

Local Development Framework

# **Development Management Policies DPD Submission**

**Statement of Consultation - Regulation 30(1)(e)**

**March 2011**



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**1. INTRODUCTION**

- 1.1 The Broads Authority's Development Management Policies DPD has been prepared in accordance with its Statement of Community Involvement and the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
- 1.2 This Consultation Statement meets the requirements of Regulation 30(1)(e) of those Regulations by setting out:
- If representations were made in accordance with Regulation 28(2);
  - The number of representations made; and
  - A summary of the main issues raised in those representations.

**2. PROPOSED SUBMISSION CONSULTATION**

- 2.1 The consultation on the Proposed Submission Development Management Policies DPD (together with Sustainability Appraisal and Appropriate Assessment), ran from 13 December 2010 to 28 January 2011. In accordance with Regulation 27, The Broads Authority:
- Made the Proposed Submission Documents available for Inspection at constituent local council offices, public libraries and published on the Authority's website;
  - Notified relevant consultation bodies and all those who had commented previously on the Plan (See Appendices B and C);
  - Produced a Consultation Statement;
  - Placed a public notice in the local press, outlining the consultation procedure (see Appendix A).

The number of representations made

- 2.2 A total of 125 valid representations were received from 28 different respondents. A further one was deemed to be invalid in that it was received after the specified consultation period.
- 2.3 A full list of representations and a summary of the main issues raised are set out below in Table 4. All representations can be viewed on the Authority's website:

**Table 1: Number of Valid Representations by Legal Compliance**

Legally Compliant?	No. of Representations
Yes	35
No	2
No Comment	88
TOTAL	125

**Table 2: Number of Valid Representations by General Soundness Test**

Sound?	No. of Representations
Yes	29
No	49
No Comment	47
TOTAL	125

**Table 3: Number of Valid Representations by Specific Soundness Test**

Why Unsound?	No. of Representations
Not Justified	13
Not Effective	17
Not Consistent with National Policy	13
No Comment	6
TOTAL	49

**Table 4: Summary of Valid Representations**

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
<b>Paragraph 2.5</b>	Somerton Parish Council	N Grayling	Paragraph 2.5 contradicts paragraph 3.14. The Broads is a man made and managed landscape. We have the Authority wishing one thing and the Environment Agency doing the opposite (through flood alleviation works). Accordingly, recommend revised text.	Yes	NA	No
<b>DP1: Natural Environment</b>		L Grahame	(i) and (j): It is not clear who decides when public interest is over-riding. Lack of clarity risks unwanted development and litigation.	Yes	NA	No
	Environment Agency	J Bowden	Support breadth of policy.	Yes	Yes	Yes
	RSPB	P Pearson	Policy not clear what type of development may come forward, its location or potential impacts. Given lack of detail, cannot be confident that policy will prevent damaging effects. Recommend amending policy to make it clear that Habitats Regulations assessment process must still be followed.	Yes	NA	No
<b>Paragraph 3.6</b>	Natural England	H Ward	For consistency should include number of Ramsar sites.	Yes	NA	NA
<b>DP2: Landscape and Trees</b>	English Heritage	K Fletcher	Would like reference to protection of heritage features as an integral part of the distinctiveness of the landscape. Accordingly, recommend addition of "heritage" after "landscape" in 2 <sup>nd</sup> line of policy.	Yes	NA	No
		L Grahame	Requires strengthening to be effective. Sometimes not appropriate to support geodiversity (c). Drop "wherever possible" in favour of "in all circumstances" (d). Policy should make clear that social/economic benefits need to apply to a local community to justify loss of feature.	Yes	NA	No
	Environment Agency	J Bowden	Support requirements of policy regarding ecological survey and no detriment on, or loss of, a feature of ecological importance.	Yes	Yes	Yes
	Norfolk and Suffolk Boating Association	R Card	Policy concentrates largely on landscape and provides inadequate strategy in two respects in relation to trees: Firstly, part (e) does not address the deleterious effect tree planting can have on navigation (sailing); secondly, need explicit reference to management of ongoing tree surgery to maintain interests of navigation. Accordingly, recommend revised policy text.	Yes	Yes	No
	Natural England	H Ward	More appropriate to separate trees and landscape into two distinct policies but are broadly supportive of content.	Yes	NA	NA
<b>Paragraph 3.19</b>	Natural England	H Ward	The word 'unnecessary is superfluous. Surely the aim of the policy should be to avoid all damage?	Yes	NA	NA

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
<b>DP3: Water Quality and Resources</b>	Norfolk County Council	D Allen	5 <sup>th</sup> paragraph of policy should reference statutory obligations of the Flood and Water Management Act 2010	Yes	NA	NA
	Environment Agency	J Bowden	Support policy requirements. Phrases 'environment permit' or 'exemption' should be used instead of 'consent'. Ideally, policy should include specific targets for water efficiency.	Yes	Yes	Yes
	Waveney District Council	J Green	Suggest that proposals for new development should demonstrate that there is sufficient infrastructure capacity before permission is granted rather than before occupation.	Yes	Yes	Yes
	RSPB	P Pearson	To ensure sufficient certainty for developers it is essential that the necessary infrastructure to support new development should be in place prior to development rather than before the development is occupied.	Yes	NA	No
	Natural England	H Ward	Should include reference to Habitats Directive as well as Water Framework Directive.	Yes	NA	NA
<b>DP4: Design</b>	Norfolk County Council	D Allen	(h) Adaptability: should be expanded to include that development should adopt features to reduce the risks posed by changes in water levels.	Yes	NA	NA
	Norfolk Constabulary	J Green	Support reference to crime prevention but it should be strengthened by stating that all development should meet 'Secure by Design'.	Yes	Yes	No
<b>Paragraph 3.30</b>	Waveney District Council	J Green	Paragraph should also cross reference policy DP28 – Amenity.	Yes	Yes	Yes
<b>DP5: Historic Environment</b>	English Heritage	K Fletcher	Support policy in principle but suggest more proactive approach. Helpful if policy refers to historic environment characterisation work such as conservation area appraisal and the Cultural Heritage Strategy.	Yes	NA	No
	Aldeby Parish Council	D Wiltshire	The criteria relate to larger scale developments and not smaller developments in largely rural areas	Yes	No comment	No
	Norwich City Council	J Bunting	Strongly support policy. Aligns with PPS5, sufficiently clear and robust to remain effective. It would be helpful to reference the many heritage assets in the urban areas that adjoin the Broads, e.g. riverside townscape and bridges, which are integral to the character and setting of the River Wensum.	Yes	Yes	Yes
<b>DP6: Re-use of Historic Buildings</b>						
<b>DP7: Energy Generation and Efficiency</b>	Norfolk County Council	S Faulkner	Welcome [policy but feel it ought to have clearer Code for Sustainable Homes targets and be consistent with (the higher standards of) the emerging Greater Norwich Joint Core Strategy.	Yes	NA	NA
	Norfolk County Council	S Faulkner	Welcome reference to decentralised and renewable energy. However, in light of SoS's decision to abolish the East of England Plan, it is unclear whether this part of policy needs further justification/evidence	Yes	NA	NA

