



**Broads Authority Local Plan  
Schedule of additional modifications.  
January 2019**

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**1. Explanation**

- The proposed changes below are expressed in the form of a red ~~strikethrough~~ for deletions and blue underlining for additions of text.
- Main modifications are given the reference MM. Additional minor modifications are given the reference AM. Changes to policies maps are given the reference PM.
- Other instructions or explanations are set out in *italics*.
- The page numbers and paragraph numbering below refer to the publication local plan as published, and do not take account of the deletion or addition of text.
- For reference, the following table shows the policy reference number of the Publication version of the Local plan when compared to the Modifications version of the Local Plan – for DM only as there are no changes to SP policies or the Sites Specifics Policies in terms of their numbering
- All tables are ordered by page number of the Publication version of the Local Plan.
- On occasion, where a policy is subject to a few changes, it is easier to copy over the entire policy into an appendix with the changes shown.
- For the avoidance of doubt, these changes will only come into force, if indeed they are supported through the examination of the Local Plan, on adoption of the final Local Plan.
- A consultation on these modifications runs until 4pm on 15 March 2019.

Publication Policy	Modifications Policy						
PUBDM1	MODDM2	PUBDM13	MODDM14	PUBDM25	MODDM26	PUBDM37	MODDM38
PUBDM2	MODDM3	PUBDM14	MODDM15	PUBDM26	MODDM27	PUBDM38	MODDM39
PUBDM3	MODDM4	PUBDM15	MODDM16	PUBDM27	MODDM28	PUBDM39	MODDM40
PUBDM4	MODDM5	PUBDM16	MODDM17	PUBDM28	MODDM29	PUBDM40	MODDM41
PUBDM5	MODDM6	PUBDM17	MODDM18	PUBDM29	MODDM30	PUBDM41	MODDM42
PUBDM6	MODDM7	PUBDM18	MODDM19	PUBDM30	MODDM31	PUBDM42	MODDM43
PUBDM7	MODDM8	PUBDM19	MODDM20	PUBDM31	MODDM32	PUBDM43	MODDM44
PUBDM8	MODDM9	PUBDM20	MODDM21	PUBDM32	MODDM33	PUBDM44	MODDM45
PUBDM9	MODDM10	PUBDM21	MODDM22	PUBDM33	MODDM34	PUBDM45	MODDM46
PUBDM10	MODDM11	PUBDM22	MODDM23	PUBDM34	MODDM35	PUBDM46	MODDM47
PUBDM11	MODDM12	PUBDM23	MODDM24	PUBDM35	MODDM36	PUBDM47	MODDM48
PUBDM12	MODDM13	PUBDM24	MODDM25	PUBDM36	MODDM37	PUBDM48	MODDM49
						PUBDM49	MODDM50

## 2. Additional Minor Modifications

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Proposed Change	Reason for change
A1	Front Cover	Front Cover	<i>Format and update front cover</i>	<i>To improve front cover of adopted document.</i>
A2	Throughout	All policies.	<i>Remove 'PUB' as prefix to all policies. For the purposes of the modifications document, the prefix is 'mod'.</i>	<i>On adoption, policies will either be SPxx, DMxx or SSxx.</i>
A3	Throughout	Hyperlinks	<i>Check and amend hyperlinks.</i>	<i>Check to ensure they still work at the time of adoption.</i>
A3a	Throughout	Reference to The Conservation of Habitats and Species Regulations	Change dates from 2010 to 2017.	<i>The Conservation of Habitats and Species Regulations 2017 was a new piece of legislation to consolidate all previous amendments, so reference to the 2017 legislation needs to be made and it does not have as amended after it.</i>
A4	4	1.1 About the Local Plan	<p>The NPPF states that every local planning authority in England should have a clear, up-to-date Local Plan that conforms to the Framework, meets local development needs, and reflects local people's views on how they wish their community to develop. <del>The plan preparation process should involve everyone with an interest in the document or the planning area, and they should have the chance to comment.</del></p> <p>This document is the Local Plan for the Broads, prepared by the Broads Authority as the local</p>	<i>Update to reflect Local Plan adoption.</i>

