

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP0	-	Active Travel England	-	-	-	-	In response to the second Regulation 19 consultation. Since 1st June 2023 ATE has been a statutory consultee on all planning applications for new developments that meet or exceed one or more of its application thresholds. This statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive. However, ATE has commissioned an independent review of its planning service and undertook a Local Plan Discovery Project to scope out opportunities for ATE's involvement in local plans in the future. ATE is currently considering the recommendations from this work. Should there be any changes to ATE's role in plan-making then Local Planning Authorities will be advised in writing.	None	Noted.	No change proposed.
BLP1	Adele Powell	Norfolk Coast Partnership (NCP)	Policy PUBSP7: Tranquillity in the Broads	Yes	Yes	-	Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBSP7: Tranquillity in the Broads. The Policy seeks to conserve the tranquillity of the area and states all development proposals will need to protect the dark skies and nocturnal character of the Broads in accordance with the dark skies policy. NCP supports this policy but suggests that a reference to the Norfolk Coast National Landscape is added to the policy to ensure that its significance is recognised in this context.	NCP believe the Plan is legally compliant and sound. Minor amendments to include reference to the Norfolk Coast National Landscape would be welcome.	Support noted. Agree with proposed change.	Add new part 4 to policy as follows: <u>Proposals will also need to consider and address impacts on dark skies, tranquillity and amenity of areas outside of the Broads as relevant. Then in supporting text, refer to the Norfolk Coast National Landscape as an area of dark skies and tranquillity.</u>
BLP2	Adele Powell	Norfolk Coast Partnership (NCP)	Policy PUBDM28: Light Pollution, Dark Skies and Nocturnal Character	Yes	Yes	-	Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBDM28: Light pollution, dark skies and nocturnal character. This Policy looks to conserve and enhance the tranquillity, nocturnal character and dark sky experience of the Broads. The Policy designates two Dark Sky Zones of which the Norfolk Coast National Landscape falls within Dark Sky Zone category 1 which is protected from permanent illumination. NCP supports this policy but suggests that a reference to the Norfolk Coast National Landscape is added to the policy to ensure that its significance is recognised in this context.	NCP believe the Plan is legally compliant and sound. Minor amendments to include reference to the Norfolk Coast National Landscape would be welcome.	Support noted. Agree with proposed change.	Add new part 4 to policy as follows: <u>Proposals will also need to consider and address impacts on dark skies of areas outside of the Broads as relevant. Then in supporting text, refer to the Norfolk Coast National Landscape as an area of dark skies.</u>
BLP3	Adele Powell	Norfolk Coast Partnership (NCP)	PUBSSCOAST: The Coast	Yes	Yes	-	Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBSSCOAST: The Coast. Specifically, we support how the policy highlights the special nature, character and tranquillity of the area of coast defined on the Adopted Policies Map and seeks to conserve the area for low-key quiet recreation and as a wild bird and seal refuge. NCP also supports the policy's promotion of appropriate small-scale development, such as footpath bridges, bird-watching hides and seal viewing platforms, which facilitates low level recreation and the policy's ban on other forms of operational development in the Coastal Area.	NCP believe the Plan is legally compliant and sound.	Support noted.	No change proposed.
BLP4	Alasdair Hain-Cole	Environment Agency	Policy PUBDM7: Water efficiency and re-use	Yes	Yes	n/a	The policy is sound in principle, however, with the publication of the Shared Standards for Water Efficiency in Local Plans, we are now advising Local Planning Authorities (LPAs) to introduce tighter water efficiency standards using the evidenced approach. Given The Broads Local Plan is at an advanced stage, we are mindful that the Shared Standards represents a step change, but the Shared Standards would provide the evidence required to support any higher standards established at a local level. The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that LPAs include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery.	Policy PUBDM7: Water efficiency and re-use 1. All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to 110 90 litres per head per day of mains supplied potable water, or any higher tighter water efficiency standard subsequently established nationally through Building Regulations Part G or locally. Measures to reduce water demand further will be encouraged and supported.	Comment noted. Prior to the publication of the REG19 version of the Local Plan, working with Anglian Water, Environment Agency and Essex & Suffolk Water, on receiving the 'Shared Standards', the Authority tried to amend the draft policy to 90l/h/d. Following research, it was found that there was no guaranteed way of checking the delivery of this policy. This is beyond the optional building regulations and so it would not be checked by building regulations. As such, it was agreed to not include the standard but if the organisations above wished to raise it as part of their response to the Local Plan, it could be considered through the Examination. We also note that there is a consultation out relating to the building regulations: https://consult.defra.gov.uk/water-efficiency-demand/review-of-water-efficiency-standards/ . This public consultation includes an option to revise the minimum Water Efficiency Standard in new houses through fittings from 125 l/p/d to 105 l/p/d, and the optional technical standard from 110 l/p/d to 100 l/p/d. Does the organisation still want to pursue 90l/h/d?	The Authority would be content in amending the use to 90l/h/d, but as stated in the response, delivery cannot be monitored or guaranteed. Accept the other proposed changes or similar as also proposed by other organisations.
BLP5	Alasdair Hain-Cole	Environment Agency	Policy PUBDM7: Water efficiency and re-use	Yes	Yes	n/a	We recommend that LPAs include Local Plan Policies that: • Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible. • Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. • Require new major non-domestic developments to include water saving measures and water reuse in their design. These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. It is considered that a modification to Policy PUBDM7 can help make development in The Broads more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives.	3. Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to include water efficient fittings.	Agree.	3. Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to include water efficient fittings.
BLP6	Alasdair Hain-Cole	Environment Agency	Policy PUBDM7: Water efficiency and re-use	Yes	Yes	n/a	It is recognised that the Broads Local Plan is at an advanced stage in its preparation, but this consultation provides an opportunity to include tighter water efficiency standards that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that: * The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations. There are non-domestic water restrictions in both Anglian Water and Essex & Suffolk Water areas, which are referenced in the supporting text to Policy PUBDM7. * Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. The Norwich and the Broads Water Resource Zone (WRZ) is identified as one of the WRZs with deterioration risk as a result of abstraction pressures. * At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs. For example, Anglian Water offer a £500 incentive for residential properties that achieve a water efficiency standard of 90 l/p/d, which would be within the shared standards water efficiency parameters of 85-95 l/p/d suggested for Local Plan policies. These incentives can support the viability of delivering water efficiency measures.	4. All new/replacement/converted non-domestic buildings are required to be designed to be water efficient and should aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) under the BREEAM standard, with a minimum score of 3 credits within WAT01 Water Consumption.	Agree to some extent. Water standard of BREEAM cannot be used in isolation. As such, we have introduced a BREEAM standard (see policy Policy PUBDM55: Non-residential development and BREEAM) which refers to a requirement to meet credits in WAT01 and other WAT calculators. So to include reference to that would be repeating another policy. The wording as included is aimed at all non-domestic buildings, including those that are below the 250sqm threshold.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP7	Alasdair Hain-Cole	Environment Agency	Policy PUBDM7: Water efficiency and re-use	Yes	Yes	n/a	It is therefore recommended that Policy PUBDM7 is modified to reflect the recommendations in the Shared Standards. Whilst the overall level of development in The Broads is low, it is considered the evidence set out in the Shared Standards is clear that tighter water efficiency standards are necessary for sustainable growth and nature recovery, which supports the National Park purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks, and the long term vision and fundamental principles for the Broads National Park in the Broads Plan 2022-2027.	See linked comments.	See response to linked comments.	See response to linked comments.
BLP8	Alasdair Hain-Cole	Environment Agency	Objective 6	Yes	Yes	n/a	As stated in our response at the Preferred Options consultation stage, our view is that it is still worth considering whether this could be made more targeted and ambitious from a water quality perspective.	For example, the objective could state "Water quality is improved, and each waterbody passes the chemical and biological requirements of the Water Framework Directive."	This objective is about more than water quality. As written, it covers the general issue raised and is succinct.	No change proposed.
BLP9	Alasdair Hain-Cole	Environment Agency	Policy PUBDM5: Water quality and foul drainage	Yes	Yes	n/a	We are pleased with the updates and added reference to Water Framework Directive (WFD) and 'adequate sewage treatment provision'.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP10	Alasdair Hain-Cole	Environment Agency	Policy PUBDM11: Green and blue infrastructure and Public Rights of Way, Policy PUBDM5: Non-residential development and BREEAM	Yes	Yes	n/a	We are pleased with the updates made in accordance with our response at the Preferred Options consultation stage.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP11	Alasdair Hain-Cole	Environment Agency	Policy PUBDM53: Source of heating	Yes	Yes	n/a	<p>However, the use of Water Source Heat Pumps (WSHP) has become a particular focus for our ecology teams since the submission of our Preferred Options response in May 2024. We have recently been involved in reviewing multiple WSHP applications and our national guidance on their use is currently under review. There is a growing body of peer-reviewed research and evidence supporting our concerns around WSHP, and work is underway to develop a framework for assessing thermal discharges. At present, there are no specific standards or regulations governing thermal discharges, and our assessments are limited to the requirements of the WFD. This remains an evolving picture, but it highlights the need for caution and robust safeguards in planning policy.</p> <p>Recent WSHP applications have required extensive monitoring to be in place and have been restricted to winter-only operation (i.e. not permitted for summer cooling, only winter heating) to prevent harm to the receiving watercourse. The potential for in-combination effects from multiple WSHPs presents a genuine risk of damaging river ecology and WFD status, and applications may therefore be refused on these grounds.</p> <p>We are therefore concerned that Policy PUBDM53: Source of heating (p.267) explicitly encourages the use of WSHPs ("This could be water, ground or air source heat pumps, to reflect the individual circumstances of the scheme.") Our position is to encourage the use of Air Source Heat Pumps (ASHP) where they are a viable option over the use of WSHPs on rivers, due to the concerns outlined above.</p>	<p>We note that the hierarchy of heating methods in section 4 (a to f) includes 'heat pumps' as the preferred option but does not specify the type of heat pump. We recommend that a further hierarchy between heat pump types be included here, i.e. with ASHP being the preferred option over WSHP within a hierarchy of heating options.</p> <p>Also wording like 'but ensuring no damage to the river or the river ecology' when referring to water source heat pumps.</p>	Agree.	<p>Add a new part 5 to policy that says: <u>where heat pumps are proposed (or the overall system is to be heat pump ready), the type of heat pump (ground, air, water source) and any in-combination effects as a result of other heat pumps nearby need to be carefully considered. Water source heat pumps need to ensure no damage to the river or the river ecology. Where technically and environmentally viable, air source heat pumps should be the preferred option over water source heat pumps.</u></p> <p>Add supporting text that says: <u>The potential for in-combination effects from multiple WSHPs presents a genuine risk of damaging river ecology and WFD status, and applications may therefore be refused on these grounds. Even a single WSHP has the potential to harm river ecology and WFD status and must be carefully assessed before approval.</u></p>
BLP12	Alasdair Hain-Cole	Environment Agency	Ecology	Yes	Yes	n/a	We have reviewed the draft Plan and are pleased with the changes made in response to our comments at the Preferred Options consultation stage, particularly the increased emphasis on avoiding likely significant effects on the natural environment before considering mitigation and the inclusion of Blue Infrastructure alongside Green Infrastructure. We consider the changes made to have improved the effectiveness of the Plan from the perspective of ecology and biodiversity.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP13	Alasdair Hain-Cole	Environment Agency	Policy PUBNOR1: Utilities Site	Yes	Yes	n/a	We note that Policy PUBNOR1: Utilities Site (p.347) states: "6. Applicants are encouraged to take the opportunity of using the proximity of the site to the river to use water source heat pumps or use the river for water source district heating but ensuring no damage to the river or the river ecology". While our concerns regarding the use of WSHPs outlined above also apply to this policy, we consider the inclusion of this added disclaimer – which was not included in the previous version of the Plan - vital. We request a similar precaution to be included in the wording of Policy PUBDM53: Source of heating.	None to NOR1.	It seems this is supporting the wording of PUBNOR1, but seeking a change to PUBDM53.	No change to NOR1. See comment BLP11 regarding PUBDM53.
BLP14	Alasdair Hain-Cole	Environment Agency	PUBDM3: Pollution and Hazards in development and protecting environmental quality	Yes	Yes	n/a	We are pleased with the addition of this new policy.	Suggest Point 1 ("All development proposals will protect the quality of the environment") could be strengthened by specifying which aspects of environmental quality - air, water, soil, biodiversity, etc. - are included. Given the sensitive nature of The Broads, you should consider making it explicit that environmental protection is a precondition for development approval.	The qualities are listed at part 4 and so that would be repeating them in the policy which is not needed. Regarding the comment relating to 'precondition for development approval', the policy as a whole does this.	No change proposed.
BLP15	Alasdair Hain-Cole	Environment Agency	Habitats Regulations Assessment (HRA)	Yes	Yes	n/a	We have reviewed the HRA for the Local Plan for the Broads and agree with its conclusions. The assessment has appropriately considered potential impacts on all relevant designated sites/habitats, and we are satisfied that the Local Plan provides sufficient safeguards and mitigation measures. As detailed within the HRA, alongside existing protections in strategic and planning policy frameworks and local procedures, these measures ensure that the Plan would not have an adverse effect on the integrity of any habitats sites, either alone or in combination. It should be noted that Natural England are the statutory stakeholders for HRAs and will therefore likely have greater scrutiny and more in-depth insight into its conclusions.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP16	Alasdair Hain-Cole	Environment Agency	Flood risk	Yes	Yes	n/a	We have reviewed the updated Plan and are pleased with the changes made following our comments at the Preferred Options stage. We find the draft to be sound but have set out some minor changes below that would enhance and clarify existing information, as well as reflecting new information that has become available since the last consultation.	See following specific comments.	See following specific comments.	See detailed comments that follow.
BLP17	Alasdair Hain-Cole	Environment Agency	Policy PUBDM8: Development and flood risk	Yes	Yes	n/a	We support the updated policy wording and find the policy sound.	<p>However, the policy includes the following repetition at point 12 on page 64, which has been copied over from a typographical error in our Preferred Options consultation response:</p> <ul style="list-style-type: none"> • remain operational and safe for users in times of flood; • result in no net loss of floodplain storage; • remain operational and safe for users in times of flood; • result in no net loss of floodplain storage; 	Agree.	<p>However, the policy includes the following repetition at point 12 on page 64, which has been copied over from a typographical error in our Preferred Options consultation response:</p> <ul style="list-style-type: none"> • remain operational and safe for users in times of flood; • result in no net loss of floodplain storage; • remain operational and safe for users in times of flood; • result in no net loss of floodplain storage;
BLP18	Alasdair Hain-Cole	Environment Agency	Policy PUBDM45: Gypsy, Traveller and Travelling Show People	Yes	Yes	n/a	We support the amended policy and find it sound in terms of flood risk. We recommend two minor changes of wording to highlight the NPPF vulnerability classification and distinguish between permanent and temporary uses. Under 'Flood Risk' in the 'Reasoned Justification' on page 236, it states: 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.	We recommend making the following minor amendment to that sentence, to state: Any Flood Risk Assessment for such accommodation (<u>temporary or permanent</u>) 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.	Agree.	Any Flood Risk Assessment for such accommodation (<u>temporary or permanent</u>) 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.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP19	Alasdair Hain-Cole	Environment Agency	Appendix 7: Flood Risk Assessment Tick Sheet	Yes	Yes	n/a	<p>We support the use of an Flood Risk Assessment (FRA) tick sheet as a guide for users. We require a change to referenced freeboard value, so that it reflects the new allowances available in the PPG guidance and the National Flood Risk Standing Advice. Appendix 7 currently uses the old freeboard guidance which specifies a freeboard value of 300 millimetres. The guidance has now been updated and recommends working to a higher freeboard value of 600 mm, where there is a particularly high level of uncertainty in the modelled flood levels.</p> <p>While we may accept a lower freeboard value (minimum being 300 mm) if the detailed modelling is assessed to be suitable, this will need to be evaluated on a case-by-case basis. Therefore, we recommend the developers work to the higher freeboard level to improve flood resilience to developments within the Broads area. Please signpost users to the Flood risk assessment: Flood Zones 1, 2, 3 and 3b - GOV.UK for the new freeboard allowances.</p> <p>Furthermore, new guidance and information was released in September 2025 to support those creating FRAs. Developers can increase their chances of submitting a satisfactory FRA by completing the Flood Risk Assessment Template and following the guidance note. We also released a new Main River Consultation Area layer to help LPAs and applicants check if a proposal is within 20 metres of the bank top of a main river – a trigger for statutory consultation with the Environment Agency. We recommend considering the FRA template in appendix 7, either by incorporating it or by referencing it via hyperlinks to further information.</p>	See Appendix F that shows the suggested amendments.	Agree.	Amend tick sheet as per Appendix F .
BLP20	Alasdair Hain-Cole	Environment Agency	PUBDM52A: Proposals for residential extensions	Yes	Yes	n/a	We support the policy and generally find it to be sound.	<p>However, while point 2 includes a link to Policy PUBDM49: Residential ancillary accommodation and its additional flood risk information, we recommend including the following paragraph in PUBDM52A to provide clarity: In terms of flood risk, where extensions fall under householder development or small non-residential extensions (with a footprint of less than 250m2), applicants should refer to National Flood Risk Standing advice for guidance and recommendations on Flood Resilience measures. Where the extensions are greater than 250 m2, the application may require a site-specific flood risk assessment. For further information, refer to Flood risk assessments: applying for planning permission - GOV.UK.</p>	Agree to some extent.	<p>Add this text to the policy: new part e) consider and address flood risk issues in line with the flood risk section of the Local Plan and National Policy.</p> <p>Add this text to the reasoned justification: <u>In terms of flood risk, where extensions fall under householder development or small non-residential extensions (with a footprint of less than 250m2), applicants should refer to National Flood Risk Standing advice for guidance and recommendations on Flood Resilience measures. Where the extensions are greater than 250 m2, the application may require a site-specific flood risk assessment. For further information, refer to Flood risk assessments: applying for planning permission - GOV.UK.</u></p>
BLP21	Alasdair Hain-Cole	Environment Agency	Policy PUBDM24: excavated material	Yes	Yes	n/a	We support the policy and generally find it to be sound.	<p>We recommend including a paragraph, under 'reasoned justification', regarding Environmental Permitting Regulation 2016, as follows: Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit from the Environment Agency for flood risk activities for work or structures in, under, over or within 16m from a main river and from any flood defence structure or culvert. The works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.</p>	Agree.	<p>When disposing of material, the Environment Agency needs to be contacted as a licence may be required. <u>Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit from the Environment Agency for flood risk activities for work or structures in, under, over or within 16m from a main river and from any flood defence structure or culvert. The works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.</u></p>
BLP22	Alasdair Hain-Cole	Environment Agency	Policy PUBDM3: Pollution and Hazards in development and protecting environmental quality	Yes	Yes	n/a	We support the addition of Policy PUBDM3, which correctly states that proposals must not give rise to pollution and highlights there may be existing contamination. We welcome the emphasis on the importance of groundwater resources and protection of the underlying aquifer.	<p>Point 6 states that development proposals should take into account the hydrological links to local watercourses and the associated potential for pollution. We would like to highlight that this could include the presence of shallow groundwater on site, which may or may not be hydraulically connected to surface watercourses. We therefore stress the importance of carrying out a site-specific risk assessment following the Land Contamination Risk Management (LCRM) guidance, which is referenced in the Reasoned Justification section below the policy.</p>	Support noted. Agree with proposed change.	<p><u>6. Where proposals are within a close proximity (typically less than 400m, although this may vary based on local topography) to watercourses, there may be the potential for a hydrological link. Development proposals that are within close proximity* to watercourses^ and/or that include the presence of shallow groundwater (which may or may not be hydraulically connected to surface watercourse) should take into account the potential for pollutants and provide a strategy for preventing this reaching the watercourses untreated. A site-specific risk assessment following the Land Contamination Risk Management (LCRM) guidance will be required. This includes the design of Sustainable Drainage Systems (SuDS).</u></p> <p><u>* Typically less than 400m, although this may vary based on local topography. ^ There may be the potential for a hydrological link.</u></p>
BLP23	Alasdair Hain-Cole	Environment Agency	PUBSP3: Soils - supporting text 'Contaminated Land'	Yes	Yes	n/a	As per our previous response, we welcome the reference to the Definition of Waste: Development Industry Code of Practice and the Waste Management page on gov.uk within Policy PUBSP3.	<p>The section on Contaminated Land in Policy PUBSP3 states: 'Where development is proposed on land that could be contaminated, a site investigation will usually be required.' In order to be effective, we request that this wording is amended to read: 'When dealing with land which could be affected by contamination, follow the risk management framework provided in Land Contamination Risk Management (LCRM) https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm. This guidance describes the type of information required to establish any potentially unacceptable risks.' Policy PUBSP3 should also reference Local Plan Policy PUBDM3 and include the suggested wording: 'The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner.'</p>	Support noted. Agree with proposed change.	<p><u>Where development is proposed on land that could be contaminated, a site investigation will usually be required. When dealing with land which could be affected by contamination, follow the risk management framework provided in Land Contamination Risk Management (LCRM) https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm. This guidance describes the type of information required to establish any potentially unacceptable risks. The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner. Policy PUBDM3 might also be of relevance.</u></p>
BLP24	Alasdair Hain-Cole	Environment Agency	Policy PUBDM9: Surface water run-off	Yes	Yes	n/a	We are pleased that Policy PUBDM9 includes an order of priority for infiltration whereby the Environment Agency would not normally support the use of deep bore soakaway systems, as these can present an unacceptable risk to the groundwater environment. We welcome the specific mention of acceptable depth and minimum 1.2m clearance beneath the base of infiltration SuDS. We also support relevant guidance including the National standards for SuDS on gov.uk. Similarly, we are pleased that the Reasoned Justification section makes it clear that not all techniques will be appropriate for all sites.	<p>However, we consider that this could be enhanced by amending the wording of policy point 4 d) ('any captured water should be filtered from pollutants to help avoid contamination') to state 'systems must not result in pollution of groundwater and shall incorporate appropriate pollution prevention appropriate to the environmental sensitivity.'</p>	Support noted. Agree with proposed change.	<p><u>Amend point 4 d) any captured water should be filtered from pollutants to help avoid contamination systems must not result in pollution of groundwater and shall incorporate appropriate pollution prevention appropriate to the environmental sensitivity.</u></p>

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP25	Alasdair Hain-Cole	Environment Agency	Policy PUBDM10 Open space on land, play space, sports fields and allotments	Yes	Yes	n/a	In line with our previous suggestion, the Reasoned Justification section of Policy PUBDM10 states that Bure Park and the marshes adjacent to Broadland Rugby Club are underlain by historic landfills and this may require consideration for land contamination. We support this addition. We also support the reference to relevant Environment Agency guidance in the section detailing the requirements for cemetery space provision.	For effectiveness this should include reference to Local Plan Policy PUBDM3 and contaminated land pages on gov.uk https://www.gov.uk/contaminated-land .	Support noted. Agree with proposed change.	Include reference to Local Plan Policy PUBDM3 and contaminated land pages on gov.uk https://www.gov.uk/contaminated-land .
BLP26	Alasdair Hain-Cole	Environment Agency	Policy PUBDM21: Renewable and low carbon energy	Yes	Yes	n/a	The Local Plan discusses local battery storage in the context of Policy PUBDM21: Renewable and low carbon energy. If Battery Energy Storage Systems (BESS) are developed, there is potential for pollution of the water environment in the case of emergency situations, in particular fires. This would be exacerbated if in a vulnerable groundwater location. Highly polluting chemicals in batteries could enter surface waterbodies in firewater or rainfall via surface water run off should battery containers become exposed in the event of a fire. Applicants should assess risks to groundwater and ensure mitigation is in place for containment of this water.	To mitigate the risks to groundwater and surface water, as well as proposing appropriate measures to manage activities, applicants should consider whether BESS battery containers should be located away from vulnerable receptors. Applicants are encouraged to engage with Local Fire & Rescue Services to ensure issues of siting and location of BESS are dealt with before applications are made. Applicants should also refer to guidance published by The Department for Energy Security and Net Zero: Health and safety in grid scale electrical energy storage systems https://www.gov.uk/government/publications/grid-scale-electrical-energy-storage-systems-health-and-safety/health-and-safety-in-grid-scale-electrical-energy-storage-systems-accessible-webpage .	Support noted. Agree with proposed change.	Include text as follows in supporting text: <u>To mitigate the risks to groundwater and surface water, as well as proposing appropriate measures to manage activities, applicants should consider whether BESS battery containers should be located away from vulnerable receptors. Applicants are encouraged to engage with Local Fire & Rescue Services to ensure issues of siting and location of BESS are dealt with before applications are made. Applicants should also refer to guidance published by The Department for Energy Security and Net Zero: Health and safety in grid scale electrical energy storage systems</u> https://www.gov.uk/government/publications/grid-scale-electrical-energy-storage-systems-health-and-safety/health-and-safety-in-grid-scale-electrical-energy-storage-systems-accessible-webpage .
