



Broads Local Plan Habitats Regulations Assessment Addendum

7th May 2019

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Habitats Regulations Assessment (HRA) is the step by step process of ensuring that a plan or project being undertaken by, or permitted by, a public body will not adversely affect the ecological integrity of any European wildlife site. It is undertaken as a requirement of the Conservation of Habitats and Species Regulations 2017, as amended (the Habitats Regulations).

This HRA addendum should be read in conjunction with the HRA of the Broads Local Plan, prepared by Footprint Ecology and finalised in January 2019 at the Main Modifications stage of plan making. This addendum does not repeat the in-depth explanation and analysis provided in the main HRA report.

Since the finalisation of the HRA report at the Main Modifications stage, the Examining Inspector has prepared her final report and has found the Broads Local Plan to be sound, subject to a number of changes. These changes were consulted on during the Modifications consultation. The Inspector then published her final report into the Examination of the Local Plan and made some minor changes to the Modifications that were consulted on.

The Inspector's changes and some minor text changes made by the Broads Authority have been checked by Footprint Ecology, on behalf of the Broads Authority, to ensure that they do not raise any further matters of relevance to the HRA. The check is made ensure that the changes do not further exacerbate any previously identified risks to European sites, or present new risks that have not yet been assessed. A similar check has also been made by the Broads Authority in relation to the Sustainability Appraisal for the new Local Plan.

This addendum provides a record of the checks made on all final minor changes recommended by the Inspector and the Broads Authority, so that the Broads Authority can adopt the new Broads Local Plan with confidence that the plan in its final form is compliant with the requirements of the Habitats Regulations.

The following two tables set out the minor text changes to the plan in Table 1, and specific changes to the Main Modifications in Table 2. These tables have been prepared by the Broads Authority to provide a schedule of final changes, and include checks made in relation to the Sustainability Appraisal. For the HRA check, Footprint Ecology has added a final column to both tables, to make a record of HRA checks undertaken.

For the majority of changes, it is concluded that the change is of no consequence to the HRA. For two matters, the change has the potential to be of relevance, and therefore a record has been made that a conclusion of no likely significant effect can be drawn.

One matter relates to the reference to the most recent Strategic Flood Risk Assessment report for Waveney, 2018. This report has been checked and reference to this report within the Broads Local Plan does not lead to any likely significant effects or alter previous HRA conclusions.

The other matter relates to specific wording describing the open mosaic habitat type of brownfield land within Policy DM13. The change provides a more accurate description of the habitat found on brownfield land that is of biodiversity value. This change therefore does not lead to any likely significant effects.

It is concluded that the final changes proposed by the Inspector and the Broads Authority do not lead to any likely significant effects on European sites. This addendum provides a record that the necessary checks have been made to confirm that the conclusions of the main HRA report are still correct and the Broads Local Plan can be adopted with confidence that it is compliant with the Habitats Regulations.

Tables 1 and 2 are provided below, taken from those prepared by the Broads Authority and with a final HRA column added.

Table 1: Schedule of changes to the Local Plan for the Broads post-examination, made by the Broads Authority

The following changes have been made to the Local Plan for the Broads since the examination ended. They reflect some factual inaccuracies as well as typographical and grammatical errors. On occasion they may provide clarification. They are all judged to be minor changes and are explained and set out in the following table. The final two columns show the SA and HRA assessment of these changes using the following key:

For the HRA column	Minor text change of no consequence to HRA	/
	Re-screened to conclude No Likely Significant Effect	
	Re-screened to conclude Likely significant effect	

For the SA column	No effect on SA	/
	Positive effect on SA	
	Negative effect on SA	
	Uncertain effect on SA	?

Part of Final Local Plan		Change	Reason	Why this change has been made.	SA	HRA
Page	Section					
-	Throughout	Instances of 'Waveney District Council HMA' now say 'Waveney HMA'. On occasion the text has been changed to say 'East Suffolk' or 'former Waveney District'.	Since 1 April 2019, the former Council and Area that was Waveney District Council is now East Suffolk.	The change is factual.	/	/
-	Throughout	All hyperlinks checked and working as at 23 April 2019. On occasion some hyperlinks that were not working were removed or replaced.	The few changes made are to mend broken links and delete those that are not working. The hyperlinks still take you to the same place.	To ensure the hyperlinks work at the time of adoption.	/	/
-	Throughout	Cross references to other policies checked and amended where appropriate.	To ensure that the correct policy numbers are used when cross referring to other policies.	The change is factual.	/	/

