



Local Plan for the Broads

Statement of Common Ground

**Between the Broads Authority and Norfolk County Council –
regarding Minerals and Waste and Lead Local Flood Authority**

**In relation to comments made as part of the first and second
Regulation 19 consultation**

February 2026

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1. Introduction

The first Regulation 19 consultation on the Local Plan for the Broads was held over the summer in 2025 and the second Regulation 19 consultation over December 2025 and January 2026. 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	Meets the legal and procedural requirements?	Met the 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	Proposed change to Local Plan.
Policy PUBDIT1: Maltings Meadow Sports Ground, Ditchingham	Yes	No	Not Effective	Point 5 of the Policy refers to Norfolk County Council's Core Strategy Policy CS16. However, all the policies in Norfolk County Council's Minerals and Waste Core Strategy were superseded by the policies in the Norfolk Minerals and Waste Local Plan in May 2025. Therefore the policy text needs to be updated to refer to the relevant current local plan policy.	The wording of Point 5 of the policy needs to be amended as follows: "The site lies on a safeguarded mineral resource (sand and gravel) and any development proposals will need to address this (see Norfolk County Council's Minerals and Waste Local Plan Policy MP11 – mineral safeguarding areas and mineral consultation areas). "	Agree with this factual update.	Amend as follows: "The site lies on a safeguarded mineral resource (sand and gravel) and any development proposals will need to address this (see Norfolk County Council's Minerals and Waste Local Plan Policy MP11 – mineral safeguarding areas and mineral consultation areas Core Strategy Policy CS16 – Safeguarding mineral and waste sites and mineral resources or successor policy/document). "
9.2 and 9.3	No	No		The LLFA notes the floodplains and wider flood extents are a natural resource that offers the biodiversity and landscape features that are considered the strengths for the Broads Authority Area and the wider Norfolk and Suffolk areas. The Broads Authority has stated the majority of the Broads Authority area is at risk of flooding, which is considered a weakness (section 9.3.d). There are no reasons given in this point as to why this is seen as a weakness. The difficulty appears to come with the need to develop within these areas when NPPF is clear that development is required to be diverted away from high flood risk areas. However, in point 9.3.g, the applicant notes "Difficulty of modernising and adapting existing buildings and uses, and accommodating new ones, due to flood prone nature of the area." In section 7.3 the Local Plan lists the three purposes of the Broads Authority, none of which directly state that development is required. Although it does state the Broads Authority must have regard to protecting natural resources from damage and the needs of economic and social interests of those who live and work on the Broads. This is supported in section 9.2.b which states "A unique wetland and low-lying area and status equivalent to a National Park." This confirms the existence of the Broads National Park is due to the low-lying wetland environment associated with areas at flood risk. Therefore, the LLFA questions whether the flood risk associated with the Broads area is a strength rather than a weakness due to the intrinsic benefits associated with flood risk	The LLFA suggests that Flood risk should be considered as both a strength and a weakness. An additional text into the section 9.2 text which could be altered as follows with the underlined text; b.) A unique wetland and low-lying area <u>prone to flooding</u> and status equivalent to a National Park. g.) Attractive environment <u>prone to flooding</u> , providing the basis for most of the Broads' economy and recreation for residents and visitors t.) An area providing many ecosystem services <u>and natural resources</u> , as evidenced in the Norfolk and Suffolk natural capital assets compendium6.	Agree to some extent.	Amend and as new as follows: 9.2 t) An area providing many ecosystem services <u>and natural resources</u> , as evidenced in the Norfolk and Suffolk natural capital assets compendium. Add a new bullet point as follows: 9.2 w) An area <u>subject to flooding</u> . This water can be <u>stored and used by nature and people</u> . Flooding can also <u>filter pollutants out of rivers and nourishing land to support ecosystems and fertile areas for farming</u> .

