



**Local Plan for the Broads**  
**Statement of Common Ground**  
**Between the Broads Authority & British Sugar**  
**In relation to comments made as part of the first Regulation 19**  
**consultation**  
**December 2025**

**Contents**

1. Introduction.....	1
2. Areas of agreement .....	2
3. Areas of disagreement.....	5
4. Signed.....	10

**1. Introduction**

The first Regulation 19 consultation on the Local Plan for the Broads was held over the summer in 2025. This is one of a series of Statements of Common Ground that relate to comments made as part of that consultation. The comments are included, as well as response from the Broads Authority. If a change is proposed, that is also included.

There is a section relating to areas of agreement and areas of disagreement.

## 2. Areas of agreement

Part of Local Plan	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
Policy PUBCAN1 - Cantley Sugar Factory	<p>British Sugar Plc was formed in 1936 and has been one of Associated British Foods' ('ABF') subsidiary companies since 1991. It is the sole British producer of sugar from sugar beet and processes all sugar beet grown in the UK by around 2,300 growers. From the four factories in the UK, including Cantley Sugar Factory, a total of circa 8 million tonnes of sugar beet is processed annually. British Sugar's sugar processing creates a number of co-products including Topsoil, animal feed, LimeX and aggregates. Furthermore, their innovative approach to the operation also enables the creation of a range of co-products from power generation and bioethanol. British Sugar is continuously reviewing opportunities to grow and diversify the operations in partnership with ABF's subsidiary or third party agri-food sector businesses while reducing greenhouse gas emissions to operate more sustainably. British Sugar supports up to 7,000 UK jobs in the wider economy and supplying over 50% of the UK's demand for sugar.</p>	-	Background information noted.	No change proposed.
Policy PUBCAN1 - Cantley Sugar Factory	<p>Cantley Sugar Factory was the first sugar beet processing factory in the UK and has been in operation since its opening in 1920. Cantley Sugar Factory is of national importance, producing home-grown sugar and other related produces. The factory is integral to the local – and regional – economy, as well as the local communities. The factory employs 90 permanent staff and a further 25 seasonal employees during the Campaign period (the annual harvest and processing season for sugar beet). In addition, the factory supports 80 off-site indirect jobs within the catchment area and 350 local farmers and several haulage companies. The factory also supports local schools and colleges through offering work experiences and apprenticeship schemes every year. In addition to the production of sugar, the sustainable production of the site ensures that the output of each process becomes the input of the next, turning raw materials into products thus avoiding unnecessary waste. The result is the production of much more than sugar, with its co-products including:</p> <ul style="list-style-type: none"> <li>• Animal feed from residual sugar beet fibre which is supplied to the livestock industry;</li> <li>• Topsoil from soil recovered from sugar beet which is used primarily by the landscaping industry;</li> <li>• LimeX, a liming material supplied to agriculture;</li> <li>• On-site power generation (Combined Heat and Power) and the export of electricity into the electrical grid, and</li> <li>• Aggregates from stones recovered from sugar beet which is used by civil engineering, road building and construction industries.</li> </ul> <p>British Sugar is fully committed to the ongoing and long-term operations at its factory in Cantley. For example, in recent years, the business made significant investment (£10m) in a new wastewater treatment plant, which has been completed and operational. Furthermore, the installation of a new CHP plant has recently been completed and enabled the decommissioning of the previous coal boiler and is now 40% hydrogen ready. British Sugar will continue to review opportunities to diversify and reduce greenhouse gas emissions further through on-site renewable energy development. British Sugar's operations at Cantley are diverse and they will continue to invest in further opportunities for diversification, efficient operations and carbon emission reductions, which will strengthen its role in the agri-food sector in the region and the sustainable, low carbon future.</p>	-	Background information noted.	No change proposed.
Policy PUBCAN1 - Cantley Sugar Factory	<p>Our representations to the consultation are made in the context of the above background and having regard to the tests of soundness as set out in the National Planning Policy Framework 2024 ('NPPF'). Cantley Sugar Factory benefits from a site specific designation under Policy CAN1 in the adopted Local Plan. The policy defines the defined area of Cantley Sugar Factory as an employment site and supports development that secures and enhances the sugar factory's contribution to the economy of Broads and wider area. British Sugar is fully committed to the site in the foreseeable future and continues to invest in the improvement, enhancement and diversification of the operations. We therefore support the continued designation of Cantley Sugar Factory under Policy PUBCAN1 in principle. Policy PUBCAN1 Part 2 supports development within the defined area which secures and enhances the sugar works' contribution to the economy of the Broads and the wider area subject to 17 criteria, an increase from 8 criteria in Policy CAN1. We consider that the Policy should support the sustainable growth and expansion of the significant and established existing business based on its operational requirements and needs, while ensuring that constraints and features as identified the supporting paragraph are</p>	See following specific comments.	See following specific comments.	See following specific comments.