BLP27	Alasdair Hain-Cole	Environment Agency	PUBDM53: Source of heating	Yes	Yes	n/a	Through various policies of the Local Plan including Policy PUBDM53: Source of heating, there may be an increased number of ground source heat pumps. The Environment Agency regulates ground source heating and cooling systems. The system may require an abstraction licence and an environmental permit, or exemptions may apply. Developers should engage with Environment Agency at an early stage. Groundwater amendments to the Environmental Permitting Regulations classified heat as a pollutant for groundwater activities. Ground source heat pumps change the temperature in the ground and the water environment which could have impacts on the water quality or aquatic ecology. There are additional environmental risks to consider such as the impact of drilling during installation or potential leakage of fluid. Risks need to be appropriately assessed and mitigated.	We recommend the following guidance be referenced: Closed loop ground source heating and cooling systems including exemption conditions and Open loop heat pump systems on gov.uk. Also refer to the need for abstraction licence, permit and engage with EA and additional environmental risks.	Support noted. Agree with proposed change.	Reference: Closed loop ground source heating and cooling systems including exemption conditions and Open loop heat pump systems on gov.uk. Also refer to the need for abstraction licence, permit and engage with EA and additional environmental risks.
BLP28	Alasdair Hain-Cole	Environment Agency	Policy PUBDM2: Embodied Carbon	Yes	Yes	n/a	We have reviewed the Plan and are pleased with its focus on the reuse and recycling of materials, the circular economy, and requiring developments to demonstrate sustainable waste management during and after construction.	However, where demolition and waste removal is found to be justified, it should be stated that the waste must be treated at a suitably permitted site.	Support noted. Agree with proposed change.	Add this to supporting text: <u>where demolition and waste removal is found to be justified, the waste must be treated at a suitably permitted site</u>
BLP29	Alasdair Hain-Cole	Environment Agency	Policy PUBDM13: Heritage Assets	Yes	Yes	n/a	We have reviewed the Plan and are pleased with its focus on the reuse and recycling of materials, the circular economy, and requiring developments to demonstrate sustainable waste management during and after construction.	However, where demolition and waste removal is found to be justified, it should be stated that the waste must be treated at a suitably permitted site.	Support noted. Agree with proposed change.	Add this to supporting text: <u>where demolition and waste removal is found to be justified, the waste must be treated at a suitably permitted site</u>
BLP30	Alasdair Hain-Cole	Environment Agency	Policy PUBDM50: Replacement dwellings	Yes	Yes	n/a	We have reviewed the Plan and are pleased with its focus on the reuse and recycling of materials, the circular economy, and requiring developments to demonstrate sustainable waste management during and after construction.	However, where demolition and waste removal is found to be justified, it should be stated that the waste must be treated at a suitably permitted site.	Support noted. Agree with proposed change.	Add this to supporting text: <u>where demolition and waste removal is found to be justified, the waste must be treated at a suitably permitted site</u>
BLP30a	Alasdair Hain-Cole	Environment Agency	Policy PUBDM7: Water efficiency and re-use				<i>In response to the second Regulation 19 consultation.</i> We note that Appendix 11 ("Explanation why reasonable alternatives were not taken forward") refers to Policy PUBDM7: Water efficiency and re-use as requiring a 110l/h/d standard. In a Statement of Common Ground relating to Environment Agency comments made as part of the first Regulation 19 consultation, the Broads Authority have since agreed to amend the use to 90l/h/d for consideration through the Examination. Regardless, this does not affect the Sustainability Appraisal's assessment of Policy PUBDM7, and that a policy for a tighter water standard "is considered needed".	Seeks 90l/h/d water use.	See 90l/h/d Topic Paper.	See 90l/h/d Topic Paper.
BLP30b	Alasdair Hain-Cole	Environment Agency	Duty to Cooperate				<i>In response to the second Regulation 19 consultation.</i> Following the government's announcement that the Duty to Cooperate will not form part of the new regulations for the plan-making system expected in 2026, we would like to state our satisfaction with the level of cooperation and engagement provided by the Broads Authority over the course of this Local Plan production period. We are committed to maintaining this relationship in the future.	Not seeking changes	Support noted.	No change proposed.
BLP30c	Alex Jessop	Suffolk Wildlife Trust	Policy PUBDM16: Biodiversity Net Gain				<i>In response to the second Regulation 19 consultation.</i> With specific regard to Section 1 of Policy PUBDM16; There is currently no clear guidance which states that a local authority cannot include required net gain above the minimum statutory level of 10%. 20% has widely been shown to offer greater confidence in delivering a gain (whereas 10% is the minimum level to have confidence in no net loss). Suffolk Wildlife Trust have long advocated for plans in Suffolk to include a minimum 20% policy and support the Broads Authority in including this in their vision for the Broads.	We do not think a change is necessary. However, should it be necessary to change the wording of the plan to remove the requirement for delivery of 20% then we would support and encourage the plan to read that an "ambition to deliver 20% net gain should be evident" or similar.	Support noted.	No change proposed.
BLP31	Alice Lawman	National Highways	The whole plan	Not specified	Not specified	Not specified	General information included in representation. See Appendix D of this report .	Not seeking changes	Comments noted. It is presumed that no changes are proposed.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP32	Andrew Marsh	Historic England	Policy PUBDM13: Heritage Assets	Yes	No	-	<p>The current policy wording conflates the NPPF's approach to designated and non-designated heritage assets, particularly in relation to the tests of substantial harm and less than substantial harm. We support the overall direction of Policy PUBDM13. However, we recommend that the Authority reviews point 3 (Identified and unidentified non-designated heritage assets) and 4 (Archaeology) to ensure consistency with the National Planning Policy Framework (NPPF). As currently drafted, the policy wording does not fully reflect national policy and is therefore not sound. Nonetheless, we believe this can be readily addressed through minor modifications.</p> <p>3: Identified and unidentified non-designated heritage assets: It is particularly important that the policy distinguishes clearly between the tests of harm applicable to designated and non-designated heritage assets. Paragraph 214 of the NPPF sets a high bar for substantial harm or total loss of designated heritage assets, requiring clear and convincing justification and demonstration of substantial public benefits. In contrast, paragraph 216 requires a balanced judgement for non-designated heritage assets, having regard to the scale of harm and the asset's significance. These distinct approaches should be reflected accurately in the policy wording to avoid conflation.</p>	To ensure consistency with the National Planning Policy Framework (NPPF), we consider it necessary to amend the policy wording. The revised text should more closely reflect the language and intent of the NPPF. We would welcome the opportunity to meet and discuss this further.	Agree with comment. Further to this response, Historic England provided suggested wording amendments which we are content with. Changes supported by Heritage Officer at Broads Authority.	<p>3. Identified and unidentified non-designated heritage assets Where local heritage assets (identified or unidentified) are affected by development proposals, their significance should be retained within development. Development resulting in harm to or loss of significance of a locally identified asset will only be acceptable where:</p> <p>i. there are demonstrable and overriding public benefits associated with the development; and</p> <p>ii. it can be demonstrated that there would be no reasonably practicable or viable means of retaining the asset within a development.</p> <p><u>Development proposals that would result in harm to the significance of a non-designated heritage asset (identified or unidentified) will be considered in the context of national policy.</u></p> <p><u>A balanced judgement will be made having regard to:</u></p> <ul style="list-style-type: none"> <u>•the significance of the heritage asset,</u> <u>•the scale of any harm or loss, and</u> <u>•the public benefits of the proposal.</u> <p><u>Applicants should consult the Historic Environment Record and provide an appropriate assessment of the asset's significance and the potential impact of the development. Proposals should demonstrate how harm has been avoided or minimised, and where appropriate, how the asset's significance will be preserved or enhanced.</u></p>
BLP33	Andrew Marsh	Historic England	Policy PUBDM13: Heritage Assets	Yes	No	-	<p>The current policy wording conflates the NPPF's approach to designated and non-designated heritage assets, particularly in relation to the tests of substantial harm and less than substantial harm. We support the overall direction of Policy PUBDM13. However, we recommend that the Authority reviews point 3 (Identified and unidentified non-designated heritage assets) and 4 (Archaeology) to ensure consistency with the National Planning Policy Framework (NPPF). As currently drafted, the policy wording does not fully reflect national policy and is therefore not sound. Nonetheless, we believe this can be readily addressed through minor modifications.</p> <p>4: Archaeology: we recommend that criterion (d) be reviewed. It currently appears to address harm to both designated and non-designated heritage assets. However, as discussed above the thresholds set out in paragraphs 214 and 216 of the NPPF differ considerably. If the intention is to apply this policy only to non-designated archaeological remains of equivalent significance to scheduled monuments (as referenced in paragraph 213(b), footnote 75 of the NPPF), this should be made explicit. The policy also omits a key element of the test in paragraph 214, namely that the harm or loss is necessary. It is not enough for substantial public benefits to outweigh the substantial harm, the harm itself needs to be necessary to achieve the public benefits. We recommend that paragraph (d) be amended to ensure consistency with the Framework.</p>	To ensure consistency with the National Planning Policy Framework (NPPF), we consider it necessary to amend the policy wording. The revised text should more closely reflect the language and intent of the NPPF. We would welcome the opportunity to meet and discuss this further.	Agree with comment. Further to this response, Historic England provided suggested wording amendments which we are content with. Changes supported by Heritage Officer at Broads Authority.	<p>4. Archaeology</p> <p>c) There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets that are demonstrably of equivalent significance.</p> <p>d) Development proposals that will result in unavoidable harm to, or loss of, an archaeological heritage asset's significance <u>will be considered in the context of national policy, having regard to the significance of the asset. Harm to, or loss of, an Scheduled Monument's significance will only be permitted where there is a clear justification in terms of public benefits arising from the development which outweigh that harm and, in the case of substantial harm/loss of a Scheduled Monument and other archaeological heritage assets that are demonstrably of equivalent significance, proposals must also meet the following requirements:</u></p> <ul style="list-style-type: none"> i. There is no less harmful viable option; ii. The amount of harm has been reduced to the minimum possible; and iii. Satisfactory provision is made for the evaluation, excavation, recording interpretation, dissemination and archiving of the remains and then interpretation, dissemination and archiving before the commencement of development.
BLP33a	Andrew Marsh	Historic England	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Thank you for consulting us on the Local Plan for the Broads - Regulation 19 version, again. As the Government's adviser on the historic environment, Historic England is keen to ensure that its protection is fully considered at all stages and levels of the local planning process. We therefore welcome the opportunity to comment on these proposals. I can confirm that while we do not have any further comments to make at this stage, we would be interested in receiving future consultations on this and related projects.	None	Noted.	No change proposed.
BLP33b	Brian Wilkins	Norfolk and Suffolk Boating Association	Sustainability Appraisal	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We failed to find any reference in the Sustainability Assessment, to the most sustainable form of transport on the Broads, and the most sustainable form of tourism, which is transport by engineless boat propelled by the harnessing of wind and tide. We consider that this ought to feature in your SA, because: * Sailing is one of the most important elements of the cultural heritage of the Broads, as set out in sections 7.10 and 7.11 of the Local Plan. * The Navigation, and Boating on the Broads is why there is special legislation for the Broads – The National Parks Act could not apply to the Broads because of the Navigation. * Boating is a very major consideration – Toll income from boat owners amounts to well over half of the Broads Authority's regular annual income. * Encouragement of sailing, making passage under sail, and sail training, appear to be appropriate to policies SOC1, SOC3, ENV7, ENV11 and ENV12?	No change proposed.	This is noted, but sailing itself is not a land use. The Local Plan relates to land use. There are policies that relate to navigation and moorings and stabilisation and residential moorings and tourism. The Local Plan gives general support to use of the water by all types of boats. So the general thrust of the comment is addressed. No specific wording is provided.	No change proposed.
BLP33c	Brian Wilkins	Norfolk and Suffolk Boating Association	Section 9 of Local Plan	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We suggest amending, under Strengths, page 31 Item n), "Substantial engaged community of private boat owners"	Amend to "Substantial engaged community of private boat owners, <u>many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors</u> ".	Agree.	Amend to "Substantial engaged community of private boat owners, <u>many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors</u> ".
BLP33d	Brian Wilkins	Norfolk and Suffolk Boating Association	Policy PUBSP13: Navigable water space	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We endorse the draft policies PUBSP13: 'Navigable water space' and PUBDM38: 'Access to the water'.	Not seeking changes	Support noted.	No change proposed.
BLP33e	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM38: Access to the water	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We endorse the draft policies PUBSP13: 'Navigable water space' and PUBDM38: 'Access to the water'.	Not seeking changes	Support noted.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP33f	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM41: The impact of replacement quay heading on navigation.	-	-	-	<i>In response to the second Regulation 19 consultation.</i> We strongly endorse the content, as proposed, of policy DM41, 'The Impact of replacement quay headings on the Navigation', to prevent extensions of the shoreline from extending into the water space, adverse to the Navigation.	Not seeking changes	Support noted.	No change proposed.
BLP33g	Brian Wilkins	Norfolk and Suffolk Boating Association	Policy PUBDM40: Moorings, mooring basins and marinas	-	-	-	<i>In response to the second Regulation 19 consultation.</i> However we are concerned that Policies DM40 and DM41 fail to establish that existing moorings may be refurbished without challenge when the existing piling or other components are at end-of life. Not infrequently, quay headings that have been in use for fifty years or more require replacement of pilings that have succumbed to corrosion or decay in the wet marine environment, especially if previously constructed in short-life treated softwood. Recent negotiations at Hickling, and perhaps elsewhere, suggest that additional clarity is required. We believe this is important because quay headings are essential for access onto the water, and that the best way to appreciate the special qualities of the Broads is from a boat.	No change proposed.	Local Plan policies are relevant to proposals that need Planning Permission. Like for like replacements are generally acceptable. And under 25m we don't seek planning applications. Maintenance is likely to not need planning permission. It is not clear what changes are proposed. The policy is clear that navigation must be protected.	No change proposed.
BLP33h	Brian Wilkins	Norfolk and Suffolk Boating Association	Policy PUBDM41: The impact of replacement quay heading on navigation.	-	-	-	<i>In response to the second Regulation 19 consultation.</i> However we are concerned that Policies DM40 and DM41 fail to establish that existing moorings may be refurbished without challenge when the existing piling or other components are at end-of life. Not infrequently, quay headings that have been in use for fifty years or more require replacement of pilings that have succumbed to corrosion or decay in the wet marine environment, especially if previously constructed in short-life treated softwood. Recent negotiations at Hickling, and perhaps elsewhere, suggest that additional clarity is required. We believe this is important because quay headings are essential for access onto the water, and that the best way to appreciate the special qualities of the Broads is from a boat.	No change proposed.	Local Plan policies are relevant to proposals that need Planning Permission. Like for like replacements are generally acceptable. And under 25m we don't seek planning applications. Maintenance is likely to not need planning permission. It is not clear what changes are proposed. The policy is clear that navigation must be protected.	No change proposed.
BLP33i	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks as well as piling	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Turning to Policy DM42, we believe the Authority is misguided in recommending at Item 3 that the Authority's preference is timber for the piled components of quay heading and landing stagings. Whilst treated softwood is very appropriate for cappings and walings, it has such a short life in the wet/dry intertidal zone even if pressure treated with preservative. Timber compares very poorly with lightweight galvanised steel sheet piling and with the longevity of proprietary recycled plastic piling sections. The policy is correct to say that each has its merits, but the need to re-pile in timber at intervals of ten to fifteen years is irresponsible and a flagrant waste of the owners or Toll-payers money when there are proven alternative options that can be expected to last four times as long.	No change proposed.	The entire policy needs to be read together. Points 1 and 2 are general principles. Then there is point 3 which relates to timber. And then after that point 4 which clearly talks about other materials. This policy was compiled with assistance from the Head of Construction and the Rivers Engineer.	No change proposed.
BLP33j	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks as well as piling	-	-	-	It is very apparent that the draft policy has not been guided by appropriate engineering expertise. This should be sought at the first opportunity, and the whole life cost of maintaining quay headings given much greater priority over appearance. It is also apparent that the policy is over-preoccupied by the colour of the material used for piling in quay headings -The colour is irrelevant – nearly all of the piling is below water and ground level, and the small amount above average water level quickly weathers to a dull/matt green or grey, with the effects of tidal waters, detritus and marine growth.	No change proposed.	The entire policy needs to be read together. Points 1 and 2 are general principles. Then there is point 3 which relates to timber. And then after that point 4 which clearly talks about other materials. This policy was compiled with assistance from the Head of Construction and the Rivers Engineer.	No change proposed.
BLP33k	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM28: Light pollution and dark skies and nocturnal character	-	-	-	<i>In response to the second Regulation 19 consultation.</i> One additional point we would raise is the need for planning control of bright waterside lighting at night (the examples on Horning Racing Reach and at Great Yarmouth are typical). The lights interfere with helms' night vision and have an impact on marine safety. They tend to provoke retaliation in the form of the use of searchlights on boats – which should be discouraged on the Broads.	Not seeking changes	Agreed. We do have a policy relating to light pollution. And you can report specific lights to us for us to investigate either through planning or through our navigation role.	No change proposed.
BLP33l	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBSP14: Mooring provision	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Regarding the provision of electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case. (Reference policies PUBSP14 (4) and DM28).	Not seeking changes	Support noted.	No change proposed.
BLP33m	Brian Wilkins	Norfolk and Suffolk Boating Association	PUBDM28: Light pollution and dark skies and nocturnal character	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Regarding the provision of electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case. (Reference policies PUBSP14 (4) and DM28).	Not seeking changes	Support noted.	No change proposed.
BLP34	Caroline Jeffery	Planning Services (Minerals and Waste Planning Authority)	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). "
BLP35	Char Lewis	Marine Management Organisation	6.3	Yes	Yes	-	We welcome and agree with the inclusion of sections '6.3 UK Marine Policy Statement' and '6.4 East Inshore and Offshore Marine Plans (2014)'	Not seeking changes	Support noted.	No change proposed.
BLP36	Char Lewis	Marine Management Organisation	The whole plan	Not specified	Not specified	Not specified	Representation included a list of East Marine Plan policies and a list of current Local Plan policies that are potentially relevant to the MMO area. But no specific comments on the Local Plan are included other than relating to section 6.3. See Appendix C to this report .	Not obviously seeking changes	Comments noted. It is presumed that no changes are proposed.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP36a	Chris Balls	-	Policy PUBSP13: Navigable water space	-	-	-	<i>In response to the second Regulation 19 consultation.</i> Whilst legally compliant I feel there needs to be more consideration of the potential for restoration of more commercial use of the waterways by shipping and cross river ferries etc. Autonomous technology could make this economically viable in the medium term future and integrated transportation strategy needs to consider both current and future needs. Inappropriate developments could hinder these potentially environmentally and socially friendly developments difficult. e.g. lack of dredging, removal of moorings. Must ensure the Norwich Navigation rights are maintained with Norwich still designated as a port. Automation is already seeing a return to smaller ships in Europe. as well as on demand small foot ferries, in time this could easily be adapted to the Broads	I feel the Navigation and other related legal responsibilities (including environmental shipping legislation) needs more mention as waterways are navigable by internationally trading (and Pleasure) vessels which comply with a reasonably high International Standard that does not always directly translate to local regulation but is reasonable to consider equivalent. Similar could possibly be said for foreign road vehicles.	We would tend to support appropriate, safe use of the waterways. The ferries that operate offer a service that is welcomed and they do so in a safe and appropriate way. It is down to individual businesses and organisations to investigate using the water to transport freight and we would be open to working with them on their proposals. The Integrated Access Strategy supports improvement and expansion of access points for ferries. Purely from the position of the Authority facilitating access for vessels and our approach to commercial freight on the rivers. the Authority's Safety Management System, describes the Authority's responsibilities as part of the Port Marine Facilities Safety Code. The SMS includes a dedicated section on "Management of Hydrography", covering dredging, tidal flows, navigation channels, and aids to navigation. This underpins continual surveys and maintenance essential for regular freight access. As there is currently no commercial freight, or future plans for such river traffic, the Authority's maintenance dredging is optimised for the current recreational traffic (see Waterways Management Strategy for more details). If schemes to re-introduce commercial freight were proposed, then the hydrographic regime and provision of commercial mooring on private land would be considered at that time. In terms of the Local Plan, Policy PUBDM38: Access to the water says: 3. Development proposals for new freight wharves and for the provision of freight interchange on brownfield sites adjacent to the navigation will be permitted where these are in accordance with the other policies of the Local Plan. And then in the supporting text to that policy: The waterways of the Broads have the potential to provide a sustainable and efficient mode of transporting freight. However, it is important that the use of waterways for this purpose does not affect the special qualities of the Broads. Consequently, proposals for infrastructure to support the greater use of the waterways by freight will be permitted if they do not have an adverse impact on landscape character, biodiversity, dark skies, tranquillity or other people's enjoyment of the Broads. Also, in terms of Cantley Sugar Beet Factory, the use of water is considered in that policy: PUBCAN1.	No change proposed.
BLP36b	Chris Waldron	Defence Infrastructure Organisation	Policy PUBDM21: Renewable and low carbon energy	-	-	-	<i>In response to the second Regulation 19 consultation.</i> The MOD notes and welcomes the provision within Policy PUBDM21: Renewable and low carbon energy General principles– "6. Proposals shall not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets. 7. The authority shall also consider the impact of proposals on air traffic safety, radar, reflected light and telecommunication, water quality and water resources."	In addition the MOD recommend, in order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the implications of developing within an area containing MOD safeguarded zones, Broads Authority should include at future stages of the Local Plan, policy wording that makes clear that only those applications for development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and/or assets will be supported.	Noted. This is already in the policy at part 6.	No change proposed.
BLP36c	Chris Waldron	Defence Infrastructure Organisation	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> The area covered by any Broads Authority Local Plan Review Plan period 2021 to 2041 consultation will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of RRH Neatished and the East Wide Area Multilateration (WAM) Network. Eastern WAM Network is a new technical asset, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through Broads Authority Local Plan review preferred options area of interest. Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address.	None	Background information noted. We will check our GIS system.	No change proposed.
BLP36d	Chris Waldron	Defence Infrastructure Organisation	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> A number of the policies within the site-specific area in the Broads Authority Local Plan fall within statutory safeguarding zones, with areas of land that have been identified as having potential for mixed development but offers no specifics. As such the MOD is unable to provide any detailed advice in relation to specific safeguarding criteria that would apply to any potential development sites. At such time as more detail on the location and extent of potential development sites becomes available the MOD would be able to provide more detailed responses. The MOD should be consulted on any development that triggers statutory consultation requirements.	None	Comment noted.	We will check our GIS system and ensure DM Officers are aware of the trigger.