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				for both the Broads Authority and other authorities in the wider Norfolk and Suffolk area.			
PUBDM9: Surface Water Runoff	No	No	yes	<p>1. The local plan proposes an alternative surface water discharge hierarchy to national and LLFA policy. This is also not consistent with the industry standards in the Sewer Sector Guidance or the new National Standards for SuDS. The local plan proposes to prioritise “natural discharge processes” but without defining what is meant by this. On reviewing the relevant reasoned justification section, the LLFA is no clearer on what is meant. In addition, the local plan prioritises the use of deep borehole soakaways over the use of combined sewers. This is not supported by the LLFA Developer Guidance that states in section 9.1.17 that “deep borehole soakaways as an absolute final resort”. In addition, in low lying areas where the connectivity between the river and the groundwater level is high, deep borehole soakaways are unlikely to work. In the very recently published National Standards for SuDS, deep borehole soakaways are not even considered as a sustainable discharge location in the discharge hierarchy.</p>	1. and 2. Update Policy PUBDM9 and the supporting Reasoned Justification text to be aligned with the national and LLFA policies and guidance.	Agree.	<p>In the absence of suggested text, the following change is proposed:</p> <p>1.All development proposals will need to incorporate measures to attenuate surface water run-off in a manner appropriate to the Broads. This will need to reflect the characteristics of the site. <u>The type of SuDS used needs to meet the requirements of the National Standards and any LLFA guidance.</u> in accordance with a surface water drainage hierarchy so that, in order of priority, they:</p> <p>a) Continue natural discharge processes;</p> <p>b) Store water for later use;</p> <p>c) Adopt shallow infiltration techniques in areas of suitable porosity;</p> <p>d) Store water in open water features for gradual release to a watercourse;</p> <p>e) Store water in sealed water features for gradual release to a watercourse;</p> <p>f) Discharge direct to a watercourse;</p> <p>g) Discharge direct to a surface water drain (highways, Anglian Water or other body or within private ownership);</p> <p>h) Discharge direct to deep infiltration or borehole soakaways; or</p> <p>i) Discharge direct to a combined sewer</p>
PUBDM9: Surface Water Runoff	No	No	yes	The local plan states that “The IDB have their own local surface water policy which takes precedence over national best practice.” The LLFA notes that NPPF and the supporting NPPG is national policy rather than best practice. In addition, reviewing the link to the WLMA website (Development - Water Management Alliance: Water Management Alliance) indicates that the IDB, under their land drainage consenting powers, are only	1. and 2. Update Policy PUBDM9 and the supporting Reasoned Justification text to be aligned with the national and LLFA policies and guidance.	Agree.	<p>See amendments in relation to comment BLP52 as agreed with LLFA and WMA:</p> <p>The IDB have their own local surface water policy which takes precedence over national best practice (Development – Water Management Alliance (wlma.org.uk)).</p>

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				able to regulate the “introduction of water (flow or volume) to the Internal Drainage District.” This does not negate the need to consider alternative discharge locations in accordance with the national policy and guidance or the LLFA’s Developer Guidance.			<u>Watercourses in the Broads Internal Drainage Board’s Internal Drainage District are regulated by the Internal Drainage Board, and maintained by the IDB or by private landowners. Development affecting watercourses is likely to require Consent under the Land Drainage Act 1991 and the Board’s Byelaws. WMA officers are open to and actively support early engagement in the drainage design process to support developers in achieving sustainable drainage, as well as reducing the risk of conflict between the Board’s regulation and that of Local Planning Authorities. IDBs are regulators of surface water discharges within IDD.</u>
PUBDM9: Surface Water Runoff	No	No	yes	2. In point 2 of Policy PUBDM9, the local plan contradicts itself by stating “Brownfield sites should aim to reduce runoff as close to greenfield rates as possible.” Before going on to state “The discharge rate for brownfield sites should be no more than the rate prior to any new development” meaning that the Brownfield runoff rate does not need to be reduced. The local plan also contradicts the LLFA Developer Guidance which states in section 12.1.3 “Brownfield sites must discharge at the original pre-development (greenfield) runoff rate.”	1. and 2. Update Policy PUBDM9 and the supporting Reasoned Justification text to be aligned with the national and LLFA policies and guidance.	Agree.	In the absences of suggested text, the following change is proposed: 2. The surface water runoff rate that will occur as a consequence of the development is required to be no more than the existing pre-development greenfield runoff rate. <u>Brownfield sites must discharge at the original pre-development (greenfield) runoff rate.</u> Brownfield sites should aim to reduce runoff as close to greenfield rates as possible. The discharge rate for brownfield sites should be no more than the rate prior to any new development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals for brownfield sites. The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant, sewerage undertaker.
PUBDM9: Surface Water Runoff	No	No	yes	3. Policy PUBDM9 states that SuDS “shall be used unless, following adequate assessment, soil conditions and/or engineering feasibility dictate otherwise.” However, NPPF paragraph	3. Update the policy to reflect the national policy in NPPF.	Agree.	In the absence of suggested text, the following change is proposed: 3. Sustainable Drainage Systems