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
	Residential Boat Owners' Association	I Caplan	As amended, policy is sound.	Yes	NA	Yes
		L Grahame	(a) and (b) need to be more ambitious to be effective in promoting sustainable development	Yes	NA	No
	Waveney District Council	J Green	Does policy require new development to meet full CfSH compliance or just particular aspects of the Code? Clarification might be useful.	Yes	Yes	Yes
<b>Paragraph 3.42</b>	Waveney District Council	J Green	Given its relationship with neighbouring districts, supporting evidence produced by neighbouring authorities may be relevant, including Waveney DC's Sustainable Construction and Renewable Energy Study.	Yes	Yes	Yes
	Waveney District Council	J Green	A sentence should be included in supporting text referring to energy efficiency and the application of the Government's Energy Hierarchy.	Yes	Yes	Yes
<b>DP8: Renewable Energy</b>	Norfolk County Council	S Faulkner	Welcome policy but given the environmental sensitivities of the Broads, felt that there ought to be separate, detailed policy advice on wind farms and other renewable energy.	Yes	NA	NA
	Residential Boat Owners' Association	I Caplan	As amended, policy is sound.	Yes	NA	Yes
		L Grahame	Policy sees threat but not potential of wind power. Wind could play a significant role in meeting regional energy needs. Biodiversity is threatened by the mono culture of biofuel crops. National Policy Statements on Energy Infrastructure could override local considerations; important to have strong local policies.	Yes	NA	No
<b>Paragraph 3.47</b>	Norfolk County Council	D Allen	Text should reflect the UK Renewable Energy Strategy 2009, including the UK's binding renewable energy target of 15% by 2020	Yes	NA	NA
<b>DP9: Telecommunications Development</b>	Aldeby Parish Council	D Wiltshire	The policy should clarify specify what would constitute an unacceptable impact on the wider landscape and amenities of neighbours.	Yes	No comment	No
<b>DP10: Advertisements and Signs</b>						
<b>DP11: Access on Land</b>						
<b>Paragraph 4.6</b>	Norfolk County Council	R Doleman	Text should refer to NCC/DfT guidance on Travel Plans and linked to the requirement for both Transport Assessments and Travel Plans.	Yes	NA	NA

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
<b>DP12: Access to the Water</b>	Norwich City Council	J Bunting	Should have explicit reference to the impact of proposals on adjoin sites and uses. To improve its effectiveness and consistency, suggest additional clause (d) to policy.	Yes	Yes	No
	Environment Agency	J Bowden	Welcome reference to Water Framework Directive in policy and paragraph 4.11. For clarity, it may be useful to indicate in supporting text that prior written consent of the Agency is also required for certain works within 9 metres of a main river.	Yes	Yes	Yes
	Norfolk and Suffolk Boating Association	R Card	Policy likely to be prejudicial to the enjoyment of the legal right of navigation. Accordingly, recommend additional/revised policy text.	Yes	Yes	No
	RSPB	P Pearson	Policy does not explain how development will be made consistent with the Broad's environmental sensitivities nor does it identify any specific mechanisms for ensuring that increased use of watercraft does not adversely affect Natura 2000 sites. It is unclear how increased use of waterways will be managed o ensure that visitors avoid harming sensitive locations.	Yes	NA	No
<b>DP13: Bank Protection</b>	Environment Agency	J Bowden	Welcome reference to Water Framework Directive in policy. For clarity, it may be useful to indicate in supporting text that prior written consent of the Agency is also required for certain works within 9 metres of a main river.	Yes	Yes	Yes
<b>DP14: General Location of Sustainable Tourism and Recreation Development</b>	Norfolk and Suffolk Boating Association	R Card	(4 <sup>th</sup> line): Should be extended to refer to other watercraft clubs, e.g. motor boat club, sail training centre or waterborne activity centre. Accordingly, recommend additional/revised policy text.	Yes	Yes	No
	RSPB	P Pearson	Policy does not consider whether number of visitors will increase or how this increase can be managed to avoid harm to Natura 2000 sites, including consideration of control measures to attract or direct visitors away from sensitive locations.	Yes	NA	No
<b>DP15: Holiday Accommodation – New Provision and Retention</b>		L Grahame	(d) Register of bookings may be intrusive. Main concern is risk of housing remaining empty if tourism unviable. If residential use allowed, this would aid communities and help meet local needs.	Yes	NA	No
	Waveney District Council	J Green	Final paragraph states that conversion of accommodation resulting in the loss of more than five beds will be resisted. Throughout the document there is a strong emphasis on tourism development; should such accommodation not be protected in general?	Yes	Yes	Yes
<b>Paragraph 4.22</b>	Waveney District Council	J Green	Should refer to <u>independent</u> chartered surveyor to ensure evidence is unbiased	Yes	Yes	Yes