BLP37	Clare Howe	Sport England	Policy PUBDM10: Open space on land, play space, sports fields and allotments.	Yes	No	Sport England considers Policy PUBDM10 to be inconsistent with national planning policy.	While the aim of enhancing amenity and biodiversity value is supported in principle, the wording as currently drafted is problematic because it lacks safeguards that ensure playing fields are protected. There is a risk that proposals introducing biodiversity enhancements (e.g., tree planting, wildflower meadows, or wetland features) could be supported under this policy, even if they compromise the usability of existing playing fields. Amendments are suggested. This amendment would ensure that biodiversity and amenity enhancements are supported without undermining the use of the playing field; provide clarity for applicants and decision-makers; and bring the policy into consistency with national planning policy. Sport England support the objective of this policy, however, this should not come at the cost of losing or prejudice playing fields. Sport England advises the Council to amend Policy PUBDM10(b) as suggested above, or similar, to ensure consistency with the NPPF to ensure the proposal protects playing fields. Within the supporting text of the policy, Sport England recommends reference is made to Sport England's Biodiversity Net Gain (BNG) guidance - Biodiversity Net Gain guidance Sport England https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/our-planning-role-guidance-and-tools/BNG It shows how biodiversity measures can be incorporated into playing fields without compromising their intended sporting use or long-term protection. The resource gives advice on good design principles for BNG, information about the maintenance of different BNG features and information about when to consider BNG as part of the planning application process.	To address this concern and ensure consistency with the NPPF, Sport England recommend the following amendment to criteria (b): 'Proposals that meet the requirements of 1a above and improve the amenity or biodiversity value of the open space in an appropriate way, provided they do not result in the loss, or prejudice the use of playing fields, will be supported'.	Agree with the comment.	Amend 1b) as follows: 'Proposals that meet the requirements of 1a above and improve the amenity or biodiversity value of the open space in an appropriate way, <u>provided they do not result in the loss, or prejudice the use of the open space, will be supported</u> '.
BLP37a	Clare Howe	Sport England	-	-	-	-	<i>In response to the second Regulation 19 consultation.</i> I have received the consultation on the additional information being consulted on regarding the Sustainability Appraisal. Having reviewed the changes in bright pink, Sport England have no further comments to our comments raised previously at Reg 19.	None	Noted.	No change proposed.
BLP38	David Barker	Evolution Planning on behalf of Somerleyton Estate/Trustees 1971 Settlement	Policy PUBSOM1 - Somerleyton Marina Residential Moorings	Yes	Yes	-	Support policy and provide comments - document is Appendix A to this report .	Not seeking changes	Support noted.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP38a	David Barker	Evolution Town Planning	Supporting text of policy PUBDBM46 New Residential Moorings	Yes	No	Positively Prepared; Justified:	<i>In response to the second Regulation 19 consultation.</i> The Estate has recently found delivering the residential moorings more complex as the application has progressed. This is because of the local planning authority's interpretation of the supporting text of the residential moorings policy which is making it more difficult to deliver residential moorings. This text is similar in the existing and proposed Local Plans, hence the need for these representations in order to provide clarity. In the supporting text of the emerging Local Plan under the sub heading 'Definition of a Residential Mooring and what can moor there', it states that the vessel will be used as the 'main residence.' This is a significant restriction on the property rights of those using residential moorings as it prevents letting or other such activities which are commonly allowed for other homes unless there are exceptional circumstances.	For the purposes of this policy, a 'residential mooring' is a mooring where someone lives aboard a vessel, the vessel is capable of navigation, where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base. For the purposes of this policy, it should be noted that there is an expectation that the moorings will be occupied by a vessel of standard construction and appearance, and which is conventionally understood to be a boat. The residential mooring relates to how the land is used and not necessarily to a specific boat.	The proposed change in wording could result in residential moorings being used as second homes or holiday homes. The purpose of them is to be lived in as a form of residential accommodation as per the Planning and Infrastructure Act 2016. Whilst not addressing this comment, but a reflection of this comment, it is proposed to amend the definition slightly as well as refer to the issue of main residence in the policy.	Amend definition as follows; For the purposes of this policy, a 'residential mooring' is a mooring where someone lives aboard a vessel as their sole and principal residence and the vessel is capable of navigation, where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base.
BLP38b	David Barker	Evolution Town Planning	Supporting text of policy PUBDBM46 New Residential Moorings	Yes	No	Positively Prepared; Justified:	<i>In response to the second Regulation 19 consultation.</i> This creates problems for the Estate Trustees finding people to occupy the moorings as it imposes a significant restriction on the homes. This is not a type of restriction proposed on bricks and mortar homes which may be built in the Broads area. It is not a restriction proposed by East Suffolk on homes allowed in Somerleyton village. There is no justification given in the Local Plan why this significant restriction is required. If it is intended to help deliver moorings as the Council has suggested in discussions on the planning application, then it has the opposite effect. For full representation, see Appendix i: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0008/221102/Covering-Letter-E374.C1.BroadsRep.Let01-A.pdf .	See above		Amend part 9 of the policy as follows; Conditions will be used to restrict the number, scale and size of boats using the residential moorings. A management plan for the site and a register of those who live on boats will be required and will be covered by a planning condition imposed on any planning permission granted. <u>A condition will also be used to ensure the vessel will be the sole and principle residence of the occupier.</u>
BLP38c	David Barker	Evolution Town Planning	Supporting text of policy PUBDBM46 New Residential Moorings	Yes	No	Positively Prepared; Justified:	<i>In response to the second Regulation 19 consultation.</i> The second point of objection is the supporting text which states that: 'the Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.' This is unsound and cannot be done as at the point a planning application is submitted it is impossible to know what the boats who will use the mooring over its lifetime will look like.	Remove this text: The Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.	Disagree. The Authority is aware of some plans to have buildings on pontoons or rafts to be what is moored at residential moorings and these are contrary to flood risk policy. Hence the requirement to confirm what is intended to be moored at the residential moorings.	No change proposed.
BLP39	Dickon Povey	East Suffolk Council	The whole plan	-	-	-	Thank you for providing East Suffolk Council with the opportunity to submit representations on the Regulation 19 Broads Authority Local Plan (July 2025). East Suffolk Council supports this plan and is committed to continue working collaboratively with the Broads Authority to deliver on strategic planning matters. We have identified some areas of the plan which, in our view, would benefit from improved clarity or accuracy. As such, we have made detailed comments on some matters via your consultation portal.	-	Support noted and welcomed.	See detailed comments that follow.
BLP40	Dickon Povey	East Suffolk Council	Policy PUBDM1: Major Development in the Broads	Yes	No	Consistent with national policy	Minor change proposed to para 1 as: All sites over 10 dwellings or 0.5ha will definitely be major dev. Para 1 should be amended to reflect this, in line with national policy.	Amend para 1 to say: 'Major development' may include the development of sites over 10 dwellings or larger than 0.5 hectares but is not restricted to that...'	This is in relation to major development in terms of Para 190 of the NPPF. And whether the scheme is major development, in terms of that defined in the glossary of the NPPF, is a consideration. It is confusing, but those are two different 'major development' terms.	No change proposed.
BLP41	Dickon Povey	East Suffolk Council	Policy PUBDM20: Energy demand and performance of new buildings (including extensions)	Yes	No	Consistent with national policy	the Written Ministerial Statement of 13 December 2023 requires energy efficiency standards to be an uplift of dwelling target emission rate (TER). Point 5 of the proposed policy uses the term "predicted energy requirements". This should be amended to reflect national policy.	That Target Emission Rates should be specified in accordance with the Written Ministerial Statement.	PUBDM20 is written to not go beyond the Future Homes Standard. As such, there is no need to specify a TER as that only applies if the policy goes beyond it.	No change proposed.
BLP42	Dickon Povey	East Suffolk Council	Policy PUBSP2: Strategic flood risk policy	Yes	No	Consistent with national policy	It is not entirely clear what is meant, in criterion 3, by 'adverse impacts on flood risk management'. Is this a reference to existing flood risk defences? This should be re-worded to remove ambiguity.	These part of the policy should be re-worded to provide clarity over the meaning of 'adverse impacts on flood risk management'.	The policy goes on to say '(including flood management structures and Government Flood Risk Plans)' and so is already explained.	No change proposed.
BLP43	Dickon Povey	East Suffolk Council	Policy PUBDM17: Mitigating Recreational Impacts	Yes	No	Consistent with national policy	The current Suffolk Coast RAMS highlights the need to keep the strategy under regular review. To improve accuracy, the text should clarify that the requirement will apply under future iterations of the strategy.	The following text is added to the end of the final sentence "...which are identified within the following strategies and Zones of Influence (ZOI) (or subsequent iterations):"	The comment seems to relate to the first sentence rather than the final one, but agree.	Amend as follows: '...which are identified within the following strategies and Zones of Influence (ZOI) (or successor documents or subsequent iterations)...'
BLP44	Dickon Povey	East Suffolk Council	Policy PUBDM16: Biodiversity Net Gain	Yes	No	Consistent with national policy	Part 5 (requirement for BNG to be onsite) appears to conflict with part 6 (delivery of offsite BNG). This should be resolved to remove ambiguity.	The criteria 5 and/or 6 are re-worded to clarify the position on off-site provision of BNG	The policy needs to be read as a whole. Part 5 and then part 6 and part 6 says '...it is proven the required net gain cannot be achieved onsite within the site boundary...' but this could be clarified.	Combine points 5 and 6.
BLP45	Dickon Povey	East Suffolk Council	Policy PUBDM43: Affordable housing	Yes	No	Consistent with national policy	There does not appear to be any mention of the East Suffolk Council Affordable Housing Supplementary Planning Document. This should be referenced to improve accuracy.	Add reference to the East Suffolk Council Affordable Housing Supplementary Planning Document.	It is mentioned at 6.7 but we will refer to it in the supporting text of PUBDM43	Amend 'East Suffolk Affordable Healthy Environments Supplementary Planning Document (SPD)' Refer to East Suffolk Affordable Housing Supplementary Planning Document (SPD) in the supporting text to DM43.
BLP46	Dickon Povey	East Suffolk Council	Policy PUBDM15: Natural Environment	Yes	No	Consistent with national policy	The overall approach set out in this policy is supported. However, we provide comments on some of the detailed points to improve accuracy and comply with national policy.	Reference is made to a Local Nature Recovery Network within the Local Nature Recovery Strategies. Within the strategy for Suffolk, this 'network' is not mentioned. What exactly is this policy referring too? This should be clarified.	In response to a comment from Natural England, we propose to change wording.	13. Where development is sited within or adjacent to an area identified in the Local Nature Recovery Network Habitats Maps of the Local Nature Recovery Strategies as an 'Area that Could Become of Particular Importance for Biodiversity' and/or has a Potential Measure mapped to it, it will demonstrate how the proposal will maintain and enhance the ability of the network to restore and enhance habitats and provide eco-system ecosystem services in line with the Local Nature Recovery Strategy.'
BLP47	Dickon Povey	East Suffolk Council	Policy PUBDM15: Natural Environment	Yes	No	Consistent with national policy	The overall approach set out in this policy is supported. However, we provide comments on some of the detailed points to improve accuracy and comply with national policy.	We recommend removing the text in brackets in part 7 "(which is not also subject to an international designation)", as even where a SSSI wholly overlaps a Habitats Site it can have different reasons for designation which would not be specifically picked up in a Habitats Regulations Assessment (which would specifically focus on assessing impacts on Habitats Sites features).	Agree.	Remove brackets of (which is not also subject to an international designation).
BLP48	Dickon Povey	East Suffolk Council	Policy PUBDM15: Natural Environment	Yes	No	Consistent with national policy	The overall approach set out in this policy is supported. However, we provide comments on some of the detailed points to improve accuracy and comply with national policy.	Not all Brownfield Sites meet the criteria to be considered as 'open mosaic habitat on previously developed land'. This paragraph should be amended to clarify this.	Noted. Part 10 says there may be a need to determine if the site has open mosaic habitat and then part 11 says what to do if there is the habitat.	No change proposed.
BLP49	Dickon Povey	East Suffolk Council	Section 30.1	Yes	No	Consistent with national policy	East Suffolk Council confirms that the position with respect to housing need remains the same as we set out in our letter to the Broads Authority dated 20th May 2025. With respect to the plan itself, in our view, it is not sufficiently clear that the former Pegasus site (PUBOUL2) is excluded from the housing need figure. Furthermore, it is not sufficiently clear that sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers.	Add text to provide clarity that Pegasus site (PUBOUL2) is excluded from the housing need figure. Add text to clarify that sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers set out in the plan to be planned for over the plan period but will nevertheless make a contribution to housing supply. 3rd paragraph: add the site names to the reference numbers to improve the clarity of the plan.	Footnote 126, and bullet point i) on page 218 refer to OUL2 allocations already having permission. Agree re site names and reference to permissions pre 2021.	Add site names to para 3 of section 30.1. And in section 30.1 para 2 add reference to sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers set out in the plan to be planned for over the plan period but will nevertheless make a contribution to housing supply

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP50	Dickon Povey	East Suffolk Council	Policy PUBSP5: Biodiversity	Yes	No	Consistent with national policy	Protected species should be referenced in criterion 2 b) for completeness and to comply with national policy	Criterion 2 b) should include reference to protected species	Agree. The term 'protected species' does not appear in the NPPF. There is reference to 'priority species' and 'threatened species'. PUBSP5 specifically references Section 41 species and while these are 'protected' there are others that are also protected by law but are not Section 41. The section 41 group are 'of principal importance' for conserving biodiversity in England, whereas 'protected species' covers a broader classification.	2b) protect against the loss of <u>protected Section 41 habitats and species</u>
BLP51	Ellie Roberts	Water Management Alliance	Policy PUBDM9: Surface water run-off	Not specified	Not specified	Not specified	I note that the Broads IDB Development page on the WMA website has been provided. Whilst I am pleased to see that the IDB is being signposted, I'd like to highlight that whilst the most prominent IDB within the Broads in terms of area covered is the Broads (2006) IDB, the area covered by the Broads Authority is also partially coincidental with the Norfolk Rivers IDB (Belagh to Ranworth, and West of the North Walsham and Dilham Canal) and the Waveney, Lower Yare and Loothingland IDB (South of the River Yare from the East of Rockland St Mary to Great Yarmouth).	It may be more beneficial to direct users of the plan to the WMA website (https://www.wma.org.uk/) from which they can access maps and our contact details to determine which Board's area a development falls into, if any.	Agree with proposed change.	<u>From the WMA website (https://www.wma.org.uk/) you can access maps and contact details to determine which IDB area a development falls into, if any.</u>
BLP52	Ellie Roberts	Water Management Alliance	Policy PUBDM9: Surface water run-off	Not specified	Not specified	Not specified	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.	Within the 'Designing SuDS' section on page 77, I'd request that the IDBs are referenced as regulators of surface water discharges within IDD's as per Byelaw 3 in each of the Boards' Byelaws.	Agree with proposed change.	<u>The IDB have their own local surface water policy which takes precedence over national best practice (Development Water Management Alliance (wma.org.uk)). 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's.</u>
BLP53	Ellie Roberts	Water Management Alliance	Policy PUBDM8: Development and flood risk	Not specified	Not specified	Not specified	On page 73 beneath policy PUBDM8, I am pleased to see that Section 23 of the Land Drainage Act 1991 has been referenced regarding any proposal to alter a watercourse. I would like to note that the Boards are only the regulator of Section 23 within their IDD's, whilst the legislation applies to any ordinary watercourse, in or out of an IDB's district. I understand that the Lead Local Flood Authority is the regulator of works to ordinary watercourses outside the Boards' districts in the Broads area.	Not seeking changes	Support noted.	No change proposed.
BLP54	Fiona Husband		Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	Yes	No	Not justified, effective or consistent with National Policy	IT IS NOT NECESSARY TO LABEL THIS SECTION OF LAND HERE IN CHEDGRAVE AS SETTLEMENT FRINGE. WE HAVE PLENTY OF LABELS & DON'T NEED AN ADDITIONAL LABEL. AS FAR AS LANDSCAPE GOES, ANY GREEN AREA HAS TREES PLANTED BY THE LANDOWNERS – MOST OF WHICH ARE NOT NATIVE SPECIES. I WOULD HAVE THOUGHT YOU SHOULD BE CONCERNED WITH THE AREAS THAT ARE NOT PART OF THE SETTLEMENT. THE DISTANCE FROM BRIDGE STREET IN LODDON IS NOT RELEVANT. OUR SITES HAVE BEEN HERE A LOT LONGER THAN MOST OF THE CLOSER SITES TO BRIDGE STREET INCLUDING LODDON QUAY. WE ARE NOT ON THE FRINGE OF CHEDGRAVE, WE ARE WELL AND TRULY CHEDGRAVE AND AGAIN BEEN HERE BEFORE LONGER THAN MUCH OF THE DEVELOPMENT IN CHEDGRAVE. The character of the land nominated does not meet with the character definition of what the policy is seeking to protect (pages attached). Much of the area designated is already fully developed and there is no formal specific site justification for the site designation. The remaining undeveloped sections are already designated as Priority Habitat: Deciduous Woodland and Lowland Fen and all lie within Flood Zones 2 and 3. Therefore, it is not necessary to have yet another designation. This is all private land and most trees have been planted over the years by the landowners. It is and has been for many years complete settlement. It is part of the settlement. The gardens and land are already have restrictions though I believe our government would be most happy for development here – in fill I believe it's called. The boatyards have always used the land for storage of boats, general storage and customer cars. These commercial businesses have been very important to the local economy. We would suggest that a site visit rather than an aerial photograph to establish landscape designation to be the way forward. This area should not be designated as Settlement Fringe and is not Settlement Fringe as outlined within the character definition of the policy. Settlement Fringe in this area should be the marshes. I strongly feel that the Broads Authority are unnecessarily adding an extra label to our land. It is not comparable to Acle Recreation Centre and such. It was purely by chance that I learned of this landscape designation which just isn't good enough. You have caused us to spend a lot of time and money on this and over the years, in particular, with the Local Green Space objection. This needs to stop. The online form is way too difficult to complete and not clear at all.	I strongly feel that the Broads Authority are unnecessarily adding an extra label to our land. It is not comparable to Acle Recreation Centre and such.	Regarding the form - there is guidance to fill out the form. The respondent was talked through the form on two separate occasions. Officers also offered to fill out the form with her sat next to them, which was refused. See Appendix G .	See Appendix G .
BLP55	Fiona Husband	Pacific Cruisers	Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	Yes	No	Not justified, effective or consistent with National Policy	IT IS NOT NECESSARY TO LABEL THIS SECTION OF LAND HERE IN CHEDGRAVE AS SETTLEMENT FRINGE. WE HAVE PLENTY OF LABELS & DON'T NEED AN ADDITIONAL LABEL. AS FAR AS LANDSCAPE GOES, ANY GREEN AREA HAS TREES PLANTED BY THE LANDOWNERS – MOST OF WHICH ARE NOT NATIVE SPECIES. I WOULD HAVE THOUGHT YOU SHOULD BE CONCERNED WITH THE AREAS THAT ARE NOT PART OF THE SETTLEMENT. THE DISTANCE FROM BRIDGE STREET IN LODDON IS NOT RELEVANT. OUR SITES HAVE BEEN HERE A LOT LONGER THAN MOST OF THE CLOSER SITES TO BRIDGE STREET INCLUDING LODDON QUAY. WE ARE NOT ON THE FRINGE OF CHEDGRAVE, WE ARE WELL AND TRULY CHEDGRAVE AND AGAIN BEEN HERE BEFORE LONGER THAN MUCH OF THE DEVELOPMENT IN CHEDGRAVE. The character of the land nominated does not meet with the character definition of what the policy is seeking to protect (pages attached). Much of the area designated is already fully developed and there is no formal specific site justification for the site designation. The remaining undeveloped sections are already designated as Priority Habitat: Deciduous Woodland and Lowland Fen and all lie within Flood Zones 2 and 3. Therefore, it is not necessary to have yet another designation. This is all private land and most trees have been planted over the years by the landowners. It is and has been for many years complete settlement. It is part of the settlement. The gardens and land are already have restrictions though I believe our government would be most happy for development here – in fill I believe it's called. The boatyards have always used the land for storage of boats, general storage and customer cars. These commercial businesses have been very important to the local economy. We would suggest that a site visit rather than an aerial photograph to establish landscape designation to be the way forward. This area should not be designated as Settlement Fringe and is not Settlement Fringe as outlined within the character definition of the policy. Settlement Fringe in this area should be the marshes. I strongly feel that the Broads Authority are unnecessarily adding an extra label to our land. It is not comparable to Acle Recreation Centre and such. It was purely by chance that I learned of this landscape designation which just isn't good enough. You have caused us to spend a lot of time and money on this and over the years, in particular, with the Local Green Space objection. This needs to stop. The online form is way too difficult to complete and not clear at all.	I strongly feel that the Broads Authority are unnecessarily adding an extra label to our land. It is not comparable to Acle Recreation Centre and such.	Regarding the form - there is guidance to fill out the form. The respondent was talked through the form on two separate occasions. Officers also offered to fill out the form with her sat next to them, which was refused. See Appendix G .	See Appendix G .

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP56	Georgia Teague	Suffolk County Council	general	n/a	n/a	n/a	Thank you for consulting Suffolk County Council (SCC) on the Broads Local Plan at Regulation 19 Submission Stage. This letter will set out where there may be issues which make the plan unsound, as set out in paragraph 36 of the NPPF. SCC wish to be constructive and considers that the plan can be made sound and will provide support to do so where necessary. Please note that the main focus of our comments will be on Suffolk and not Norfolk.	n/a	Background information noted.	No change proposed.
BLP57	Georgia Teague	Suffolk County Council	general	yes	yes	n/a	n/a	SCC would suggest that it would be easier to read and navigate this local plan if there were paragraph numbers for the supporting text.	Noted.	Consider paragraph numbers.
BLP58	Georgia Teague	Suffolk County Council	section 6 policy context	yes	no	a - positively prepared	It is noted that the plan produced by Suffolk County Council, the "Suffolk Minerals and Waste Local Plan 2020" is not acknowledged directly in main text of the Regulation 19 draft document nor are there any specific mention of maps or policies from the plan relating to the minerals safeguarding (Notably the 'safeguarding and proposals map' and the policy 'MP10: Minerals safeguarding'. However, the Minerals and Waste Local Plan and its safeguarding requirements are mentioned and assessed as part of the site assessment policies in the Regulation 19 draft document (for example Policy PUBOUL1: Boathouse Lane Leisure Plots).	Therefore, it would be best practice to list and acknowledge the Suffolk Minerals and Waste Local Plan 2020 and its safeguarding maps and policies in the main body of the document in 'Section 6 – Policy context'. This would ensure that the plan is positively prepared.	Noted, but it is referred to in 6.8 in the same way as all other Local Plans of our districts and Norfolk County Council.	No change proposed.
BLP59	Georgia Teague	Suffolk County Council	Policy PUBDM1: Major Development in the Broads	yes	no	d - Consistent with national policy	amend for clarity, accuracy and ease of reading	Point 3 outlines what proposals for major development need to demonstrate but makes no reference to highway impacts. It may be considered that this is covered through sub-point 'f'; however, the policy could be clearer in the need to ensure highway impacts are suitably assessed and suitable mitigation is delivered to prevent a severe cumulative impact on the highway network and/or unacceptable impacts on highway safety, in accordance with NPPF paragraph 115 part d).	Noted. Impacts on a highway network are addressed in the transport policies. The impact of a scheme is one thing, but this policy clearly seeks to set out how we will consider if something is major development in terms of para 190 of the NPPF. The rest of the policies in the Local Plan that are relevant will then come into play to determine the applications.	No change proposed.
BLP60	Georgia Teague	Suffolk County Council	PUBDM3: Pollution and Hazards in development and protecting environmental quality	yes	no	d - Consistent with national policy	amend for clarity, accuracy and ease of reading	SCC suggests the following added text, to be in line with NPPF paragraph 182: <i>This includes the design of Sustainable Drainage Systems (SuDS) which should comply with the CIRIA pollution assessment best practices.</i>	Agree.	Add text as proposed.
BLP61	Georgia Teague	Suffolk County Council	Policy PUBDM8: Development and flood risk	yes	no	d - Consistent with national policy	Amend for clarity, accuracy and ease of reading	For supporting text 'SuDS' page 73, SCC would suggest the following added text, to be in line with NPPF paragraph 182: There is a range of possible SuDS techniques that can be used, although not all techniques will be appropriate for individual development sites <u>but a preference should be given to green, open features such as raingardens, tree pits, conveyance swales, and green/blue roofs.</u>	Agree.	There is a range of possible SuDS techniques that can be used, although not all techniques will be appropriate for individual development sites <u>but a preference should be given to green, open features such as raingardens, tree pits, conveyance swales, and green/blue roofs.</u>
BLP62	Georgia Teague	Suffolk County Council	PUBDM9: Surface water run-off	yes	no	d - Consistent with national policy	amend for clarity, accuracy and ease of reading	SCC as the LLFA would recommend that point b) should be above point a). Water reuse is the highest form of capture and should be prioritised. New Government non-technical statutory guidance reinforces this. Suggested rewording for point 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>In the first instance, brownfield sites should aim to match the greenfield discharge rate to provide betterment, should this not be achievable the applicant should seek to significantly improve upon existing discharge rate.</u> The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant, sewerage undertaker.	Agree to some extent - see comment from Norfolk LLFA at BLP194.	See comment BLP194.