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				182 states "Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal." NPPF makes no reference to the circumstances under which the SuDS may not be suitable. Furthermore, SuDS designs are feasible in most situations / soil conditions as long as the point of discharge, such as to ground or watercourse, are viable.			(SuDS) that are proportionate to the nature and scale of the proposal shall be used unless, following adequate assessment, soil conditions and/or engineering feasibility dictate otherwise. These should be designed and implemented to be multifunction and follow the general principles set out at Appendix 9 as well as any relevant guidance or standards that are in place such as Lead Local Flood Authority guidance on drainage design.
PUBDM9: Surface Water Runoff	No	No	yes	4. The LLFA notes that in the reasoned justification section the local plan references the now superseded Non-statutory technical standards for SuDS. These have been replaced with the new National Standards for SuDS.	4. Update text to reference the new National Standard for SUDS.	Agree.	Update text to reference the new National Standard for SUDS.
Policy PUBDM8: Development and flood risk	No	No	yes	1. The LLFA notes there is an inconsistency of Policy PUBDM8 with NPPF. The LLFA notes that in point 1.c) the policy states "A flood response plan, where required, has been produced that is appropriate and deliverable". However, Paragraph 181 e.) of NPPF, states "safe access and escape routes are included where appropriate, as part of an agreed emergency plan." The local plan diverges from national policy by not requiring the plan to be "agreed". The LLFA notes the importance of the plan being agreed to ensure that local emergency planners are supportive of the proposed arrangements and prevent delay in progressing planning applications.	1. The LLFA suggested the addition of "agreed" to the existing text in 1.c so as to read as follows. An agreed flood response plan, where required, has been produced that is appropriate and deliverable	This is an area we are looking into and exploring options.	This is work in progress.
Policy PUBDM8: Development and flood risk	No	No	yes	2. The LLFA notes the point 2.b in Policy PUBDM8 states "Whether the proposed development will make a significant contribution to achieving the objectives of the Local Plan". This is not a typically a requirement of Flood Risk Assessments as it does not contribute to the assessment of flood risk. NPPF and NPPG do not refer to the flood risk assessment needing to assess whether the proposed development makes "a significant contribution to achieving the objectives of the Local Plan". In addition, the opportunity for proposed development sites within the Broads Authority area is limited due to the plan confirming that major developments (as defined under the Town and County Planning Act) are unlikely to come forward within this area. This is likely to result	2. Remove the text in point 2.b in Policy PUBDM8	Agree.	Remove part 2b).