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			<p>planning authority for the area. <del>This is the Publication stage of the Local Plan process, which includes our final policies. These policies are based on evidence reports, on consultation responses to the Issues and Options stage (Feb-Apr 2016) and the Preferred Options stage (Dec to Feb 2017), and on our current adopted policies.</del> <u>This Local Plan has been consulted on with the public and stakeholders (between 2016 and 2018) and examined by the Planning Inspectorate in 2018. This Local Plan has been prepared in accordance with the regulations, NPPF and NPPG and has been found sound.</u></p> <p>For the avoidance of doubt, <del>until this adopted Local Plan is adopted our existing adopted and saved policies remain in place and</del> will be used in determining planning applications <u>and replaces the Core Strategy, Development Management DPD and Sites Specifics Local Plan (which are no longer in use and have been superseded).</u></p>	
A5	5	1.4 Local Plan Production Process	<i>Delete section.</i>	<i>Once adopted, this section is superfluous so delete it.</i>
A6	5	1.5	<p>The UK's decision to leave the European Union following the Referendum in June 2016 has not, at the time of writing, created any changes to regulations relating to Local Plans. <u>The European Union (Withdrawal) Act 2018 states that 'direct EU legislation, so far as operative immediately before exit day, forms part of domestic law on and after exit day'</u>. In summary, the current EU law will still be in place when the UK leaves the EU, and so this Local Plan is based on the current rules and regulations</p> <p><del>The White Paper called 'The United Kingdom's exit from and new partnership with the European Union'<sup>1</sup> states up front that 'to provide legal certainty over our exit from the EU, [the Government] will introduce the Great Repeal Bill to remove the European Communities Act 1972</del></p>	<i>To ensure the adopted local plan is as up to date as possible.</i>

<sup>1</sup> ~~The United Kingdom's exit from and new partnership with the European Union:  
www.gov.uk/government/uploads/system/uploads/attachment\_data/file/589191/The\_United\_Kingdoms\_exit\_from\_and\_partnership\_with\_the\_EU\_Web.pdf~~

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			<p><del>from the statute book and convert the ‘acquis’ – the body of existing EU law – into domestic law. This means that, wherever practical and appropriate, the same rules and laws will apply on the day after we leave the EU as they did before’.</del></p> <p>The Great Repeal Bill was announced to Parliament on 10 October 2016. The Bill has three primary elements:</p> <ul style="list-style-type: none"> <li>• <del>First, it will repeal the European Communities Act 1972;</del></li> <li>• <del>Second, the Bill will preserve EU law where it stands at the moment before the UK leaves the EU. Parliament (and, where appropriate, the devolved legislatures) will then be able to decide which elements of that law to keep, amend or repeal. The UK courts will then apply those decisions of Parliament and the devolved legislatures;</del></li> <li>• <del>Finally, the Bill will enable changes to be made by secondary legislation to the laws that would otherwise not function sensibly once the UK has left the EU.</del></li> </ul>	
A7	7	2. Overview of document	<p>The Local Plan sets out the issues the Authority faces, a vision of what the Broads Authority Executive Area will look like in 2036, and the strategic policies and site allocations to get us there. As such, it is a detailed and lengthy document. <del>At this Publication Stage, all draft policies start with ‘PUB’, followed by one of these suffixes.</del> <u>The Local Plan should be read as a whole. No single policy can be used in isolation, and all relevant policies, together with National Policy, Neighbourhood Plans, Supplementary Planning Documents and any other material planning considerations may be relevant in making a planning decision.</u></p> <p>There are three types of policies in the Plan: Strategic, Development Management and Site Specific.</p> <p>At this <del>Publication</del> Stage (<u>Modifications consultation</u>), all draft policies start with ‘<u>MOD</u><del>PUB</del>’, followed by one of these suffixes.</p> <p><u>All strategies and planning policies appear in coloured boxes to help draw your attention to them. But do not forget the supporting text is also important.</u></p>	<p><i>Policies will either be SPxx, DMxx or SSxx. Although for the modifications document, they have a prefix of ‘MOD’. Also provides guidance on how to use policies.</i></p>

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Proposed Change	Reason for change
			<u>There is supporting text after policy. This text explains the purpose for and reasoning behind the policy. Some important evidence may be summarised, but the majority of supporting evidence is included within Topic Papers and other reports in our online evidence base.</u>	
A8	8	Section 3	Delete entire section 3 and then re-number other sections.	Section 3 refers to consultation and is not needed in the adopted Local Plan. This modification will be made to the version that will be adopted.
A9	10	Section 4.5	(because dykes and drains divide the marshes <del>and that</del> contain grazing cattle)	Wording correction
A10	14	4.11	<u>The Broads Authority Executive Area covers parts of over 90 parishes in Norfolk and Suffolk (see Appendix x for a list of parishes and the districts they are in as well as a map showing this information).</u>	To link to the new appendix that lists the parishes and shows them on a map.
A11	16	5.2	5.2 National Planning Policy Framework (NPPF) <del>(2012)</del> <sup>2</sup> The National Planning Policy Framework acts as guidance for local planning authorities and decision-makers, both in drawing up plans and determining planning applications, and is a material consideration in decision-making. Throughout this Local Plan, we refer to relevant parts of the NPPF.  <u>Part way through the examination of the Local Plan for the Broads, the 2012 version of the NPPF was replaced by a 2018 version. The Local Plan was examined mainly under the 2012 version of the NPPF however in some instances, the 2018 version of the NPPF is referenced.</u>	To explain that a new NPPF is in place
A12	16	Footnote 9	Footnote: <u>NPPF 2012:</u> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf</a> and <u>NPPF 2018:</u> <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf</a>	To provide links to the two NPPFs