BLP63	Georgia Teague	Suffolk County Council	PUBDM9: Surface water run-off	yes	no	d - Consistent with national policy	amend for clarity, accuracy and ease of reading	Suggested rewording for point 3: <u>Sustainable Drainage Systems (SuDS) shall always be used.</u> 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. 99.9% of sites that say they cannot provide a SuDS solution is because of bad engineering and planning, not because a SuDS systems is not feasible. This point should not offer an 'out' to excuse bad site planning.	Agree to some extent - see comment from Norfolk LLFA at BLP195.	See comment BLP195.
BLP64	Georgia Teague	Suffolk County Council	Policy PUBDM10: Open space on land, play space, sports fields and allotments	yes	yes	n/a	SCC particularly support part 2) part f) - engaging children for green/play spaces.	It is suggested to have considerations for children with disabilities and also spaces for girls (i.e. not just skateparks). This would help the plan to meet wider population needs.	Agree to some extent. Girls also like skateparks and we already say at part f that local young people need to be engaged when designing an area of open space, in order to be inclusive for all.	Under part 2 of the policy add a new criterion; <u>As appropriate, open spaces and play need to address the needs and provide for children with disabilities.</u>
BLP65	Georgia Teague	Suffolk County Council	Policy PUBDM11: Green and blue infrastructure and Public Rights of Way	yes	yes	n/a	This policy is very welcomed as it highlights the importance of green access networks in enhancing people's physical and mental wellbeing and providing necessary access options.	This policy could be strengthened in recognising the role the PROw network plays in linking people to services, employment and facilities as well as green destinations by offering sustainable travel options. It is noted that such references have been made elsewhere in the plan, especially on page 162 regarding active travel.	Agree to some extent, but this is probably not for the policy itself as it is a reason to have the policy.	Include wording in the first part of the reasoned justification: <u>The PROw network plays an important role in linking people to services, employment and facilities by offering sustainable travel options.</u>
BLP66	Georgia Teague	Suffolk County Council	Policy PUBDM16: Biodiversity Net Gain	yes	n	d - Consistent with national policy	SCC welcome the ambition to delivery 20% BNG, above and beyond the 10 % requirement set out in the Environment Act, and detail and Topic Paper justifying this policy. SCC would draw attention to paragraph 4 which states that: "Exempted developments must achieve no net loss of biodiversity. They will be required to provide biodiversity enhancements (see the Natural Environment policy (PUBDM15))" SCC queries how it is expected that developers will demonstrate that exempted developments will "achieve no net loss". For this to be achievable, it must be quantifiable and would require the developer to undertake a BNG metric on the site to show that the "biodiversity enhancements" are achieving a certain amount of net gain to offer the development and result in "no let loss".	SCC would suggest the following replacement paragraph: <u>4. Developments exempt from the Biodiversity Net Gain (BNG) under the Environment Act 2021 will still be required to adequately assess any biodiversity loss and ensure this loss is adequately addressed and compensated through "biodiversity enhancements" (PUBDM15).</u> As currently written, this policy is not considered sound as it is not clear and unambiguous, in line with NPPF paragraph 16 part 6).	Noted. On reflection, if a scheme/proposal is exempted from BNG then the BNG policy would not be used. Therefore part 4 can be deleted. Where there are exemptions to BNG, we will rely on PUBDM15 part 12.	Delete part 4 of PUBDM16.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP67	Georgia Teague	Suffolk County Council	Policy PUBDM25: Utilities infrastructure development	yes	yes	N/a	not specifically a soundness issue, but would make policy stronger.	SCC raises concerns that part 1 part c) might not always be achievable, given that in Part 1.a) this already refers to proposals which have an essential role in the provision of a regional and national network. SCC would recommend the following minor addition: c) There is no <u>significant</u> , adverse impact on the character of the locality, the wider landscape, character and significance of the historic environment and the amenity of neighbours.	Noted. We are proposing a change to 3a) in light of another comment.	See response to comment BLP156
BLP68	Georgia Teague	Suffolk County Council	Policy PUBDM28: Light pollution, dark skies and nocturnal character	yes	yes	n/a	not specifically a soundness issue, but would make policy stronger	Part 5 of the supporting text to this policy on page 156 includes to the lowest Correlated Colour Temperature (CCT). It is suggested that this also be incorporated into the policy directly.	Agree.	Add a new criterion: Use the warmest colour with the lowest Correlated Colour Temperature [CCT] possible.
BLP69	Georgia Teague	Suffolk County Council	Policy PUBDM30: Recreation facilities parking areas	yes	no	d - Consistent with national policy	amend for clarity, accuracy and ease of reading	SCC suggests the following additional text, to be in line with NPPF paragraph 182: iii) High quality design of surface, landscaping and boundary treatments including to address management of water (run off and avoiding pollution) <u>and integration of high-quality SuDS features</u>	Agree.	iii) High quality design of surface, landscaping and boundary treatments including to address management of water (run off and avoiding pollution) <u>and integration of high-quality SuDS features</u>
BLP70	Georgia Teague	Suffolk County Council	Policy PUBDM29: Transport, highways and access	yes	no	d - Consistent with national policy	To encourage sustainable travel, as per Chapter 9 of the NPPF, and thus achieve sustainable development.	For section 3 of the policy, Transport Assessments and Transport Statements (3): it should be clear that the Transport Assessment or Statement should be "multi-modal", meaning it considers all modes of travel to ensure that sustainable and active travel objectives are at the centre of the assessment. This would feed in well to Points 4 and 5, which detail importance of travel plan measures.	Agree, but seems best to be referred to in part 3.	3. In appropriate cases, either a Transport Assessment (TA) or Transport Statement (TS) will be required to demonstrate the potential impact of development proposals on the highway and how those impacts might be mitigated. <u>These assessments need to consider all modes of travel and ensure sustainable and active travel objectives are at the centre of the assessments.</u> Mitigation can take the form of infrastructure improvements and/or travel planning.
BLP71	Georgia Teague	Suffolk County Council	Policy PUBDM30: Recreation facilities parking areas	yes	yes	n/a - typo	typo	SCC notes that in the supporting text there is a typo on page 168, which SCC would suggest amending as follows: The Authority expects proposals to include an appropriate number of disabled parking spaces.	Agree. There are three occurrences of this typo. Page 168, 325, 326.	Amend the three occurrences of this typo: The Authority expects proposals to include an appropriate number of disabled parking spaces.
BLP72	Georgia Teague	Suffolk County Council	Policy PUBDM44: Residential development within defined Development Boundaries	yes	n	a - positively prepared	amend for clarity, accuracy and ease of reading	The policy states "New residential development will only be permitted within defined development boundaries and must comply with other policies of the Development Plan". However on the map supporting this policy, the red line boundaries for Oulton part 3 a) (and the other sites but is our focus as it Oulton is in Suffolk) are very tightly drawn, and SCC believe that it would - hard to input any housing in here, even infill.	Comment noted. Although no suggestions for changes have been put forward. The justification is included in the supporting text under 'Development Boundary for Oulton Broad'.	No change proposed.
BLP73	Georgia Teague	Suffolk County Council	Policy PUBDM48: Elderly and specialist needs housing	yes	n	d - Consistent with national policy	To help meet the needs of a wider population, as per NPPF Paragraph 63.	SCC welcomes this policy, which currently focuses on "Elderly and Specialist Needs Housing". SCC would suggest that the policy could advocate for a broader scope that includes housing to meet the needs of diverse population groups, e.g. ageing population, those with physical and/or mental disabilities and accommodation for children and young people. It is suggested to add in reference to M4(2) and M4(3) housing, which would meet the needs of not only an ageing population but also those with disabilities, as per NPPF Paragraph 63.	The policy refers to elderly and specialist needs housing. So it does include those with physical and/or mental disabilities and children and young people - that would be under 'specialist need'. The supporting text may refer more to elderly, but the policy covers all types generally. Agree re reference to M4(2) and M4(3).	No change re first part of comment. Cross refer to design policy and M4(2) and M4(3).
BLP74	Georgia Teague	Suffolk County Council	Policy PUBDM49: Residential ancillary accommodation	yes	n	d - Consistent with national policy	To help meet the needs of a wider population, as per NPPF Paragraph 63.	SCC suggest considering adding reference for these dwellings to be adaptable and accessible to meet a wider range of occupants needs, i.e., built to M4(2) and/or M4(3) standards. This would help the plan to help meet the needs of a wider population, as per NPPF Paragraph 63.	This is already in the policy. See part 7 c).	No change proposed.
BLP75	Georgia Teague	Suffolk County Council	Policy PUBDM51: Custom/self-build	yes	yes	n/a	Not a soundness issue, formatting.	SCC notes what appears to be a minor formatting error in part g), where there are ellipsis and the end of the point and at the start of following segment.	Noted. They are there on purpose. The wording at point 4 is linked to the ... 4. If plots remain unsold after a thorough and proportionate marketing exercise which: e f g ... these plots may be built out as conventional market housing subject to detailed permission being secured and the Authority being satisfied that e) and f) and g) have been satisfactorily concluded.	Could make it clearer as follows: ... <u>then</u> these <u>unsold</u> plots may be built out as conventional market housing subject to detailed permission being secured and the Authority being satisfied that e) and f) and g) have been satisfactorily concluded.
BLP76	Georgia Teague	Suffolk County Council	Policy PUBDM52: Design	yes	yes	n/a	amend for clarity, accuracy and ease of reading	SCC would recommend for part f) to insert "secure" storage of bicycles. SCC strongly supports part i) requiring M4(2) standards for all new dwellings, although it is considered that the M4(3) requirements for affordable dwellings could be higher. Oftentimes, the need for affordable housing and disabilities go hand-in-hand. In the supporting text, SCC notes that the RTPI Dementia link is broken. Please try: https://www.rtpi.org.uk/media/t0nb4xfz/dementiapracticeadvice4pagesummary2017.pdf or https://www.rtpi.org.uk/new-from-the-rtpi/dementia-and-town-planning/	Agree. Support re M4(2) and M4(3) is noted. The 10% M4(3) approach reflects GYBC Local Plan which is currently at examination. SCC do not propose a specific level for M4(3).	Amend RTPI Dementia link. Amend 4f) provision for the <u>secure</u> storage of bicycles No change re M4(3)
BLP77	Georgia Teague	Suffolk County Council	Policy PUBDM54: Heat resilient design	yes	yes	n/a	Not a soundness issue, clarity query.	SCC is supportive of this policy. A minor query: the diagram displays up to the year 2020, but the text above states to 2018.	If you follow the link and look at the date the article was published, you will see this is 31 July 2019. The chart cannot therefore include 2020. It is suggested that 2020 is on the graph as, after 1884, the years are set out every 20 years.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP78	Georgia Teague	Suffolk County Council	Policy PUBDM59: Designing places for healthy lives	yes	yes	n/a	recommended amendments for clarity and accuracy.	<p>The policy states under point 2a): "For developments of over 50 dwellings, developments of fewer than 50 dwellings but which are deemed to impact health services potentially significantly, development that includes care homes, housing for the elderly, or student accommodation and development that involves the significant loss of public open space, the Norfolk and Waveney Health Protocol shall apply".</p> <p>It is noted that the term 'the Norfolk and Waveney Health Protocol, may have been used in error. The following Paragraph 'Delivery and implementation of the policy' refers instead to the 'Planning in Health Protocol'. It is suggested that the text is changed for consistency.</p> <p>There are two further instances in Appendix 12 where the term 'Norfolk and Waveney Health Protocol' is used, and one reference of 'Norfolk Health Protocol checklist'. These may also need to be updated to '<u>Planning in Health Protocol</u>' for accuracy and consistency.</p> <p>To improve usability, it is recommended that the implementation details of the Policy are separated under clear subheadings: * Add '2a' beneath the heading 'Delivery and Implementation of the Policy'. * Replace the current wording 'The threshold of this policy is all new housing, commercial and recreational development' with a new sub-heading '<u>2b</u>'.</p>	<p>Agree to make the reference consistent.</p> <p>Agree with other changes to some extent.</p>	<p>Ensure references to the Protocol is 'Planning in Health Protocol'.</p> <p><u>'In terms of part 2a of the policy, working with Norfolk and Suffolk Public Health and Norfolk and Waveney NHS colleagues...'</u></p> <p><u>'In terms of part 2b of the policy, working with health colleagues, we have produced a small sites checklist to reflect smaller development...'</u></p>
BLP79	Georgia Teague	Suffolk County Council	Policy PUBDM59: Designing places for healthy lives	yes	yes	n/a	recommended amendments for clarity and accuracy.	<p>Public Health recommend strengthening the following sentences: * '...although if the threshold for <u>undertaking the Planning in Health Protocol</u> is met, then that will take precedence.' * All new housing, commercial and recreational development are required to produce a statement saying how their proposal <u>addresses supports and promotes</u>:</p> <p>The penultimate paragraph currently feels disjointed, it introduces the Sport England guidance immediately after a summary of Small Sites Checklist requirements and before the closing text. Given the range of relevant local and national policies on healthy placemaking, it may be more effective to: •Relocate the Sport England reference (and similar resources) to an Appendix or dedicated guidance section, or •Group them under a short sub heading within the main text (e.g. 'Further Guidance and Resources').</p>	<p>Agree with proposed changes.</p>	<p>* ...although if the threshold for <u>undertaking the Planning in Health Protocol</u> is met, then that will take precedence.</p> <p>* All new housing, commercial and recreational development are required to produce a statement saying how their proposal <u>addresses supports and promotes</u>:</p> <p>Add a title as suggested: <u>Further guidance</u>.</p>
BLP80	Georgia Teague	Suffolk County Council	PUBSP2: Strategic flood risk policy	yes	no	d - Consistent with national policy	amend for clarity, accuracy and ease of reading	<p>SCC suggest the following added text, in line with NPPF paragraph 182: <u>5. Preference should be made towards high quality, green open SuDS features over less sustainable solutions such as attenuation crates.</u></p>	<p>Agree, but that would fit best with 1b).</p>	<p>Amend 1b) as follows: Will incorporate appropriate surface water drainage mitigation measures and will implement sustainable drainage (SuDS) principles that control runoff (quantity), treat surface pollutants (quality), and enhance biodiversity and amenity value of the development. <u>The preference being high quality, green open SuDS features over less sustainable solutions such as attenuation crates.</u></p>
BLP81	Georgia Teague	Suffolk County Council	Policy PUBSP5: Biodiversity	yes	yes	n/a	recommended amendments for clarity and accuracy.	<p>Part e) appears to refer to mitigation hierarchy (without saying as much) but stops short of requiring compensation for unmitigable adverse impacts and effects, as does the justification. (Policy PUBDM15: Natural Environment does address this in part c)</p> <p>PUBSP5 further only talks about mitigating 'significant' effects. SCC consider that, while potential 'significant effects' should be mitigated to be reduced to 'non-significant', this should not mean that 'non-significant' effects need no mitigation.</p>	<p>Agree.</p>	<p><u>e)utilise the Mitigation Hierarchy when considering potential impacts on the natural environment avoid likely significant effects on the natural environment wherever possible and then after following the relevant tests set out in National Policy, mitigate any likely significant effects</u></p>
BLP82	Georgia Teague	Suffolk County Council	Policy PUBSP8: Accessibility and Transport	yes	no	d - Consistent with national policy	to encourage sustainable travel, as per Chapter 9 of the NPPF, and thus achieve sustainable development.	<p>Part (2): it could be clearer that the development impacts on the highway network need to be suitably assessed to prevent a severe cumulative impact on the highway network and/or unacceptable impacts on highway safety, contrary to Paragraph 116 of the NPPF. Furthermore, it could be clear that safe and suitable access is required for all, in accordance with paragraph 115 of the NPPF.</p> <p>part (6): it could be clearer that development should give priority first to pedestrian and cycle movements and second to public transport, in accordance with Paragraph 117 of the NPPF. It is noted that this is outlined within Policy PUBDM29 (point 1).</p> <p>SCC welcomes the reference to the Suffolk Local Transport Plan in the supporting text. Please note that the Suffolk Local Cycling & Walking Infrastructure Plan has been updated from 2021 to 2024, and can be found here: https://storymaps.arcgis.com/stories/4b0713ff2b1049e19ffb896c47898fda</p>	<p>Agree.</p>	<p>1. Development will be well located and designed to maximise the use of sustainable forms of transport appropriate to its particular location. Safe and suitable access is required for all.</p> <p>2 All new development is required to address the transport implications of that development. <u>The development impacts on the highway network need to be suitably assessed to prevent a severe cumulative impact on the highway network and/or unacceptable impacts on highway safety.</u></p> <p>6. Integration between all modes of transport will be sought to encourage the community and visitors to arrive and travel within the Broads via sustainable modes of transport. <u>Development should give priority first to pedestrian and cycle movements and second to public transport.</u></p> <p>Update link to Suffolk Local Cycling and Walking Infrastructure Plan.</p>

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP83	Georgia Teague	Suffolk County Council	general - Site Specific / Allocation Policies	yes	n	d - Consistent with national policy	recommended amendments for clarity and accuracy.	Page 214 in section 30.1 states "No sites for residential dwellings are allocated in the Local Plan", however policy PUBSP15 then states that there are residential site allocations in the plan in part 7) a) of the policy. SCC considers that the plan is unsound as currently written, and thus further clarity is required here, as per paragraph 16 part d) of the NPPF which requires policies to be clear and unambiguous.	Yes. Your commentary is correct, but conclusion is not and the comment includes snippets of a paragraph and excludes a linked footnote. In terms of section 30.1, the full paragraph is as follows and sets the situation out clearly: 'No sites for residential dwellings are allocated in the Local Plan. Please note that PUBTHU1 (16 dwellings) and PUBOUL2 (76 dwellings) already have planning permission and were not assessed in the HELAA but will still be included in the Local Plan until they are built out. The Utilities Site (PUBNOR1) is allocated for mixed use, with housing being a potential option'. In terms of PUBSP15, part 7 a) i) see footnote 126 which again sets the situation out clearly.	No change proposed.
BLP84	Georgia Teague	Suffolk County Council	Policy PUBOUL1: Boathouse Lane Leisure Plots	yes	yes	n/a	SCC raises no objection to this policy. We note the reference to the Suffolk Minerals & Waste Local Plan in the supporting text on page 355.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP85	Georgia Teague	Suffolk County Council	Policy PUBOUL2: Oulton Broad - Former Pegasus / Hamptons Site	yes	no	d - Consistent with national policy	recommended amendments for clarity and accuracy.	SCC notes that this allocation is a "carry-over" from the previous Broads Local Plan. SCC raises a query regarding timelines: the supporting text states that planning permission was granted in 2012, however planning application reference BA/2012/0271/FUL (found in footnote 175) states planning committee & site visit took place in April 2013. According to SCC records, SCC were consulted in Dec 2012, and the S106 was signed and sealed in 2014. Therefore, SCC would recommend the review of the supporting text of this policy for accuracy. It also queried what is meant by "optionally housing", as planning permission has been granted for 76 market dwellings, and the final section of the supporting text sets out the estimated phasing and timings of housing to come forwards, which indicates that there are residential allocations for housing taking place. Therefore, as currently written, this policy is not considered sound and clarity is sought to make the policy clear and unambiguous, in line with NPPF paragraph 16 part d).	The application was approved 2014. The planning permission has not been built out yet. Whilst enacted, no buildings have been built. It could be that the site owner comes back in for a new permission and that permission could include housing or include other land uses in line with the policy. The phasing reflects our recent monitoring information on the planning permission.	Please note that this allocation received planning permission in 2012 for 76 market dwellings, office accommodation, and moorings. It is anticipated that the dwellings permitted as part of the extant planning permission will be delivered as follows: End 2028: 15 End 2029: 15 After 2030: 46
BLP86	Georgia Teague	Suffolk County Council	Policy PUBSSLSGS: Local Green Space	yes	yes	n/a	not a soundness issue, but recommended amendments for accuracy and ease of reading.	Overall, SCC supports this policy, however it is noted that the link to the Local Green Spaces maps document has some errors: the map for Chedgrave (page 2), and map for Beccles rowing club (page 6) do not have titles like the others included within the document. It is also noted that page 7 just says "playing field", and it would be considered useful to add the village name/location.	Agree.	Check map titles and ensure locations are obvious. Check maps for consistency.
BLP87	Georgia Teague	Suffolk County Council	Policy PUBSSA47: Road schemes on the Acle Straight (A47T)	yes	no	d - Consistent with national policy	recommended amendments for clarity and accuracy.	Regarding the supporting text Surface Water section (page 417), SCC suggests the following text amendments, to be in line with the surface water drainage hierarchy, and NPPF paragraph 182: Surface water disposal location, prioritised in the following order: <u>reuse and harvesting of water</u> , disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration.	Agree.	Surface water disposal location, prioritised in the following order: <u>reuse and harvesting of water</u> , disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration.
BLP88	Georgia Teague	Suffolk County Council	Appendix 12	yes	yes	n/a	amend for clarity, accuracy and ease of reading	It is recommended that Appendix 12 be reframed to improve clarity, using the following wording: Appendix 12: Small Site Healthy Planning Checklist This checklist is based on the <u>Norfolk-Planning in Health Protocol</u> checklist but amended to be more applicable to the types and scale of schemes we see in the Broads. It is a self-assessment checklist that will be required as part of relevant applications. The checklist is split into two – the first part is to be filled in for all new housing, commercial and recreational development (that does not meet the threshold relating to the Norfolk and Waveney Health Protocol). As well as filling out the first part of the checklist, schemes for one or more dwelling(s); but less than 50 dwellings, need to fill out the second part. <u>When to use this checklist</u> Part 1: must be completed for all new housing, commercial, and recreational developments (unless the Planning in Health Protocol applies). Part 2: in addition, developments of 1–49 dwellings must also complete Part 2.	Agree.	Appendix 12: Small Site Healthy Planning Checklist This checklist is based on the <u>Norfolk-Planning in Health Protocol</u> checklist but amended to be more applicable to the types and scale of schemes we see in the Broads. It is a self-assessment checklist that will be required as part of relevant applications. The checklist is split into two – the first part is to be filled in for all new housing, commercial and recreational development (that does not meet the threshold relating to the Norfolk and Waveney Health Protocol). As well as filling out the first part of the checklist, schemes for one or more dwelling(s); but less than 50 dwellings, need to fill out the second part. <u>When to use this checklist</u> Part 1: must be completed for all new housing, commercial, and recreational developments (unless the Planning in Health Protocol applies). Part 2: in addition, developments of 1–49 dwellings must also complete Part 2.