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				in the flood risk assessment in many of proposed developments being unlikely to fulfil this requirement.			
Policy PUBDM8: Development and flood risk	No	No	yes	<p>3. In relation to the replacement of an existing residential property in Flood Zone 3a, the LPA is seeking to prevent an increase in any new development. Under NPPF's Sequential and Exception Tests, all sources of flood risk should be considered. However, there is no consideration of other areas at high risk of flooding such as surface water or groundwater flood risk. Furthermore, a residential development would require the application of the Exception Test to be passed for permission to be given. NPPG requires the development proposal to demonstrate its sustainability benefits to the wider community outweighs the flood risk, and the development is safe for its lifetime without increasing flood risk and where possible reduce flood risk. These points are referred to in point 5 of Policy PUBDM8. Therefore, this approach is not consistent with national policy, which seeks to safeguard land to from development for "current or future flood management" (NPPF Paragraph 172.b). It is also not clear how the like-for-like replacement of a residential property in Flood Zone 3a (or other equivalent areas of flood risk) could be beneficial to the wider community. It has long been acknowledged to be difficult for operable SuDS systems to be developed in Flood Zone 3 or areas at high flood risk up to the 1% plus climate change event extents. It is not good practise to locate SuDS systems in areas identified at risk of flooding in the 1% AEP event from pluvial or fluvial sources. The new National Standards for SuDS in section 3.13 supports this view by stating "3.13 Surface water drainage features shall not be located in areas identified at risk of flooding in the 1% AEP event from pluvial or fluvial sources unless designed to be and demonstrated to operate under flood conditions." Locating SuDS in these areas would further reduce the opportunity of the developer to demonstrate sustainable development of a site in Flood Zone 3a (or equivalent).</p>	3, 4 and 6. Review the text and update to more consistent with principles of national policy and resolve potential difficult planning interactions with other areas of the proposed policy.	<p>This seems to relate to part 5 and 11d of the policy.</p> <p>Replacement dwellings on a like-for-like basis can come forward in the Broads. We are not aware of any issues if national and local policy requirements are met. By replacing the dwelling, a flood response plan is required, the dwelling could be placed in a less vulnerable part of the site and resilience measures would be put in place. Therefore, the flood risk impacts of the replacement dwelling are less than the existing one.</p> <p>Through experience of dealing with applications for replacement dwellings, we work with the EA and seek to address its concerns. If like for like, there tends to not be an issue with the EA.</p> <p>On occasion, where there is a larger footprint, but there are finished floor levels at a higher level, the EA tend to accept a scheme. Therefore, in working with the EA, schemes may result in betterment.</p> <p>For like for like, the policy does seek location on site to less vulnerable. And schemes will have resilience measures. And a flood response plan.... as per 1b, 1c and 1f and point 4 of the policy.</p> <p>Comment was discussed with EA and some changes are proposed.</p>	<p>Part 5 of PUBDM8 could be removed and placed in PUBDM50 as a new point 5 to say:</p> <p><u>Replacement dwellings will have to provide a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe and operable from all sources of current and future flood risk for the lifetime of the development without increasing flood risk elsewhere.</u></p>
Policy PUBDM8: Development and flood risk	No	No	yes	4. The subsequent interaction of policy point 5 with policy points 6 to 12 (discussion on the application of the Sequential and Exception Tests) is also not clear. The local plan appears to have a definition of 'reasonably available'	3, 4 and 6. Review the text and update to more consistent with principles of national policy and resolve potential difficult planning interactions with other areas of the proposed policy.	Noted. This is taken from the currently adopted Flood Risk SPD. As SPDs are not to be used in future, we have brought most of the SPD into the Local Plan. Agree with comment.	In the absence of suggested text, it is proposed to make these changes to policy and supporting text. The site is available to be

