of Representation:

Supports provision of a policy on the Trinity Broads, but wishes to see more detail on what is and is not acceptable, provision for temporary consents and monitoring for operations with uncertain impacts, and explicit inclusion of waterside businesses in the policy coverage.

ZYX/DSSP-a Non Settlement Based - Trinity Broads

PURE Architecture Representation:

Broads Authority Officer Summary of Representation:

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Suggests that Filby Broad should be excluded from the area of the Trinity Broads Policy, because cannot see that residential development within the existing development boundary should have impact on water quality or special habitats.

ZYX/DSSP-a Non Settlement Based - Trinity Broads

RSPB Representation:

Broads Authority Officer Summary of Representation:

Supports the policy and its aspiration to maintain the biodiversity of the site. Wishes to see more specific monitoring indicators.

ZYX/DSSP-b Non Settlement Based - Upper Thurne

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Pleased to note this area will be conserved and protected, given the water quality issues identified.

ZYX/DSSP-b Non Settlement Based - Upper Thurne

RSPB Representation:

Broads Authority Officer Summary of Representation:

Supports the policy and its aspiration of maintaining the biodiversity of the area.
Wishes to see more specific monitoring indicators.

ZYX/DSSP-c Non Settlement Based - The Coast

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights the high risk of tidal inundation in the event of a breach of the coastal defences.
Suggests that the small-scale development permitted by this development should be subject to consideration in terms of flood risk.
Recommends extending this policy area further along the coast.

ZYX/DSSP-c Non Settlement Based - The Coast

Natural England Representation:

Broads Authority Officer Summary of Representation:

Welcomes the policy.

ZYX/DSSP-c Non Settlement Based - The Coast

RSPB Representation:

Broads Authority Officer Summary of Representation:

Supports the policy and its aspiration of maintaining the biodiversity of the area.

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Wishes to see more specific monitoring indicators.

Is concerned it should be clear that the suggested infrastructure should be used to manage and control visitors to sensitive locations, in keeping with conservation objectives, and not worsen recreational disturbance.

ZYX/DSSP-d Non Settlement Based - Main road network

Suffolk County Council Representation:

Broads Authority Officer Summary of Representation:

Supports the principle of ensuring the safety of users on defined primary routes. Suggests policy text amendments to clarify terms, refer to the potential for mitigation, and update the nomenclature of traffic assessments.

ZYX/DSSP-e Non Settlement Based - Drainage Mills

Ashby, Herringfleet and Somerleyton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Supports the Drainage Mills policy.

ZYX/DSSP-e Non Settlement Based - Drainage Mills

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Expresses uncertainty, and wishes to be further advised, as to what the policy entails in respect of works to mills, and identifies issues and consents which may need to be addressed, depending on the works involved.

ZYX/DSSP-f Non Settlement Based - Riverside, etc., pubs

Ashby, Herringfleet and Somerleyton Parish Council Representation:

Broads Authority Officer Summary of Representation:

Supports the Riverside Pubs policy.

ZYX/DSSP-f Non Settlement Based - Riverside, etc., pubs

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Suggests the policy is expanded to include improvements to flood risk and foul water facilities.

ZYX/DSSP-f Non Settlement Based - Riverside, etc., pubs

Essex and Suffolk Water Representation:

Broads Authority Officer Summary of Representation:

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Supports the policy in general, but does not think it is relevant to the Trinity Broads. If it is to apply to the Trinity Broads, it should include the Waterside Restaurant (at Rollesby).

ZYX/DSSP-f Non Settlement Based - Riverside, etc., pubs

Grahame, Lesley (Ward Councillor, Thorpe Hamlet) Representation:

Broads Authority Officer Summary of Representation:

Commends the protection of pub sites relating to the Thorpe St. Andrew area.

ZYX/DSSP-f Non Settlement Based - Riverside, etc., pubs

Ivy House Country Hotel (Agent - Wheatman Planning) Representation:

Broads Authority Officer Summary of Representation:

Seeks to have the Ivy House Hotel included within the Waterside Pubs policy.

ZYX/DSSP-f Non Settlement Based - Riverside, etc., pubs

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

The NBSA supports the riverside pubs policy, agreeing these are key parts of the network of community, visitor and boating facilities. It also wishes to see similar protection for village shops.

Points out minor errors in the list of pubs included in the Draft Policy.

ZYX/DSSP-f Non Settlement Based - Riverside, etc., pubs

Rockland St Mary with Hellington PC Representation:

Broads Authority Officer Summary of Representation:

Supports the Policy.

ZYX/DSSP-f Non Settlement Based - Riverside, etc., pubs

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Supports the policy as it relates to Waveney and Oulton Broad.

ZYX/DSSP-g Non Settlement Based - St. Benet's

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Identifies the site as falling within a high flood risk zone, and the need to have regard to this in the determination of any planning application on the site.

ZYX/DSSP-REJ/1 Non Settlement Based - Provisionally Rejected Option - Haddiscoe-Beccles railway track-bed

Suffolk County Council Representation:

Broads Authority Officer Summary of Representation:

Wishes to see these routes continue to be protected from prejudicial development for their potential value offering access to the Waveney riverbank and Beccles Marshes; calls national and Broads policies in support of such an approach; and invites discussion of ways to establish foot, cycle or bridle paths using the trackway. Confirms that re-opening this rail route is not an investment priority for Suffolk County Council, and does not disagree that there is little likelihood of a replacement bridge over the Waveney.