Part of Final Local Plan		Change	Reason	Why this change has been made.	SA	HRA
Page	Section					
-	Throughout	NPPF references checked and date changes from 2018 to 2019.	To ensure the information given is correct as NPPF updated in 2019.	The change is factual.	/	/
-	Throughout	Check ordnance survey copyright wording	To ensure it is correct and up to date	The change is factual.	/	/
Page 4 of Modification version.	Section 1	Remove 'what is this version of the Local Plan' box	Refers to modification consultation. Not relevant to adopted Local Plan	Removing reference to modifications version/appropriate to adopted version	/	/
Page 5 of Modifications version	1.2 and 1.3	Remove reference to 'modifications version' of the Local Plan	Not relevant to adopted Local Plan	Removing reference to modifications version/appropriate to adopted version	/	/
Page 8 of Modifications version	2.4	Remove 'at this stage' paragraph	Not relevant to adopted Local Plan	Removing reference to modifications version/appropriate to adopted version	/	/
Page 9 of Modifications version	Section 3	Remove this section	Not relevant to adopted Local Plan	Removing reference to modifications version/appropriate to adopted version	/	/
4	last part of 1.1	For the avoidance of doubt, this adopted Local Plan will be used in determining planning applications and replaces the Core Strategy, Development Management DPD and Sites Specifics Local Plan (which are no longer in use and have been superseded – see Appendix B).	Appendix B is relevant to this part of the Local Plan	The change assists in using the document.	/	/
4	last part of 1.1	The process of producing the Local Plan is set out in the following diagram:	To briefly set out how the Local Plan was produced.	The change is factual.	/	/

Part of Final Local Plan		Change	Reason	Why this change has been made.	SA	HRA
Page	Section					
		<p style="text-align: center;">Local Plan for the Broads – the Process to date.</p> <p>The flowchart details the following stages:</p> <ul style="list-style-type: none"> Issue and Options consultation: This consultation stage ran for 8 weeks from 15 February to 8 April 2016. Consultees were asked their thoughts on various issues raised in the Local Plan. Preferred Options consultation: This consultation stage ran for 9 weeks from 5 December 2016 to 3 February 2017. Consultees were asked if they agreed or not with the choice and detail of the draft policies and the provisional rejection of other policies. Single Issue focused consultations: A series of informal consultations/engagements were undertaken in the summer of 2017. The consultation/engagements were targeted at specific stakeholders relevant to that particular issue. There was also a second call for sites for residential meetings. Pre-Submission Consultation: This consultation stage ran for 8 weeks from 9 November 2017 to 5 January 2018. The document was published for comments relating to its soundness. Submission: The Local Plan was submitted on 18 March 2018. The Local Plan was submitted to the Planning Inspectorate. Examination: Mr Child was appointed to examine the Local Plan for the Broads. Examination Hearings were held in June and September 2018. Main (and Additional) Modifications Consultation: The Main and Additional Modifications were published for public consultation in February and March 2018. Inspector's Report: Concludes that the Local Plan is sound subject to some Main Modifications. Received April 2018. Was assessed against the NPA, and SA criteria. Adoption: 17 May 2018. 				
17	4.10	Update list of Neighbourhood Plans	To ensure it is correct and up to date. Wroxham NP likely to be adopted for example.	The change is factual.	/	/
25	DM1	Point 2, '...can demonstrate that they are the development...'	-	To correct a typographical/grammatical error	/	/
27	DM1, supporting text	'Due to its status as a protected landscape equivalent to a National Park, there will <u>be</u> limited...'	-	To correct a typographical/grammatical error	/	/
31	DM4 supporting text	'For non-residential buildings, an assessment of the efficiency of the building's domestic water consuming components is undertaken <u>required to be completed</u> using the ...'	-	To correct a typographical/grammatical error	/	/
31	DM4 supporting text	'adopt the 110l/h/d standard, and the draft Local Plan for Waveney District'	To reflect Waveney Local Plan is adopted.	The change is factual.	/	/