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				that is not consistent with the NPPG guidance (see paragraph 028 of NPPG). One example of the difference is the local plan indicates that ownership should be considered as to whether an alternative site is available (point 6, part a). However, the NPPG states that "Such lower-risk sites do not need to be owned by the applicant to be considered 'reasonably available'". Therefore, the local plan does not appear to support national policy. The LLFA is concerned the local plan approach limits the consideration of sites that would otherwise be considered available in accordance with the National policy approach, resulting in inappropriate development in areas of high flood risk (such as Flood Zone 3a or surface water flood extent areas of up to 1% AEP.			developed (including considering site ownership or whether the owners of sites have any intention of them being developed);
Policy PUBDM8: Development and flood risk	No	No	yes	Furthermore, in policy point 10, the local plan cross references to the Local Plan Sustainability Appraisal Objectives (presented in Appendix 8). The following Sustainability Appraisal Objectives (ENV5, ENV6 and ENV7) support the development not being placed in areas of high flood risk, such as Flood Zone 3a. Therefore, policy point 5 could not meet the SA Objectives it aims to support.	3, 4 and 6. Review the text and update to more consistent with principles of national policy and resolve potential difficult planning interactions with other areas of the proposed policy.	See response to previous comments.	See response to previous comments.
Policy PUBDM8: Development and flood risk	No	No	yes	5. The LLFA notes in the Sequential Test information in the policy PUBDM8 and the supporting reasoned justification there is a focus of flood zones and no apparent consideration of all sources of flood risk. NPPF is clear in paragraphs 172, 173 and 174 that all sources of flood risk should be considered in the application of the Sequential Test.	5. Amend text in the policy and the reasoned justification to include all sources of flood risk in the sequential test.	Agree. It is presumed that this comment refers to the introductory paragraph of the Sequential Test section.	It is proposed to make these changes to policy and supporting text. Although the sequential test must be applied, due to the limited availability of sites in Flood Zone 1, the main objective, as applied to the Broads, is likely to be to reduce flood risk (from all sources of flooding) to new development through the application of the sequential approach and to maximise opportunities to build in resilience both at the site and buildings level through design. And amend policy at 1a as follows: "1. All new development: a) Will be directed to the lowest area of located to minimise flood risk from all sources, mitigating any residual risk and deliver safe development

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							through design and management measures, and ensuring that flood risk to other areas is not materially increased, taking into account climate change allowances; and"
Policy PUBDM8: Development and flood risk	No	No	yes	6. The supporting reasoned justification in relation to Policy PUBDM8 is also inconsistent with both the proposed local policy and national policy. The previous points raised in this response would apply in addition, to other examples. Such as on page 70 in the fifth paragraph down, the plan states "the over-riding principle in respect of development is that it should not increase [flood] risk above the existing level." NPPF is clear in paragraphs 170, 172, 175, 178 and others, that current and future flood risk should be considered. This approach could negatively undermine the LLFA's consistent approach to surface water management in Norfolk.	6. Amend the guidance to remove the indication that only existing flood risk should be considered.	The comment is confusing. The wording quoted; 'the over-riding principle in respect of development is that it should not increase [flood] risk above the existing level', seems consistent with the thrust of the comment. In that to meet that over-riding principle, you need to know current and future flood risk.	The LLFA have since suggested the text is amended as follows; "the over-riding principle in respect of development is that it should not increase <u>flood risk now or in the future</u> ." to resolve the issues.
Policy PUBDM8: Development and flood risk	No	No	yes	7. The supporting reasoned justification in relation to Policy PUBDM8 also does not reference the LLFA developer guidance. NPPF paragraph 182 states that developments including SuDS should "a.) take account of advice from the Lead Local Flood Authority".	7. Update the text to include reference to the LLFA's Developer Guidance that is freely available on the Norfolk County Council website.	Agree.	Update the text to include reference to the LLFA's Developer Guidance that is freely available on the Norfolk County Council website.
Policy PUBDM8: Development and flood risk	No	No	yes	8. The LLFA notes the Broads Authority's expectation for the Environment Agency and others to undertake the SFRA to support their local plan, which is not yet available. However, no timeframe of when to expect the Broads SFRA has been provided in the respective section of the reasoned justification.	8. Further information of when the updated SFRA could be expected should be included.	The timeline is not known at this stage. It depends on when the BFI work is completed and then to some extent, the spatial development strategy and local government reorganisation.	Check with BFI the timeline for the work to see if there is potential to include timeline in the Local Plan.
Policy PUBDM8: Development and flood risk	No	No	yes	9. The climate change section in the reasoned justification is not clear which type of climate change allowance (peak river flows, peak rainfall intensity or sea level rise) has been discussed. The text appears have not considered all three and how they would relate to proposed development sites in the Broads Authority area. Furthermore, climate change appears to have not been considered in the policy requirements of PUBDM8.	9. An update to the text of PUBDM8 and the supporting Reasoned Justification to suitably include appropriate references to climate change.	Agree to refer to climate change allowances in Policy. This part of the supporting text directs applicants to the Government webpage where more information is provided. It is not intended to copy over that information, but signpost to it.	Add reference to climate change <u>allowances</u> to part 2a of the policy. No change proposed to supporting text.
Policy PUBSP1: Responding to the Climate Emergency	No	No	yes	In point 5 of Policy PUBSP1, the LLFA notes the inclusion of "open Sustainable Drainage Features (SuDS)". However, the LLFA notes there is no consideration in the policy of avoiding the areas at risk of future flooding due to the impacts of climate change. The LLFA suggests this should be included to	Add as an additional sub-point in point 5 of Policy PUBSP1. Avoiding development in areas at risk of future flood risk due to the impacts of climate change.	Agree.	Add a new criterion as follows: j) <u>Avoiding development in areas at risk of future flood risk due to the impacts of climate change.</u>