ZYX/DSSP-REJ/1 Non Settlement Based - Provisionally Rejected Option - Haddiscoe-Beccles railway track-bed

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Disappointed by rejection on grounds of unlikely to be delivered, when proposals or opportunities may arise in future.

General comment Brundall Riverside

Brundall Parish Council Representation:

Broads Authority Officer Summary of Representation:

Has no comment or criticisms of the draft policies, but asks two questions. The first about the environmental improvements mentioned in the Riverside Pubs policy, the other about monitoring the effects of the draft policy and the involvement of the Brundall Riverside Association.

General comment Rejected policies

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Notes the provisionally rejected sites. Will not comment on these, but wishes to be advised if they are brought into consideration again.

General comment

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

1) Highlights the importance of careful consideration of flood risk through the Broads planning documents because the majority of the Broads area is at flood risk. Draws attention to national policy on flood risk and the following issues.

2) THE SEQUENTIAL TEST

States that any site identified in the document and in flood zone should pass the sequential test.

3) FLOOD ZONE 3b

Draws attention to the Technical Appendix to the NPPF, and states that 'highly vulnerable', 'more vulnerable' and 'less vulnerable' uses should not be allocated to land identified as in flood zone 3b. Notes the treatment of existing buildings and infrastructure as excluded from the definition of the zone, but urges caution in exploiting this because of the remaining flood hazards.

4) SEQUENTIAL APPROACH TO SITE LAYOUT.

Draws attention to the national policy presumption that the lowest vulnerable land uses are located in the areas of sites at least flood risk. Suggests consideration of identifying the particular parts of sites suitable for development. Notes site flood risk assessments would identify the precise locations of flood risk zones.

5) RELOCATION OF EXISTING DEVELOPMENT.

Recommends consideration of whether there are opportunities for relocation of development to areas at lower risk of flooding, and whether these could be addressed in this DPD.

6) EXCEPTION TEST.

Advises that site allocations should be made only where the Authority is confident and can demonstrate that (where relevant) the exception test can be passed.

7) FLOOD RISK ASSESSMENT.

Suggests that policies highlight the requirement of the NPPF and Broads Development Management Policies for flood risk assessment to inform decisions on proposed development; that consideration and explanation is given as to what information will be required where policies refer to consideration of flood risk; and that consideration is given to developing guidance on the details of managing flood risk.

8) INSURANCE REQUIREMENTS.

Draws attention to the issue of availability of insurance for flood risk, and the discussions and documents pursuing this matter. Highlights five key recommendations from the Association of British Insurers and the National Flood Forum, relating to expertise, all sources of flooding (including climate change), potential impacts on drainage infrastructure, ensuring flood mitigation (preferably floor raising) and information sharing, and taking account of relevant costs in local plans. Suggests consideration of a policy requirement of raised floor levels above the 1% annual probability flood level (including climate change) requirement.

9) BROADS AUTHORITY SPD: DEVELOPMENT AND FLOOD RISK:

Highlights that the Broads Supplementary Planning Document requires there should be no increase in flooding vulnerability within flood risk zones, and apparent contradiction between this and some Draft Site Specific Policies.

10) SURFACE WATER MANAGEMENT:

Advises consideration of surface water management to avoid increased risk of flooding through development. Rehearses the principles of 'sustainable drainage systems' (SuDS).

11) RESIDENTIAL MOORINGS:

Notes mention of residential moorings policy DP25 in relation to marinas in Brundall, Horning and Stalham. Suggests that consideration be given to whether accommodation of this use in areas of high flood risk is compatible with Core Strategy and national policies on flood risk, particularly in terms of safety.

Refers to the policies and processes to be followed, and suggests it would be beneficial for these to be reflected in the (site specific) policies.

General comment

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights that parts, in some cases a majority, of areas within Draft development boundaries are at risk of flooding, where the potential for development is constrained by national and local policy. Future planning applications will need to have regard to this. Notes specific reference to flood risk constraints in some cases, and considers this should be included in all areas where there is flood risk.

General comment

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Draws attention to the riverside nature of many of the sites included in the DPD; the desirability of maintaining and enhancing existing water bodies and watercourses; urbanisation of water bodies avoided; its support for proposals that protect or enhance water bodies and watercourses; the challenges and requirements in relation to the WFD and the statutory duty to have regard to the River Basin Management Plan; the desirability of highlighting WFD requirements in the DPD.

Is pleased to note that BEC/DSSP-a and BRU/DSSP-a incorporate a protective margin, and suggests consideration of suitable buffer zones elsewhere.

General comment

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Supportive of the intention to give flood risk issues particular attention, but queries the lack of specific detail of how this will be measured. Notes that the SA highlights the difficulty of quantifying the risk. Suggests inclusion of some guidelines to accompany flood risk indicators.