<sup>2</sup> NPPF: [www.gov.uk/government/publications/national-planning-policy-framework--2](http://www.gov.uk/government/publications/national-planning-policy-framework--2)

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Proposed Change	Reason for change
			<a href="a/file/728643/Revised_NPPF_2018.pdf">a/file/728643/Revised NPPF 2018.pdf</a>	
A13	18	5.9	5.9 Norfolk Strategic Planning Framework (NSPF) All Norfolk Local Planning Authorities <del>are working towards a</del> <u>have completed a</u> Norfolk Strategic Planning Framework (NSPF) <del>to make sure which ensures</del> that planning is undertaken strategically and the requirements of the 'Duty to Cooperate' are met (see following section). The Framework <del>will identify</del> <u>identifies</u> cross boundary and strategic issues and seek ways <del>to recommend to</del> the Authorities <del>how to</del> address the issues in a coordinated manner. <del>A framework rather than a policy document, the NSPF follows the approach taken by Cambridgeshire Local Planning Authorities. The NSPF will be nearing completion at the time of the publication stage of the Broads Local Plan, and an assessment of this Local Plan against the draft NSF Agreements has been completed<sup>3</sup>.</del>	<i>To updated this section</i>
A14	18	5.10 Neighbourhood Plans	<i>Update this section to ensure it is as up to date as possible.</i>	<i>This update will reflect which Neighbourhood Plans are in place or being prepared. The precise wording will be added immediately prior to adoption.</i>
A15	19	6.2	<ul style="list-style-type: none"> <li>All Norfolk Local Planning Authorities have assisted in the completion of, and have signed up to, the Norfolk Strategic <u>Planning</u> Framework. <del>This is being consulted on at the time of writing.</del> The process is overseen by members from all Local Planning Authorities.</li> </ul>	<i>Update to reflect that the name has changed to Norfolk Strategic Planning Framework and that the NSPF has been agreed.</i>
A16	22	7.5	<ul style="list-style-type: none"> <li><u>Drying out of wetland and oxidation of peat, leading to loss of finite environmental and archaeological archives as well as release of stored carbon</u></li> <li><u>Coastal protection work, which may alter the dynamics of marine erosion and sediment transport.</u></li> </ul>	<i>Additional threats to be added.</i>
A17	24	Section 8.2,	Generally most policies address this objective. See transport section <u>and navigation section</u>	<i>To add clarification.</i>

<sup>3</sup>Duty to Cooperate Statement: [www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2](http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan/evidence-base2)

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		Objective 14		
A18	25	8.4 j)	j) History: <a href="#">Earth heritage</a> <del>Geo-heritage</del> , heritage assets, archaeology , historic structures	<i>Improve reference to geodiversity in this section.</i>
A19	26	PUBSP1 supporting text	The National Planning Policy Framework states that Local Plans should be based upon, and should reflect, the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally ( <del>paragraph 15</del> ). <a href="#">Sustainable Development has three dimensions according to the NPPF: economic, social and environmental</a> . The Planning Inspectorate considers that the DCLG's model wording will, <del>if incorporated into a draft Local Plan submitted for examination</del> , be an appropriate way of meeting this expectation.	<i>Add reference to the NPPF's definition of sustainable development. Remove reference to draft.</i>
A20	37	PUBDM5 supporting text	<p><a href="#">The majority of the watercourses in the Broads are regulated and maintained by the Internal Drainage Board who have their own local surface water policy which takes precedence over national best practice (<a href="https://www.wlma.org.uk/broads-idb/development/">https://www.wlma.org.uk/broads-idb/development/</a>).</a></p> <p><a href="#">The following guidance will be useful when designing SuDS schemes:</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Non-statutory technical standards for the design, maintenance and operation of sustainable drainage systems: <a href="http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf">www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf</a></a></li> <li>• <a href="#">SuDS manual produced by CIRIA: In delivering SuDS there is a requirement to meet the framework set out by the Government's 'non statutory technical standards'. The revised SuDS manual complements these, but goes further to support the cost-effective delivery of multiple benefits. <a href="http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx">www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx</a></a></li> <li>• <a href="#">Good examples of how development can be planned to manage water and deliver multiple benefits are outlined in the RSPB/WWT report 'Sustainable drainage systems: maximising the potential for people and wildlife – A guide for local authorities and developers', available at <a href="http://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf">www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf</a>.</a></li> <li>• <a href="#">Suffolk County Council's Guidance sets out Suffolk County Council's approach as Lead Local Flood Authority: <a href="https://www.suffolk.gov.uk/roads-and-transport/flooding-and-">https://www.suffolk.gov.uk/roads-and-transport/flooding-and-</a></a></li> </ul>	<i>To clarify the role of IDBs and to bring into this text the various guides for SuDS.</i>