Part of Final Local Plan		Change	Reason	Why this change has been made.	SA	HRA
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32	SP2 supporting text.	Approximately 95% 82.5% of the Broads Authority Executive Area is covered by flood zone 3 (3, 3a & 3b) of the Broads Authority area is at some risk of flooding; This equates to 25,472 hectares. This includes more than 2000 properties and almost 30,000 hectares. The Broads Authority boundary is tightly drawn around the edge of the floodplain.	Updated to reflect the recent SFRAs.	The change is factual.	/	/
38	DM6 supporting text	The majority of the Watercourses in the Broads are regulated and maintained by the Internal Drainage Board or by private landowners. The IDB have who their own local surface water policy which takes precedence over national best practice (https://www.wlma.org.uk/broads-idb/development/).	The proposed text was not quite factually correct.	The change is factual.	/	/
78	SP8, supporting text.	'Through traffic will be encouraged to find alternative routes away from visitor and residential areas and this can be achieved through measures including improved signage.'	-	To correct a typographical/grammatical error	/	/
84	DM26	'c) the use of the site and/or buildings for uses lists listed in (a) or (b) above....'	-	To correct a typographical/grammatical error	/	/
104	SP15 supporting text, ii)	There is a residual need in the Great Yarmouth Housing Market Area for 39-38 dwellings.	To ensure consistency throughout this section.	The change is factual.	/	/
112	DM35, constraints and features relating to Oulton Broad	'SFRA 2017 2018 '	This used the Norfolk 2017 SFRAs and now the Waveney SFRA is in place.	The change is factual.	/	Waveney SFRA checked. No LSE
116	DM36 supporting text	'...for a limited time period, after which time the use shall cease and the land must be restored to its former condition...'	-	To correct a typographical/grammatical error	/	/
116	DM37, e, i)	'Would not have an adverse impact upon; the character and appearance of the site on or the surrounding area arising from the moorings and the use of adjacent land incidental to the mooring'	-	To correct a typographical/grammatical error	/	/
119	DM37 supporting text	'This would normally cover things like noise, waste, deliveries delivery times etc...'	-	To correct a typographical/grammatical error	/	/
119	DM37 supporting text	'The policy requires a management plan for the site as well as a register of those boats being lived on within the marina. '	The wording refers to residential moorings within marinas only but	Does not change policy and adds clarity.	/	/

Part of Final Local Plan		Change	Reason	Why this change has been made.	SA	HRA
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			the policy refers in general to residential moorings. This could be confusing			
120	DM38	'Development of a new dwelling or a residential mooring for rural workers will only be permitted outside the defined development boundaries <u>(or other locational criteria if for a residential mooring)</u> if...'	Residential moorings have additional locational criteria as set out in DM37 and this change provides consistency with that policy.	This reflects the change to DM37 to ensure consistency.	/	/
126	DM42 supporting text	' <u>Custom/self-build register</u> Since April 2016, the Authority has <u>had</u> a register ^[1] in place where those wishing to build their own homes can register their interest. At the time of writing (September 2017) <u>adopting this Local Plan</u> there were <u>190</u> individuals interested in building their own home on the register. However, it is important to note that the register covers four Local Planning Authorities who use the same register: South Norfolk, Breckland, King's Lynn and West Norfolk and the Broads Authority. When assessing the register, in the vast majority of cases, individuals have stated that they wish to develop in the Broads as well as in another district; few, if any, individuals express a desire to develop in the Broads alone.'	To correct a typographical/grammatical error. To ensure it is correct and up to date. Final figure will be taken from the register when Local Plan is adopted.	The change is factual.	/	/
143	DM51 supporting text	'...are Hoveton Town Centre and Oulton Broads District Centre'	-	To correct a typographical/grammatical error	/	/
145	ACL1 supporting text	'However, the EA wishes to ensure that any risk-of risk of pollution to groundwater is...'	-	To correct a typographical/grammatical error	/	/
148	BEC2, constraints and features	'SFRA 2017 <u>2018</u> '	This used the Norfolk 2017 SFRA's and now the Waveney SFRA is in place.	The change is factual.	/	Waveney SFRA checked. No LSE
151	BRU4	'(ii) Broads Local Plan policies on general employment and boatyards in the economy section will apply ;-and '	-	To correct a typographical/grammatical error	/	/

^[1] Self-build and custom build register: www.broads-authority.gov.uk/planning/Other-planning-issues/self-build-and-custom-build-register