General comment

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights potential for contaminated land on three identified sites (and possibly others), suggests reference to NPPF provisions in relation to this, and recommends methods for addressing these.

Also highlights the need to ensure adequate foul drainage if sites identified for development, recommending consultation with Anglian Water to confirm this.

General comment

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights then importance of pollution control for waterside sites; the EA's guidance note 5; groundwater vulnerability; and the particular relevance of these to the sites listed.

General comment

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights the need for Flood Defence Consent for works within 9 metres of a main river or flood defence, and suggests this might be highlighted within the document to bring this to the attention of future developers.

General comment Trinity Broads

Essex and Suffolk Water Representation:

Broads Authority Officer Summary of Representation:

Proposes mention of the sailing bases at Trinity Broads, and that there should be a policy for the development of their sites, which is needed from time to time.

General comment

Highways Agency Representation:

Broads Authority Officer Summary of Representation:

Proposals judged unlikely to have a detrimental impact on Strategic Road Network, thus no comment on the document.

General comment

Natural England Representation:

Broads Authority Officer Summary of Representation:

Highlights that its assessment is desk based and does not attempt a detailed assessment of each site.

General comment

Natural England Representation:

Broads Authority Officer Summary of Representation:

Notes the importance of the Core Strategy and the Development Management Policies, especially DP1, to the production and context of the Site Specific Policies and the consideration of planning applications on those sites.

Seeks a greater consistency of the carrying through of consideration of nature conservation assets into individual policies.

Seeks cross-reference to Policy DP1 in each policy.

Suggests that the maps showing the policies identify other features such as flood risk zones and designated nature conservation sites, etc., as the Core Strategy maps do not readily allow scaling.

General comment

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

Suggests that much of the 'Broadland' area is scruffy, and that development control is but one aspect of conserving and enhancing the area. Encourages the Broads Authority to take a holistic approach to the area in conjunction with the relevant local authorities.

General comment

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

Supports the rejection of the identified options.
Points out an update and a correction to the background information on Neatishead.

General comment

Norfolk and Suffolk Boating Association Representation:

Broads Authority Officer Summary of Representation:

Expresses broad agreement with the choice and detail of the Draft Policies, and the identification and assessment of issues.
Comments that the reasons for absence of site specific policies for six named parishes is not apparent.

General comment

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Sets out the context for, and approach to, minerals and waste safeguarding areas in Norfolk. (NB. The identification of whether draft policy sites are within a safeguarding area is noted against the individual Draft Policies.)

General comment

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Highlights the officer level and non-prejudicial status of the comments provided. Considers the document is consistent with the sustainable aims and objectives of the Core Strategy. Notes the potential need for further amendments arising from the publication of the National Planning Policy Framework.

General comment

Norfolk County Council Representation:

Broads Authority Officer Summary of Representation:

Suggests reconsideration of the rejection of this option, on the grounds of its potential to contribute to the wider network of trails and path enhancements.

General comment **Oulton Broad**

RSPB Representation:

Broads Authority Officer Summary of Representation:

Reference to status of Lake Lothing Area Action Plan in consultation draft requires updating.

General comment

RSPB Representation:

Broads Authority Officer Summary of Representation:

Welcomes the opportunity to comment. Does not consider policy approaches unsound, but considers improvements required to strengthen some policies' biodiversity protection or landscaping guidance, and provide 'SMART' monitoring of potential impacts on Natura 2000 sites.

General comment

Salhouse Parish Council Representation:

Broads Authority Officer Summary of Representation:

General comment

West Somerton

Somerton Parish Council Representation:

Broads Authority Officer Summary of Representation:

1) Notes that not all of West Somerton is in the Broads area, but the centre of it is.
2) Suggests that the reference to the pub being closed is pessimistic, as this could be temporary.
3) Questions whether the adjoining local planning authority has agreed to the references to its area in the Consultation Document. States the Parish Council's preference that the document should concentrate on the area within the Broads.
4) Supports retention of a development boundary for West Somerton.
5 & 6) Rehearses the Parish Council's view of some of the history and geography of the Staithe Road site.
7) Points out a discrepancy in the description of the public transport for the village.
8) Comments on the justification of the provisional rejection of the Staithe Road site, suggesting inconsistency with developments approved nearby.
9) Queries the justification of rejection of the Staithe Road site in relation to public transport accessibility, and suggests inconsistency with approval of another development nearby.
CONCLUSION: Requests that a development boundary be retained, and that it be extended further down Staithe Road. Trusts the comments will be given full consideration and the Broads Authority will review its provisional conclusions.

General comment

Suffolk County Council Representation:

Broads Authority Officer Summary of Representation:

Welcomes opportunity to comment on the Draft Policies. Highlights the Suffolk Sustainable Community Strategy and the delivery of key public services as the basis for its comments, which refer only to Suffolk sites.

General comment

Bungay & Ditchingham

Suffolk County Council Representation:

Broads Authority Officer Summary of Representation:

Draws attention to high archaeological potential, and to national policy supporting this being addressed in any grant of planning permission.