BLP89	Georgia Teague	Suffolk County Council	Appendix 12, cnt'd	yes	yes	n/a	amend for clarity, accuracy and ease of reading	Exemptions This checklist does not apply if any of these criteria are met. This checklist does not apply to: * Developments of over 50 dwellings * developments of less than 50 dwellings but which are deemed to impact health services potentially significantly * development that includes care homes, housing for the elderly, or student accommodation * development that involves the significant loss of public open space	Agree.	Exemptions This checklist does not apply if any of these criteria are met. This checklist does not apply to: * Developments of over 50 dwellings * developments of less than 50 dwellings but which are deemed to impact health services potentially significantly * development that includes care homes, housing for the elderly, or student accommodation * development that involves the significant loss of public open space

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP90	Georgia Teague	Suffolk County Council	Appendix 12, cnt'd	yes	yes	n/a	amend for clarity, accuracy and ease of reading	<p>If any of the above apply, use the Planning in Health Protocol (see Policy PUBDM59: Designing places for healthy lives). You can get some additional guidance from these two resources: Guidance and resources:</p> <ul style="list-style-type: none"> * Sport England offers guidance on designing and adapting where we live to encourage activity in our everyday lives (Sport England, Active Design Sport England) * Building for a Healthy Life (2020). * Housing and health needs assessment (2024) - Healthy Suffolk <p>If the above criteria are met, the Norfolk and Waveney Health Protocol shall apply (see Policy PUBDM59: Designing places for healthy lives in this Local Plan):</p> <p>Some of the questions in the checklist also have related policy requirements. your scheme may address those issues. Your response Where this is the case, your application may include the cross refer to relevant policies in this Local Plan (or indeed Neighbourhood Plan) and detail how your proposal address meets their requirements.</p>	Agree.	<p>If any of the above apply, use the Planning in Health Protocol (see Policy PUBDM59: Designing places for healthy lives). You can get some additional guidance from these two resources: Guidance and resources:</p> <ul style="list-style-type: none"> * Sport England offers guidance on designing and adapting where we live to encourage activity in our everyday lives (Sport England, Active Design Sport England) * Building for a Healthy Life (2020). * Housing and health needs assessment (2024) - Healthy Suffolk <p>If the above criteria are met, the Norfolk and Waveney Health Protocol shall apply (see Policy PUBDM59: Designing places for healthy lives in this Local Plan):</p> <p>Some of the questions in the checklist also have related policy requirements. your scheme may address those issues. Your response Where this is the case, your application may include the cross refer to relevant policies in this Local Plan (or indeed Neighbourhood Plan) and detail how your proposal address meets their requirements.</p>
BLP91	Jackie Norton	Suffolk Constabulary	The whole plan	Not specified	Not specified	Not specified	Representation is a general commentary and does not seek changes. See Appendix E of this report .	Not seeking changes	Response noted.	No change proposed.
BLP91a	Joe Wyatt	Norfolk County Council LLFA	Sustainability Appraisal	-	-	-	In response to the second Regulation 19 consultation. In NTSS 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.
BLP91b	Joe Wyatt	Norfolk County Council LLFA	Sustainability Appraisal	-	-	-	In response to the second Regulation 19 consultation. 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.	No change proposed.
BLP91c	Joe Wyatt	Norfolk County Council LLFA	Sustainability Appraisal	-	-	-	In response to the second Regulation 19 consultation. 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 - non technical. But we can change it.	Replace 'rain bursts' with 'intense rainfall events'.
BLP91d	Joe Wyatt	Norfolk County Council LLFA	Sustainability Appraisal	-	-	-	In response to the second Regulation 19 consultation. 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.
BLP92	Jonathan Greenway	Greenway Marine	Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	No	No	Not justified	<p>I strongly object to the land in Chedgrave belonging to Greenway Marine Ltd being designated in the new broads plan as Settlement Fringe for the following reasons.</p> <p>1,The land has for at least the last 50 years been used for light industrial purposes by our family with various planning permissions gained for mooring, lifting out of boats, storing boats shore and the repair and maintenance of boats with all the associated paraphernalia, chocking timber, hoists, tractors, vehicles, trailers and cradles.</p> <p>As I understand it settlement fringe in this instance is to stop urban development spreading into the countryside i.e. where urban meets countryside, in our case it's more a case of where light industrial meets urban as there are houses and their gardens all around the boatyard and on one side a boatyard with house. Only one short length of the boatyards boundary is adjacent to countryside but this is industrial fringe not settlement fringe. Boatyards desperately need protection this will not help in this instance.</p> <p>2,With the drastically reducing number of boats on the Broads due to the rapidly increasing costs of boat ownership boatyards are fighting over less and less customers so all boatyards futures are becoming more uncertain therefore diversification will be necessary for survival , This survival can only be hindered by the designation settlement fringe should planning permissions or change of use be sought.</p>	Land that has always been used for light industrial use cannot possibly fit the criteria for this designation and should be removed from the plan .	See Appendix G .	See Appendix G .
BLP93	Judy Clift, vice chair Somerton PC	Somerton parish Council	The whole plan	Yes	Yes	-	Somerton PC supports this plan, and does not seek any changes	Not seeking changes	Support noted.	No change proposed.
BLP94	Julie Reynolds	-	PUBSOM1: Somerleyton Marina Residential Moorings	No	No	Positively prepared	Due consideration has not been given to site access and road safety. You state that access to the site should provide adequate visibility splays (in line with DMRB standards) and access width should be adequate to allow two vehicles to pass and accommodate large service vehicles. The present access road will not meet this requirement. Furthermore the point where this current track meets The Street and Slugs Lane within the village (Map ref: TM 479970) has extremely poor visibility and is currently a danger point. More residential and service traffic at this point will exacerbate this situation. Due consideration has not been given to road safety issues.	Rejection of the application on road safety grounds.	<p>Suffolk County Council were asked for their views on this comment: In his response to the planning consultation, the highways officer has recommended that the surfacing of the existing access track is surfaced in a bound material for the first 5 metres from the highway and SCC feel that is appropriate for the proposal, that would increase the use of the existing access due to the additional moorings and parking provision.</p> <p>The existing access is located on the outside of a bend and there are footways (albeit narrow) on the side of the road where the access is located providing a reasonable level of visibility (estimated around 50 metres in both directions). Whilst visibility would not accord with current standards for a new access, the access is established and SCC understand has been in constant use without any record of injury accidents within the last 25 years.</p> <p>Subsequently, I do not feel that our highways response or the comments on the LP require amendment.</p>	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP95	Karen Walklin Smith	Walklin Cruisers	Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	Yes	No	Not justified, effective or consistent with National Policy	I have on several occasions looked at the extensive document Local Plan for the Broads, and have found this very difficult to understand, especially the maps. The document not being user friendly does not invite comment. If the classification of land is to change the land owner should be contacted directly/personally giving full and clear details of how the proposal will affect them and them alone. An arranged site visit prior to any decision being made is essential, no other form of assessing the land is sufficient. Aerial views are distorted and incomplete due to tree canopies. It has now been brought to my attention land in Chedgrave pertaining to the boatyards has been included. This is private commercial land, used for business, garden and residential purposes. For the purposes of planning this land already comes under the jurisdiction of the Broads Authority, another level of designation is not necessary. With reference to my earlier comments, I along with many other members of the public, do not find the form user friendly and have been unable to complete it. Therefore I insist my comments are considered by means of this email:- OBJECTION:- * The character of the land nominated does not meet with the character definition of what the policy is seeking to protect * Much of the area designated is already fully developed and there is no formal specific site justification for the site designation * The remaining undeveloped sections are already designated as Priority Habitat: Deciduous Woodland and Lowland Fen, which all lie within Flood Zones 2 and 3 * The proposed area is private land with the majority of trees being planted over the years by the landowners * The land is and has been for many years (over 60) been complete settlement and is therefore part of the settlement * The boatyards have always used the land for storage of boats, general storage, customer cars etc. which is essential to the operation of the business * Any land pertaining to or owned by the boatyards should most definitely not be included within the settlement fringe The boatyards are responsible for bringing in tourists to Chedgrave and Loddon, who support the local business and are therefore very important to the local economy. Any disruption to the operation of the boatyard business as a result of the proposal would have a wide spread knock on effect to the community. Thanking you for your attention and understanding.	The area should not be classed as Settlement Fringe.	See Appendix G.	See Appendix G.
BLP96	Kim Balls	Great Yarmouth Borough Council	Policy PUBSSA47: Road schemes on the Acle Straight (A47T)	Yes	Yes	-	This representation has been made at officer level. The Borough Council notes the provision of a Policy that would be used to assess proposals for changes to the Acle Straight. Realising the full dualling of the Acle Straight continues to be a key ambition of the Borough Council and is critical to the long-term health of industries and job growth in the borough, which are of importance to the wider and national economy. The Borough Council welcome the potential identification of a strategic cycling route between Acle and Great Yarmouth, as required to be considered by criterion '8' of the Policy.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP97	Kim Balls	Great Yarmouth Borough Council	Policy PUBSTRACKS: Former rail trackways	Yes	Yes	-	This representation has been made at officer level. The Borough Council supports the Policy for its potential to expand and integrate the networks of paths, cycleways, and bridleways which benefits residents and visitors. The policy would align with adopted Policy GSP7 of the Great Yarmouth Local Plan Part 2 (and emerging Policy SUT1 of the first Draft Local Plan) by seeking to use former rail trackways to provide a link between Bradwell, Belton and areas outside of the borough to the south-west.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP98	Kim Balls	Great Yarmouth Borough Council	Policy PUBTHU1: Tourism development at Hedera House, Thurne	Yes	Yes	-	The representation has been made at officer level. The Borough Council supports the allocation of the site for tourism uses and a proportionate amount of general market housing enabling development. The Borough Council recognises that the allocation may assist in supporting the small-scale range of services and facilities within Thurne (including the Local convenience store and public house.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP99	Kim Balls	Great Yarmouth Borough Council	Policy PUBORM1: Ormesby waterworks	Yes	Yes	-	This representation has been made at officer level. The Borough Council is in support of the protection of Ormesby Water treatment works from development which may adversely affect the proper functioning of the water works and its contribution to the landscape and visual amenity of the locality. The Ormesby waterworks provide much of the public water supply to the Great Yarmouth Borough, and the upgrading and maintenance of these works are important in supporting economic and population growth in the Borough.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP100	Kim Balls	Great Yarmouth Borough Council	Policy PUBGTY1: Marina Quays (Port of Yarmouth Marina)	Yes	Yes	-	This representation has been made at officer level. The Borough Council would support the re-use and enhancement of the space for river and other leisure activities where compatible with the flood risk of the site.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP101	Kim Balls	Great Yarmouth Borough Council	Policy PUBFLE1: Broadland Sports Club	Yes	Yes	-	The Borough Council is keen to support the continued use and potential improvement to Broadland Sports Club as a health and wellbeing facility that supports the area.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP102	Kim Balls	Great Yarmouth Borough Council	Policy PUBSP15: Residential development	Yes	Yes	-	The Borough Council recognises that the Broads Authority prepared an updated Local Housing Needs Assessment following publication of the latest NPPF in December 2024. It is noted that the study projects an overall need to 177 dwellings from the part of the Broads within the borough (8 per annum) which is included in the overall December 2024 standard method figure for the area. The Borough Council is supportive of the approach and method undertaken by the Broads Authority in deriving their housing need and the aim to meet the housing need identified for the Broads within the Broads Authority area where compatible with the protection of the Broad's landscape and special qualities in accordance with Agreement 12 of the Norfolk Strategic Planning Framework. The Borough Council recognises that the objectively assessed housing need from the part of the Broads within the Borough will likely need to be met in those parts of the borough outside of the Broads in accordance with Agreement 13 of the Norfolk Strategic Planning Framework (NSPF), and reiterated through the 2025 Statement of Common Ground between the Broads Authority and Great Yarmouth Borough Council. The emerging Great Yarmouth Local Plan makes no reliance upon the Broads Authority to deliver the element of the housing requirement within the Broads area of the borough. Criterion 4 sets out that the 5-year need for Gypsy and Traveller pitches for the Broads part of the Borough is 10 pitches. It is recognised that this need figure has been derived through the most up to date recent needs assessment in accordance with the 2024 PPTS. The supporting text of the Policy sets out that the 5-year need for 10 pitches in the Broads part of Great Yarmouth borough will be met through working with Great Yarmouth Borough Council. The Council is supportive of the Broads endeavour to meet its own assessed need for gypsies and travellers, which reflect the most recent (2025) Statement of Common Ground agreed between the Broads Authority and Great Yarmouth Borough Council. The Borough Council recognise that the future need for Gypsy and Traveller pitches arising from the Broads part of the Borough is likely to be met within the borough and both emerging Local Plan contains policies aimed at addressing this need, recognised through the 2025 Statement of Common Ground between the Broads Authority and Great Yarmouth Borough Council.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP103	Kim Balls	Great Yarmouth Borough Council	8.1 - 8.2	Yes	Yes	-	The following representation has been made at officer level. The Borough Council fully supports the ongoing work with the Broads Authority in relation to addressing cross-boundary planning matters and welcomes reference to the ways the Duty has been met with the Borough Council in Paragraph 8.2. The Council has no duty-to-cooperate concerns with the Local Plan. Cross—boundary matters continue to be positively addressed through the Norfolk Strategic Planning Framework (NSPF) and cooperation between the Borough Council and the Broads Authority to ensure needs are met across both authorities, specifically housing and gypsy and traveller needs, as most recently agreed through the 2025 Statement of Common Ground between Great Yarmouth Borough Council and the Broads Authority on strategic planning matters that are cross boundary.	Not seeking changes	Support noted and welcomed.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP104	Louise Oliver	Natural England	The whole plan	Yes	Yes	n/a	We consider that The Local Plan for the Broads: Review Plan Period 2021 to 2042 (Broads Authority, July 2025) is sound with regard to the aspects relevant to our natural environment remit. The plan is positively prepared as demonstrated by policies protecting the Broads National Landscape, conserving and protecting both statutory and non-statutory designated sites, habitats and species; and supporting green infrastructure and preventing fragmentation of habitats. The plan is justified, the evidence base appears to be robust as far as Natural England's remit is concerned, and alternatives have been taken into consideration throughout the plan stages. Natural England considers the policies within the plan are deliverable and flexible and therefore the plan should be effective, and the plan is consistent with national policy with regard to those within Natural England's remit. However, we have suggested some additional wording amendments which do not fundamentally alter our conclusions on the tests of soundness (additions in bold text and deletions crossed through).		Noted.	No change proposed.
BLP105	Louise Oliver	Natural England	Policy PUBSP1: Responding to the Climate Emergency	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP106	Louise Oliver	Natural England	Policy PUBDM4: Climate change adaptation and resilience checklist	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP107	Louise Oliver	Natural England	Policy PUBDM5: Water quality and foul drainage	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP108	Louise Oliver	Natural England	Policy PUBDM10 Open space on land, play space, sports fields and allotments	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP109	Louise Oliver	Natural England	Policy PUBDM11: Green and blue infrastructure and Public Rights of Way	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP110	Louise Oliver	Natural England	Policy PUBSP3: Soils	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP111	Louise Oliver	Natural England	Policy PUBDM12: Peat soils	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP112	Louise Oliver	Natural England	Policy PUBSP5: Biodiversity	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP113	Louise Oliver	Natural England	Policy PUBDM15: Natural Environment	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP114	Louise Oliver	Natural England	Policy PUBDM16: Biodiversity Net Gain	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP115	Louise Oliver	Natural England	Policy PUBDM17: Mitigating Recreational Impacts	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP116	Louise Oliver	Natural England	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP117	Louise Oliver	Natural England	Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP118	Louise Oliver	Natural England	Policy PUBSP6: Landscape character	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP119	Louise Oliver	Natural England	Policy PUBSP7: Tranquillity in the Broads	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP120	Louise Oliver	Natural England	Policy PUBDM28: Light pollution, dark skies and nocturnal character	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP121	Louise Oliver	Natural England	Policy PUBDM22: Development and landscape	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP122	Louise Oliver	Natural England	Policy PUBSP9: Recreational access around the Broads area	yes	yes	n/a	Natural England welcomes and strongly supports the following policies, which we consider are justified and evidenced:	Not seeking changes	Support noted.	No change proposed.
BLP123	Louise Oliver	Natural England	Policy PUBSP5: Biodiversity	yes	yes	n/a	We welcome the inclusion of the point which states that development 'will contribute to the delivery of the Local Nature Recovery Strategies (Norfolk and Suffolk) and the Broads Nature Recovery Strategy 2024-29 (or successor documents)'.	Not seeking changes	Support noted.	No change proposed.
BLP124	Louise Oliver	Natural England	Policy PUBDM15: Natural Environment	yes	yes	n/a	We welcome the inclusion of this policy. The term 'Local Nature Recovery Network' is not one that is used in the Norfolk and Suffolk Local Nature Recovery Strategies, and it might be misleading to use it in the policy.	'13. Where development is sited within or adjacent to <u>an area</u> the identified in the Local Nature Recovery Network Habitats Maps of the Local Nature Recovery Strategies as an 'Area that Could Become of Particular Importance for Biodiversity' and/or has a Potential Measure mapped to it, it will demonstrate how the proposal will <u>maintain and enhance the ability of the network</u> to restore and enhance habitats and provide <u>eco-system ecosystem</u> services in line with the Local Nature Recovery Strategy.'	In liaison with the Environment Advisor, we agree with the proposed changes.	13. Where development is sited within or adjacent to <u>an area</u> the identified in the Local Nature Recovery Network Habitats Maps of the Local Nature Recovery Strategies as an 'Area that Could Become of Particular Importance for Biodiversity' and/or has a Potential Measure mapped to it, it will demonstrate how the proposal will <u>maintain and enhance the ability of the network</u> to restore and enhance habitats and provide <u>eco-system ecosystem</u> services in line with the Local Nature Recovery Strategy.'

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP125	Louise Oliver	Natural England	Policy PUBDM15: Natural Environment	yes	yes	n/a	Protected sites and species - supporting text (page 113) We welcome the inclusion of the sentence 'In particular, proposals should take opportunities for the restoration and enhancement of the core opportunity areas for nature areas and priority habitats and species identified in the Local Nature Recovery Strategy and incorporate appropriate beneficial biodiversity conservation features'.	An alternative form of words that aligns more closely with the terminology used in the Local Nature Recovery Strategies would be: '.....the core opportunity areas for potential measures that will deliver the priorities for habitats and species identified in the Local Nature Recovery Strategy.....'.	In liaison with the Environment Advisor, we agree with the proposed changes.	In particular, proposals should take opportunities for the restoration and enhancement of the core opportunity areas for nature areas that will deliver the priorities for and priority habitats and species identified in the Local Nature Recovery Strategy and incorporate appropriate beneficial biodiversity conservation features'
BLP126	Louise Oliver	Natural England	Policy PUBDM15: Natural Environment	yes	yes	n/a	Protected sites and surveys - supporting text, 3rd paragraph (page 115) We welcome the reference to species that are prioritised in the Local Nature Recovery Strategies being included in surveys where relevant and being given particular regard in the context of their conservation objectives.	It would be advisable to specify whether this just refers to Key Species, Key Species and Flagship Species or to Key Species and all of the species included in habitat species assemblages (which include Flagship Species but also contain many more).	This needs to be inclusive so 'Key Species and all of the species included in habitat species assemblages. Also remove reference to Norfolk Biodiversity action Plan as it is no longer being maintained and could be out of date.	Species prioritised in the Norfolk Biodiversity Action Plan or in the Norfolk or Suffolk Local Nature Recovery Strategies, should be included in the surveys where relevant, even if not legally protected, and will be given particular regard in the context of their conservation objectives. This includes Key Species and all of the species included in habitat species assemblages.
BLP127	Louise Oliver	Natural England	Policy PUBDM15: Natural Environment	yes	yes	n/a	Wildlife Sites and Habitats, other than 'Habitats Sites' - supporting text (page 115) We welcome the requirement that development that may have a damaging or negative impact on a habitat prioritised by the Norfolk and Suffolk Local Nature Recovery Strategies must be accompanied by a suitable environmental assessment.	However, clarification is required, as the Local Nature Recovery Strategies 'prioritise' all habitats, with the prioritisation coming from targeting the best locations for their enlargement, creation or enhancement. An alternative form of wording that would reflect this would be (for the 5th bullet point): 'Development that may have a damaging or negative impact upon a... *site identified as a priority area within the Local Nature Recovery Strategy by being mapped as an 'Area that Could Become of Particular Importance for Biodiversity' and/or has a potential measure relating to the habitat mapped to it, ...must be accompanied by a suitable environmental assessment that...".	Agree.	*site identified as a priority area within the Local Nature Recovery Strategy by being mapped as an 'Area that Could Become of Particular Importance for Biodiversity' and/or has a potential measure relating to the habitat mapped to it, habitat prioritised by the Norfolk or Suffolk Local Nature Recovery Strategies
BLP128	Louise Oliver	Natural England	Policy PUBDM15: Natural Environment - supporting text	yes	yes	n/a	Local Nature Recovery Strategy - supporting text, 1st paragraph, last sentence (page 116) We welcome the reference to Local Nature Recovery Strategies, stating that planning applications 'will be required to address the requirement of the Local Nature Recovery Strategy.'	Not seeking changes	Support noted.	No change proposed as a result of this comment, although see comment BLP267.
BLP129	Louise Oliver	Natural England	Policy PUBDM16: Biodiversity Net Gain	yes	yes	n/a	Natural England welcomes the 20% minimum target in the policy, and the supporting justification (on page 119) for the target made in More than 10% Biodiversity Net Gain for the Local Plan for the Broads - Topic Paper (Broads Authority, February 2025). Section 6a). We welcome the policy that off-site delivery should prioritise contributing to nearby habitat recovery and creation strategies, with the Local Nature Recovery Strategy named as one of the strategies that could be contributed to. Delivery and Implementation of the policy – supporting text, 2nd paragraph (page 120) We welcome the reference to Local Nature Recovery Strategies, which states that 'A positive proportionate contribution should be made to the ecological network and priorities as outlined within the Local Nature Recovery Strategy and regional Nature Recovery Network'.	Not seeking changes	Support noted.	No change proposed.
BLP130	Louise Oliver	Natural England	Policy PUBDM17: Mitigating Recreational Impacts	yes	yes	n/a	We welcome this policy and are pleased to see the policy requirements to assess and address increased recreational disturbance on designated sites.	We advise that it is revised to strengthen it, provide better clarity, and to ensure that mitigation measures are agreed with the Broads Authority, acting as the competent authority, rather than with Natural England, as follows: 1. Any development which results in a net increase in residential development and / or overnight tourism accommodation will need to put in place adequate measures to avoid and mitigate potential adverse recreational impacts on the integrity of Habitats Sites which are identified within the following strategies and Zones of Influence (ZOI): a) Norfolk Recreational disturbance Avoidance and Mitigation Strategy (Norfolk RAMS) (and any successors) – covers the whole of Norfolk. b) Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (Suffolk RAMS) (and any successors) - 13 km ZOI around the relevant Habitats Sites in the Suffolk Coast area.	Agree.	'1. ... a) Norfolk Recreational disturbance Avoidance and Mitigation Strategy (Norfolk RAMS) Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (' Norfolk GIRAMS' for short) (and any successors) – covers the whole of Norfolk. b) Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (Suffolk RAMS) (and any successors) - 13 km ZOI around the relevant Habitats Sites in the Suffolk Coast area.
BLP131	Louise Oliver	Natural England	Policy PUBDM17: Mitigating Recreational Impacts	yes	yes	n/a	We welcome this policy and are pleased to see the policy requirements to assess and address increased recreational disturbance on designated sites.	We advise that it is revised to strengthen it, provide better clarity, and to ensure that mitigation measures are agreed with the Broads Authority, acting as the competent authority, rather than with Natural England, as follows: 2. Planning permission will be granted subject to demonstrating no adverse effect on the integrity of Habitats Sites from recreational disturbance when considered alone or in combination. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitats Regulations at application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the application will be refused unless it passes the tests set out in Regulation 62, and any necessary compensatory measures will need to be secured.	Agree.	2. Planning permission will be granted subject to demonstrating no adverse effect on the integrity of Habitats Sites from recreational disturbance when considered alone or in combination. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitats Regulations at application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the application will be refused unless it passes the tests set out in Regulation 62, and any necessary compensatory measures will need to be secured.