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Proposed Change	Reason for change
			<a href="#">drainage/guidance-on-development-and-flood-risk/</a> <ul style="list-style-type: none"> <li>• <a href="https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf">Norfolk County council's guidance: https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf</a></li> </ul>	
A21	37	PUBDM5 supporting text	<p>Special consideration will need to be given to the design of the drainage system when there are known flooding issues within the immediate catchment of the development. Generally, known flooding issues correlate with areas shown as high risk flooding on the Government Risk of Surface Water Flooding (RoSWF) maps, but the Lead Local Flood Authority (LLFA) will highlight any relevant information if consulted on a scheme. <a href="#">The Interactive PDFs produced as part of the SFRA work (referred to previously) show areas that are subject to surface water flooding.</a> (footnote to SFRA link: <a href="http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra">http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra</a>)</p>	<i>Signpost to interactive SFRA maps.</i>
A22	38	DM5 supporting text – additional information	<p><u>Additional information</u> Various sources of technical information can be used when addressing surface water and designing SuDS:</p> <ul style="list-style-type: none"> <li>• NPPG: <a href="http://planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/reducing-the-causes-and-impacts-of-flooding/why-are-sustainable-drainage-systems-important">planningguidance.communities.gov.uk/blog/guidance/flood-risk-and-coastal-change/reducing-the-causes-and-impacts-of-flooding/why-are-sustainable-drainage-systems-important</a>.</li> <li>• <del>Non-statutory technical standards for the design, maintenance and operation of sustainable drainage systems: <a href="http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf">www.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf</a></del></li> <li>• <del>SuDS manual produced by CIRIA: In delivering SuDS there is a requirement to meet the framework set out by the Government's 'non-statutory technical standards'. The revised SuDS manual complements these, but goes further to support the cost-effective delivery of multiple benefits. <a href="http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx">www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx</a></del></li> <li>• <del>Good examples of how development can be planned to manage water and deliver multiple benefits are outlined in the RSPB/WWT report 'Sustainable drainage systems: maximising the</del></li> </ul>	<i>Because these guides have moved to the reasoned justification of the SuDS policy.</i>

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			<p><del>potential for people and wildlife – A guide for local authorities and developers’, available at <a href="http://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf">www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf</a>.</del></p> <ul style="list-style-type: none"> <li>• <a href="http://www.nonnativespecies.org/checkcleandry/documents/species-guide.pdf">www.nonnativespecies.org/checkcleandry/documents/species-guide.pdf</a></li> <li>• <a href="http://thegreenblue.org.uk/~media/TheGreenBlue/Files-andDocuments/Leaflets/The_Green_Guide_to_Boat_Washdown_Systems.ashx">thegreenblue.org.uk/~media/TheGreenBlue/Files-andDocuments/Leaflets/The_Green_Guide_to_Boat_Washdown_Systems.ashx</a>.</li> </ul>	
A23	39	PUBDM6	Open Space on land, play <a href="#">space</a> , sports fields and allotments.	<i>Title change clarifies policy.</i>
A24	39	PUBDM6 supporting text	<a href="#">The following policy, DM7 relates to Green Infrastructure and may be of relevance to proposals.</a>	<i>To cross refer to other relevant policies.</i>
A25	39	PUBDM6 supporting text	Because each of the Authority’s constituent councils assesses its’ entire <a href="#">area</a> - including that part which is the Broads - in relation to the need for these uses, it is appropriate and reasonable to have regard to their approach, which may reflect standards in their Local Plans and other documents. <a href="#">Please contact the Broads Authority for advice regarding where to find the Local Plan policies of our districts. A summary of the standards and thresholds that were in place at the time of adoption of this Local Plan can be found at appendix xxxx.</a>	<i>Links to current documents and details of current policies could become obsolete in the next year or two as new Local Plans are produced.</i>
A26	40	PUBDM6 supporting text	... Authority and it therefore relies on S106 agreements (to which pooling restrictions <a href="#">apply (at the time of writing, although this position may change)</a> , whereby only five contributions can be sought towards generic types of infrastructure, are now in place) to provide these.	<i>Replace missing words</i>
A27	41	PUBDM7 supporting text	The first relates to the importance of incorporating existing green infrastructure assets within development proposals and enabling connectivity to other assets <a href="#">nearby (local green infrastructure).</a>	<i>Clarifying the term ‘local green infrastructure’.</i>
A28	41	PUBDM7 supporting text	<del>It goes on to say (paragraph 114) that ‘Local planning authorities should (inter alia) set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’.</del>	<i>Whilst the new NPFF does not say this, consider this reference superfluous anyway.</i>
A29	42	PUBDM7 supporting text	<a href="#">The previous policy, DM6 relates to open space and play and may be of relevance to proposals.</a>	<i>To cross refer to other relevant policies.</i>