Appendix 1: Responses to Consultation of 'Draft Site Specific Policies' (Issues and Options & Preferred Options)

Has no objection, as highway authority, to development of the scale/location envisaged, subject to normal assessment and control of development proposals. The County Council may seek developer contributions towards transport improvements in the town. Draws attention to Bridge Street, Ditchingham as a key cycle route, and development here should respect this.

General comment

Walpole, Mr R Representation:

Broads Authority Officer Summary of Representation:

Finds the Draft Policies clear and informative in relation to improving public access. Suggests reference to the Broads Local Access Forum at a particular point in the text.

General comment

Water Management Alliance Representation:

Broads Authority Officer Summary of Representation:

Confirms no comments or objections.

General comment **Bungay**

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Disagrees with the statement that 'Bungay is the focus for significant growth' (as most development planned has already occurred, and only a limited amount of land remains allocated for further development in current plans). Corrects erroneous reference to Bungay as a transport hub, and date of conservation area re-appraisal.

General comment **Beccles**

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Clarifies (together with subsequent discussions) that the significant growth previously planned for Beccles has now largely occurred and slowed. Prefers reference to completion of Conservation Area re-appraisal omitted, and reference to completion of works to swimming pool amended. Corrects date of Article 4 Direction.

General comment

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Generally supportive of the proposals within Council area, but a number of comments are made on specific issues.

General comment **Oulton Broad**

Waveney District Council Representation:

Broads Authority Officer Summary of Representation:

Seeks clarification of whether text mentioned refers to Lowestoft or Oulton Broad. Highlights that Area Action Plan now adopted.

General comment

Wroxham Parish Council Representation:

Broads Authority Officer Summary of Representation:

Praises the sustainability and readability of the document, and has (with one exception) no adverse comments.

Habitats Regulation Assessment

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Notes that detailed comments have been submitted by Natural England.

Habitats Regulation Assessment

Natural England Representation:

Broads Authority Officer Summary of Representation:

Commends the thoroughness of the consideration of potential effects.

- Concerned that consideration of in-combination effects with other plans and policies has not received detailed consideration, and considers that this requires further evidence and consideration before completion of the HRA.
- No consideration or evidence of potential impacts of traffic from housing allocation.
- Recommends potential effects/risks of introducing invasive species through boating and angling addressed.
- Supports the Task 1 amendments that were made to eliminate uncertainty of absence of significant effects.

Habitats Regulation Assessment

PURE Architecture Representation:

Broads Authority Officer Summary of Representation:

Is of the opinion that the draft Habitats Assessment should have included the rejected options, so that the potential impact of the options could have informed consultation.

Habitats Regulation Assessment

RSPB Representation:

Broads Authority Officer Summary of Representation:

SECTION 2.2.2

Is concerned that the use of the phrase 'significant adverse effects' suggests a more relaxed approach to potential harm to Natura 2000 sites than required by the Regulations.

SECTION 4.4.4

Points out that the wardening of North Denes SPA is warded by RSPB, not Natural England as stated.

SECTION 5.1.5

Suggests that Visitor Survey data may be available for sites in the Broads, and that if so this could be used to quantify the increase in visitor pressure, and likely impacts arising from planned housing growth in the Broads and surrounding areas.

SECTION 6 TASK 1

Considers that the Draft Habitats Assessment does not correctly examine the full range of potential effects on Natura 2000 sites, and in particular suggests that where there are both potential effects and uncertainty over future development, then a Stage 2 appropriate assessment is required. It further suggests instances of Draft Policies where the RSPB considers this situation exists, therefore a Stage 1 assessment is insufficient to reach the necessary conclusions.

Considers current text confusing, because text refers to changes to policies to allow a conclusion of no likely significant effects to be reached. Suggests this highlights need for a Stage 2 process, or at least revision of text to present only final conclusions.

Sustainability Appraisal

Environment Agency Representation:

Broads Authority Officer Summary of Representation:

Highlights that the baseline data on water should be updated to reflect newer classifications.

Does not favour inclusion of the last four sentences on page 23 of the draft, and would prefer these were omitted or amended.

Sustainability Appraisal

Natural England Representation:

Broads Authority Officer Summary of Representation:

Commends the 'coherent and legible form of the document and the attention given to the sustainability baseline'. Welcomes the 'site sustainability checklist' as providing depth to the sustainability appraisal. Highlights that the four Site Specific Policies DPD Objectives referred to in the Draft Sustainability Appraisal Report are omitted from the Draft Site Specific Policies document itself. Suggests the addition of 'enhancement' to conservation in the fourth of these Objectives.

Sustainability Appraisal Filby Broad

PURE Architecture Representation:

Broads Authority Officer Summary of Representation:

Suggests that the SA of the Filby Broad part of the Trinities should be undertaken in respect of smaller, distinct areas. Disagrees with the sustainability assessment of the potential for continuation of a development boundary for Filby, and considers a development boundary for Filby Broad area would provide sustainability benefits and should be reconsidered.

Sustainability Appraisal Filby Broad

PURE Architecture Representation:

Broads Authority Officer Summary of Representation:

Suggests that the SA of the Filby Broad part of the Trinities should be undertaken in respect of smaller, distinct areas. Disagrees with the sustainability assessment of the potential for continuation of a development boundary for Filby, and considers that removal of the development boundary for Filby Broad area would have a neutral effect in terms of the LDF Sustainability Objectives.