Part of Final Local Plan		Change	Reason	Why this change has been made.	SA	HRA
Page	Section					
156	CHE1, supporting text	'It is anticipated that the moorings will be <u>in</u> place within a...'	-	To correct a typographical/grammatical error	/	/
156	CHE1, supporting text	'This would normally cover things like noise, waste, deliveries <u>delivery</u> times etc...'	-	To correct a typographical/grammatical error	/	/
159	FLE1	'iv) It manages <u>s</u> flood risk on the site and <u>does</u> not increase flood risk elsewhere'	-	To correct a typographical/grammatical error	/	/
161	Horning Knackers Wood Water Recycling Centre	'Development that could increase the flows to the Water Recycling Centre <u>s</u> ...'	-	To correct a typographical/grammatical error	/	/
161	HOR1, constraints and features	'Knackers Wood <u>s</u> Water Recycling Centre...'	-	To correct a typographical/grammatical error	/	/
166	HOR6, constraints and features	'Knackers Wood <u>s</u> Water Recycling Centre...'	-	To correct a typographical/grammatical error	/	/
167	HOR8, constraints and features	'Knackers Wood <u>s</u> Water Recycling Centre...'	-	To correct a typographical/grammatical error	/	/
168	HOR9	'b) Peat assessment, recoding <u>recording</u> and disposal...'	-	To correct a typographical/grammatical error	/	/
169	HOR9 supporting text	'Parking should be set back from the river frontage, <u>so</u> as <u>to</u> not cause visual sprawl of the concentration of riverbank activities.'	-	To correct a typographical/grammatical error	/	/
174	HOV4, supporting text	'The policy seeks to make <u>s</u> sure the...'	-	To correct a typographical/grammatical error	/	/

Part of Final Local Plan		Change	Reason	Why this change has been made.	SA	HRA
Page	Section					
176	HOV5, supporting text	'...rather than limited to the area within the Broads Authority <u>Executive Area</u> '.	-	To correct a typographical/grammatical error	/	/
177	map	Update policy numbers.	To correctly reference policies.	Removing reference to modifications version/appropriate to adopted version	/	/
179	LOD1, supporting text	'This would normally cover things like noise, waste, deliveries <u>delivery</u> times etc...'	-	To correct a typographical/grammatical error	/	/
180	NOR1, constraints and features	'This site is in close proximity to a number of designated heritage assets including the Grade II listed of Ruins of...'	-	To correct a typographical/grammatical error	/	/
181	NOR1, supporting text	'...and the access <u>that runs alongside</u> by the river uses a tunnel under the railway bridge...'	'By the river' may mean on the water but in this instance refers to a land route that runs alongside the river. This change clarifies things.	Does not change policy and adds clarity.	/	/
183	OUL1, constraints and features	'SFRA 2017 <u>2018</u> '	This used the Norfolk 2017 SFRAs and now the Waveney SFRA is in place.	The change is factual.	/	Waveney SFRA checked. No LSE
184	OUL2, constraints and features	'SFRA 2017 <u>2018</u> '	This used the Norfolk 2017 SFRAs and now the Waveney SFRA is in place.	The change is factual.	/	Waveney SFRA checked. No LSE
186	OUL3, constraints and features	'SFRA 2017 <u>2018</u> '	This used the Norfolk 2017 SFRAs and now the Waveney SFRA is in place.	The change is factual.	/	Waveney SFRA checked. No LSE
189	POT2, supporting text	This option <u>policy</u> continues the general approach of the 1997 Local Plan.	-	To correct a typographical/grammatical error	/	/
191	SOM1, constraints	'SFRA 2017 <u>2018</u> '	This used the Norfolk 2017 SFRAs and now the Waveney SFRA is in place.	The change is factual.	/	Waveney SFRA

Part of Final Local Plan		Change	Reason	Why this change has been made.	SA	HRA
Page	Section					
	and features					checked. No LSE
194	STO1	d) A written methodology for the protection of the oak tree on the site during and after construction in accordance with British Standard 5837:2012 (Trees in relation to design, demolition and construction – Recommendations Trees in relation to construction) as amended;	To correctly reference the title of the document.	The change is factual.	/	/
220	SSA47	<ul style="list-style-type: none"> Landscape Character Assessment (2017): https://www.broads-authority.gov.uk/planning/planning-policies/landscape-character-assessments Landscape Sensitivity Study (2012): https://www.broads-authority.gov.uk/planning/planning-policies/landscape-sensitivity-studies Broads Plan 2017: http://www.broads-authority.gov.uk/data/assets/pdf_file/0012/976728/Broads-Plan-2017.pdf 	Added hyperlinks.	The change is factual.	/	/
238	Appendix I	Update policy numbers.	To correctly reference policies.	Removing reference to modifications version/appropriate to adopted version	/	/
243	Appendix L	Check the data in the table is correct and amend date in title. Update to reflect that Waveney Local Plan is adopted. Updated to correctly reflect the current situation in NNDC	To ensure the information given is correct.	The change is factual.	/	/
246	MODDM1 row, second column	'Strategic Policies relevant to Neighbourhood Plans.'	This is a DM policy, not a strategic policy.	The change is factual.	/	/
247	DM13 row, 4 th column	'Brownfield sites with high environment value <u>open mosaic habitat of intrinsic biodiversity value...</u> '	To reflect changes to policy DM13	This reflects the change to DM13 to ensure consistency.	/	Better defines the habitat type. No LSE