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A30	46	PUBSP4 supporting text	The NPPF ( <del>at paragraph 109 and 143</del> ) seeks the protection and enhancement of soils, <del>as well as preventing development from contributing to unacceptable levels of soil erosion</del> . The NPPF also <u>says at footnote 53, 'Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality'</u> . <del>seeks the safeguarding of the best and most versatile agricultural land.</del>	<i>To reflect the 2018 NPPF.</i>
A31	48	PUBDM9 supporting text	The NPPF ( <del>paragraphs 143 and 144</del> ) and NPPG only mention peat soils in relation to its excavation as a mineral resource, rather than the issue in the Broads relating to impact due to groundworks from development and inappropriate land management.	<i>To reflect the 2018 NPPF.</i>
A32	54	PUBDM11 supporting text	Applicants should be aware that historic buildings, particularly those in rural areas, have the potential to provide important breeding and <del>roo</del> esting places for a number of species protected under a range of legislative provisions, including bats, barn owls or other nesting birds	<i>Change resting places to roosting places to reflect better terminology.</i>
A33	55	Heritage section supporting text	<del>Relevant documents</del> <u>sources of information</u> <u>The Norfolk and Suffolk Historic Environment Records: <a href="http://www.norfolk.heritage.gov.uk">www.norfolk.heritage.gov.uk</a> and <a href="https://heritage.suffolk.gov.uk/">https://heritage.suffolk.gov.uk/</a></u>	<i>Clarify section and add additional information source.</i>
A34	62	PUBDM13 supporting text – new footnote	<u>Reference: Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings <a href="https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/">https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/</a> to be helpful in understanding these special considerations.</u>	<i>Add this reference to the end of paragraph 5 of the supporting text as an additional information source.</i>
A35	66	PUBDM15 supporting text	Applications considered to be significant in terms of scale and/or impact should provide a Landscape and Visual Impact Assessment ( <u>informal</u> or full LVIA)	<i>Wording correction</i>
A36	67	PUBDM16 Supporting text	Land or buildings are often raised above the existing ground level, usually to reduce the risk of the site flooding, although such results are not guaranteed. Dredgings or material imported or won on site (for example resulting from a new mooring basin) may be disposed <del>on a</del> <u>of on</u> site and the land raised	<i>Wording correction</i>
A36a	67	PUBDM17 policy	iii) Any remaining material is required to be disposed of in a considerate and acceptable manner, subject to the Environment Agency <del>licencing</del> <u>permitting</u> requirements	<i>Wording correction.</i>

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A37	69	PUBDM18 supporting text	The Cabinet Siting and Pole Siting Code of Practice may be of relevance: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf</a> . Please note that this may be updated from time to time.	At end of supporting text, add this reference as an additional information source.
A38	71	PUBDM20 supporting text	<del>The NPPF says, at Paragraph 17 ‘...always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings’</del> The NPPF seeks <a href="#">high standards of amenity for existing and future users</a>	To reflect the 2018 NPPF.
A39	72	PUBDM21 supporting text	The NPPF <del>says that Local Plans Paragraph 125 says ‘by encouraging good design, planning policies and decisions</del> ‘should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation’.	To reflect the 2018 NPPF.
A40	77	PUBDM22 supporting text	<a href="#">Where a development proposal could have an impact on a trunk road, it will be assessed by Highways England in accordance with policies of the relevant Department for Transport Circular<sup>4</sup>.</a>	To add clarity regarding how proposals will be assessed.
A41	80	PUBSP11	v) Recreational facilities ( <a href="#">such as moorings and access for anglers</a> )	Change to reflect comment received at pre-submission consultation.
A42	80	PUBSP11 Supporting text	<a href="#">There remains many months of low season availability for angling tourism, extending the visitor season for the benefits of the local community. Any further loss of water front access enabling angling would greatly impact the existing limited river bankside access</a>	Add as last paragraph of reasoned justification to reflect policy change.
A43	81	PUBDM24 supporting text	The NPPF <del>at Paragraph 28 says: ‘Planning policies</del> says that Local Plans should support a prosperous rural economy. <del>economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development’.</del>	To reflect the 2018 NPPF.
A44	82	PUBDM25 Supporting text	The level of detail and type of evidence and analysis presented should be proportionate to the scale and nature of the site and/or property in question. The statement should provide an assessment of the current and likely future market demand for the site or property, and details of the attempts to market it at a reasonable <a href="#">price or rate</a> for a sustained period of 12 months and its	Replace missing words

<sup>4</sup> Currently 02/2013: THE STRATEGIC ROAD NETWORK AND THE DELIVERY OF SUSTAINABLE DEVELOPMENT: [www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development](http://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development)