Sustainability Appraisal

Suffolk County Council Representation:

Broads Authority Officer Summary of Representation:

Draws attention to the importance of the historic environment. Suggests a revised wording to widen the heritage included.

Sustainability Appraisal

Suffolk County Council Archaeological Service Representation:

Broads Authority Officer Summary of Representation:

Supports the recognition in the Draft Sustainability Appraisal of the importance of the historic environment. Suggests change in terminology for the record of heritage assets.

Appendix 2a – Details of Survey

Background

Additional consultation was undertaken in response to a Parish Council representation on the Draft Site Specific Policies for West Somerton. For further details see main report on consultation.

Response to the survey

46 forms were returned, a response rate of 77%. This is a very high response rate for a questionnaire survey, and is assumed to represent the degree of interest in the matter among local households, and also the endeavours of the Parish Council in publicising the survey. Of the responses received, almost 80% supported some form of housing development on the site.

A number of responses were received after the 'closing date' (most a few days later, some many weeks). In the context of the informal nature of the survey, the relatively short 'consultation period', and a number of holiday homes in the village, it is judged that to include these would be fairer than excluding them. However, in the interests of transparency, the results for those responses received on time is shown in the second table below.

ALL RESPONSES (including late)	Number of responses	Proportion of potential responses (forms sent out)	Proportion of actual responses (forms received back)
Support	36	60%	78%
Do Not Support	10	17%	22%
No response	-	33%	-
TOTAL	46	100%	100%

IN-TIME RESPONSES (excluding late)	Number of responses received before closing date	Proportion of potential responses (forms sent out)	Proportion of actual responses (forms received back)
Support	30	50%	77%
Do Not Support	9	15%	23%
No response	-	35%	-
TOTAL	39	100%	100%

A small number of respondents added notes to qualify their responses. In particular, of those who did not support some development on the indicated land, one said

APPENDIX 2: West Somerton Supplementary Consultation

they would support a single dwelling adjacent to The Firs, and another said they might do so.

A small number of respondents added comments or queries to their forms, and the following responses or clarifications to some of these were provided to respondents in a letter of thanks to those taking part, reproduced as Appendix 2(d).

Appendix 2b – Letter to local households about the survey.

To the Occupier

14th May 2012

BA/LS/LDF/SSPDPD/DSSP

Dear Occupier,

Future planning policy for land at Staithe Road, West Somerton

The Broads Authority is undertaking this survey of all households within the Broads part of West Somerton, in order to provide additional information to help the Authority decide on potential future planning policy for the Staithe Road area of land shown on the attached plan.¹

Somerton Parish Council supports this survey, and the information is being delivered by the Parish Council to the 56 properties in the Parish and within the designated Broads area.

The Parish Council has, since 1997, supported the inclusion of the land shown on the attached plan as coming within the natural boundary of the village in that location, and therefore as having the potential for some housing development. The 1997 Local Plan, however, drew the village development boundary across the garden of one property on Staithe Road as shown by a dashed line on the attached extract from that Local Plan. Subsequently, in 2008, the development of a bungalow at the same location was refused planning permission on the grounds that it was outside the village boundary. The Parish Council have, since 1997, taken the view that the dyke opposite the kissing gate at the end of Staithe Road forms the natural boundary of the village in this part of Somerton as shown by the western boundary of the area marked on the attached plan.

The Broads Authority is now preparing a new plan which no longer proposes a village development boundary for West Somerton, so the present issue is whether the area shown on the attached plan should be accepted as having the potential for development as would have been the case if the village boundary had been drawn as the Parish Council proposed in 1997. Any subsequent detailed planning application would be the subject of normal planning application procedures, including consultation with the Parish Council and with occupiers of adjoining dwellings.

The Broads Authority has, by law, to balance a number of competing interests in its planning decisions and no commitment can be given that the Authority's final proposals will necessarily accord with the results of this survey. Nevertheless, the survey will help the Authority to gauge the level of local support for the proposal including the views of the Parish Council, which will be important factors to be considered in reaching a decision.

¹ This is a supplementary consultation to inform the Broads Authority's preparation of a Site Specific Policies Development Plan Document, and issued under Regulation 25 of the The Town and Country Planning (Local Development) (England) Regulations 2004, as amended.

APPENDIX 2: West Somerton Supplementary Consultation

The Broads Authority and Somerton Parish Council would therefore be grateful if you would complete the enclosed form and return it in the pre-paid envelope.

For any further information please contact:

Broads Authority: John Clements, Planning Policy Officer,
Tel: 01603 756050, email john.clements@broads-authority.gov.uk

or

Somerton Parish Council: Richard Starling 393823 or Trevor Jones 393715.

Yours faithfully,

John Clements
Planning Policy Officer

Appendix 2c – Survey Form

Parish of Somerton
Household Survey - May 2012
Future Planning Policy: Staithe Road, West Somerton

Please complete this form by ticking the appropriate box, signing, and return in the pre-paid addressed envelope provided **by Thursday 31st May 2012**.

See enclosed letter for details.