BLP132	Louise Oliver	Natural England	Policy PUBDM17: Mitigating Recreational Impacts	yes	yes	n/a	We welcome this policy and are pleased to see the policy requirements to assess and address increased recreational disturbance on designated sites.	We advise that it is revised to strengthen it, provide better clarity, and to ensure that mitigation measures are agreed with the Broads Authority, acting as the competent authority, rather than with Natural England, as follows: 3. Proposed adequate measures must be delivered prior to occupation of development, in perpetuity and agreed with Natural England the Broads Authority. This will include the payment of a contribution towards the cost of mitigation measures at the protected sites, in line with 1a) and 1b) above.	Agree. We note that Great Yarmouth Local Plan includes reference to paying the RAMS payment.	3. Proposed adequate measures must be delivered prior to occupation of development, in perpetuity and agreed with Natural England the Broads Authority. This will include the payment of a contribution towards the cost of mitigation measures at the protected sites, in line with 1a) and 1b) above.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP133	Louise Oliver	Natural England	Policy PUBDM17: Mitigating Recreational Impacts	yes	yes	n/a	We welcome this policy and are pleased to see the policy requirements to assess and address increased recreational disturbance on designated sites.	We advise that it is revised to strengthen it, provide better clarity, and to ensure that mitigation measures are agreed with the Broads Authority, acting as the competent authority, rather than with Natural England, as follows: 4. For development over 50 units, the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of residents as an alternative to visiting the habitats sites is required. <u>This will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace Standard</u> .* (*It may be more appropriate to refer to another standard specific to the Broads, or cross reference to another policy in the Local Plan). Follow up: As there is not a specific standard for the Broads Executive Area, then we recommend that Natural England's Green Infrastructure Standards are considered, which define what good GI 'looks like' and how to plan GI strategically to deliver multiple benefits for people and nature.	Agree.	For development over 50 units, the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of residents as an alternative to visiting the habitats sites is required. <u>This will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace Standard.</u>
BLP134	Louise Oliver	Natural England	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	yes	yes	n/a	We welcome the policy which identifies the need for mitigation measures, to address the nutrient impacts of nitrogen and phosphate from new development, within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site.	We recommend the policy wording is amended as follows (which would also ensure consistency with the nutrient neutrality policies in neighbouring authorities' adopted local plans): <u>'1. Within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site:</u> <u>* Any residential development proposal for that results in an increase in the level of overnight accommodation stays; and</u> <u>* any non-residential development that by virtue of its scale and type may draw people from outside the above catchments;</u> <u>* and/or may generate unusual quantities of surface water;</u> <u>* and/or, by virtue of the processes undertaken, may contain unusual pollutants within surface water run-off;</u> <u>which is located within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site, must provide evidence to enable the Authority to conclude through a Habitats Regulations Assessment that the proposal will not have an adverse effect increase nutrient loads, such that it will have likely significant effects on the integrity of sites. This can be demonstrated through nutrient neutrality.</u>	Agree.	<u>'1. Within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site:</u> <u>• Any residential development proposal for that results in an increase in the level of overnight accommodation stays; and</u> <u>• any non-residential development that by virtue of its scale and type may draw people from outside the above catchments;</u> <u>• and/or may generate unusual quantities of surface water;</u> <u>• and/or, by virtue of the processes undertaken, may contain unusual pollutants within surface water run-off;</u> <u>which is located within the catchments of the Broads Special Area of Conservation (SAC) and Broadland Ramsar site, must provide evidence to enable the Authority to conclude through a Habitats Regulations Assessment that the proposal will not have an adverse effect increase nutrient loads, such that it will have likely significant effects on the integrity of sites. This can be demonstrated through nutrient neutrality.</u>
BLP135	Louise Oliver	Natural England	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	yes	yes	n/a	We welcome the policy which identifies the need for mitigation measures, to address the nutrient impacts of nitrogen and phosphate from new development, within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site.	We recommend the policy wording is amended as follows (which would also ensure consistency with the nutrient neutrality policies in neighbouring authorities' adopted local plans): 2. Planning permission will be granted subject to demonstrating no adverse effects on the integrity of <u>the above named</u> habitats sites from nutrient enrichment when considered alone or in combination.	Agree.	2. Planning permission will be granted subject to demonstrating no adverse effects on the integrity of <u>the above named</u> habitats sites from nutrient enrichment when considered alone or in combination.
BLP136	Louise Oliver	Natural England	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	yes	yes	n/a	We welcome the policy which identifies the need for mitigation measures, to address the nutrient impacts of nitrogen and phosphate from new development, within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site.	We recommend the policy wording is amended as follows (which would also ensure consistency with the nutrient neutrality policies in neighbouring authorities' adopted local plans): 3. The Norfolk Nutrient Calculator <u>or the</u> Natural England Nutrient Calculator will need to be completed <u>for all qualifying development proposals</u> . If the calculator concludes an impact from nutrients, these impacts will need to be mitigated using appropriate mitigation, likely secured through a local or national mitigation scheme. The Authority <u>may will</u> use legal agreements to ensure this mitigation is secured and in place and will be delivered.'	Agree.	3. The Norfolk Nutrient Calculator <u>or the</u> Natural England Nutrient Calculator will need to be completed <u>for all qualifying development proposals</u> . If the calculator concludes an impact from nutrients, these impacts will need to be mitigated using appropriate mitigation, likely secured through a local or national mitigation scheme. The Authority <u>may will</u> use legal agreements to ensure this mitigation is secured and in place and will be delivered.'
BLP137	Louise Oliver	Natural England	Sustainability Appraisal	yes	yes	n/a	We are satisfied that the methodology and baseline information used to inform the appraisal appears to meet the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) and associated guidance. The environmental interest within our remit is covered within the Sustainability Appraisal (SA) objectives, and the SA appears to adequately assess the environmental, social and economic effects in accordance with legal and national policy requirements.	Not seeking changes	Support noted.	No change proposed.
BLP138	Louise Oliver	Natural England	HRA	yes	yes	n/a	Natural England is satisfied that Habitats Regulations Assessment (HRA) has identified and screened in the correct habitats sites. It provides a detailed and comprehensive assessment of the likely significant effects of the relevant Local Plan policies (see Table 4.1: Policies and allocations of the Local Plan screened into the HRA process (summarised from Appendix C), on pages 37-38), acting alone or in combination, on European sites and meets the requirements of the Conservation (Habitats & Species) Regulations 2017 (as amended). We agree with the conclusions reached in the Appropriate Assessments for air quality (see 5.4, page 42), water (see 6.3, page 48), and recreation and urbanisation (see 7.3, page 54), respectively. Although, we recommend that the suggested amendments to some wording in a few policies and supporting text, as described in the previous section above, is incorporated to ensure they are robust and clear.	Not seeking changes	Support noted.	No change proposed.
BLP139	Luke Wilkinson	RSPB	-	Yes	Yes	-	I am writing on behalf of the RSPB to provide our formal response to the Local Plan for the Broads review at this final stage in the consultation. We welcome the opportunity to comment and are supportive of the plan's overarching commitment to protect the unique biodiversity of the Broads. We do not object to any of the policies in the plan or the outcome of the Habitat Regulations Assessment, but we would like to offer the following observations and recommendations to help strengthen the ecological robustness of the Plan.	-	Background information noted.	No change proposed.
BLP140	Luke Wilkinson	RSPB	HRA and throughout Local Plan	Yes	Yes	-	We note that the term "likely significant adverse effects" is used in a number of places within the draft Broads Plan. This appears to combine the two tests of the Habitat Regulations i.e. is there a pathway by which a likely significant effect can occur and, if so, adverse effects on the integrity of protected sites then need to be avoided.	We recommend that the text within the plan be amended to simply state "adverse effects" in line with the Habitats Regulations tests.	In liaison with the HRA consultant, "Likely Significant Effects" relate to the screening stage of the HRA process (Stage 1). 'No adverse impacts / effects on site integrity' relate to the Appropriate Assessment process (Stage 2) and the final conclusions of the HRA. We agree that using the wording 'no adverse impacts / effects on site integrity' is fine to use throughout. The terminology that the RSPB is asking to be removed is the word 'likely significant' as this is screening specific.	Throughout, replace 'likely significant adverse effects' with 'no adverse impacts/effects on site integrity'.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP141	Luke Wilkinson	RSPB	PUBSP5: Biodiversity	Yes	Yes	-	We welcome the commitment to protect those species listed in Section 41 of the NERC Act from harmful impacts, as described in policy PUBSP5: Biodiversity. This is particularly true for breeding Lapwing and Redshank and the wet grassland habitats which support them. We support the recommendation that the ecological requirements of Section 41 species should be factored into Biodiversity Net Gain schemes where possible; the LNRS and other strategic plans for nature recovery in the Broads will help to identify those Section 41 species for which conservation is a local priority.	Irreplaceable habitats of the Broads, such as lowland fen, should also be recognised for their very high importance and afforded a level of protection commensurate with this if they fall outside of existing protected areas.	Noted. Irreplaceable habitats are protected through paragraph 193 part c of the NPPF.	No change proposed. But see comment BLP221.
BLP142	Luke Wilkinson	RSPB	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	Yes	Yes	-	We support the requirement for residential houseboat developments to demonstrate wastewater management that is protective of water quality. We note that nutrient neutrality policies do not apply to all allocations, despite the interconnected nature of the Broads wetland system. It will be important for the Broads Authority to consider how to oversee policing of this policy to ensure that wastewater is not simply discharged to waterbodies. Water quality targets are not being met in many areas and, whilst discharges from sources such as water recycling centres will have a bigger impact, any discharges to add to the nutrient burden of the Broads' waterbodies needs to be effectively managed. We accept that high level regulatory frameworks exist to combat the problem of nutrient enrichment, as indicated in the HRA, but the Broads Authority will need to be clear about the mechanism by which this issue will be addressed and the monitoring requirements to demonstrate policy effectiveness.	The Broads Authority will need to be clear about the mechanism by which this issue will be addressed and the monitoring requirements to demonstrate policy effectiveness.	Unless mitigation can be proven and secured, as per other LPAs in a similar situation, schemes will not be granted permission. If mitigation can be secured, this will be done through a legal agreement.	No change proposed.
BLP143	Luke Wilkinson	RSPB	Policy PUBBRU4: Brundall Marina	Yes	Yes	-	In the "risks and constraints" analysis for Policy PUBBRU4: Brundall Marina, the nearby Yare Broads and Marshes SSSI is listed as a constraint, but no reference is made to the Broadland SPA.	Refer to Broadland SPA	Agree.	Refer to Broadland SPA.
BLP144	Luke Wilkinson	RSPB	Policy PUBTHU1: Tourism development at Hedera House, Thurne	Yes	Yes	-	In addition, Policy PUBTHU1: Tourism (development at Hedera House, Thurne) states that "proposals must ensure no adverse effects on the conservation objectives and qualifying features of the nearby SSSI". Again, there is no mention of the Broadland SPA, despite the reference to adverse effects.	We recommend that the wording is changed to something like the following: "Proposals must ensure no adverse effects on the conservation objectives and qualifying features of the nearby Broadland SPA and associated SSSI."	Agree.	"Proposals must ensure no adverse effects on the conservation objectives and qualifying features of the nearby Broadland SPA and associated SSSI."
BLP145	Luke Wilkinson	RSPB	Policy PUBDM17: Mitigating Recreational Impacts	Yes	Yes	-	Careful consideration should be given to the potential for access improvements and residential/tourism-based developments to increase harmful disturbance of species within protected sites. Harmful disturbance pathways should be avoided in the first instance. This is recognised in the plan. Proposals which include additional launch sites for light craft such as paddle boards should be examined with some caution because there is potential for users of such craft to access water courses and habitats that have historically experienced much lower levels of disturbance. Codes of conduct alone may not be sufficient to control this. We recognise the need to balance this consideration against the requirement for improved access, low impact tourism and equal opportunities for people to enjoy the countryside, but this must be in keeping with the sensitivities of the Broads' habitats and species.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP146	Luke Wilkinson	RSPB	Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development	Yes	Yes	-	We are supportive of the policy around trees but would recommend additional emphasis on a "right tree in the right place" narrative in the reasoned justification. The retention of existing trees and planting of new trees may be appropriate around settlements and beyond the floodplain, but deliberate planting schemes driven by carbon capture and woodland biodiversity initiatives should generally be avoided on fen, wet grassland and reedbed habitats. Management of these habitats often involves the removal of naturally seeded scrub/trees to prevent succession to woodland and discourage drier conditions, to preserve the open, wet conditions favoured by several species closely associated with the Broads. Trees can also provide cover, breeding and roosting opportunities for predators that can have a significant impact on ground nesting birds of open habitats. This will be particularly important adjacent to and within protected areas, for the reasons outlined above.	A more detailed rationalisation of this in the reasoned justification section of Policy PUBDM19 will help to explain exactly why tree planting and the retention of existing trees is not always appropriate from a habitats and species perspective. This concern does not apply to existing protected areas of wet woodland/carr, which are an important component of the wetland mosaic. Recommend additional emphasis on a "right tree in the right place" narrative in the reasoned justification.	Noted. It is important to note that the policy does only relate to development and not to routine management. Agree to some extent.	Add to supporting text: <u>Planting the right species in the right place creates a positive impact. "Right tree in the right place" is a principle for planting trees to maximise benefits like carbon sequestration, biodiversity, and soil health, while minimising negative impacts by considering the species' needs and the site's conditions. More information on the right tree in the right place can be found here: https://www.woodlandtrust.org.uk/plant-trees/advice/where/.</u> Amend supporting text as follows: Due to the impacts on navigation and the open character of some parts of the Broads landscape, and the priority habitats of grazing marsh and fen and the unique peatland-based ecosystem of fen and the requirements of breeding and wintering birds of the marshes, <u>tree retention and tree planting will not always be appropriate.</u>
BLP147	Luke Wilkinson	RSPB	Policy PUBDM12: Peat soils	Yes	Yes	-	We support the preservation of peat soils and the elements of Policy PUBDM12 which will help to protect the integrity of peat and reduce carbon emissions. Projects which seek to re-wet peat and foster peat building conditions are to be commended. It is important to recognise that much of the nature restoration/enhancement work carried out on fen, reedbed, and wet grassland habitats which involves the removal of some spoil will often have a principal target of increasing surface "wetness". This includes the creation of scrapes and foot drains, and the lowering of reedbed compartments. Such works may also facilitate the transport of water around a site. As such, there exists a somewhat paradoxical situation where the redistribution of some peat within a site might facilitate an uplift in the condition of neighbouring peat.	For such projects, consideration of point 3 in Policy PUBDM12 should be pragmatic and have considerable regard for the overall benefits of the project, from a hydrology (and thus peat) perspective as well as a biodiversity perspective. The degree to which wetlands managed for nature conservation are generally protective of peat might also be considered.	Noted. Part 4 of the policy covers the comments already.	No change proposed.
BLP148	Luke Wilkinson	RSPB	Policy PUBSP3: Soils	Yes	Yes	-	Often, nature conservation works on wet grassland/grazing marsh habitats which involve the redistribution of spoil have a principal aim of increasing surface "wetness". This applies to the creation of scrapes and foot drains. Such enhancements may also facilitate the transport of water around a site. As such, the localised redistribution of some clay soil within a grade 3 site can lead to a very significant uplift in habitat quality, which is of fundamental importance in the recovery of breeding Lapwing and Redshank populations (both Section 41 species which appear in the region's LNRS). Works of this nature may also be necessary for landowners to meet the requirements of their agri-environment schemes. They may also help to store flood waters and increase resilience to climate change.	We support the general principals of Policy PUBSP3 but recommend that a distinction is made between typical development and ecological enhancement works that facilitate nature recovery.	Agree.	Add a new part 4: <u>Development that seeks to enhance biodiversity but may affect soils will still need to address criteria a) to g) and that the biodiversity benefit will outweigh impact on soils.</u>
BLP149	Luke Wilkinson	RSPB	Policy PUBDM16: Biodiversity Net Gain	Yes	Yes	-	We support the 20% BNG target and the emphasis on coherent ecological networks. With regards off-site delivery, we support the view that BNG should contribute to approved strategies for nature recovery in the Broads, focussing on priority habitats and species and adhering to the Lawton principles.	We would welcome some more clarity on the policy for not using the best and most versatile agricultural land for BNG, especially where such land could significantly enhance habitat connectivity. This part of the policy does not appear to have any accompanying comments in the reasoned justification. Some additional detail on how this relates to nature recovery strategies and some consideration of whether there can be any capacity for departure from this stance (for example where an area of good agricultural land interrupts habitat connectivity and the landowner wishes to repurpose the land for nature conservation) would be welcomed. However, we do note that much of the grade 3 agricultural land shown on page 91 appears to be broadly synonymous with grazing marsh, which already carries high potential for nature restoration when managed in a way that is conducive to that purpose.	Agree to some extent.	Amend part 8: Biodiversity gain sites need to <u>avoid the best and most versatile agricultural land thoroughly justify using BMV land and show why land of other soil grades cannot be used.</u>
BLP150	Luke Wilkinson	RSPB	Policy PUBDM15: Natural Environment	Yes	Yes	-	We support the inclusion of Swift bricks and other wildlife-friendly features in new developments. The Utilities Site presents a significant opportunity to support Swift populations in Norwich, and we encourage the incorporation of best-practice guidance from the RSPB and Swift conservation groups.	Not seeking changes	Support noted and welcomed.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP151	Mark Behrendt	Home Builders Federation	Policy PUBDM57: Fibre to the Premises (FTTP)	Yes	No	Not consistent with national policy	Firstly, it is not for the developer to ensure that there is FTTP available for the development. This is for the provider of those services to schedule and deliver and development should not be delayed where this is not available. With regard to connections within the development the Council are no doubt aware of the new part R of the Building Regulations: Physical Infrastructure and network connections to new dwellings was published in 2022. These improved regulations require all new build dwellings to be installed with the gigabit-ready physical infrastructure connections subject to a cost cap of £2,000 per dwelling. As such it is unnecessary for the Council to include DM57 in the local plan and it should be deleted.	Delete policy	We note that a similar model, that was included in North Norfolk District Council, has been amended for this reason. We will liaise with the Inspector on this issue.	Potentially amend policy as per North Norfolk Local Plan.
BLP152	Mark Behrendt	Home Builders Federation	Policy PUBDM43: Affordable housing	Yes	No	Not justified	This policy requires new development to meet the requirements for affordable housing policy as set out in the local plan for the relevant district – between 25% and 33%. However, it is notable that the viability assessment on the local plan notes at paragraph 5.11 that 33% affordable housing was only viable for older people's accommodation to provide at waterfront locations. No evidence is provided as to what an appropriate level of affordable housing might be in such locations for this typology and as such HBF would recommend that specialist housing for older people on non waterfront locations is not required to make a contribution for affordable housing. This could be set out in DM43 or DM48.	This could be set out in DM43 or DM48.	Fundamentally, the affordable housing defers to/has regard to the policies of the relevant district council. That would therefore involve their approach to seeking affordable housing on elderly schemes, if indeed they do. The affordable housing policy already refers to what to do if viability is an issue.	Add the following to the following policies: PUBDM43 reasoned justification: <u>Older person's housing</u> <u>The affordable housing policy also applies to schemes for older person's housing. The standards of our districts will be used. Any schemes that are considered not viable will need to meet the policy requirements set out in the policy (mainly section 5 of the policy).</u> Policy PUBDM48: Elderly and specialist needs housing Under delivery and implementation... <u>Some types of accommodation that fall under this policy maybe required to provide affordable housing. The standards of our districts will be used. Any schemes that are considered not viable will need to meet the policy requirements set out in the policy (mainly section 5 of PUBDM43).</u>
BLP153	Mark Behrendt	Home Builders Federation	Policy PUBSP15: Residential development	Yes	Yes	Not justified	The housing requirement of 1,077 homes over the plan period 2021 to 2042 has been calculated using a different methodology to that required by national policy for areas outside of the Broads Authority and other national parks. HBF recognise that the BA can use an alternative locally derived method as set out in paragraph 2a-014 of PPG. However, it also states that in taking these considerations such authorities must take into account the best available evidence on housing stock as well as local house prices, earnings and housing affordability. Given the latest standard method is a stock based approach housing needs HBF would have expected some consideration given to the housing stock in Broads Authority and whether the proposed requirement provides a sufficient boost to housing supply.	Missed consultation	We commissioned ORS to check our initial housing needs assessment following the change to using housing stock. They did this (https://www.broads-authority.gov.uk/_data/assets/pdf_file/0020/152471/Local-Housing-Needs-Assessment-Addendum-March-2025.pdf) and that is why the need is now 1,077 dwellings.	No change proposed.
BLP154	Mark Behrendt	Home Builders Federation	Policy PUBDM20: Energy demand and performance of new buildings (including extensions)	Yes	No	Not justified	HBF recognises that the Planning and Energy Act 2008 allows local authorities to set policies in their local plans that require development to achieve higher standards than those set out in building regulations. However, it must be noted that written ministerial statement (WMS) on local energy efficiency standards published on the 13th of December 2023 states that "Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes" and that local standards can "add further costs to building new homes by adding complexity and undermining economies of scale". After noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures: "That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). Given that the FHS will be introduced in the very near future and will require all new homes to be Zero carbon ready HBF do not consider it necessary for policies to be included in local plans that go beyond current standards. The Council state that there is no guarantee that this will be implemented however Ministers have confirmed that the Future Homes Standard will be published this autumn (https://www.gov.uk/government/news/rooftop-solar-for-new-builds-to-save-people-money). However, we recognise the concern created by the delay and as such recommend that the 10% improvement in energy be applied to those homes built under part L of the 2021 building regulations to allow improvement in energy efficiency ahead of the introduction of the FHS.	See above	The Local Plan does not go beyond current building regulations in terms of energy use. It encourages better energy efficiency and uses the 'Merton Rule' and encourages Passivhaus.	No change proposed.
BLP155a	Mark Behrendt	Home Builders Federation	Policy PUBDM16: Biodiversity Net Gain	Yes	No	Not justified	Part 1a of this policy states it will seek to secure nature recovery and biodiversity net gain by "Applying the principles related to the biodiversity hierarchy, Sites of Special Scientific Interests (SSSI) and irreplaceable habitats set out in national planning policy. In Castle Point, ancient woodlands are considered to constitute irreplaceable habitats". HBF are concerned that in putting consideration of the biodiversity hierarchy alongside the consideration of irreplaceable habitats the will create confusion in the application of this policy. The delivery of BNG is a separate and different consideration to those related to protected species and habitats and should be kept separate within policies. HBF would therefore recommend that mention of the biodiversity hierarchy is removed from part 1a. HBF does not consider the requirement in 2d for development on greenfield sites to deliver 20% BNG to be sound. Guidance in paragraph 74-006-20240214 of PPG states that: "... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented". As such the starting point is that local plan should not seek a higher requirement. This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified, and the HBF would argue that it should be considered a high bar with regard to the evidence required to justify such a policy. There must be very robust evidence that the area is significantly worse than the country as whole with regard to the negative impacts on biodiversity from development. The HBF does not disagree with the broad thrust that the UK has seen a significant loss in biodiversity not just in recent past but previous centuries and as such recognise the importance of ensuring that the outcome of new development in future is that there is a net gain in biodiversity.	The requirement to provide a 20% increase in BNG should be reduced to the statutory minimum of 10%	It is understood that costs of providing BNG (10% or 20%) will vary on a site-by-site basis depending on the size and type of land being developed and the ability of the developer to achieve Bio Units on site and the need, if at all, to purchase off site credits. It is also noted that requiring 20% BNG does not equal a doubling of Bio Unit required. For example - on a site with and existing 5 BU, a 10% gain requires 5.5 BU to be provided and, with 20%, 6 BU i.e. meeting a 20% BNG does not require double the provision of 10% BNG. Costs used in the Viability Assessment (LPVA) were derived from the Government's 2019 Impact Assessment which provides costs per dwelling for a 10% BNG. To arrive at the costs for a 20% BNG, an additional 19% has been included on the amounts per unit shown in the Impact Assessment (IA) at Tables 16 and 17 (using the regionally based Central Estimate). 19% is the figure taken from para 6.11.2 of the Impact Assessment. The IA is clear that "...we would expect to see most of the monetisable costs (and benefits) to developers passed through to the price of land that has planning permission.....in the case of additional development costs, this will revise down the result of a residual land value calculation: there will be a dampening effect on the uplift to the price of land following planning permission. Therefore, we anticipate that developers or house buyers should not bear the cost of biodiversity measures if they are mandatory and apply uniformly to all developers for a given piece of land". The reference in the IA to costs being passed through to land prices is supported by the Viability PPG (Reference ID: 10-012-20240214) which states that "the total cost of all relevant policy requirements including ... biodiversity net gain (as required by Schedule 7A of the Town and Country Planning Act) ... should be taken into account when defining benchmark land value".	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP155b	Mark Behrendt	Home Builders Federation	Policy PUBDM16: Biodiversity Net Gain	Yes	No	Not justified	However, it is important to recognise that in recent years new residential development has not been the driver of declining biodiversity either locally or nationally and in particular over the last 50 years. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), as being "Intensive management of agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species' population change in the UK". Therefore, whilst it is important for development to ensure that it improves the natural environment, it is not the main driver of biodiversity decline in across the Broads or Norfolk in general. The Broads Authority is seeking to require new development to offset the impacts of biodiversity created by the practices of other industries. This is unsound and inconsistent with paragraph 58 of the NPPF and the tests as to when a planning obligation can be sought. Given that 10% net gain is considered by Government as to what is required to address the harm to biodiversity arising from that development there can be no justification for requiring a developer to go beyond that. HBF have concerns that for some schemes the cost of BNG is being underestimated. The difficult with assessments as to the cost of meeting BNG is that every site is different and until the baseline level of biodiversity is known the cost of meeting either 10% or 20% is not known. Therefore, if it is considered to be sound to place this burden on developers there must be scope for this to be reduced where it is a barrier to delivery. HBF therefore suggests that this policy is amended to state that where a development is made unviable by the cost of meeting the 20% BNG requirement, on its own or in combination with other costs, this will be reduced to the statutory minimum.	The requirement to provide a 20% increase in BNG should be reduced to the statutory minimum of 10%	The commentator draws attention to the cost of BU published by the government in 2023. As the Government notes, "Statutory credit prices are not guideline prices for off-site biodiversity units". In summary - the Viability Assessment has used the most up to date guidance about average costs for providing off site BU where these are necessary, and it would be expected that any costs in excess of these would be passed on through the benchmark land values. Furthermore, the testing has demonstrated good general viability across the typologies tested with further 'headroom' to allow for any extra costs if these are incurred e.g. as shown in tables 5.1, 5.4 and 5.5 of the Viability Assessment. It is considered that the LPVA provides evidence that a 20% BNG requirement would not undermine the viability of the plan.	No change proposed.