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
<b>DP16: Moorings</b>	Residential Boat Owners' Association	I Caplan	As amended, policy is sound.	Yes	NA	Yes
	Residential Boat Owners' Association	I Caplan	The viability of waterside sites may rely on the multiple use of boatyards and related businesses, visitor and short term moorings, and residential moorings. Appropriate reference in the LDF should therefore link Policies DP16, DP20 and DP25.	Yes	NA	NA
	Norwich City Council	J Bunting	Omit clause (g) which merely repeats clause (b). The policy might benefit from a more prominent reference to the fact that permanent residential moorings are not covered by it but separately under policy DP25. Might consider streamlining and simplifying policies DP16 and DP25, reducing repetition and overlap.	Yes	Yes	No
	Environment Agency	J Bowden	Welcome reference to Water Framework Directive and definitions of different types of non-residential moorings in supporting text.	Yes	Yes	Yes
	Norfolk and Suffolk Boating Association	R Card	Policy should state expressly that it does not apply to residential moorings; insufficient just to refer to this in supporting text. Clause (c) is too restrictive and would prejudice the development of moorings by non-commercial organisations. Inappropriate for clauses (c) and (k) to refer to "access to local facilities within walking distance" as shortest distance often by water. Accordingly, recommend additional/revised policy text.	Yes	Yes	No
<b>DP17: Leisure Plots</b>	British Marine Federation	C Corcoran	Generally supported but final sentence too restrictive. Will prevent buildings which are a traditional feature, Accordingly, recommend additional policy text.	Yes	NA	No
<b>Paragraph 5.4</b>	Norwich Frostbite Sailing Club	I Thompson	Support reference to landscape character of urban fringe. However, reference should also be made to LDF Proposals Map. Accordingly, recommends additional text.	Yes	NA	No
<b>Paragraph 5.4</b>	Environment Agency	J Bowden	Given special nature of the Broads and level of flood risk, support requirement for development to be carefully considered in the context of the plan's policies, especially DP1, DP3 and DP29.	Yes	Yes	Yes
<b>Paragraph 5.6</b>	Environment Agency	J Bowden	Given level of flood risk associated with the Broads, support inclusion of reference to flood risk in paragraph 5.6 requiring that the impact of flooding is carefully considered when assessing development proposals.	Yes	Yes	Yes
<b>DP18: Protecting General Employment</b>		L Grahame	Employment use is clear priority but community facilities and possibly social housing should be second option for building communities, compared with leisure or tourism.	Yes	NA	No

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
Paragraph 5.8	Waveney District Council	J Green	Should refer to <u>independent</u> chartered surveyor to ensure evidence is unbiased	Yes	Yes	Yes
Paragraph 5.8	Norfolk County Council	D Dukes	Text should specify what is expected of an applicant to demonstrate proper marketing. 12 months may be insufficient. There should be liaison with District or County Council.	Yes	NA	NA
DP19: Employment Diversification	Norfolk County Council	R Doleman	References in bullet point (c) (“..nature or volume of traffic”) and paragraph 5.12 (“..unacceptable increase in traffic) should be replaced with reference to the term local transport network.”	Yes	NA	NA
	Norfolk County Council	R Doleman	Adequate provision must be made within a site for the parking and manoeuvring of associated vehicles	Yes	NA	NA
	Norfolk County Council	R Doleman	Where permission given for re-use of agricultural buildings, conditions should be imposed removing permitted development rights for further buildings where it is considered that intensification of use would have a serious adverse impact on the highway network.	Yes	NA	NA
DP20: Development on Waterside Sites in Commercial Use, Including Boatyards	Residential Boat Owners’ Association	I Caplan	The viability of waterside sites may rely on the multiple use of boatyards and related businesses, visitor and short term moorings, and residential moorings. Appropriate reference in the LDF should therefore link Policies DP16, DP20 and DP25.	Yes	NA	NA
	British Marine Federation	C Corcoran	Generally supported but deficient in: evidence base; clarity of wording; omission of key considerations. Policy needs to distinguish between boatyards and other waterside sites. Accordingly, recommend revisions to policy text.	Yes	NA	No
DP21: Conversion of Buildings in the Countryside		L Grahame	(g) could be strengthened by adding “energy/water efficiency and resilience to climate change”. The penultimate paragraph implies that the second home use has higher priority than residential, which is unacceptable.	Yes	NA	No
DP22: Residential Development within Defined Settlements Boundaries	Norwich Frostbite Sailing Club	I Thompson	Document now contains new policy [DP22] but consider that it does not properly address the issues of brownfield development and the nature of the urban fringe. Accordingly, recommends additional text.	Yes	NA	No
	Norwich Frostbite Sailing Club	I Thompson	Document now contains reference to priority for development of previously developed land but gives no mechanism to show how this priority will influence policy. Accordingly, recommends that Policy 22 and supporting text be supplemented.	Yes	NA	No
		M Hamilton	Policy too prescriptive and contrary to recent government policy that local communities should have greater influence over local development.	Yes	Yes	No
	Somerton Parish Council	N Grayling	Policy should be strengthened/modified to be consistent with paragraphs 5.1, 5.2 and 5.3.	Yes	NA	No