		Tick <u>one</u> box below
1	I support the principle of some housing development on the land shown on the attached plan.	
2	I do not support the principle of some housing development on the land shown on the attached plan.	

Signed..... Date.....

Name.....

Address.....

.....

.....

For any further information please contact:

Broads Authority: John Clements, Planning Policy Officer,
Tel: 01603 756050, email john.clements@broads-authority.gov.uk

or

Somerton Parish Council: Richard Starling 393823 or Trevor Jones 393715.

Serial No.

Issued by the Broads Authority with the support of Somerton Parish Council.

This is a supplementary consultation to inform the Broads Authority's preparation of a Site Specific Policies Development Plan Document, and issued under Regulation 25 of The Town and Country Planning (Local Development) (England) Regulations 2004, as amended.

Appendix 2d – Letter of thanks to respondents, also replying to comments received.

The Occupier
West Somerton

1 June 2012

BA/LS/LDF/SSPDPD/DSSP

Dear Occupier,

Re: Survey about potential development of houses in Staithe Road, West Somerton.

Thank you for your cooperation in responding to the recent survey. I am writing to advise you of the results of that survey, respond to some of the queries and comments received, and advise what will happen next.

a) Results of Survey

60 forms were distributed by Somerton Parish Council, one to each household in that part of Somerton Parish within the designated Broads area. (56 properties were originally identified by the Parish Council, but it later requested an additional four forms to deal with particular oversights or anomalies.)

39 forms were returned, a response rate of 65%. This is a very high response rate for a questionnaire survey, and is assumed to represent the degree of interest in the matter among local households. The balance of responses supporting or not supporting some housing development on the land shown are set out in the following table.

	Number of responses	Proportion of potential responses	Proportion of actual responses
Support	30	50%	77%
Do Not Support	9	15%	23%
TOTAL	39	65%	100%

Note that a small number of respondents added notes to qualify their responses. In particular, of those who did not support some development on the indicated land, one said they would support a single dwelling adjacent to The Firs, and another said they might do so.

b) Queries and Comments Received.

A small number of respondents added comments or queries to their forms, and the following is intended to provide responses or clarifications to some of these. They are set out in no particular order.

- 1. A large proportion of those included in the survey will not be affected, either in visual or traffic terms, and thus are more likely to support it.***
- 2. It is clear from conversations that some of those who responded did not really understand what was being asked.***

3. ***By surveying by property, rather than by individuals on the electoral role, some people's opinion may not be heard.***
4. ***Requirement for names and addresses may deter some, especially in a small community, from expressing their views.***

BA Response: The survey is only intended to provide a general, 'broad brush', gauge of opinion in the locality. The Broads Authority does not have either the resources, or the access to the full electoral register, to carry out a more detailed survey. Names and addresses were requested in order to give the results credibility and avoid any suggestion that the responses were fraudulent. It is understood that there will always be a degree of misunderstanding by those participating, it is also always difficult to decide how far to extend a survey, and that as a consequence of issues like these the results of any such survey need to be treated with a degree of caution.

The Parish Council does now have powers to make development plans and to grant planning permissions, and use of these powers would require the Borough Council to undertake a referendum of local voters using the electoral register to decide whether a plan should be adopted. However, the procedures involved are rather onerous, and likely to be expensive and time consuming for the Parish Council, the Broads Authority and the Borough Council, at a time when resources are very tightly constrained.

5. ***How much, and what sort of housing are we being asked to support or not support?*** BA response: This was deliberately left unstated, as it is the principle of extending the village in the Staithe Road area to accommodate some houses, as requested by the Parish Council, that was at question. That said, it is considered most unlikely that either the Parish Council or the Broads Authority would wish to see a large number of houses or a dense development.
6. ***As the land falls within a conservation area, would there be strict controls on the appearance and materials of any buildings at the planning application stage?*** BA response: The land is actually outside the West Somerton Conservation Area, but it is within the designated Broads area, which has the highest national degree of protection for its landscape and scenic beauty, etc. In the event this land were allocated for development there would be control of the appearance and materials of any new houses through the planning application process, but these might best be described as 'careful', rather than 'strict'.
7. ***Is the Broads Authority looking at other potential housing sites in West Somerton? Why are we not being asked our opinion on other potential housing sites in the village?*** Broads Authority response: The Broads Authority is not looking for sites to accommodate housing in West Somerton. It is only re-examining this particular potential site (which the Authority had previously provisionally rejected) at the request of the Parish Council.
8. ***Why is the Parish Council supporting housing here? What does the Parish Council envisage? What does this benefit the village? Do they***

have a view on potential development elsewhere in the village? BA response: These are questions for the Parish Council

9. ***Will widening of Staithe Road, better drainage of the road, and additional parking provision be a required of any development?*** BA Response: In the event the land were allocated for development, these matters would be addressed and decided at the planning application stage.
10. ***I own part of the land indicated, and do not wish to see it developed.*** BA Response: Views noted.
11. ***I am concerned that this special village will be overdeveloped, and the lane will not be able to cope with the traffic (n.b. already permission for 6 houses on the farm site).*** BA Response: Views noted.

c) What happens next?