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			value.	
A45	91	PUBSP13 Supporting text	Parts of the rivers and broads are subject to periodic dredging to keep the waterways open to navigation, not only <del>for</del> <u>by</u> the Authority but also <del>for</del> <u>by</u> owners of private water space who may require planning consent for disposal.	<i>Wording correction</i>
A46	94	PUBDM31 supporting text	<u>It is also important to note that works near a main river may require an environmental permit. Further information is provided in paragraph 32.3.</u>	<i>Add cross reference</i>
A47	106	PUBDM34 Supporting text	<p><b>Horning</b> Flood risk (zones 1, 2 &amp; 3 by EA mapping <u>and mostly 1 with some 2, 3a and modelled 3b using SFRA 2017</u>) Conservation area Listed buildings Just across river from SAC, SPA, Ramsar Site, SSSI</p> <p><b>Oulton Broad</b> Area is within Oulton Broad Conservation Area High potential for archaeological remains in the area Flood risk (mainly zone 1, plus some 2 &amp; 3, by EA mapping <u>and mostly 1 with some 2, 3a and indicative 3b using SFRA 2017</u>) Nearby listed buildings</p> <p><b>Thorpe St Andrew</b> Area is within Thorpe St. Andrew Conservation Area Flood risk (mainly zone 2, some zones 1 &amp; 3, by EA mapping <u>and mostly 1 with some 2, 3a and modelled 3b using SFRA 2017</u>) The bounded area includes safeguarded minerals (sand and gravel) resources, but the Minerals Planning Authority has advised this is unlikely to constrain the type and scale of development supported by the Policy Large number of listed buildings</p>	<i>Correction to better reflect SFRA.</i>

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			<p><b>Wroxham and Hoveton</b>  Close to SPA and SAC  Lies partly within Wroxham Conservation Area  Flood risk (mainly zone 3 by EA mapping, and partly zones 1 &amp; 2 <a href="#">and 1, 2, 3a and indicative 3b using SFRA 2017</a>)  The SFRA shows almost all of the area is at risk of flooding  Capacity of minor roads in the area  Wroxham Bridge is a Scheduled Monument  The Grange - Grade II listed</p>	
A48	110	PUBDM35 supporting text	<a href="#">Policy PUBDM4: Development and flood risk could be of relevance because any Flood Risk Assessment for such accommodation would need to show how the safety of the occupants would be managed and ensured, considering the transient nature of the site and its potential effects on the occupant's ability to receive flood warnings.</a>	<i>Cross refer to other policy</i>
A48a	123	PUBDM42 supporting text	<p>Evidence used to inform this section</p> <ul style="list-style-type: none"> <li>The policy is rolled forward from the Development Management DPD.</li> <li>Amendments reflect officer experience.</li> <li><del>Lifetime Homes: <a href="http://www.lifetimehomes.org.uk/">http://www.lifetimehomes.org.uk/</a></del></li> <li>Building for Life: <a href="http://www.builtforlifelifehomes.org/">http://www.builtforlifelifehomes.org/</a></li> </ul>	<i>To reflect that the policy no longer refers to lifetime homes.</i>
A49	132	PUBDM47 supporting text	Buildings in the countryside have the potential to provide important breeding and <del>roo</del> esting places for a number of species protected under a range of legislative provisions, including bats, barn owls or nesting birds.	<i>Change resting places to roosting places to reflect better terminology.</i>
A50	136	32.3	<a href="#">Anyone carrying out these activites without a permit where one is required is breaking the law.</a>	<i>At the end of 32.2 and before the two bullet points add this sentence to reflect request from Environment Agency.</i>
A51	136	Section 32.2	The underlying principle of development and flood risk is summarised in the <a href="#">2018 NPPF (100 155)</a> : <i>'Inappropriate development in areas at risk of flooding should be avoided by directing</i>	<i>To reflect the 2018 NPPF.</i>

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			<i>development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere., but where development is necessary, making it safe without increasing flood risk elsewhere'.</i>	
A52	139	PUBBEC1 constraints and features	Within flood risk zone 3 (EA mapping) and <del>indicative</del> modelled 3b (Waveney SFRA 2018) (SFRA 2017).	To reflect the emerging SFRA of Waveney District Council.
A53	140	PUBBEC2	<u>Conditions will be used to restrict the number, scale and size of boats using the residential moorings.</u>	To clarify that how the moorings used is an important consideration.
A54	145	PUBBRU6	<u>Conditions will be used to restrict the number, scale and size of boats using the residential moorings.</u>	To clarify that how the moorings used is an important consideration.
A56	147	PUBCHE1	<u>Conditions will be used to restrict the number, scale and size of boats using the residential moorings.</u>	To clarify that how the moorings used is an important consideration.
A57	149	PUBDIT1 Constraints and features	Risk of flooding (almost wholly zone 3 by EA mapping; zones 1, 2, 3a & <u>modelled</u> 3b by SFRA 2017 mapping).	Correction to better reflect SFRA.
A58	152	PUBGTY1 Constraints and features	Adjacent to the extended Outer Thames Estuary pSPA.	Correction to reflect this is a SPA now
A59	153	PUBHOR1	Environmental improvements and landscaping will be encouraged to improve the site's contribution to the character <del>and</del> <u>or</u> appearance of the Conservation Area and to visual amenity, and to address surface water runoff.	Improve wording to aid clarity.
A60	154	PUBHOR2 Constraints	Flood risk zones 1, 2 & 3 by EA mapping, most 2 and 3a with some <u>modelled</u> 3b by SFRA 2017 mapping.	Correction to better reflect SFRA.