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
	Norwich City Council	J Bunting	Consider Policy DP22 to be generally effective. However, use of term "settlement boundary" (policy and supporting text) does not appear in the adopted Local Plan or Core Strategy. Needs clarification to avoid ambiguity and legal challenge.	Yes	Yes	No
<b>DP23: Affordable Housing</b>	Residential Boat Owners' Association	I Caplan	As amended, policy is sound.	Yes	NA	Yes
	Norwich City Council	J Bunting	Support approach to affordable housing but concerned that since the 'relevant District Council' is not the LPA the application of the former's standards might result in legal challenge. Suggest separate summary or appendix to address this and maximise effectiveness of the Plan.	Yes	NA	No
	Waveney District Council	J Green	It may be useful to develop guidance (SPD) to support Policy SDP23, providing clarity for developers as to what the requirements are in different parts of the Broads and provide links to the evidence base on which these are based	Yes	Yes	Yes
<b>Paragraph 5.29</b>	Waveney District Council	J Green	Would be useful for text to refer to Suffolk as well as Norfolk as the Broads straddles both Counties.	Yes	Yes	Yes
<b>DP24: Replacement Dwellings</b>						
<b>DP25: New residential Moorings</b>		J Clarke	Considerable shift from current policy of not permitting houseboats. Concerned that residential moorings, once approved, will adversely affect appearance of Broads.	Yes	NA	NA
	Residential Boat Owners' Association	I Caplan	As amended, policy is sound.	Yes	NA	Yes
	Residential Boat Owners' Association	I Caplan	The viability of waterside sites may rely on the multiple use of boatyards and related businesses, visitor and short term moorings, and residential moorings. Appropriate reference in the LDF should therefore link Policies DP16, DP20 and DP25.	Yes	NA	NA
		T Hallam	Support DP25. Permitting residential moorings will allow dwellers to invest in modern vessels, improving their quality and appearance.	Yes	NA	NA
	Norwich City Council	J Bunting	Might consider streamlining and simplifying policies DP16 and DP25, reducing repetition and overlap.	Yes	Yes	No
	British Marine Federation	C Corcoran	Generally supported but propose that permanent residential moorings be permitted if for better management of a boatyard and in marina or boatyard. Requirement for flexibility in only allowing mooring in or adjacent to defined settlement boundary. Accordingly, recommend changes to policy text.	Yes	NA	No
		L Grahame	Strongly welcomed. Would not want to unnecessarily restrict site allocation as proposed as flexibility should be applied on occasions.	Yes	NA	No

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
	Environment Agency	J Bowden	Welcome reference to Water Framework Directive and to sewage disposal and pollution prevention. Pleased to note additional definitions included. Understand that applications would need to comply with policy DP29, requiring a consideration of flood risk and the safety of occupants of residential vessel/houseboat.	Yes	Yes	Yes
	Norfolk and Suffolk Boating Association	R Card	Unlike DP16 and inconsistently with paragraph 5.39, policy does not make it explicit that proposals for new residential moorings should not result in the loss of moorings available for visitor/short stay use.	Yes	Yes	No
<b>DP26: Permanent and Temporary Dwellings for Agriculture, Forestry and Other Workers</b>	British Marine Federation	C Corcoran	Welcomes and strongly supports policy. Three year period of consent should be extendable if there is a continuing need for affordable housing.	Yes	NA	No
	Environment Agency	J Bowden	Support requirement for mobile homes to be located outside of flood zone 3.	Yes	Yes	Yes
<b>DP27: Visitor and Community Facilities and Services</b>						
<b>DP28: Amenity</b>	Aldeby Parish Council	D Wiltshire	Consideration should be given to access issues including shared access with neighbours and existing communities.	Yes	No comment	No
<b>DP29: Development on Sites With a High Probability of Flooding</b>	Norfolk County Council	D Allen	Policy should make link to Flood and Water Management Act 2010 and should mention adaption of developments to climate change.	Yes	NA	NA
	British Marine Federation	C Corcoran	Needs clear statement that development of boat related uses in boatyards will satisfy sequential test as such development cannot be located elsewhere. Also, that for development on boatyards, the exception test is passed. It should be made clear that boats are places of safety.	Yes	NA	No
	Environment Agency	J Bowden	Support policy and supporting text. However would support further amendments to provide clarity, specifically with regard to the Exception Test and reference to the safety of users of the development and to flood warning/evacuation. Also, it may be useful to indicate in supporting text that prior written consent of the Agency is also required for certain works within 9 metres of a main river. Accordingly, recommends revised/additional text.	Yes	Yes	Yes
<b>DP30: Developer Contributions</b>	English Heritage	K Fletcher	Policy should include reference to contributions to conserving or enhancing heritage assets.	Yes	NA	No
	Norfolk Constabulary	J Green	Policy should include reference to the police under criterion (b)	Yes	Yes	No
	Aldeby Parish Council	D Wiltshire	Developer contributions considerations shall not override the other planning criteria.	Yes	No comment	No

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
	British Marine Federation	C Corcoran	Concerned with policy: range of contributions; impact upon marketability and investment value; cost of good design, flood resilience and maintenance. Policy will reduce the amount of development. Policy should clarify that it applies to ne not replacement development.	Yes	NA	No
	Natural England	H Ward	Support the introduction of a Community Infrastructure Levy as the most equitable way of addressing deficiencies in strategic infrastructure provision.	Yes	NA	NA
<b>Paragraph 5.60</b>	Norfolk County Council	R Doleman	Paragraph 5.60 should make reference to transport contributions	Yes	NA	NA
<b>Paragraph 5.62</b>	Norfolk County Council	R Doleman	Paragraph 5.62 should note that NCC seeks highway maintenance sums for bridges or other highway structures.	Yes	NA	NA
<b>Implementation and Monitoring Framework</b>						
<b>Table 2</b>	English Heritage	K Fletcher	Targets for Policies DP5 and DP6 unlikely to make significant difference to securing preservation of assets. Given high number of listed building in Broads, a more ambitious target should be referenced to a positive strategy for decreasing the figure.	Yes	NA	No
	Natural England	H Ward	Believe that Indicator 'Number of BAP habitats created as part of new development' should be under DP1 rather than DP2.	Yes	NA	NA
<b>Appendix A (Saved Policies)</b>						
<b>Appendix B (Glossary and Abbreviations)</b>						
<b>General/non-specific Comments</b>	Hemsby Parish Council	S Weymouth	No Comments.	Yes	NA	NA
	Stokesby Parish Council	S Weymouth	No Comments.	Yes	NA	NA
	Salhouse Parish Council	D Wyatt	No Further Comments.	Yes	NA	NA
	Winterton Parish Council	G Lack	No mention of light pollution. Encourage more use of electric craft. There should be Parish Council representation on the Broads Authority panel	Yes	NA	NA
	British Pipeline Agency	P Hirst	Request that rights of statutory consultation are maintained.	Yes	Yes	Yes
	The Coal Authority	R Bust	No Comments	Yes	NA	NA
	Suffolk County Council Archaeological Service	J Tipper	Previous comments incorporated in document. Satisfied that DPD is sound.	Yes	NA	Yes