Table 2: Inspector Report Amendments

The following table sets out the amendments made by the Inspector to the Main Modifications to the Local Plan. The final column gives a commentary on how these changes relate to the SA of the policy. The Appendices referred to in this table relate to the Main Modifications Schedule.

For the HRA column	Minor text change of no consequence to HRA	/
	Re-screened to conclude No Likely Significant Effect	
	Re-screened to conclude Likely significant effect	

For the SA column	Text description of SA check made, and conclusions drawn	
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Ref.	Page No. (From Broads Local Plan Pre-Submission)	Policy/ Para. No. (From Broads Local Plan Pre-Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
M1	New Policy	New Policy	<i>New policy allocating residential moorings at Horning – would be HOR9. See Appendix B. Monitoring indicator included as well.</i>	In the case of Horning I have altered the Authority’s proposed milestone wording to clarify that delivery can	This change strengthens the wording that relates to the Horning Knackers Wood Water Recycling Centre capacity	/

Ref.	Page No. (From Broads Local Plan Pre-Submission)	Policy/ Para. No. (From Broads Local Plan Pre-Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
				take place after provision of wastewater infrastructure, thereby aligning with the rest of the policy.	issues. No change to SA of final policy as ENV2 is already positive.	
M4	New Policy	New Policy	<i>New Major Development Policy – would be new DM1 in the Sustainable Development section. See Appendix S. Also includes monitoring indicator.</i>	22. I have slightly amended M4 to remove the ‘or’ between criteria a) to e) in the supporting text, and include new criterion f) relating to impact on the Broads purposes and special qualities. This is to ensure clarity and provide consistency with	This change strengthens the wording that relates to the special qualities of the Broads. No change to SA of final policy as objectives relating to the special qualities are already positive.	/

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
				the approach established in the rest of the published text and policy, and does not fundamentally alter the approach.		
M29	63	PUBDM14 (now called DM15) supporting text.	The NPPG NPPF 2019 (paragraph 154 footnote 49) says 'in the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan'. The Authority does not intend to allocate any sites in the Broads for wind turbines. More information can be found in the Renewable Energy Topic Paper. <u>Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing'.</u>	I have amended paragraph 2 of the Authority's published modification slightly to refer to 'areas' rather than 'sites'. This reflects the evidence base and clarifies the published policy approach.	No change to SA of final policy as the change is more for consistency and clarification and does not fundamentally alter the approach.	/

Ref.	Page No. (From Broads Local Plan Pre-Submission)	Policy/ Para. No. (From Broads Local Plan Pre-Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
			<p><u>The Landscape Sensitivity Study concluded that</u> wind turbines are tall structures and <u>that</u> have the potential to detract from the mainly open and low-lying character of the Broads landscape, particularly when they are in large groups or sited in prominent locations. <u>The Renewable Energy Topic Paper (link) assesses the potential for wind turbines in the Broads and does not identify specific areas of suitability within the Broads Authority Executive Area for wind turbines and as such no areas are identified in this Local Plan.</u></p> <p>When considering such proposals, the Authority will take into account: the scale of the wind farm (in terms</p> <p>of turbine groupings and heights); the condition of the landscape; the extent to which topography and/or</p> <p>trees screen the lower part of turbines; the degree of human influence on the landscape; and the presence</p> <p>of strong visual features and focal points. The Authority's Landscape Character Assessment and Landscape</p> <p>Sensitivity Study will be used to help assess the impact of individual proposals.</p>			