Part of Local Plan	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
	addressed and considered in planning application processes. In this regard, we object to the following criteria under Part 2 of Policy PUBCAN1, so that there are no unreasonable or impractical requirements are placed on future development requirements by British Sugar.			
Policy PUBCAN1 - Cantley Sugar Factory - delivery and implementation	The delivery and implementation section of Policy PUBCAN1 does not reflect the significant upgrades made to the site in the recent years to reduce carbon emissions from British Sugar's operations. The existing operations are described as causing negative impacts on residential amenity and highway safety and capacity. British Sugar's operations are regulated by Environmental Permitting regime, and environmental management and health & safety management are the highest priorities for British Sugar. In this context, this section places a disproportionate emphasis on negative impacts. In addition, some of the paragraphs may be perceived as requirements, rather than providing justification for specific policy requirements.	Cantley Sugar factory receives substantial amounts of raw material from local farms, requiring substantial amounts of HGV movements <b>during the Campaign period. Where the business is required to transition to zero-emission vehicles by law in future, depending on the type of vehicles and use of technology, the provision of appropriate on-site infrastructure may be necessary.</b> <del>There will be required by law to move to zero-emission vehicles, potentially Battery Electric or Hydrogen powered. As these vehicles may have shorter range than existing diesel vehicles, new refuelling equipment may be needed at the site.</del>	Agree.	Make change as suggested.
Policy PUBCAN1 - Cantley Sugar Factory - delivery and implementation	The delivery and implementation section of Policy PUBCAN1 does not reflect the significant upgrades made to the site in the recent years to reduce carbon emissions from British Sugar's operations. The existing operations are described as causing negative impacts on residential amenity and highway safety and capacity. British Sugar's operations are regulated by Environmental Permitting regime, and environmental management and health & safety management are the highest priorities for British Sugar. In this context, this section places a disproportionate emphasis on negative impacts. In addition, some of the paragraphs may be perceived as requirements, rather than providing justification for specific policy requirements.	The policy <del>requires</del> <b>seeks</b> improvements in the water efficiency of the site. This is an area that British Sugar have made <b>significant</b> improvements, <b>including the installation of a new wastewater treatment plant</b> , and seek to do more.	Comment noted. Given the well-known water resource issues in the East and given that the British Sugar website says 'At British Sugar, we're focused on reducing our environmental impact not just in our factories, but across every aspect of our business. We recognise the vital importance of our natural resources, and we strive to minimise our impact and use these resources responsibly, prioritising investments and improvements which allow us to use fewer resources. One of our areas of focus is water', requiring water efficiency is logical. Indeed, this is a theme throughout the Local Plan. Part 2n of the policy refers to water efficiency and re-use.	Amend footnote 169 to refer to the installation of the new waste water treatment plant.
Policy PUBDM15: Natural Environment and supporting paragraph	Part 13 of the policy requires development sited within or adjacent to the identified Local Nature Recovery Network to demonstrate how the proposal will maintain and enhance the ability of the network to restore habitat and provide eco-system services in line with the Local Nature Recovery Strategy. The supporting paragraph states that applications will be required to address the requirements of the Local Nature Recovery Strategy (LNRS).  The government's guidance on Local Nature Recovery Strategies is clear that the Local Plans must be consistent with national policy, as set out in the NPPF and that LNRSs should be used by plan-makers to inform the way they address the NPPF requirement for plans to protect and enhance biodiversity. In	We request that the wording of the policy and the supporting paragraph should be amended so that development proposals <b>have regard to</b> the Local Nature Recovery Strategy.	Having discussed this comment with the LNRS Team and our Environment Advisor, agree with the thrust of the comment.	Amend 1 e) as follows: e) <del>Assist in the delivery of</del> <b>Take account of the</b> Local Nature Recovery Strategies (Norfolk and Suffolk)  Amend supporting text to say: Applications will be required to <del>address the requirements</del> <b>take</b>