DPD Policy/Paragraph	Organisation	Name	Summary of Representation	Valid Representation	Legally Compliant	Sound
	Norfolk Wildlife Trust	J Hiskett	No Comments.	Yes	NA	NA
	Norfolk County Council	R Doleman	Corridors of Movement should be mentioned in the document.	Yes	NA	NA
	Norwich City Council	J Bunting	Welcome changes made following previous representations. Consider the suite of policies to be generally effective; no fundamental concerns that would affect the City or require attendance at Examination. There are a small number of matters where changes to wording would benefit overall effectiveness, clarity and soundness.	Yes	Yes	No
	English Heritage	K Fletcher	The DPD builds on strategic policies of the Core Strategy. Whilst welcoming the commitment to the historic environment in the DPD we would recommend certain minor changes to ensure consistency with PPS5	Yes	NA	No
	EEDA	N Blaken	The present status of the Regional Strategy is 'fluid'. Although the Regional Economic Strategy (RES) is not a development plan. However, its sub-regional ambitions for Greater Norwich and the role of rural economies may be relevant in assessing if the DPD will help maintain the prosperity of the East of England, enhancing its regional competitiveness and giving support to business growth.	Yes	NA	NA
		L Grahame	Volume and complexity of documents make it difficult for lay people to respond.	Yes	NA	No
	RSPB	P Pearson	Although many policies state that projects will only be permitted where they will not adversely affect the integrity of Natura 2000 sites, no specific measures are provided to indicate how the effect can be avoided and that projects can be delivered. By this stage of the DPD, the Authority should have robust and credible evidence demonstrating a clear understanding of land use patterns, anticipated changes and measures to prevent harm. Neither the DPD nor its supporting documents contain measures to address all these, notably an assessment of the impact of large scale housing development within Greater Norwich and measures to manage the potentially higher visitor numbers as a result of larger local population.	Yes	NA	No
	Broadland District Council	J Walchester	Consider the DPD to be unsound and not legally compliant because of deficiencies in the Appropriate Assessment. Recommend changes to supporting text of appropriate policies to the effect that "If a proposal is considered in the context of Policy?? to potentially have an effect on an internationally designated site then it will need to be considered against the Habitats Directive and a project level Appropriate Assessment undertaken."	Yes	No	No

<b>Sustainability Appraisal</b>						
<b>Paragraph 3.2/Page 15</b>	Natural England	H Ward	The baseline column is misaligned so the indicators and baseline numbers don't match up.	Yes	NA	NA
<b>Paragraph 3.2/Page 15</b>	Natural England	H Ward	The SSSI condition figures are out of date.	Yes	NA	NA
<b>Appendix A/Page 62</b>	Natural England	H Ward	Second column: replace 'conversation' with 'conservation'.	Yes	NA	NA
<b>Appendix B/Page 76</b>	Natural England	H Ward	Update Natural England website address.	Yes	NA	NA
<b>Appendix C/Page 79</b>	Natural England	H Ward	As well as the designated nature conservation sites, there is an opportunity to consider adverse and beneficial effects on the intervening, functionally linked habitat between sites, which often support SPA populations, and acts as a buffer zone against damage to the sites themselves.	Yes	NA	NA
<b>Appendix C/Page 80</b>	Natural England	H Ward	First box in table needs rewording for clarity.	Yes	NA	NA
<b>Appropriate Assessment</b>						
<b>Introduction/Page 3</b>	Natural England	H Ward	There are ten marine SACs and two marine SPAs in England with full European legal protection	Yes	NA	NA
<b>Page 6/Paragraph 4.1</b>	Natural England	H Ward	List should include Ramsar sites which, according to Government guidance, should be treated in the same way as European sites for the Appropriate Assessment process.	Yes	NA	NA
<b>Page 7/Figure 1</b>	Natural England	H Ward	Map is out of date: has Broads SAC as candidate site and does not indicate either Great Yarmouth North Denes SPA or Winterton to Horsey Dunes SAC.	Yes	NA	NA
<b>Page 8/Paragraph 4.2</b>	Natural England	H Ward	List of SSSIs should include Trinity Broads SSSI.	Yes	NA	NA
<b>Page 11</b>	Natural England	H Ward	AA notes that bird species are vulnerable to disturbance from increase visitor pressure. Given this, and the potential for in-combination impact with the additional large-scale population growth anticipated by the Joint Core Strategy, it appears that a likely significant effect cannot be ruled out, and a Task 2 assessment should be undertaken in relation to the Broadland SPA and all policies which would lead to an increase in visitor numbers, i.e. DP15, DP21, DP22, DP23, DP25 and DP27.	Yes	NA	NA
<b>Page 13/Vulnerability</b>	Natural England	H Ward	Breydon Water estuary stated as a robust ecosystem but this does not necessarily mean that it is not vulnerable – there are still risks of disturbance to SPA populations from inappropriate recreational use of the open water element of the site.	Yes	NA	NA
<b>Page 14 (1<sup>st</sup> Paragraph)</b>	Natural England	H Ward	Update to Conservation of Habitats and Species Regulations 2010.	Yes	NA	NA
<b>Page 22 (Proximity Effects)</b>	Natural England	H Ward	Add increased traffic effects from <i>operational</i> (as well as construction) activities.	Yes	NA	NA
	RSPB	P Pearson	Appropriate Assessment has not supplied sufficient evidence and given sufficiently detailed consideration to justify its conclusions and fails to show that the policies of the DPD will	Yes	NA	No