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				reflect the approach given in paragraph 172, Chapter 14 of NPPF.			
Sustainability Appraisal	Not stated	Not stated	Not stated	<i>In response to the second Regulation 19 consultation.</i> In NTS5 and in 2.3, the SA lists the special qualities of the Broads. However, it is noted that the flood risk management the Broads provide has not been listed despite it being a key benefit.	The text should be amended to include the Broads as a flood risk management asset. Further work is recommended.	Comment noted. The 'parent' document for the identification of the special qualities of the Broads is the Broads Plan. This is the Management Plan for the Broads. The Local Plan for the Broads links to the current Broads Plan and includes the special qualities of the Broads that are identified. It will be for the LLFA to raise this comment as and when the Broads Plan is reviewed and consulted on.	No change proposed.
Sustainability Appraisal	Not stated	Not stated	Not stated	<i>In response to the second Regulation 19 consultation.</i> In section 2.6, the LLFA notes that flood risk is not listed but water is.	Please confirm whether flood risk is included in the water point or whether this is water quality.	This list is taken directly from the Environmental Assessment of Plans and Programmes Regulations 2004 Statutory Instrument, Schedule 2. You will note that the SA objective ENV6 refers to flood risk and ENV2 refers to water quality.	No change proposed.
Sustainability Appraisal	Not stated	Not stated	Not stated	<i>In response to the second Regulation 19 consultation.</i> The non-technical phase "rain bursts" should be replaced with "intense rainfall events" such as in section 5, in the climate change subsection.	Replace 'rain bursts' with 'intense rainfall events'	This is in the Local Plan and SA. The term rain bursts is exactly that - nontechnical. But we can change it.	Replace 'rain bursts' with 'intense rainfall events'.
Sustainability Appraisal	Not stated	Not stated	Not stated	<i>In response to the second Regulation 19 consultation.</i> In Appendix 10, there is clear overlap with text produced in the Local Plan.	The LLFA is aware that the text in the Local Plan is being updated but it is not clear whether the text in the SA is going to be updated to match the text in the local plan. Clarification is requested.	Yes, the list is copied from the Local Plan. So it reflects the Local Plan. The SA assessing the main modifications that are agreed through the Local Plan process and then consulted on is yet to be produced, but the REG19 number 2 will form the basis for the SA and will be checked to ensure it is up to date.	No change proposed.

3. Areas of disagreement

None.

4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 11 November 2025

For Norfolk County Council: Paul Harris, Strategic Planning Manager, 11 February 2026