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		and features		
A61	154	PUBHOR3 Constraints and features	Flood risk (zone 3 by EA mapping and all 2 and 3a with most <a href="#">modelled</a> 3b by SFRA 2017 mapping.	<i>Correction to better reflect SFRA.</i>
A62	155	PUBHOR4 Constraints and features	Flood risk zone 3 by EA mapping and all 2 and 3a with some <a href="#">modelled</a> 3b by SFRA 2017 mapping.	<i>Correction to better reflect SFRA.</i>
A63	156	PUBHOR5 Constraints and features	Flood risk - predominantly zone 3 by EA mapping, with small areas of zones 1 & 2 and almost all 2 and 3a with most <a href="#">modelled</a> 3b by SFRA 2017 mapping.	<i>Correction to better reflect SFRA.</i>
A64	157	PUBHOR6 Constraints and features	<ul style="list-style-type: none"> <li>Flood risk - predominantly zone 3 by EA mapping, with small areas of zones 1 &amp; 2 and most 2, 3a and <a href="#">modelled</a> 3b according to SFRA 2017 mapping.</li> <li>Knackers Woods Water Recycling Centre <a href="#">capacity constraints</a>.</li> </ul>	<i>Correction to better reflect SFRA. Correction to better reflect the issue at the Water Recycling Centre.</i>
A65	157	PUBHOR6 Supporting text	The SFRA 2017 highlights that almost all the area is in flood risk zone <a href="#">modelled</a> 3b, and there is a need to address the risks of water pollution for waterside sites in boatyard use.	<i>Correction to better reflect SFRA.</i>
A66	158	PUBHOR7 Constraints and features	<ul style="list-style-type: none"> <li>Flood risk zones 2 &amp; 3 by EA mapping and all 2 and 3a with some <a href="#">modelled</a> 3b by SFRA 2017 mapping.</li> </ul>	<i>Correction to better reflect SFRA.</i>
A67	159	PUBHOV1 Constraints and features	<ul style="list-style-type: none"> <li>Flood risk - zones 1, 2 &amp; 3 by EA mapping and all 2, some 3a and some <a href="#">modelled</a> 3b by SFRA 2017.</li> </ul>	<i>Correction to better reflect SFRA.</i>
A68	159	PUBHOV1	The identified significant areas of green infrastructure will be <del>retained</del> <a href="#">maintained and enhanced</a> for their combined and respective contributions to the character and appearance of the village, the amenity of visitors and local residents, flood water capacity and nature conservation.	<i>To aid clarification relating to what is expected.</i>
A69	168	PUBL0D1	<a href="#">Conditions will be used to restrict the number, scale and size of boats using the residential moorings.</a>	<i>To clarify that how the moorings used is an</i>

Ref.	Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Proposed Change	Reason for change
				<i>important consideration.</i>
<b>A70</b>	171	PUBNOR2 Constraints and features	Flood risk - zone 2 by EA mapping and small parts in zone 2, 3a and <u>modelled</u> 3b by SFRA 2017 mapping.	<i>Correction to better reflect SFRA.</i>
<b>A71</b>	174	PUBOUL3 supporting text	<u>Of relevance will be the generic retail policy DMx.</u>	<i>To cross refer to generic retail policy.</i>
<b>A72</b>	175	PUBOUL3 supporting text	The <u>2018</u> NPPF, at paragraph 23, says <del>'planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period'</del> . <u>'planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation'</u>	<i>To reflect the 2018 NPPF.</i>
<b>A72a</b>	185	TSA2 Supporting text	Finally, the <b>western end of the island</b> has been the subject of many complaints, enforcement action, planning appeals and legal action. A summary may be found here: <a href="http://www.broads-authority.gov.uk/news-and-publications/news/thorpe-island-full-facts">www.broads-authority.gov.uk/news-and-publications/news/thorpe-island-full-facts</a> . The provision of <u>appropriately surfaced and screened car parking spaces, an agreed method of waste storage and collection as well as provision for pump out all on the island will ensure that the impact of any mooring provision within the basin is minimal on the nearby community. Subject to detailed design this provision could be located to the west of the marina, close to the existing bridge.</u>	<i>To provide some more details for this part of the island.</i>
<b>A73</b>	185	PUBTSA3 Constraints and features	Flood risk (mainly zone 3 by EA mapping; zones 2, 3a & <u>modelled</u> 3b, by SFRA 2017 mapping).	<i>Correction to better reflect SFRA.</i>
<b>A74</b>	186	PUBTSA4 Constraints and features	Flood risk (zones 2 & 3 by EA 2012 mapping; zone <u>modelled</u> 3b by SFRA 2017 mapping).	<i>Correction to better reflect SFRA.</i>
<b>A75</b>	187	PUBTSA5 Constraints and features	Flood risk (zone 2 by EA 2012 mapping; zones 2, 3a & <u>modelled</u> 3b by SFRA 2017 mapping).	<i>Correction to better reflect SFRA.</i>
<b>A76</b>	189	PUBWHI1 Constraints	Flood risk (mainly zone 3, some zones 1 and 2, by EA mapping; mainly zone <u>modelled</u> 3b, some 1, 2 & 3a, by SFRA 2017 mapping).	<i>Correction to better reflect SFRA.</i>