			not harm Natura 2000 sites, and consequently that they will be deliverable.			
	Broadland District Council	J Walchester	There is ambiguity in the AA report. If the Authority is of the view that increased residents and visitors, arising both from its own policies and 'in combination' with adjoining areas (implicit from the overall conclusion but not stated) will not have any potential adverse effect then this should be made explicit in the report at section 5 and the conclusion (section 6). If not then there could be potential effects relating to residential and visitor use. As such more detailed Task 2 and possibly Task 3 assessments should have been undertaken for the relevant policies. Accordingly, recommend appropriate changes to AA.	Yes	No	No

**APPENDIX A – Proposed Submission (Publication): Press notice of Consultation**



**Broads Authority**

The Broads - a member of the  
National Park family

**Planning and Compulsory Purchase Act 2004**

**TOWN AND COUNTRY PLANNING  
(LOCAL DEVELOPMENT) (ENGLAND)  
(AMENDMENT) REGULATIONS 2008**

**Pre-Submission Publication of Development Policies  
DPD (Regulation 27)**

The Authority has prepared a Development Policies DPD which sets out detailed policies from which planning applications in the Broads will be determined up to 2021. The pre-submission proposals have been published and representations are invited.

The proposals documents are available for inspection at the Authority's Head Office at Dragonfly House (Mon-Fri, 9am-5pm), on its website; and at main council head offices and libraries in the Broads. For details visit [www.broads-authority.gov.uk](http://www.broads-authority.gov.uk) or tel 01603 610734.

Representations must be made in writing (representation form available) and submitted between Monday 13th December 2010 and 4pm on Friday 28th January 2011 to the above address or by email to [LDF@broads-authority.gov.uk](mailto:LDF@broads-authority.gov.uk).

Representations may be accompanied by a request to be notified at a specified address that the DPD has been submitted for independent examination under section 20, the publication of the recommendations of the person appointed to carry out an independent examination, and the adoption of the DPD.

Andrea Long, Director of Planning and Strategy  
Dragonfly House, 2 Gilders Way, Norwich NR3 1UB



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Media: **Eastern Daily Press (Norwich)**

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**APPENDIX B – Proposed Submission (Publication): Letter to consultees inviting comments**



**Broads Authority**

The Broads - a member of the  
National Park family

Dragonfly House, 2 Gilders Way  
Norwich, Norfolk, NR31J8

Telephone: (01603) 610734

Fax: (01603) 756089

Email: [broads@broads-authority.gov.uk](mailto:broads@broads-authority.gov.uk)

[www.broads-authority.gov.uk](http://www.broads-authority.gov.uk)

09 December 2010

AL/LDF/DPreg27/consult

Dear Sir or Madam

**Local Development Framework: Proposed Submission (Regulation 27) Development Management Policies DPD (Dec 2010): Public consultation 13 Dec 2010 – 28 Jan 2011**

Please find enclosed a copy of the Authority's Proposed Submission (Regulation 27) Development Management Policies DPD. The DPD sets out the detailed policies that will be used in determining planning applications in the Broads up to 2021. The DPD is accompanied by a Sustainability Appraisal Report (incorporating non-technical summary) and a Habitats Regulations Appropriate Assessment together with a Consultation Statement and Landscape Guidance for selected locations within The Broads.

The Authority is seeking views on the Proposed Submission (Regulation 27) Development Management Policies DPD and your comments are welcomed. The DPD is subject to a period of consultation from 13 December 2010 to 28 January 2011. We have allowed additional time in the normal 6 week consultation period to allow for Broads Authority office closures over the Christmas and New Year period. All responses should be made in writing and submitted to the Authority by the closing date of 4pm on **Friday 28 January 2011**. Responses may be sent by post to: Director of Planning and Strategy, Broads Authority, 2 Gilders Way, Norwich NR3 1UB; or preferably by email to: [LDF@broads-authority.gov.uk](mailto:LDF@broads-authority.gov.uk).

All consultation documents, including the representations form and accompanying guidance notes, may also be viewed on the Authority's website at [www.broads-authority.gov.uk](http://www.broads-authority.gov.uk). The Proposed Submission DPD and accompanying submission documents are also available to view at the locations listed overleaf.

The Authority maintains a database of organisations and individuals who have asked to be kept informed of the LDF process. Unless otherwise requested, your details will be added to this list when you respond (the Authority does not share this information with third parties).

We look forward to hearing your views.