Ref.	Page No. (From Broads Local Plan Pre-Submission)	Policy/ Para. No. (From Broads Local Plan Pre-Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
			<p>The operation of the turbines can also adversely affect ecological interests, particularly birds and bats. If a proposal is considered likely to have an effect on internationally designated sites, it will need to be considered in the context of the Conservation of Habitats and Species Regulations 2010 (the Habitats Directive) and a project level Appropriate Assessment undertaken. Development that could affect the integrity of a local, international or European site would not be in accordance with Policy PUBDM12 of this Local Plan.</p>			
M50	96	<p>PUBDM32 (now called DM33) supporting text</p>	<p>With regards to the requirement <u>to provide short stay visitor moorings as set out in part m of the policy</u>for 10% or two short stay mooring berths (whichever is greater), the preference is to deliver these short stay moorings on site. 'On site' does not have to be part of the development site; it could be elsewhere in an appropriately accessible and suitable part of the marina or boatyard. Indeed, the applicant may wish to provide these moorings in a location easily accessible by novice helms to minimise the potential for accidental damage. It is expected that these moorings will be appropriately advertised, perhaps on websites or signed on the river (in accordance with policy PUBDM48).</p> <p>In exceptional circumstances, the Authority may accept off-site contributions towards mooring provision. The contribution would be calculated to reflect the cost of delivering the moorings on site. That is to say that the contribution <u>in line with the standards set out in the policy</u>of 10% or two mooring berths would be equal to the</p>	<p>I have made a small change to M50 to ensure the monitoring indicator reflects the revised percentages. This will ensure clarity and consistency with the modified policy as published.</p>	<p>The monitoring indicator in this SA has been updated to reflect this change.</p>	/

Ref.	Page No. (From Broads Local Plan Pre-Submission)	Policy/ Para. No. (From Broads Local Plan Pre-Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check										
			<p>cost of delivering the same amount of moorings as part of that scheme. This reflects that it would cost the Broads Authority this amount to deliver an equivalent provision in the same location.</p> <p>To support the delivery of the mooring berths contributions, the Authority is willing to consider seasonal usage of moorings. A boatyard or marina may have moorings they only need for their own use in the off peak season (November to March) and could therefore allow to be used for short stay moorings, as per the policy requirements, in the peak season only (April to October). If this is the case, the Authority would <u>consider this approach subject to agreeing an appropriate and deliverable approach to operating, monitoring, managing and advertising the seasonal moorings and would expect more short stay moorings than set out in part m to be provided</u> provision of 15%/three mooring berths contributions in the peak season’.</p> <table border="1" data-bbox="566 1129 1592 1410"> <thead> <tr> <th data-bbox="566 1129 734 1241">Policy number</th> <th data-bbox="734 1129 913 1241">Delivery mechanism</th> <th data-bbox="913 1129 1115 1241">Milestones</th> <th data-bbox="1115 1129 1317 1241">Organisations involved</th> <th data-bbox="1317 1129 1592 1241">Monitoring indicator</th> </tr> </thead> <tbody> <tr> <td data-bbox="566 1241 734 1410">PUBDM32: Moorings, mooring</td> <td data-bbox="734 1241 913 1410">If appropriate to a scheme,</td> <td data-bbox="913 1241 1115 1410">None-identified/on-going</td> <td data-bbox="1115 1241 1317 1410">EA, businesses, landowners</td> <td data-bbox="1317 1241 1592 1410">2/10% moorings delivered on site-</td> </tr> </tbody> </table>	Policy number	Delivery mechanism	Milestones	Organisations involved	Monitoring indicator	PUBDM32: Moorings, mooring	If appropriate to a scheme,	None-identified/on-going	EA, businesses, landowners	2/10% moorings delivered on site-			
Policy number	Delivery mechanism	Milestones	Organisations involved	Monitoring indicator												
PUBDM32: Moorings, mooring	If appropriate to a scheme,	None-identified/on-going	EA, businesses, landowners	2/10% moorings delivered on site-												

Ref.	Page No. (From Broads Local Plan Pre-Submission)	Policy/ Para. No. (From Broads Local Plan Pre-Submission)	Main Modification					Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
			basins and marinas	policy used to help determine application.			<p>off-site contributions.</p> <p><u>Number/percentage of short stay visitor moorings delivered on site or via off-site contributions in line with part m in Policy PUBDM32.</u></p>			
M52	102	PUBDM33 (now called DM34) policy and supporting text	<i>Replace existing policy and reasoned justification with that shown at Appendix R.</i>					59. I have amended M52 as published to clarify that commuted sums from schemes of 6-9 units will be sought consistently across the Broads	No change to SA of final policy as the change is more for consistency and clarification and does not fundamentally	/