The Broads Authority has to decide whether or not to propose some or all of the land in question for houses in its Proposed Site Specific Policies plan document. It is likely it will make this decision at its September 21st meeting. The results of this survey will be reported to the Authority, and taken into account in reaching its decision.

As was highlighted before, by law the Authority must balance a number of competing planning considerations in reaching its decisions, and no undertaking can be given that its decision will necessarily follow the results of this survey. However, no doubt the Authority will wish to attach significant weight to the local community's views on this matter, including the results of the survey.

I hope the above is clear. Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

John Clements
Planning Policy Officer

Tel. 01603 756050

Email: john.clements@braods-authority.gov.uk

APPENDIX 3

No	Draft Sites Ref. No.	Recommended DPD Ref No.	Name	Changes Recommended	Map Change?	Notes
1	ACL/DSSP-a	RP/ACL 1	Acle cemetery extension	Area reduced. Minor rewording.	Yes	Parish Council proposals amended/clarified.
2	ACL/DSSP-b	RP/ACL 2	Acle Playing Field Extension	Area reduced; Minor rewording	Yes	Recreation Trust's proposals amended./clarified
3	BEC/DSSP-a		Beccles Development Boundary	Delete	Omitted	In light of range of constraints highlighted in consultation responses.
4	BRU/DSSP-a	RP/BRU 1	Brundall Riverside chalets and mooring plots	Minor rewording.	-	In light of consultation responses.
5	BRU/DSSP-b	RP/BRU 2	Brundall Riverside Estate Boatyards, etc. ,	Minor rewording	-	In light of consultation responses.
6	BRU/DSSP-c	RP/BRU 3	Brundall Mooring Plots	Minor rewording	-	In light of consultation responses, and to improve consistency of wording for such areas.
7	BRU/DSSP-d	RP/BRU 4	Brundall Marina	Minor rewording	-	In light of consultation response.
8	BRU/DSSP-e	RP/BRU 5	Brundall Land east of the Yare public house	Minor rewording	-	In light of further consideration.
9	BUN/DSSP-a		Bungay Development Boundary	Delete	Omitted	In light of range of constraints highlighted in consultation responses.
10	BUN/DSSP-b	RP/DIT 1	Ditchingham Maltings	Wording elaborated.	-	In light of consultation responses. (Note new planning permission for development of the site in

No	Draft Sites Ref. No.	Recommended DPD Ref No.	Name	Changes Recommended	Map Change?	Notes
						the interim.)
11	BUN/DSSP-c	RP/DIT 2	Maltings Meadow Sports Ground, Ditchingham	Minor rewording	-	In light of consultation responses.
12	CAN/DSSP-a	RP/CAN 1	Cantley Sugar Factory	Minor rewording	-	In light of consultation responses.
13	DIL/DSSP-a	RP/DIL 1	Dilham Marina (Tyler's Cut Moorings)	Minor rewording	-	In light of consultation responses and detailed discussion with the local boat-owner's association.
14	GTY/DSSP-a		Great Yarmouth (Newtown) Development Boundary	Delete	Omitted	In light of range of constraints highlighted in consultation responses.
15	GTY/DSSP-b	RP/GTY 1	Marina Quays, Great Yarmouth (Newtown)	Minor rewording	-	In light of consultation responses.
16	HOR/DSSP-a	RP/HOR 1	Horning Development Boundary	Minor boundary changes.	YES	In light of consultation responses.
17	HOR/DSSP-b	RP/HOR 2	Horning Car Parking	Minor rewording	-	In light of consultation responses.
18	HOR/DSSP-c	RP/HOR 3	Horning Open Space	Minor rewording	-	In light of further consideration.
19	HOR/DSSP-d	RP/HOR 4	Horning Waterside plots	Minor adjustments of area covered (part now included in development)	YES	In light of consultation response from local residents association, and detection of minor error in digitization.

No	Draft Sites Ref. No.	Recommended DPD Ref No.	Name	Changes Recommended	Map Change?	Notes
				boundary, plus minor corrections).		
20	HOR/DSSP-e	RP/HOR 5	Horning Sailing Club	Minor rewording.	-	In light of consultation response.
21	HOR/DSSP-f	RP/HOR 6	Horning Crabbett's Marsh	Minor rewording.	-	To better reflect the area concerned (excluding adjacent roadway)
22	HOR/DSSP-g	RP/HOR 7	Horning - Boatyards, etc.	Minor rewording	-	
23	HOR/DSSP-h	RP/HOR 8	Woodbastwick Fen moorings	Minor rewording	-	To reflect changes in wording in other mooring areas
24	LUD/DSSP-a		Ludham Development Boundary	Delete	Omitted	In light of review of approach to development boundaries as a result of consultation responses.
25	NOR/DSSP-a	RP/NOR 1	Norwich, Utilities Site	Minor rewording	-	In light of consultation responses and further consideration.
26	NOR/DSSP-b	RP/NOR 2	Norwich, Riverside walk	Minor rewording	-	In light of consultation response.
27	ORM/DSSP-a	RP/ORM 1	Ormesby waterworks	Area significantly extended to better reflect extent of waterworks. Minor rewording;	Yes.	In light of consultation response and further discussion with Water Co..