Yours faithfully

Andrea Long  
Director of Planning and Strategy



Chair: Dr Stephen Innes  
Chief Executive: Dr John Pickett

Where to view the draft Development Management Policies DPD

Broads Authority:

Head Office: Dragonfly House, 2 Gilders Way, Norwich NR3 1UB (opening hours Mon-Fri; 9am-5pm) Tel: 01603 610734; website: [www.broads-authority.gov.uk](http://www.broads-authority.gov.uk);  
email: [ldf@broads-authority.gov.uk](mailto:ldf@broads-authority.gov.uk)

The document may also be viewed at the following locations:

Constituent local council offices:

Broadland District Council: Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich NR7 ODU; tel: 01603 431133; website: [www.broadland.gov.uk](http://www.broadland.gov.uk)

Great Yarmouth Borough Council: Town Hall, Hall Plain, Great Yarmouth, NR30 2QF; tel: 01493 856100 (website: [www.great-yarmouth.gov.uk](http://www.great-yarmouth.gov.uk))

Norwich City Council: City Hall, Norwich NR2 1NH; tel: 01603 212212; website: [www.norwich.gov.uk](http://www.norwich.gov.uk)

Norfolk County Council: Martineau Lane, Norwich NR1 2DH; tel: 0844 800 8020; website: [www.norfolk.gov.uk](http://www.norfolk.gov.uk)

North Norfolk District Council: Council Offices, Holt Road, Cromer, Norfolk NR27 9EN; tel: 01263 513811; website: [www.north-norfolk.gov.uk](http://www.north-norfolk.gov.uk)

South Norfolk Council: South Norfolk House, Swan Lane, Long Stratton, Norfolk NR15 2XE; tel: 01508 533633; website: [www.south-norfolk.gov.uk](http://www.south-norfolk.gov.uk)

Suffolk County Council: Endeavour House, Russell Road, Ipswich, Suffolk IP1 2BX; tel: 01473 583000; website: [www.suffolkcc.gov.uk](http://www.suffolkcc.gov.uk)

Waveney District Council: The Marina Customer Service Centre, Marina, Lowestoft, NR32 1HH; tel: 01502 562111; website: [www.waveney.gov.uk](http://www.waveney.gov.uk)

Public Libraries:

Acle Library, Bridewell Lane, Acle, Norfolk NR13 3RA

Cromer Library, Prince of Wales Road, Cromer, Norfolk NR27 9HS

Great Yarmouth Library, Tolhouse Street, Great Yarmouth, NR30 2SH

Norwich Millennium Library, The Forum, Millennium Plain, Norwich NR2 1AW

Wroxham Library, Norwich Road, Wroxham, Norfolk NR12 8RX

Beccles Library, Blyburgate, Beccles, Suffolk NR34 9TB

Bungay Library, Wharton Street, Bungay, Suffolk NR35 1EL

Lowestoft Library, Clapham Road South, Lowestoft, Suffolk NR32 1DR

Oulton Broad Library, Council Offices, 92 Bridge Road, Oulton Broad, Suffolk NR32 3LR

To receive this information in large print, please contact the Broads Authority on 01603 610734 or email: [ldf@broads-authority.gov.uk](mailto:ldf@broads-authority.gov.uk)

## **APPENDIX C – Proposed Submission (Publication): Statutory and other bodies consulted**

### **Statutory Consultees:**

#### County Councils - Statutory

- Norfolk County Council
- Suffolk County Council

#### District Councils - Statutory

- Broadland District Council
- Great Yarmouth Borough Council
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Waveney District Council

#### Government – Statutory

- Broadland Environmental Services Ltd
- East of England Local Government Association
- East of England Regional Assembly (EERA)
- Environment Agency
- Environment Agency - BFAP
- Government Office for the East of England (GO-East)
- Natural England

#### Electricity and gas companies - Statutory

- British Pipeline Agency Ltd
- EDF Energy
- EON UK (Powergen)
- National Grid
- NPower Renewables
- Scottish Power
- The Coal Authority

#### Transport – Statutory

- Great Yarmouth Port Authority
- Secretary of State for Transport

#### Sewerage and water undertakers - Statutory

- Anglian Water Services
- Association of Drainage Board Authorities - Waveney, Yare & Lothingland\*
- Essex & Suffolk Water
- Water Management Alliance

#### Social - Statutory

- NHS Great Yarmouth & Waveney PCT
- NHS Norfolk PCT
- Norfolk Police Authority
- Suffolk Police Authority

#### Telecommunications operators - Statutory

- Atkins OSM (Cable and Wireless)
- British Telecommunications plc
- LTE Network Communications Ltd
- Mobile Operators Association
- National Transcommunications Ltd

#### Cultural Heritage/Landscape - Statutory

- English Heritage

#### Parish and Town Councils - Statutory

- Within in the Broads Executive Area (92)
- Adjacent to the Broads Executive Area (39)
- Lowestoft Charter Trustees
- Norfolk Rural Community Council
- Suffolk Association of Local Councils
- Suffolk ACRE

## **General Consultees:**

### Government

- Department for Environment, Food and Rural Affairs (DEFRA): Sponsorship, Landscape & Recreation Division
- Department for Transport (DfT)

### Members of Parliament

- Great Yarmouth
- Mid Norfolk
- North Norfolk
- Norwich South
- Norwich North
- South Norfolk
- Waveney
- UK MEPs - Eastern Region

### Ward councillors

- Ward councillors within Broads Executive Area (71)

### Local Strategic Partnerships

- Broadland Community Partnership
- Chet Valley Development Partnership
- Gt Yarmouth Local Strategic Partnership
- Norfolk County Strategic Partnership
- North Norfolk Community Partnership
- Norwich Local Strategic Partnership
- South Norfolk Alliance
- Stalham w/Happisburgh Partnership
- Suffolk Strategic Partnership
- Waveney Local Strategic Partnership

### Business and employment

- Business Link in the East of England
- CBI East of England
- Learning and Skills Council
- Norfolk Chamber of Commerce & Industry
- May Gurney Ltd
- Suffolk Chamber of Commerce Industry

### Boating & Water Based Business/Recreation

- Amateur Rowing Association\*
- Association of Inland Navigation Authorities
- British Canoe Union\*
- British Marine Federation\*
- British Water Ski Federation\*
- British Waterways
- Broads Hire Boat Federation\*
- Broom Boats Ltd
- Canoe Committee of Suffolk Water Sports Association\*
- Cruising Association
- East Anglian Waterways Association\*
- East of England Development Agency
- Eastern Rivers Ski Club\*