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		and features		
A77	190	PUBSSTRI Constraints and features	Flood risk and open water (zones 1, 2 & 3 by EA mapping; zones 1, 2, 3a & <a href="#">indicative</a> 3b by SFRA 2017 mapping).	<i>Correction to better reflect SFRA.</i>
A78	191	PUBSSUT Constraints and features	Flood risk, including serious risk of coastal inundation (zone 3, with some zones 1 & 2, by EA mapping; zone <a href="#">indicative</a> 3b by SFRA 2017 mapping).	<i>Correction to better reflect SFRA.</i>
A79	192	PUBSSCOAST Constraints and features	High risk of flooding (flood zone 3) (EA mapping), riverine flood risk (zone 3 by EA mapping; zone <a href="#">indicative</a> 3b by SFRA 2017 mapping).	<i>Correction to better reflect SFRA.</i>
A79A	193	PUBSSROADS	<a href="#">Footnote x: More detail is provided as follows. In Norfolk see https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/roads-and-travel-policies/transport-asset-management-plan</a> in particular map ciii of the appendices. In Suffolk Part 1 of the Suffolk Local Transport Plan has a principal routes diagram on page 35: <a href="#">https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/</a> and there is also the Suffolk Lorry Route network: <a href="#">https://www.suffolk.gov.uk/assets/Roads-and-transport/lorry-management/Lorry-Route-Map-Amended-MAY-17.pdf</a>	<i>This extra information helps apply the policy.</i>
A80	194	PUBSSMILLS Constraints and features	Many of the mills are listed buildings, Grades II and II* <a href="#">or on the Local List</a> .	<i>Correction to reflect that mills may be locally protected.</i>
A81	208	33.4	The Authority will start to review the Local Plan around 18 months after it has been adopted. This allows a good period of time for the strategy to take effect, and gives officers time to experience using the policies. <a href="#">This review would use the monitoring information collected either through the specific monitoring indicators as set out in the Monitoring and Implementation Framework as well as the bespoke questionnaire that Development Management Officers will complete on issuing the decision notice of applications to set out how policies were used in determining applications.</a> With the Local Plan likely to take around	<i>Update to reflect regulation change and to cross refer:</i>

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			three years to implement, this review timetable will result in a new Local Plan in place about five years after this Local Plan has been adopted, in line with the <del>Housing White Paper's intentions</del> . <a href="#">amended Regulations (The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017)</a> .				
A82	217	Appendix F	<ul style="list-style-type: none"> <li><a href="#">The 'organisations involved' column lists organisations that are relevant to the policies. The organisation could for example be responsible for the delivery of the policy, be affected by the policy, have an interest in how the policy is applied and delivered or be called upon to assist in assessing information received as required in the policy.</a></li> </ul>				<i>Add this as an introduction to this section.</i>
A83	227	Appendix F	<ul style="list-style-type: none"> <li>Some policies have measurable outcomes, but for others defining an indicator is difficult. On adoption <a href="#">of the Local Plan</a>, when completing the relevant decision notice, Development Management Officers will complete a questionnaire that states which policies were used to determine the application, and to what level of conformity to those particular policies the application/proposal is. <a href="#">The levels of conformity are that the policy met the policy requirements, partly met or was contrary to policy requirements. This qualitative assessment will help us understand how each policy was used and to what effect for when the Local Plan is reviewed. As set out in section xxx, this review will start around 18 months after adoption of the Local Plan.</a></li> </ul>				<i>Changes to supporting text to monitoring section to aid clarity.</i>
A83a	230	Appendix G		SOL2	<del>Rolled forward with some slight amendments.</del> <a href="#">Removed as has permission for housing</a>	<del>MODSOL2_</del>	<i>To reflect that the policy is now deleted.</i>
A84	233	Appendix J	<i>Delete appendix J.</i>				<i>Various evidence is already referred to in various parts of the Local plan as well as a link to the evidence in the introduction.</i>