Part of Local Plan	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Proposed change to Local Plan.
	this context, it is considered that the wording of the policy together with the supporting paragraph goes beyond the purpose and intention of LNRSs in the plan making process, particularly with reference to “the requirements” of the LNRS.			account of the of the Local Nature Recovery Strategy.
Policy PUBDM27: Amenity	Part 1 of the policy states that “development will not be permitted if it would have an unacceptable impact on the amenity of existing or potential neighbouring properties or uses”. The requirement to address the impacts on “ <b>potential</b> neighbouring properties or uses” is not aligned with the NPPF’s ‘agent of principle’ policy under the NPPF paragraph 200. “Potential” properties and uses are not “existing”. Therefore, it would be unreasonable for new developments to address the impacts of neighbouring properties or uses which do not exist.	We therefore object to Part 1 of the policy and request that the reference to “potential” neighbouring properties and uses is removed.	Agree.	development will not be permitted if it would have an unacceptable impact on the amenity of existing <del>or potential</del> neighbouring properties or uses
Policy PUBDM29: Transport, highways and access	Part 8 of the policy safeguards public rights of way and prevents development where it would result in the severance of loss of an existing public route. However, the relevant legislation allows for diversion if it is necessary to allow development, and the relevant guidance advises that the diversion should be substantially as convenient to the public.	Part 8 of the policy should be amended as follows:  When determining development proposals, the Authority will safeguard public rights of way and ensure that future routes are not compromised. Development will not be acceptable where it would result in the severance or loss of an existing public route, <b>without an alternative route or a diversion which is substantially as convenient as the existing. The Authority, in liaison with relevant partners, will consider proposals for suitable, safe and convenient diversions.</b>	Following discussions with Suffolk Public Rights of Way Team, Norfolk Public Rights of Way Team and the Head of Construction, Maintenance and Ecology, the proposed additional text is supported to some extent, but the crossed through text kept as well. A developers/applicants view of what constitutes a suitable alternative may be different from other stakeholders. Using the term ‘alternative route’ could give the impression that it is OK to have a permissive alternative without the legal order which would safeguard a route long term.	When determining development proposals, the Authority will safeguard public rights of way and ensure that future routes are not compromised. Development will not be acceptable where it would result in the severance or loss of an existing public route, <u>without a legally undertaken diversions under the relevant Act</u> . The Authority, in liaison with relevant partners, will consider proposals for suitable, safe and convenient diversions.

**3. Areas of disagreement**

On liaison with British Sugar, the following are areas of disagreement. It should be noted that even though some changes were proposed, British Sugar did not agree with the proposed changes.

Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Broads Authority Proposed change to Local Plan.	Representor response to Broads Authority Proposed Change to Local Plan
Policy PUBCAN1 - Cantley Sugar Factory - criterion d	Yes	No	Positively prepared, justified and consistent with national policy	<p>We requested the deletion of this criterion as it is too broad and unclear as to what specific impacts other than an impact on matters such as environmental considerations, visual amenity and access which are covered by other policies, the applicant is required to address.</p> <p>The Authority's reasons for this criterion in response to our previous representations are as follows:                      "The reason for this additional criteria is because as stated in one of the previous comments, the additional land that is likely to be included in the boundary to which the policy applies is a car or service yard currently. The Factory have not said specifically what they wish to do to that land once it is included in the boundary. A car park use is different to, say, a building or some kind of treatment process associated with what the factory does. Therefore as an as yet unknown use could be brought closer to the pub, which as you say has been running for a long time, we feel it is reasonable to have the criterion that states that the proposals need to consider the pub."</p> <p>The land in question is the car park and service yard which have been used for the purpose of the operations of the Sugar Factory. We requested the inclusion of this area (which is reflected in the Publication version policy map) on the basis of the intrinsic nature of this area, forming a fundamental component of the operation of British Sugar. There will always be a requirement for parking and servicing areas, so unless alternative provision is made elsewhere, this area is likely to remain as car parking/servicing yard for the factory. The inclusion of the car park/servicing yard within the Cantley Sugar Factory policy area means that any</p>	<p>It should be either deleted or specific considerations to be given to the pub should be identified in the policy.</p>	<p>Comment noted. The types of impacts are listed in the PUBDM27: Amenity and therefore PUBCAN1 could refer to the amenity policy.</p>	<p>For criterion c and d add reference to the PUBDM27: Amenity.</p>	<p>Policy PUBDM27 sets out matters that need to be considered when assisting the impact of a development. These considerations are largely relevant to residential amenity and amenity issues such as visual dominance and pollution are normal development management consideration. The reference to Policy PUBDM27 still does not make it clear what specific amenity considerations that British Sugar should consider in respect of the pub. Rather, it places an unjustified requirement for the applicant to address amenity considerations which are not relevant to the pub.</p>

Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Broads Authority Proposed change to Local Plan.	Representor response to Broads Authority Proposed Change to Local Plan
				<p>development of this area would be brought forward and considered in line with the objective of the policy, which supports the ongoing operation and enhancement of the Sugar Factory's contribution to the local economy. Therefore, the use/development, if alternative to the current car park and service yard is proposed, will form part of the factory's ongoing operations.</p> <p>In this context, we remain concerned that the criterion is ambiguous, and it is not clear what specific impacts the proposals need to consider in respect of the pub and therefore consider that this criterion is unsound. It should be either deleted or specific impacts or considerations to be given to the pub should be identified in the policy.</p>				
Policy PUBCAN1 - Cantley Sugar Factory - criterion g	Yes	No	Positively prepared, justified and consistent with national policy	<p>In our previous representations, we requested this criterion be amended to include "wherever possible" in line with the NPPF, as it is ancient woodland and veteran trees which are defined as irreplaceable habitats that have the highest level of protection by the NPPF. In response, the Authority advised that a new policy on trees (Policy PUBDM19) has been introduced which should be used for any schemes that propose the removal of trees.</p> <p>Policy PUBDM19 is a more stringent policy on the protection of existing trees than the NPPF. Our representations on Policy PUBDM19 are made separately. The criterion still requires the retention and absolute protection of existing trees that are not ancient woodlands or veteran trees, contrary to the provisions under the NPPF. We therefore object to criterion g).</p>	Retains and does not impact the tree belt along the eastern edge of the track to the river, <b>wherever possible (See policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development)</b>	<p>The trees are not classified as ancient woodland on our mapping system.</p> <p>If they are veteran trees (and if they are ancient woodland) then para 193 c comes into play. There is no 'wherever possible' in para 193 c.</p> <p>Furthermore, NPPF Para 136 and 187 sets the basis for protecting trees and the wording in this policy reflects that.</p> <p>The Norfolk LNRS mentions the importance of trees. Some examples include: Potential measures of: Retain riparian trees in appropriate areas and Use of riparian trees to cool chalk streams. Employ minimal woodland management to benefit barbastelle bats. Retain trees important for valuable plant and fungi species.</p>	No change proposed.	If trees are identified as veteran trees, then NPPF para 193 c applies. However, as this has not been confirmed by tree survey, the policy is onerous. As NPPD para 193 c would apply if the trees are identified as veteran trees, "where possible" should be included in criterion g).

Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Broads Authority Proposed change to Local Plan.	Representor response to Broads Authority Proposed Change to Local Plan
Policy PUBCAN1 - Cantley Sugar Factory - criterion k	Yes	No	Positively prepared, justified and consistent with national policy	<p>Our previous representations sought amendments to criterion k) in order to provide clarification that the protection of public access to the staithe and slipway is considered alongside the need to ensure health and safety. We considered to this be necessary as one of the exiting Public Rights of Way (PROW Cantley FP19) within the Cantley Sugar Factory policy runs across the heavy industrial operational area, which British Sugar has been seeking to divert for health and safety reasons.</p> <p>In response, the Authority clarified that this criterion is not referring to PROW FP19. Rather it is referring to PROW Cantley FP20 which runs along the western boundary of the Cantley Sugar Factory policy area from Station Road to the north to the south. As this route is outside the Cantley Sugar Factory area, it is not relevant to proposals within the designated area.</p>	This criterion should be deleted or, as a minimum, refer to this specific route (PROW Cantley FP20) as confirmed by the Authority.	We discussed this comment with Norfolk County Council Public Rights of Way Team who advised that British Sugar has not as yet submitted an application to NCC to try to divert this footpath. To date, only informal consultations have been undertaken. We will add some explanatory text in line with the comment.	Add a new footnote as follows: <u>This refers to footpaths 20, 22 and 19 (the part that is along the river) as well as any vehicular access rights from Station Road along the track to the pub/staithe/slipway. The Authority notes that at the time of writing, British Sugar are seeking the diversion of part of footpath 19 that passes through the factory.</u>	It is British Sugar's long term desire to divert Public Footpath FP19 as it runs through the operational area of British Sugar. In this context, the retention of the policy criteria to "protects and where possible enhances public access to the Staithe and slipway" is unreasonable. It is unreasonable for the site specific policy to expect British Sugar to improve public access to the Staithe and slipway. The criteria should be deleted, unless the criterion is made clear that the diversion of the public footpath FP19 running through the operational area of British Sugar is encouraged and supported for health and safety of users of the public footpath and for the Class B2 factory operation, while ensuring that public access to the Staithe and slipway provided.
Policy PUBCAN1 - Cantley Sugar Factory - delivery and implementation	Yes	No	Positively prepared, justified and consistent with national policy	<p>The delivery and implementation section of Policy PUBCAN1 does not reflect the significant upgrades made to the site in the recent years to reduce carbon emissions from British Sugar's operations. The existing operations are described as causing negative impacts on residential amenity and highway safety and capacity. British Sugar's operations are regulated by Environmental Permitting regime, and environmental management and health &amp; safety management are the highest priorities for British Sugar. In this context, this section places a disproportionate emphasis on negative impacts. In addition, some of the paragraphs may be perceived as requirements, rather than providing justification for specific policy requirements.</p>	<del>The works are a major emitter of carbon dioxide within the Broads, and the heavy road freight associated with the works has negative impacts on residents' amenity, and on highway safety and capacity. It is recognised that, in recent years, significant investments have been made to the existing plant at Cantley Sugar Factory to reduce carbon emissions through the installation of a new Combined Heat and Power (CHP) plant, which has enabled the use of natural gas and the decommissioning of</del>	Agree to some extent.	<del>The works are a major emitter of carbon dioxide within the Broads, and the heavy road freight associated with the works has negative impacts on residents' amenity, and on highway safety and capacity. The policy recognises that Cantley is a significant emitter of carbon dioxide in the area and seeks betterment and that schemes should be designed with minimal carbon dioxide emissions in mind. It is recognised that, in recent years, significant investments have been made to the existing plant at Cantley Sugar Factory to reduce carbon emissions through the installation of a new Combined Heat and Power (CHP) plant, which has enabled the use of natural gas and the decommissioning of previous coal boiler.</del>	We agree to some extent - we suggest a minor amendment so that it is positively worded, as follows:  The works are a major emitter of carbon dioxide within the Broads, and the heavy road freight associated with the works has negative impacts on residents' amenity, and on highway safety and capacity. The policy recognises that Cantley is a significant emitter of carbon dioxide in the area and <b>seeks encourages</b> betterment and that schemes should be designed with minimal carbon dioxide emissions in mind. <u>It is recognised that, in recent years, significant investments have been made to the existing plant at Cantley Sugar Factory to reduce carbon emissions through the installation of a new Combined Heat and Power (CHP) plant, which has enabled the use of natural gas and the decommissioning of previous coal boiler.</u>

Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Broads Authority Proposed change to Local Plan.	Representor response to Broads Authority Proposed Change to Local Plan
					previous coal boiler. The policy recognises that Cantley is a significant emitter of carbon dioxide in the area and seeks betterment and The policy encourages further reductions and seeks to ensure that schemes should be are designed with minimal carbon dioxide emissions in mind.			
Policy PUBCAN1 - Cantley Sugar Factory - delivery and implementation	Yes	No	Positively prepared, justified and consistent with national policy	The delivery and implementation section of Policy PUBCAN1 does not reflect the significant upgrades made to the site in the recent years to reduce carbon emissions from British Sugar's operations. The existing operations are described as causing negative impacts on residential amenity and highway safety and capacity. British Sugar's operations are regulated by Environmental Permitting regime, and environmental management and health & safety management are the highest priorities for British Sugar. In this context, this section places a disproportionate emphasis on negative impacts. In addition, some of the paragraphs may be perceived as requirements, rather than providing justification for specific policy requirements.	Part of the site covered by this policy is near to the Reedcutter Pub and any proposal must ensure it does not negatively impact that pub.	The policy identifies an immediate neighbour whose business could be affected by some proposals of the sugar beet factory. This is especially pertinent given that this Local Plan reflects the extra area to be covered by the policy that was put forward by the sugar beet factory - this additional area is closer to the pub than the main site. The policy wording reflects the HELAA assessment ( <a href="https://www.broads-authority.gov.uk/__data/asset/s/pdf_file/0023/134357/HELAA-September-2023.pdf">https://www.broads-authority.gov.uk/__data/asset/s/pdf_file/0023/134357/HELAA-September-2023.pdf</a> , page 129 onwards) which identifies the potential impact on the pub as a consideration in extending the area to which the policy applies. The pub is referred to in the policy - part 2d.	No change proposed. But see comment BLP259 relating to the reference to the pub within the policy itself.	We do not agree for the reasons we stated in our response on criterion d)
Policy PUBDM16: Biodiversity Net Gain	Yes	No	Justified	Part 1 of this policy requires a locally set mandatory requirement of a minimum of 20% Biodiversity Net Gain. Going above the mandatory 10% BNG requirement set by the legislation could have a disproportionate impact on the deliverability and viability of development	The 20% requirement should be amended to 10%.	The Local Plan Viability Assessment reported on the viability of non-residential development in chapter 6 and concluded that plan policies that might affect any future non-residential development,	No change proposed.	The Local Plan Viability Assessment refers to Defra's Impact Assessment dating back to 2019. The financial assessment is based on the 2017 prices. We consider that the evidence is significantly out of date. Furthermore, the Local Plan Viability Assessment refers to a figure of £14,334

Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Broads Authority Proposed change to Local Plan.	Representor response to Broads Authority Proposed Change to Local Plan
				proposals. We therefore object to the mandatory requirement of a minimum of 20% BNG, and request that this is amended to 10%. The Authority's topic paper on this matter has been reviewed but viability testing does not seem to have been undertaken on industrial/commercial developments.		if they occurred, would be modest. With specific regard to BNG at 20%, para 6.4 of the LPVA set out that the Government's Impact Assessment indicated an additional cost of meeting a 20% requirement (as opposed to a 10% requirement) of c£2,700 per hectare. It is considered that this would represent a very small percentage of any development costs associated with non-residential development at this sort of scale.		which is taken from Table 15 of Defra's Impact Assessment (2019). This figure is a central estimate and does not take account take account of the significantly higher cost estimated where the 10% BNG gain requirement is met off-site (ie Scenario C which is estimated to be £47,885). In this scenario, the 20% BNG could represent a cost of £56,983 which is circa £9,000 per hector. Taking into account the significantly outdated and broadbrush estimates, this represents significant costs, and the proposed 20% BNG requirements could have a disproportionate impact on non-residential developments.
Policy PUBDM19: Trees, woodlands...	Yes	No	Positively prepared, justified and consistent with national policy	The policy proposes a stringent requirement with regard to loss or replacement of existing trees, woodlands, hedges, scrub and shrubs. Trees, woodlands, hedges, scrub and shrubs which require particular protection should be identified based on a site-specific survey and development's impact and necessary mitigations (including a number of replacement trees required) should be identified through arboricultural, biodiversity and landscape character considerations.	The first three parts of the policy should be removed.	Agree with the comment. The comment seems to support the thrust of the policy.  Disagree with the proposed change. NPPF Para 136 sets the basis for protecting trees. This policy provides the detail.  It is based on Policy BG4: Trees of the Publication version of the Bristol Local Plan (which is currently at examination). <a href="https://www.bristol.gov.uk/files/documents/6894-bristol-local-plan-main-document-publication-version-nov-2023/file">https://www.bristol.gov.uk/files/documents/6894-bristol-local-plan-main-document-publication-version-nov-2023/file</a>	No change proposed.	Bristol Local Plan Policy BG4 seeks to protect the most valuable trees and allows for tree loss or damage if it is essential to allow for appropriate development, subject to prescribed compensation measure. However, Policy PUBDM19 only allows removal of any trees, woodlands, hedgerows or shrub masses and areas of scrub only where the removal will enhance the survival or growth of other trees, woodlands, hedgerows or shrub masses or it would allow for a substantially improved overall approach to the design and landscaping and habitat enhancement of the site and surrounding area that would outweigh the loss. We consider that the Policy is onerous.
Policy PUBDM21 - Renewable Energy	Yes	No	Consistent with national policy	In July 2024, the government removed de facto ban on onshore wind development, and onshore wind applications are now treated in the same way as the other energy development proposals. The NPPF Paragraph 168 states that local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and give significant weight to the benefits associated with renewable and low carbon energy. However, criterion a) under Part 12 of Policy PUBDM21 requires justification for the turbine(s) being within	Criterion a) under Part 12 should be removed	Justification for renewable energy is different to justification for locating a turbine where it is proposed. The NPPF says at para 168 'not require applicants to demonstrate the overall need for renewable or low carbon energy'. The proposed policy does not question the overall need for renewable or low carbon energy. In fact, the supporting text says, 'It is widely acknowledged that	No change proposed.	We do not agree for the reasons stated in our original submission.

Part of Local Plan	Meets the legal and procedural requirements?	Met the tests of soundness?	If not meet tests of soundness, which test?	Why you consider this part of the Plan is not legally compliant or sound/comment	What change(s) you consider necessary to make the Plan legally compliant or sound.	Broads Authority response to comment	Broads Authority Proposed change to Local Plan.	Representor response to Broads Authority Proposed Change to Local Plan
				the Broads. We consider this to be contrary to the NPPF Paragraph 168.		tackling the challenges posed by climate change will necessitate a radical increase in the proportion of energy generated from renewable sources'. Given also that Para 189 says, inter alia 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes' and 'The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. It therefore seems logical to seek justification for a turbine in the Broads. Which is not seeking justification for the need for renewable or low carbon energy.		

#### 4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 1 December 2025

For British Sugar: Wakako Hirose, Associate Partner, Rapleys LLP, 3 December 2025