- Eastern Rowing Council\*
- Ellis-Frost Marine Ltd
- Ferry Marina
- Hoseasons Holidays Ltd
- Inland Waterways Association\*
- Jeckell and Son Ltd
- Kingfisher Boatyard
- Moonfleet Marine Ltd
- Norfolk Broads Direct Ltd
- Norfolk & Suffolk Pleasure Boat Owners Association\*
- Norfolk & Suffolk Boating Association\*
- Norwich Canoe Club
- Norwich Frostbite Sailing Club
- Oulton Broad Users Association\*
- Performance Plus (East Anglia) Ltd
- Residential Boat Owners Association
- Royal Yachting Association\*
- Silverline Marine
- South Quays Marina
- Waterways Trust
- Waveney and Oulton Broad Yacht Club
- Yare Users Association\*
- Windboats Marine Ltd

### Land Based Recreation

- British Association for Shooting and Conservation\*
- British Horse Society\*
- East Anglian Cycling Club
- East Anglian Trail Riders Association\*
- Norwich & District Wildfowling Association
- Ramblers Association\*
- Sport England (Eastern Region)\*

### Wildlife and Conservation

- Aurum Ecology
- British Trust for Ornithology
- BTCV\*
- Butterfly Conservation
- Forestry Commission East of England Conservancy
- Friends of the Earth\*
- Norfolk Coast Partnership AONB
- Norfolk Farming & Wildlife Advisory Group
- Norfolk Geodiversity Partnership
- Norfolk & Norwich Naturalists' Society
- Norfolk Wildlife Trust\*
- Norwich Fringe Project
- RSPB\*
- Suffolk Coast and Heaths AONB
- Suffolk Geodiversity Partnership
- Suffolk Wildlife Trust\*

### Fishing/Angling

- Anglers Consultative Association for Norfolk & Suffolk\*
- Broads Angling Strategy Group\*

### Farming and Landowners

- Attree Estates Ltd
- British Reed Growers' Association
- Broads Reed & Sedge Cutters Association
- Bungay Outney Meadow Common Owners
- Country Land & Business Association\*
- Hall Farm
- National Farmers Union\*
- Waters Farm Ltd

### Housing, land agents and developers

- Aldreds Chartered Surveyors
- Arnolds
- ART-TECH Design Services Ltd
- Barry J Bridgewood Building Designs
- Bidwells/Carpenters Planning Consultants
- Brown & Co
- Brundall Riverside Estates Association
- C & M Architects Ltd
- Crown Estate
- DevPlan UK
- Dunsheath, B
- Durrants
- Engineering Support Practice Ltd
- FPD Savills
- Gibb, H
- Goodliffe, B J
- Gt Yarmouth BC Architectural Service
- Hale-Sutton, R
- Hogg, G E
- Home Builders Federation
- John Ellis Architectural Design
- KLH Architects Ltd
- Knight Benjamin
- Knights, A
- Land agents (*separate label list*)
- Landpro Services Ltd
- Les Brown Associates
- LPC (Trull) Ltd
- M & S Lynch Consultancy
- McCarthy & Stone (Developments) Ltd
- NPS Property Consultants Ltd
- O W L Partnership: Architects
- P H Design and Planning Ltd
- Palmer, R
- Planning Potential
- Putman, J
- Richard C Anderson-Dungar
- Ross Powlesland Associates
- Ropes Hill Dyke Residents Association
- Stacey, D

- Strutt and Parker
- The Barton Willmore Planning Partnership
- Utton, J
- Vaughan Keal Associates

### Cultural Heritage/Landscape

- CPRE Norfolk
- CPRE North Norfolk
- CPRE Suffolk Preservation Society\*
- National Trust\*
- Norfolk Archaeological Trust\*
- Norfolk Archaeological Unit\*
- Norfolk Landscape Archaeology
- Norfolk Wherry Trust\*
- Norfolk Windmills Trust\*
- Norwich Rivers Heritage Group
- Suffolk Archaeology Service
- Wherry Yacht Charter Charitable Trust\*

### Tourism

- A T Bent Properties Ltd
- Archdeacon of Norfolk
- Broadland District Council
- Broads Tourism Forum
- East of England Tourist Board\*
- Ivy House Country Hotel
- King Line Cruisers
- Norfolk Tourism Management Partnership\*
- Oulton Parish Council
- Reedham Ferry Inn
- Visit Norwich Ltd\*
- Waveney District Council

### Education/Charities/Trusts

- Broads Society\*
- Easton College\*
- Hertfordshire Schools Sailing Base\*
- How Hill Trust\*
- Nancy Oldfield Trust\*
- Norfolk Heritage Fleet Trust\*
- Norfolk Schools Sailing Association\*
- Norwich City College\*
- Renewables East
- Rural Action East
- Ted Ellis Trust & Wheatfen Partnership
- The Horstead Centre
- University of East Anglia
- Whitlingham Boathouses Federation
- Whitlingham Charitable Trust

### Social

- Arts Council England (East)
- Broads Local Access Forum ☹ (*separate label list*)
- Health and Safety Executive
- MENTER
- Norfolk Racial Equality Council

- Norfolk Youth and Community Service
- The Gypsy Council
- Voluntary Norfolk
- Waveney DC Leisure Services

#### Waste and recycling

- Broadland Environmental Services Ltd
- Norfolk Environmental Waste Services (NEWS)

#### Transport

- Highways Agency Network Ops East
- Norfolk and Norwich Transport Action Group
- Sustrans\*
- The Three Rivers Way Association

#### National Parks

- Association of National Park Authorities (ANPA)
- Campaign for National Parks

#### Broads Authority Members and Co-opted Members

- Broads Authority Members plus co-opted members (31)

#### Individuals

- Individuals (162)

*Organisations/interests represented on the Broads Forum marked with (\*)*

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- LTE Network Communications Ltd
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