N o	Draft Sites Ref. No.	Recommend ed DPD Ref No.	Name	Changes Recommended	Map Chan ge?	Notes
28	OUL/DSSP-a	RP/OUL 1	Oulton Broad Development Boundary	Minor rewording	-	In light of consultation response.
29	OUL/DSSP-b		Oulton Broad - Development off Marsh Road	Delete	Omit- ted	In light of consultation responses and further consideration.
30	OUL/DSSP-c	RP/OUL 2	Oulton Broad - Boathouse Lane Leisure Plots	Minor rewording	-	In light of consultation response.
31	OUL/DSSP-d	RP/OUL 3	Oulton Broad - Former Pegasus/Hamptons Site	Minor rewording	-	In light of consultation response.
32	POT/DSSP-a	RP/POT 1	Potter Heigham - Bridge Area	Minor rewording	-	
33	POT/DSSP-b	RP/POT 2	Potter Heigham - Waterside plots	Minor rewording	-	
34	POT/DSSP-c	RP/POT 3	Potter Heigham - Green Bank Zones	Minor rewording	-	
35	REE/DSSP-a		Reedham - Development Boundary	Delete	Omit- ted	In light of review of approach to development boundaries as a result of consultation responses.
36	SOL/DSSP-a	RP/SOL 1	Riverside area moorings	Minor rewording	-	To reflect changes in wording in other mooring areas
37	SOL/DSSP-b	RP/SOL 2	Land adjacent to A143 Beccles Road	None	-	

No	Draft Sites Ref. No.	Recommended DPD Ref No.	Name	Changes Recommended	Map Change?	Notes
38	STA/DSSP-a	RP/STA 1	Land at Stalham Staithe (Richardson's Boatyard)	Minor rewording	-	In light of consultation response.
39	TSA/DSSP-a	RP/TSA 1	Cary's Meadow and adjoining land	Area reduced to better reflect the area under the management regime. Minor rewording.	Yes	Improved information. Wording amended in light of consultation response.
40	TSA/DSSP-b	RP/TSA 2	Thorpe Island	Major rewording; boundary extended to river centre-line.	Yes	Amended in light of important appeal decision affecting part of the island. Area extended slightly to clarify application to moorings and shoreline structures, etc.
41	TSA/DSSP-c	RP/TSA 3	Griffin Lane – boatyards and industrial area	None.	-	(Note planning permission for redevelopment of part of area granted since.)
42	TSA/DSSP-d	RP/TSA 4	Bungalow Lane – mooring plots and boatyards	Minor rewording	-	Result of internal consultation.
43	TSA/DSSP-e	RP/TSA 5	Thorpe St. Andrew Development Boundary	Minor rewording	-	
44	TSA/DSSP-f	RP/TSA 6	River Green Open Space	Minor rewording	-	
46	WHI/DSSP-a	RP/WHI 1	Whitlingham Country Park	Minor rewording	-	

No	Draft Sites Ref. No.	Recommended DPD Ref No.	Name	Changes Recommended	Map Change?	Notes
47	WES/DSSP-REJ/2	RP/WES 1	West Somerton – Proposed Housing Development	New policy included, allocating part of area for development.	Added	Reconsidered in light of Parish Council's response and following additional consultation to gauge level of local support.
48	WRX/DSSP-a	RP/HOV 1	Development Boundary	Minor rewording		Note all previously under heading 'Wroxham and Hoveton' now listed as 'Hoveton and Wroxham' at request of Hoveton Parish Council
49	WRX/DSSP-b	RP/HOV 2	Open Space	Additional area included.	YES	At request of Wroxham Parish Council
50	WRX/DSSP-c	RP/HOV 3	Station Road car park	None	-	
51	WRX/DSSP-d	RP/HOV 4	Village Retail Core	Minor rewording	-	
52	ZYX/DSSP-a	RP/XNS 1	Trinity Broads	Minor rewording	-	In light of consultation response.
53	ZYX/DSSP-b	RP/XNS 2	Upper Thurne	Minor rewording	-	In light of consultation response.
54	ZYX/DSSP-c	RP/XNS 3	The Coast	Minor rewording	-	In light of consultation response.
55	ZYX/DSSP-d	RP/XNS 4	Main road network	Minor rewording	-	On advice of the highway authorities

No	Draft Sites Ref. No.	Recommended DPD Ref No.	Name	Changes Recommended	Map Change?	Notes
56	ZYX/DSSP-e	RP/XNS 5	Drainage Mills	Minor rewording	-	In light of consultation response.
57	ZYX/DSSP-f	RP/XNS 6	Riverside, etc., pubs	One additional premises included; list repetitions corrected.	YES	In light of consultation response, including request by owner for inclusion..
58	ZYX/DSSP-g		St. Benets	Delete as serving no useful purpose.	Omitted	Following in-house consultation.
59	ZYX/DSSP-REJ/1	RP/XNS 7	Haddiscoe-Beccles former rail trackway	New policy included. (previously Provisionally Rejected Option).	Added	On recommendation of County and District Council.
60	n/a	RP/XNS 8	PINS/DCLG 'Model Policy'	New policy	No Map	Apparently a government requirement.