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
				<p>Executive Area. This reflects the approach specified in the supporting text, the table in Policy PUBDM33 and in the Authority's evidence base, and removes the inconsistent and unclear text relating to North Norfolk.</p> <p>61. I have made a slight adjustment to the modified policy, as published by the Authority, to clarify that an</p>	alter the approach.	/

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
				<p>applicant's viability appraisal should be assessed independently and not 'by the relevant Council as appropriate'. Planning applications for housing are submitted to the Broads Authority, and the amendment reflects the approach outlined in the published supporting text.</p>		

Ref.	Page No. (From Broads Local Plan Pre-Submission)	Policy/ Para. No. (From Broads Local Plan Pre-Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
M62	122	PUBDM42 Supporting Text	<p>With regard to adaptable dwellings, the Authority refers to the 16 criteria relating to Lifetime Homes^[1]. We encourage new housing to be built to the Lifetime Homes standard, which makes it easier for people to remain in their own homes as their mobility needs change, through encouraging homes to be built in a way in which rooms can be used flexibly over time. The criteria in this policy also contribute towards the creation of safe, functional and well-designed communities as aspired to by the Government's Lifetime Neighbourhoods^[2] ambitions.</p> <p>The Authority also encourages the provision of some dwellings, in appropriate locations, to be designed to be accessible and accommodate wheelchairs. In schemes of over 205 dwellings <u>or more</u> it requires 205% to meet Building Regulations part M4(2). The details are set out in the Building Regulations part M^[3].</p> <p><u>The justification for this requirement is discussed in the Design policy requirement relating to Building Regulations M(4)2 Topic Paper (2018) (insert footnote and link). In summary:</u></p>	I have amended the Authority's published wording in M62 to refer to the updated Viability Assessment 2018. This amendment does not materially alter the thrust of the policy but ensures the correct evidence base is referenced.	No change to SA of final policy as the change is more for consistency and clarification and does not fundamentally alter the approach.	/

[1] Lifetime Homes Standards Homes that are accessible to everybody and where the layout can be easily adapted to meet the needs of future occupants. www.lifetimehomes.org.uk/

[2] Government's Lifetime Neighbourhoods www.gov.uk/government/publications/lifetime-neighbourhoods--2

[3] Building Regulations part M: www.gov.uk/government/uploads/system/uploads/attachment_data/file/506503/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf

Ref.	Page No. (From Broads Local Plan Pre-Submission)	Policy/ Para. No. (From Broads Local Plan Pre-Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
			<ul style="list-style-type: none"> The Census 2011 shows that the Broads Authority Executive Area has an ageing population, with 30% <u>of the population being over 65</u>, and 23% of people saying their daily activities are limited. <u>The age profile of the Broads is likely to change in a similar manner to our districts. That is to say that the relative proportions of those aged 65 and over and 85 and over will increase by 2035/36. Older people may experience health and mobility issues and it is these issues which the Building Regulations M4(2) seeks to help address.</u> <u>Turning to viability, the 2018 Viability Assessment concludes that for new build, the requirement can be designed in from the start at little or no cost. If sites are on steep hills, the cost could increase; but it is recognised that there are very few steep hills in the Broads. For conversions, there could be a slight cost increase but that depends on the level of works to the structure being converted. Generally the 2018 Viability Assessment concludes that additional base costs of complying with M4(2) are capable of being absorbed and that schemes of 5+ dwellings would be viable.</u> <p>The NPPG^[4] is clear, however, in saying that <i>‘Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3)</i></p>			

^[4] NPPG: planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/accessibility-and-wheelchair-housing-standards/

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Main Modification	Inspector Report Amendments	Impact on Sustainability Appraisal	HRA check
			<p><i>compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied</i>'. The Authority acknowledges that this standard may not be appropriate in some locations or for some schemes, but applicants are required to justify reasons for not including dwellings that are accessible and adaptable.</p>			
M120	234	Appendix K	<p><i>Amend residential dwellings trajectory. See Appendix A.</i></p>	<p>I have corrected the modified trajectory as published to refer to a completions figure of 68 dwellings, ensuring consistency with the total published elsewhere.</p>	<p>No change to SA of final policy as the change is more for consistency and clarification and does not fundamentally alter the approach.</p>	/