BLP156	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM25: Utilities infrastructure development	Yes	No	Not justified, effective or consistent with National Policy	Policy PUBDM25: Utilities infrastructure development states at point 1 that: "Proposals for utilities infrastructure and associated development will only be permitted where: a) The proposal has an essential role in the provision of a regional and national network". The requirement within this policy for any utilities infrastructure proposal to play an essential role in the provision of a regional or national network is deemed somewhat restrictive. Paragraph 77 of the NPPF (December 2024; as amended February 2025) sets out that the supply of new homes needs to be supported by necessary infrastructure. There is no requirement within national policy for utilities infrastructure to be delivered as part of a wider network, and indeed, many of Essex & Suffolk Water's essential capital projects are not delivered as part of wider regional or national networks. However, these projects are essential to ensuring the provision and maintenance of a consistent water supply to homes across the county. It is therefore important that local policy continues to support the provision of much-needed utilities infrastructure, in line with national policy, and should therefore avoid restrictive wording.	It is proposed that Policy PUBDM25: Utilities infrastructure development be amended to remove reference to regional and national networks.	Agree.	a) The need for the infrastructure being located in the Broads is fully justified and there are no suitable alternative locations outside the Broads protected landscape. The proposal has an essential role in the provision of a regional and national network
BLP157	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM7: Water efficiency and re-use	Yes	No	Not effective	It is recognised that the Broads Local Plan is at an advanced stage in its preparation and includes the higher optional standards for water efficiency in areas of serious water stress (110 l/p/d). However, it is considered that Policy PUBDM7 is not effective as it does not impose tighter water efficiency standards than Building Regulations and therefore does not encourage sustainable growth. Essex & Suffolk Water would like to work with The Broads Authority both within this plan's timeframe and in a future iteration of their Local Plan, to introduce tighter water efficiency standards that can help make development in The Broads more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives. The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. The Shared Standards recommend that LPAs include Local Plan Policies that: <ul style="list-style-type: none"> Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible. Require new, extended or redeveloped non-domestic1 development to aim to achieve full credits in the BREEAM water calculator. Require new major non-domestic developments to include water saving measures and water reuse in their design. 	It is considered that a modification to Policy PUBDM7 can help make development in The Broads more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed and implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives. It is recommended that Policy PUBDM7 is modified to reflect the recommendations in the Shared Standards. Whilst the overall level of development in The Broads is low, it is considered the evidence set out in the Shared Standards is clear that tighter water efficiency standards are necessary for sustainable growth and nature recovery, which supports the National Park purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks, and the long term vision and fundamental principles for the Broads National Park in the Broads Plan 2022-2027.	See response to detailed comments below.	See response to detailed comments below.
BLP158	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM7: Water efficiency and re-use	Yes	No	Not effective	These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. Tighter water efficiency standards that can be justified by evidence are set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that: <ul style="list-style-type: none"> The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations (i.e. there are non-domestic water restrictions in both Anglian Water and Essex & Suffolk Water areas which are referenced in the supporting text to Policy PUBDM7). Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. The Norwich and the Broads water resource zone (WRZ) is identified as one of the WRZs with deterioration risk as a result of abstraction pressures. At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs. These incentives can support the viability of delivering water efficiency measures. 	1. All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to 110-90 litres per head per day of mains supplied potable water, or any tighter water efficiency higher standard subsequently established nationally through Building Regulations Part G or locally. Measures to reduce water demand further will be encouraged and supported.	Comment noted. Prior to the publication of the REG19 version of the Local Plan, working with Anglian Water, Environment Agency and Essex & Suffolk Water, on receiving the 'Shared Standards', the Authority tried to amend the draft policy to 90l/h/d. Following research, it was found that there was no guaranteed way of checking the delivery of this policy. This is beyond the optional building regulations and so it would not be checked by building regulations. As such, it was agreed to not include the standard but if the organisations above wished to raise it as part of their response to the Local Plan, it could be considered through the Examination. We also note that there is a consultation out relating to the building regulations: https://consult.defra.gov.uk/water-efficiency-demand/review-of-water-efficiency-standards/ . This public consultation includes an option to revise the minimum Water Efficiency Standard in new houses through fittings from 125 l/p/d to 105 l/p/d, and the optional technical standard from 110 l/p/d to 100 l/p/d. Does the organisation still want to pursue 90l/h/d?	The Authority would be content in amending the use to 90l/h/d, but as stated in the response, delivery cannot be monitored or guaranteed. Accept the other proposed changes or similar as proposed by other organisations.
BLP159	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM7: Water efficiency and re-use	Yes	No	Not effective	See related detailed comment.	3. Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to include be-water efficient fittings.	Agree.	Amend policy as per comment.
BLP160	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM7: Water efficiency and re-use	Yes	No	Not effective	See related detailed comment.	4. All new/replacement/converted non-domestic buildings are required to be designed to be water efficient and should aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) under the BREEAM standard, with a minimum score of 3 credits within WAT01 Water Consumption.	Agree to some extent. Water standard of BREEAM cannot be used in isolation. As such, we have introduced a BREEAM standard (see policy Policy PUBDM55: Non-residential development and BREEAM) which refers to a requirement to meet credits in WAT01 and other WAT calculators. So to include reference to that would be repeating another policy. The wording as included is aimed at all non-domestic buildings, including those that are below the 250sqm threshold.	Clarify part 4 and cross refer to DM55. Then in supporting text, explain the criterion better and cross refer to DM55.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP161	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM16: Biodiversity Net Gain	Yes	No	Not justified or effective.	Point 5 of Policy PUBDM16: Biodiversity Net Gain states (underline added by Savills for emphasis): <u>"The Biodiversity Net Gain will be provided on site with habitats functionally linked to the wider habitat network creating coherent ecological networks".</u> It is considered unreasonable that the Local Planning Authority require Biodiversity Net Gain to always be delivered on site. On Essex & Suffolk Water's capital projects, it is not always appropriate to provide Biodiversity Net Gain on site due to the nature of their projects whereby land is not always acquired to deliver essential infrastructure projects. As per Schedule 14 Part 1 Section 90A of the Town and Country Planning Act 1990, Biodiversity Net Gain can be achieved on-site, off-site, or via buying statutory biodiversity credits, and is therefore not restricted purely to on-site delivery. Flexibility within local policy is therefore required, and is not currently provided.	Current Policy PUBDM16: Biodiversity Net Gain point 5 reads: "The Biodiversity Net Gain will be provided on site with habitats functionally linked to the wider habitat network creating coherent ecological networks". Policy PUBDM16 should be updated to read: <u>"The Biodiversity Net Gain will be provided on site where possible, with habitats functionally linked to the wider habitat network creating coherent ecological networks. Off-site provision or purchase of credits is also acceptable".</u> This wording change would enable flexibility that still encourages the delivery of on-site Biodiversity Net Gain wherever possible, whilst ensuring that local policy is able to support and accommodate those schemes where on-site delivery is not possible due to the nature of the project, such as Essex & Suffolk Water's capital infrastructure projects. It is also important to highlight that many of Essex & Suffolk Water's schemes are delivered on operational land or on 3rd party land, and it will not always be appropriate or feasible to deliver Biodiversity Net Gain on operational land or land owned by 3rd parties. Ensuring flexibility within local policy will therefore enable the continued delivery and maintenance of essential infrastructure projects.	The policy needs to be read as a whole. Part 6 then covers the proposed amendments.	Combine points 5 and 6.
BLP162	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM15: Natural Environment	Yes	No	Not justified or effective.	Policy PUBDM15: Natural Environment refers to the protection of biodiversity and enhancement of natural habitats. As mentioned in response to Policy PUBSP5: Biodiversity and Policy PUBSP16: Biodiversity Net Gain, on Essex & Suffolk Water's capital projects, it is not always appropriate to provide Biodiversity Net Gain on site due to the nature of their projects. Flexibility within local policy is therefore required, and is not currently provided. Please see response to Policy PUBSP16 for more detailed comments. Point 8 of Policy PUBDM15 also states that (underline added by Savills for emphasis): "Development that would have an adverse impact on a Local Nature Reserve, County Wildlife Site, a section 41 priority habitat identified under the Natural Environment and Rural Communities (NERC) Act 2006, or a local site of geodiversity, including peat soils, <u>will only be permitted in exceptional circumstances</u> , having regard to the international, national, regional and local importance of the site in terms of its contribution to biodiversity, scientific and educational interest, geodiversity, visual amenity and recreational value". It is unclear from the wording of Policy PUBDM15 how the Council defines 'exceptional circumstances'. Whilst Essex & Suffolk Water's capital projects will have regard to Local Nature Reserves, County Wildlife Sites, priority habitats or local sites of geology wherever possible, there may be situations whereby some impact is unavoidable due to the necessity of essential infrastructure delivery. Greater clarity is therefore sought regarding the definition of 'exceptional circumstances', and the delivery of essential infrastructure projects should be considered 'exceptional circumstances'.	Any policy wording relating to the delivery of Biodiversity Net Gain should be updated to provide greater flexibility to reflect that it is not always possible to achieve on-site Biodiversity Net Gain in every instance. Local policy should therefore state that on-site Biodiversity Net Gain should be provided wherever possible. On behalf of Essex & Suffolk Water, Savills (UK) Ltd also encourages the Council to define 'exceptional circumstances'. The provision of essential infrastructure should be considered an 'exceptional circumstance'.	We are not sure of the relevance of BNG to this comment. The BNG comment from Savills E&S Water is covered elsewhere. Turning to the comment on exceptional circumstances, the NPPF, at footnote 70, talks about this.	No change proposed.
BLP163	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBSP5: Biodiversity	Yes	No	Not justified or effective.	Policy PUBSP5: Biodiversity is not considered to be justified or effective in relation to the development of essential water infrastructure. Part 2 c) of Policy PUBSP5: Biodiversity reads as follows (underline added by Savills for emphasis): " <u>Development will provide biodiversity net gains in line with local and / or national policy and / or through providing biodiversity enhancements</u> (particularly where net gain is not required), paying attention to habitats and species including the Broads core habitat within wider ecological networks and habitat corridors, especially linking fragmented habitats". Policy PUBDM16: Biodiversity Net Gain relates specifically to the delivery of Biodiversity Net Gain. As detailed in the response to Policy PUBDM16, on Essex & Suffolk Water's capital projects, it is not always appropriate to provide Biodiversity Net Gain on site due to the nature of their projects. Essex & Suffolk Water has a number of operational sites that are relatively small and the provision of biodiversity on such sites is not practical, particularly where further development might be necessary in the future. Essex & Suffolk Water also installs infrastructure on third party land and does not have the power to require those land owners to allow BNG to be delivered on that land. Provision of biodiversity enhancements off-site can be acceptable in certain circumstances. Flexibility within local policy is therefore required, and is not currently provided. Please see response to Policy PUBDM16 for more detailed comments.	Any policy wording relating to the delivery of Biodiversity Net Gain should be updated to provide greater flexibility to reflect that it is not always possible to achieve on-site Biodiversity Net Gain in every instance. Local policy should therefore state that on-site Biodiversity Net Gain should be provided where possible.	This comment relates to PUBDM16 and not PUBSP5. See response to comment on PUBDM16.	No change proposed.
BLP164	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBORM1: Ormesby waterworks	Yes	No	Not justified or effective.	Point 2 of Policy PUBORM1: Ormesby waterworks states (underline added by Savills for emphasis): "Development <u>reasonably required</u> for the operation of the water treatment works, and the operator's statutory duties as a water supply undertaker, will be supported where: a) it is <u>designed to make a positive contribution</u> to the local landscape or to minimise any negative visual impact, particularly when viewed from Ormesby, Ormesby Little, and Rollesby Broads; b) the tree coverage of the site, which makes an important contribution to the character and appearance of the area, <u>is retained and also protected during construction works</u> ; c) it reduces and does not cause light pollution; d) it is appropriate considering the flood risk to the site; and e) it has no adverse effect on the adjacent Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI)". It is considered that the phraseology 'reasonably required' is unhelpful with regard to the operation of the Ormesby waterworks. Development is either required or not required for the continued effective operation of the water treatment works to ensure the provision and maintenance of a consistent water supply to homes across the area. The wording 'reasonably' is therefore deemed ambiguous and unnecessary. Further, in relation to point 2. a), whilst Essex & Suffolk Water will always endeavour to minimise negative visual and landscape impacts, it will not always be possible to make a positive contribution due to the nature of their capital projects premised on the delivery of much-needed essential water infrastructure. The requirement at point 2. b) for tree coverage to be retained and protected during construction works is also considered somewhat restrictive in relation to the delivery of essential infrastructure projects. Essex & Suffolk Water has a number of operational sites with considerable tree coverage. Whilst trees will be retained wherever practicable, it must be recognised that this will not always be possible, and a degree of flexibility within policy is therefore required. Paragraph 190 of the NPPF does not contain a blanket restriction on tree removal but rather that any applications should include an assessment of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	it is proposed that Policy PUBORM1, point 2 reads as follows: "Development <u>reasonably required</u> for the operation of the water treatment works, and the operator's statutory duties as a water supply undertaker, will be supported where..." This wording change would enable the continued effective operation of the water treatment works, and avoids any ambiguity regarding whether development is required or not required.	Agree with removing 'reasonably'.	"Development <u>reasonably</u> required for the operation of the water treatment works, and the operator's statutory duties as a water supply undertaker, will be supported where..."
BLP165	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBORM1: Ormesby waterworks	Yes	No	Not justified or effective.	See related detailed comment.	To enable flexibility for the delivery of essential water infrastructure, it is also requested that point 2. a) be amended from: "it is designed to make a positive contribution to the local landscape or to minimise any negative visual impact, particularly when viewed from Ormesby, Ormesby Little, and Rollesby Broads" To: <u>"It is designed to make a positive contribution to avoid detrimental impact on the character and quality of the local landscape or to minimise any negative visual impact, particularly when viewed from Ormesby, Ormesby Little, and Rollesby Broads".</u>	Agree.	1. Ormesby water treatment works will be protected from development which adversely affects the proper functioning of the waterworks and its contribution to the landscape and visual amenity of the locality. 2a) it is designed to <u>make a positive contribution to avoid detrimental impact on the character and quality of the local landscape or to minimise any negative visual impact, particularly when viewed from Ormesby, Ormesby Little, and Rollesby Broads.</u>

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP166	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBORM1: Ormesby waterworks	Yes	No	Not justified or effective.	See related detailed comment.	Similarly, it is requested that point 2. b) be amended from: "the tree coverage of the site, which makes an important contribution to the character and appearance of the area, is retained and also protected during construction works" To: "the tree coverage of the site, which makes an important contribution to the character and appearance of the area, is retained and also protected wherever possible and also protected during construction works to avoid unnecessary loss".	Disagree. Having discussed this proposed change with the Authority's Tree Consultant who is familiar with the site. Given the importance of the tree coverage with their proximity to the Broad, we will retain the existing wording as the proposed rewording does suggest that tree protection would become subservient to development	No change proposed.
BLP167	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM39: Bank stabilisation	Yes	No	Not justified or effective.	Policy PUBDM39: Bank stabilisation refers to the piling of banks and sets out specifically at point 3. b) that: "Piling of banks will only be permitted where it takes account of criteria 1(a) to (i) and where piling / quay heading is part of the character of the area". Given the nature of Essex & Suffolk Water's capital projects and in particular pipeline schemes and associated infrastructure, piling may be required for the delivery of essential infrastructure on a regular basis. Our client cannot, therefore, be in a situation where piling is largely prohibited. Further, Policy PUBDM39 point 3. d) sets out that: "Piling of banks will only be permitted where it takes account of criteria 1(a) to (i) and the piling works are required for: i) Navigation purposes (including moorings, but see mooring policies that follow); ii) Compliance with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017; iii) The prevention of diffuse pollution to the water environment; or iv) Flood defence" In addition to the circumstances identified at point 3. d) above, piling may also be required for the provision of essential infrastructure, yet it is not currently acknowledged in emerging policy.	It is proposed that the wording of Policy PUBDM39 is amended to read as follows: "Piling of banks will only be permitted where it takes account of criteria 1(a) to (i) and where piling / quay heading is part of the character of the area, unless where it is required for the provision of essential infrastructure". i) Navigation purposes (including moorings, but see mooring policies that follow); ii) Compliance with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017; iii) The prevention of diffuse pollution to the water environment; or iv) Flood defence; or v) The provision of essential infrastructure"	"Essential infrastructure" means one thing to Highways or the EA at a national or public interest level, but without explicit definition you could get riparian owners making a case that their plans are "essential" for their business/land protection etc. We asked Savills a couple of times to elaborate on their comment. If projects need piling because they are in areas of erosion, that is covered in the report. We asked if the need for piling was, for example, to hold up land on which Essex and Suffolk Water's projects would sit. But no elaboration was forthcoming. Given that the policy refers to areas of erosion and in the absence of any further explanation as to why the policy needs to be changed, it is proposed that no change is made in relation to this comment.	No change proposed.
BLP168	Mark Hodgson	Savills, on behalf of Essex & Suffolk Water	Policy PUBDM19: Trees, woodlands, hedges, scrubs and shrubs and development	Yes	No	Not justified, effective or consistent with National Policy	Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development aims to protect trees, woodlands and hedgerows, shrub masses and areas of scrub and states that development which requires the loss of these features will only be permitted where: "a) the removal will enhance the survival or growth of other trees, woodlands, or hedgerows or shrub masses and areas of scrub. OR b) it would allow for a substantially improved overall approach to the design and landscaping and landscape / habitat enhancement of the site and surrounding area that would outweigh the loss of any tree, woodland, or hedgerow or shrub masses and areas of scrub". The wording of this policy does not, however, recognise the potential need to remove trees and hedgerow to facilitate the development of essential infrastructure. As per Paragraph 193 c) of the NPPF (December 2024; as amended February 2025): "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists". Footnote 70 sets out that wholly exceptional reasons could include "for example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat". National planning policy clearly recognises the potential need to remove trees to enable the delivery of essential infrastructure projects, and this could be better reflected within local policy. Some of Essex & Suffolk Water's capital projects will likely require tree and hedgerow removal, and it is important that local planning policy is flexible enough to ensure the continued delivery of much-needed essential infrastructure. Furthermore, Policy PUBDM19 also sets out that where the loss of trees is deemed acceptable as per the policy wording above, it is also required that replacement trees "be provided on-site unless the applicant can show exceptional circumstances which would justify replacement provision elsewhere". However, it is unclear how the Council define 'exceptional circumstances', and our client is concerned that this level of ambiguity could delay the delivery of essential infrastructure. Given the nature of Essex & Suffolk Water's capital projects, and the fact that they may not always have acquired the land where development is proposed, replacement trees may not always be able to be delivered on-site. It is therefore imperative that essential infrastructure projects are recognised as an 'exceptional circumstance' that would not always require replacement trees to be provided on-site.	It is proposed that an additional point c) is added to Policy PUBDM19 relating to the protection of trees, woodlands and hedgerows, shrub masses and areas of scrub to read as follows: "Development requiring the loss of trees, woodlands or hedgerows or shrub masses and areas of scrub will only be permitted where: a) the removal will enhance the survival or growth of other trees, woodlands, or hedgerows or shrub masses and areas of scrub. OR b) it would allow for a substantially improved overall approach to the design and landscaping and landscape / habitat enhancement of the site and surrounding area that would outweigh the loss of any tree, woodland, or hedgerow or shrub masses and areas of scrub. OR c) it would enable the delivery of essential infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of trees, woodlands, hedgerows, shrub masses and areas of scrub". On behalf of Essex & Suffolk Water, Savills (UK) Ltd also encourages the Council to define 'exceptional circumstances'. Essential infrastructure projects must be recognised as an 'exceptional circumstance', whereby replacement trees would be provided on-site wherever possible, whilst recognising that there may be circumstances where replacement trees would need to be delivered off-site.	Having discussed this proposed change with the Authority's Tree Consultant and Heritage and Design Manager, the first part of the policy makes clear that there can be exceptions. The policy already says 'where there are exceptional and overriding benefits in accepting their loss'. So applicants will need to therefore make the case that their proposals will provide public benefits that override the loss and the Authority may require mitigation if necessary. In terms of 'exceptional circumstances', as quoted above, the policy refers to 'exceptional and overriding benefits'. 'Benefits' is a well-established concept in planning policy and could be wide-ranging, encompassing a long list of potentially different benefits.	Take out example as follows: 'except where their long-term survival would be compromised by their age or physical condition or where there are exceptional and overriding benefits in accepting their loss, such as restoration of appropriate areas of fen.'
BLP169	Martin Thinkettle	The Broads Society	Policy PUBDM2: Embodied Carbon	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP170	Martin Thinkettle	The Broads Society	Section 13 Climate Change	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP171	Martin Thinkettle	The Broads Society	Section 14 Water Use and Quality	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP172	Martin Thinkettle	The Broads Society	Section 15 Flooding	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP173	Martin Thinkettle	The Broads Society	Section 17 Blue and Green Infrastructure	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP174	Martin Thinkettle	The Broads Society	Section 19 Heritage and Historic Assets	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP175	Martin Thinkettle	The Broads Society	Section 20 Natural Environment	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP176	Martin Thinkettle	The Broads Society	Policy PUBDM21: Renewable and low carbon energy	Yes	No	Justified	Feel that there is no justification for onshore wind turbines in the Broads given the local off shore capacity and potential	Insert clear policy against any wind turbines in the Broads	Noted. Prior to July 2024, areas for onshore wind turbines had to be identified in the Local Plan. We did not identify anywhere. That test was removed by the new Labour Government. The proposed policy does not promote wind turbines; it is a criteria-based policy for any schemes that come forward. It should be noted that the Landscape Sensitivity Study finds that turbines will impact the character of the entire Broads. The area where the impact is least, but still a moderate impact, is around Whittingham. But there are broads there as well as areas of trees and a registered park and garden. So it is very unlikely turbines would be supported there. It should also be noted that smaller, domestic turbines are different to larger turbines. On occasion, landowners apply to put in wind pumps which are used to move water, tending to use an Archimedes Screw and the policy would help assess those applications.	No change proposed.
BLP177	Martin Thinkettle	The Broads Society	Section 22 Landscape Character	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP178	Martin Thinkettle	The Broads Society	Section 24 Tranquillity and Light Pollution	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP179	Martin Thirkettle	The Broads Society	Policy PUBSP9: Recreational access around the Broads area	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP180	Martin Thirkettle	The Broads Society	Section 26 Broads Economy	Yes	No	Justified	Have concerns about the Marketing Guides 12 month marketing period requirement	Reduce marketing requirement to 6 months to reduce the possibility of stagnation	Comment noted. Looking at some recently adopted Local Plans in the area: West Suffolk Local Plan - 12 months King's Lynn and West Norfolk Local plan - 12 months Greater Norwich Local Plan - 12 months for self/custom build North Norfolk - 12 months for Employment As such, the 12 month period is in keeping with other recently adopted Local Plans.	No change proposed.
BLP181	Martin Thirkettle	The Broads Society	Section 28 Sustainable Tourism	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP182	Martin Thirkettle	The Broads Society	Policy PUBSP13: Navigable water space part 4	Yes	No	Effective	No baseline data provided to clarify what 'adequate water depths' may be	Qualify how adequate water depths are assessed	The depths of the Waterways Specifications (the target depth to which we plan and carry out our dredging) is detailed in the https://www.broads-authority.gov.uk/_data/assets/pdf_file/0020/132923/Waterways-Management-Strategy-Action-Plan-2022-27.pdf . In the strategy we set out the scope and frequency of surveys which tell us what the current water depths are and to identify those areas in need of dredging; how we prioritise dredging to meet the Waterways Specification targets; and the options for managing the dredged material for beneficial re-use and to ensure environmental compliance.	Include reference to the Waterways Management Strategy Action Plan (or successor document)
BLP183	Martin Thirkettle	The Broads Society	Policy PUBSP15: Residential development	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP184	Martin Thirkettle	The Broads Society	Policy PUBDM46: New residential moorings	Yes	No	Justified	The Society still feels that there is a clear difference between 'residential moorings' and 'liveaboards' and there is still concern that the issue of 'liveaboards' is not dealt with adequately. In fact, the Local Plan fails to identify any difference between the two types of residential mooring. Liveaboards by their nature represent a more transient residential use of the waterways (beyond the use of short-term moorings and not as permanent as residential moorings).	New Policy	The Authority has identified the need for residential moorings and sought to meet the need as it is required to do in the Planning and Housing Act 2016. As stated in the comment, those who are transient in nature can stay at short stay moorings and then move on. If they over stay, and the Authority is made aware, the Ranger team has powers. If there is a planning issue that needs to be addressed and the Team is made aware, then the Planning team have powers. It is not clear what the Local Plan for the Broads can do in terms of those who live on their boats and are transient in nature; indeed, it is not clear if there is anything that the Local Plan needs to do in this regard.	No change proposed.
BLP185	Martin Thirkettle	The Broads Society	Section 31 Design	Yes	No	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP186	Martin Thirkettle	The Broads Society	38 Brundall Riverside	Yes	No	Justified	The Society still has concerns about the potential stagnation and degradation of the area that is likely to occur if the current highway situation is not addressed. The problem of access via Station Road has inhibited the development potential of the area for decades – a situation which Norfolk County Council has failed to address. Given that the carriageway is unlikely to be widened, the Society would encourage the Broads Authority to enter into dialogue with Norfolk County Council to try and put in place a traffic management scheme which would allow more diversification within the estate, subject to other criteria in the plan. Without this, a number of boatyards are likely to fail and the area is likely to gradually degrade. Given the proximity of Brundall railway station and nearby bus routes into the city, the area could be a focus for sustainable tourism opportunities.	Address the highway issues	Comment is noted. The comment has been passed on to Norfolk County Council as Highways Authority.	No change to Local Plan.
BLP187	Martin Thirkettle	The Broads Society	OBJ14	Yes	Yes	-	The Broads Society supports this	Not seeking changes	Support noted.	No change proposed.
BLP187a	Martin Thirkettle	Broads Society	-	-	-	-	In response to the second Regulation 19 consultation. I can confirm that the Broads Society has no further comments to make at this stage.	None	Noted.	No change proposed.
BLP188	Mr Michael Priaux	Swifts Local Network: Swifts & Planning Group	Policy PUBDM15: Natural Environment	Yes	No	Effective	Supportive of this policy especially the requirement for "...at least one integral bird box..." clause on page 116 which implements the NPPG guidance, but to ensure fully sound and effective please add "(e.g. swift brick)" as this is how NPPG Natural Environment 2025 paragraph 017 refers to them. Swift bricks are a universal nest brick for small bird species as set out in the NPPG, and the only type that meets BS 42021, so there is no need for other types of integral boxes. Please add "with reference to best-practice guidance such as BS 42021 or equivalent" after "case-by-case basis" to ensure fully sound and effective and ensure suitable numbers and locations specified and installed. https://www.gov.uk/guidance/natural-environment	Supportive of this policy especially the requirement for "...at least one integral bird box..." clause on page 116 which implements the NPPG guidance, but to ensure fully sound and effective please add "(e.g. swift brick)" as this is how NPPG Natural Environment 2025 paragraph 017 refers to them. Swift bricks are a universal nest brick for small bird species as set out in the NPPG, and the only type that meets BS 42021, so there is no need for other types of integral boxes. Please add "with reference to best-practice guidance such as BS 42021 or equivalent" after "case-by-case basis" to ensure fully sound and effective and ensure suitable numbers and locations specified and installed. https://www.gov.uk/guidance/natural-environment	Agree	Incorporation of wildlife friendly features such as swift bricks, bird and bee houses built into the fabric of buildings and hedgehog tunnels. In particular, an average of at least one integral bird box (e.g. swift bricks which are a universal nest brick for small bird species) per residential unit should be incorporated in the fabric of all new housing developments, with flats, hotels, care/nursing homes, commercial and public buildings considered on a case-by-case basis, with reference to best-practice guidance such as BS 42021 or equivalent.
BLP189	Mrs Lynda Cressy	Gale cruisers	Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	No	No	Positively Prepared, justified, effective, consistent with National Policy	The character of the land nominated does not meet with the character definition of what the policy is seeking to protect (pages attached). Much of the area designated is already fully developed and there is no formal specific site justification for the site designation. The remaining undeveloped sections are already designated as Priority Habitat: Deciduous Woodland and Lowland Fen and all lie within Flood Zones 2 and 3. Therefore, it is not necessary to have yet another designation. This is all private land and most trees have been planted over the years by the landowners. It is and has been for many years complete settlement. It is part of the settlement. The gardens and land are already restricted from residential development. The boatyards have always used the land for storage of boats, general storage & customers cars which the wildlife thrive in as it is not used constantly all the year through it is their bolt hole away from permanent structures. These commercial businesses have been very important to the local economy and continue to be also providing local jobs. We would suggest that a site visit rather than an aerial photograph to establish landscape designation to be the way forward. This area should not be designated as Settlement Fringe.	This area should not be designated as Settlement Fringe.	See Appendix G.	See Appendix G.
BLP190	Mrs Madeleine Sillitoe	n/a	Policy PUBBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line part 4	No	Yes	-	THE DOCUMENT SAYS: '...the policy seeks greater public access to appreciate the river scene. It also seeks more public moorings and more slipways to access the water.' Since anyone residing at the new mooring site will have access to village resources and to private road access leading to Brundall (e.g. Laurel Drive) it would be right and fair for villagers to have access to the river so they can enjoy the Broads. This is consistent with a need for residents of Brundall, as noted as one of the aims of Brundall Parish Council, to expand villagers' access to riverside areas. At present the village has almost no common access to the Broads/river despite the fact that Brundall is a village located by the River Yare itself. So, given that access to village resources are to be shared with new residents at the mooring site, a reciprocal benefit for the village should be included within these plans too. Thank you.	More consideration for access and roaming rights for local residents need to be considered.	The comment is noted. It seems to support the wording of the policy. The relevant wording refers to 'public' on a number of occasions and that would include residents of Brundall, residents/workers or owners of chalets at Brundall Riverside as well as general members of the public that are visiting the area.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP191	Naomi Chamberlain/LFA	Norfolk County Council	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 for both the Broads Authority and other authorities in the wider Norfolk and Suffolk area.	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 prone to flooding and status equivalent to a National Park. g.) Attractive environment prone to flooding, providing the basis for most of the Broads' economy and recreation for residents and visitors t.) An area providing many ecosystem services and natural resources, as evidenced in the Norfolk and Suffolk natural capital assets compendium.	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. This water can be stored and used by nature and people. Flooding can also filter pollutants out of rivers and nourishing land to support ecosystems and fertile areas for farming.</u>
BLP192	Naomi Chamberlain/LFA	Norfolk County Council	PUBDM9: Surface Water Runoff	No	No	yes	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.	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 absence of suggested text, the following change is proposed: 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, in accordance with a surface water drainage hierarchy so that, in order of priority, they:</u> a) Continue natural discharge processes; b) Store water for later use; c) Adopt shallow infiltration techniques in areas of suitable porosity; d) Store water in open water features for gradual release to a watercourse; e) Store water in sealed water features for gradual release to a watercourse; f) Discharge direct to a watercourse; g) Discharge direct to a surface water drain (highways, Anglian Water or other body or within private ownership); h) Discharge direct to deep infiltration or borehole soakaways; or i) Discharge direct to a combined sewer
BLP193	Naomi Chamberlain/LFA	Norfolk County Council	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 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.	1. and 2. Update Policy PUBDM9 and the supporting Reasoned Justification text to be aligned with the national and LLFA policies and guidance.	Agree.	See amendments in relation to comment BLP52.
BLP194	Naomi Chamberlain/LFA	Norfolk County Council	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 absence 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. 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.</u> 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.
BLP195	Naomi Chamberlain/LFA	Norfolk County Council	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 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.	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 (SuDS) <u>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.</u> 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.
BLP196	Naomi Chamberlain/LFA	Norfolk County Council	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.
BLP197	Naomi Chamberlain/LFA	Norfolk County Council	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.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP198	Naomi Chamberlain/LFA	Norfolk County Council	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 in the flood risk assessment in many of proposed developments being unlikely to fulfil this requirement.	2. Remove the text in point 2.b in Policy PUBDM8	Agree.	Remove part 2b).
BLP199	Naomi Chamberlain/LFA	Norfolk County Council	Policy PUBDM8: Development and flood risk	No	No	yes	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).	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.	This seems to relate to part 5 and 11d of the policy. 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. 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. 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. 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. Comment was discussed with EA and some changes are proposed.	Part 5 of PUBDM8 could be removed and placed in PUBDM50 as a new point 5. 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.
BLP200	Naomi Chamberlain/LFA	Norfolk County Council	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' 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).	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 developed (including considering site ownership or whether the owners of sites have any intention of them being developed);
BLP201	Naomi Chamberlain/LFA	Norfolk County Council	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 comment BLP198.	See response to previous comments.
BLP202	Naomi Chamberlain/LFA	Norfolk County Council	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 Text section.	In the absence of suggested text, 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 - a new part 1. <u>1. All new development will be directed to the lowest area of located to minimise flood risk from all sources, mitigating any residual risk and deliver safe development through design and management measures, and ensuring that flood risk to other areas is not materially increased, taking into account climate change allowances</u>
BLP203	Naomi Chamberlain/LFA	Norfolk County Council	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 flood risk now or in the future." to resolve the issues.
BLP204	Naomi Chamberlain/LFA	Norfolk County Council	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.
BLP205	Naomi Chamberlain/LFA	Norfolk County Council	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.
BLP206	Naomi Chamberlain/LFA	Norfolk County Council	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 allowances to part 2 of the policy. No change proposed to supporting text.
BLP207	Naomi Chamberlain/LFA	Norfolk County Council	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 reflect the approach given in paragraph 172, Chapter 14 of NPPF.	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: <u>j) Avoiding development in areas at risk of future flood risk due to the impacts of climate change.</u>

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP208	Natasha Styles	The Planning Bureau Limited on behalf of McCarthy Stone and Churchill Living.	Policy PUBDM16: Biodiversity Net Gain	Yes	No	Not justified	<p>The Council should not set a higher biodiversity net gain (BNG) requirement for development in the Broads areas than that set out in the Environment Act 2021. Requiring BNG above 10% does not meet the tests set out in paragraph 57 of the NPPF and in particular a greater than 10% requirement is not necessary to make the development acceptable in planning terms and a 10% requirement should be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF). The Council should also note that the Planning Policy Guidance on Biodiversity Net Gain at paragraph: 006 Reference ID: 74-006-20240214 confirms that 'Plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented'. Therefore a 10% requirement should also be maintained in order to ensure that the requirement is 'fairly and reasonably related in scale and kind to the development' (para 57, NPPF) and consistent with national policy guidance. We appreciate that the council has attempted to support the increased requirement via an evidence document however we have concern as to the limited cost that has been used for Biodiversity Net Gain within this document as well as the Viability Assessment. BNG costs are taken from a 2019 DEFRA biodiversity net gain impact assessment and suggests costs are in the region of £1272 per dwelling on greenfield sites and £304 per dwelling on brownfield sites. However, the Council should note that on 27th July 2023 the price of statutory biodiversity credits were published (available from Statutory biodiversity credit prices - GOV.UK (www.gov.uk)). This has enabled it to be determined how much BNG may cost and it is considered that the costs per dwelling put forward in 2019 by DEFRA have underestimated the costs. In addition, brownfield site BNG costs are often more substantial than Greenfield but this very much depends on the site characteristics. As a result the Council should reconsider whether 20% BNG is reasonable and financially viable especially when considered alongside other additional costs.</p>	<p>Therefore, although we recognise that the 10% is a minimum it should be for the developer to decide whether to go beyond this figure not the Council. It is important to remember that that it is impossible to know what the cost of delivering net gain is until the base level of biodiversity on a site is known and consequently what is required to achieve a 10% net gain. On some sites this may be achievable on site with no reduction in developable area, for others it may require a large proportion of it to be addressed offsite or a significant reduction in the developable area – a far more expensive option that could render a site unviable without a reduction in other policy requirements.</p> <p>The council should therefore not require a BNG of greater than the 10%.</p>	<p>It's understood that costs of providing BNG (10% or 20%) will vary on a site-by-site basis depending on the size and type of land being developed and the ability of the developer to achieve Bio Units on site and the need, if at all, to purchase off site credits. It is also noted that 20% BNG does not equal a doubling of Bio Unit required. For example on a site with and existing 5 BU, a 10% gain requires 5.5 BU to be provided and, with 20%, 6 BU i.e. meeting a 20% BNG does not require double the provision of 10% BNG. Costs used in the Viability Assessment (LPVA) were derived from the Government's 2019 Impact Assessment which provides costs per dwelling for a 10% BNG. To arrive at the costs for a 20% BNG, an additional 19% has been included on the amounts per unit shown in the Impact Assessment (IA) at Tables 16 and 17 (using the regionally based Central Estimate). 19% is the figure taken from para 6.11.2 of the Impact Assessment. The IA is clear that "we would expect to see most of the monetisable costs (and benefits) to developers passed through to the price of land that has planning permission... In the case of additional development costs, this will revise down the result of a residual land value calculation: there will be a dampening effect on the uplift to the price of land following planning permission. Therefore, we anticipate that developers or house buyers should not bear the cost of biodiversity measures if they are mandatory and apply uniformly to all developers for a given piece of land". The reference in the IA to costs being passed through to land prices is supported by the Viability PPG (Reference ID: 10-012-20240214) which states that "the total cost of all relevant policy requirements including ... biodiversity net gain (as required by Schedule 7A of the Town and Country Planning Act) ... should be taken into account when defining benchmark land value". The comment draws attention to the cost of BU published by the government in 2023. As the Government notes, "Statutory credit prices are not guideline prices for off-site biodiversity units". In summary the Viability Assessment has used the most up to date guidance about average costs for providing off site BU where these are necessary, and it would be expected that any costs in excess of these would be passed on through the benchmark land values. Also, the testing has demonstrated good general viability across the typologies tested with further 'headroom' to allow for any extra costs if these are incurred e.g. as shown in tables 5.1, 5.4 and 5.5 of the Viability Assessment. It's considered that the LPVA provides evidence that a 20% BNG requirement would not undermine the viability of the plan.</p>	No change proposed.
BLP209	Nicola Ledain	Somerton Parish Council	The whole plan	Yes	Yes	-	The parish council wish to express that they resolved to support the plan.	not seeking changes	Support noted and welcomed.	No change proposed.
BLP209a	Pauline James	Acle Parish Council	Policy PUBACL1: Acle Cemetery extension	-	-	-	In response to the second Regulation 19 consultation. Acle Parish Council supports the two site specific policies that concern Acle. Both sites are very much needed for the village.	None	Noted.	No change proposed.
BLP209b	Pauline James	Acle Parish Council	Policy PUBACL2: Acle Playing Field extension	-	-	-	In response to the second Regulation 19 consultation. Acle Parish Council supports the two site specific policies that concern Acle. Both sites are very much needed for the village.	None	Noted.	No change proposed.
BLP209c	Philip Porter	National Highways	-	-	-	-	In response to the second Regulation 19 consultation. The letter does just say we have no further comment to our original response, so you can rely on the first response dated 15 September 2025.	None	Noted.	No change proposed.
BLP210	Richard Starling	BRASCA	The whole plan	Yes	Yes	-	BRASCA supports the Plan.	Not seeking changes	Support noted.	No change proposed.
BLP211	Rosemary Spooner	n/a	Policy PUBDM44: Residential development within defined Development Boundaries - Filby Development Boundary	Yes	No	Justified	An area of land has been omitted from the proposed development boundary that should be included. We think this area of land is suitable for development.	An extension of the Filby Development Boundary along Howes Loke, off Thrigby Road to include part of land of Mallard's Reach.	<p>Internal colleagues and the Highways Authority (Norfolk County Council) were asked for their thoughts:</p> <p>Landscape: this area of the broad is quite exposed, with a number of the existing plots benefiting from direct views across the water, creating intervisibility. This is one of the reasons we defined the settlement boundary as it is. Any additional development in this area has potential to increase the sense of urbanisation and this could be readily apparent from the broad and impact the overall character of the area.</p> <p>Heritage: no objection in terms of heritage impact</p> <p>Development Management: concern regarding building lines and urban grain as these are important considerations.</p> <p>Norfolk County Council: The Highway Authority objects to this site being included in the proposed development boundary. The Loke is privately owned. There is no direct connection to the highway. We also have concerns with visibility to the south at the junction The Loke, Thrigby Road.</p>	No change proposed.
BLP212	Sandra Squire	Forestry Commission	The whole plan	Yes	Yes	-	We have read through the documents, are satisfied and have no further comment to make	Not seeking changes	Support noted.	No change proposed.
BLP212a	Sandra Squire	Forestry Commission	Policy PUBDM15: Natural Environment	-	-	-	In response to the second Regulation 19 consultation. Under "Biodiversity enhancements and wildlife friendly features" the first bullet point mentions "expecting as the norm, planting of native species". We would recommend this wording be changed to "planting of native species in areas predominantly laid out for biodiversity and wildlife (as opposed to amenity)". This is because the wording as it is would conflict with the "delivery and implementation" section on policy PUBDM19, especially sections 6a, 6e, 6f & 6j.	As stated above, change "expecting as the norm, planting of native species" to "planting of native species in areas predominantly laid out for biodiversity and wildlife (as opposed to amenity)"	<p>The supporting text for PUBDM15 does not need to change to include "...predominantly laid out for biodiversity and wildlife". The policy is about the requirement for all development to provide biodiversity enhancements and clearly states that these will reflect the specifics of the site. Use of native species should be encouraged across all aspects of a development.</p> <p>The reported clash with PUBDM19 is suggesting that the use of native species doesn't allow for the stated use of climate resilient species, but we don't think these are mutually exclusive. There are native species that are more drought tolerant, hardy to changing conditions etc.</p> <p>We think PUBDM19 needs to include the wording 'native species' – then we are linking the two.</p>	Amend PUBDM19 to refer to native species.
BLP213	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM9: Surface water run-off	Yes	Yes	-	We support this policy, and the Reasoned Justification, particularly the text around the use of SUDS and their potential to reduce phosphorous in surface water run-off.	Not seeking changes	Support noted.	No change proposed.
BLP214	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBSP2: Strategic flood risk policy	Yes	Yes	-	We support this policy and the requirement for new development to incorporate Sustainable Urban Drainage SUDS measures. This is in line with paragraph 164 of the NPPF which states that "New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems;"	Not seeking changes	Support noted.	No change proposed.
BLP215	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM7: Water efficiency and re-use	Yes	Yes	-	We support this policy which requires new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. The design of new developments should optimise the inclusion of water efficiency and consumption measures, such as rainwater/ or greywater recycling, low flow taps and showers, low flush toilets, rain gardens and water butts and Sustainable Urban Drainage Systems (SUDS) in the construction of new buildings. We recommend that all major non-residential development should incorporate water conservation measures to achieve full credits for category Wat 01 of BREEAM and recommend that non-domestic buildings referred to in section 4 of the policy are given an appropriate efficiency target for clarity for developers and monitoring policy delivery. We support the reasons given in the Reasoned Justification text	Not seeking changes	Support noted.	No change proposed.
BLP216	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM2 Embodied Carbon	Yes	Yes	-	We support the inclusion of additional text around the issue of embodied carbon. Embodied carbon makes up a significant portion of the built environment's total emissions, therefore to meet the UK's net-zero by 2050 target, a holistic approach that includes addressing embodied carbon is crucial.	Not seeking changes	Support noted.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP217	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM20: Energy demand and performance of new buildings (including extensions)	Yes	Yes	-	We support general intention of this policy to reduce the energy demand of buildings, in line with the weight afforded to the measures in the updated NPPF (Paragraph 164): In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).	Not seeking changes	Support noted.	No change proposed.
BLP218	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development	Yes	Yes	-	We support this policy. We suggest adding words requiring after care/management of new trees to ensure that they survive and replacement planting for any that die.	We suggest adding words requiring after care/management of new trees to ensure that they survive and replacement planting for any that die.	Agree.	5. Details of appropriate measures for the establishment and long-term maintenance of new tree planting will need to be provided. It is expected that planting will follow current best practice, including BS 8545:2014 and other relevant British Standard guidance. Where new tree planting is proposed, an Aftercare and Maintenance Plan will need to be submitted covering a minimum of 5 years, including watering, mulching, staking and replacement of failed specimens. Where trees are lost within the establishment period, they must be replaced on a like-for-like basis in the next planting season.
BLP219	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM16: Biodiversity Net Gain	Yes	Yes	-	General support - see Appendix H for detail.	Not seeking changes	Support noted.	No change proposed.
BLP220	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM15: Natural Environment	Yes	Yes	-	We support this policy which aims to protect, restore and enhance biodiversity and habitats and welcome the additional text around compliance with the mitigation hierarchy.	Not seeking changes	Support noted.	No change proposed.
BLP221	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBSP5: Biodiversity	Yes	Yes	-	We support this policy which aims to prevent development having an adverse impact on internationally, nationally, and locally designated sites and are pleased to see that County Wildlife Sites and Section 41 Priority Habitats are referred to in this policy. However, we recommend that additional text is added to cover the functionally linked habitats of these sites. We also recommend additional policy text regarding a requirement for developments to submit full Ecological Impact Assessments in order that the potential impacts on biodiversity can be reviewed. We support the addition of a clause stating that new development will include beneficial features biodiversity. This will help comply with the Council's duty to have regard to the conservation and enhancement of biodiversity under the 2006 NERC Act and its amendment under the 2021 Environment Act.	We recommend that additional text is added to cover the functionally linked habitats of these sites. We also recommend additional policy text regarding a requirement for developments to submit full Ecological Impact Assessments in order that the potential impacts on biodiversity can be reviewed.	Agree regarding functionally linked habitats. In terms of Ecological Impact Assessment, terminology is important – EIA is only for projects expected to have serious impact on the surrounding environment & include consideration of social, ecological, health & economic impacts, e.g. roads, urban etc. EclA is what we think is being referred to (Ecological Impact Assessment) which focus on ecological impact and may also include mitigation and compensation measures. Our current approach – we may ask for a Preliminary Ecological Appraisal (PEA) which in effect is the very first stage of an EclA. It is where the habitats and potential constraints on a site are identified. This may then recommend the need for further surveys for specific habitats and/or species. This could all be tied together into an EclA whereby the scoping (PEA) and the mitigation, compensation, enhancements are all in one document. In effect, many PEAs do this. Not all developments will require the same level of detail or attention, depending on size, location and significance of effects.	2a) protect the value and integrity of nature conservation interest and objectives of international, national and local (such as County Wildlife Sites and Local Nature Reserves) sites designated for nature conservation, nature-conservation designations. Functionally linked land, i.e. land outside of designated site boundaries, but integral to their function, will also be protected. Biodiversity Net Gain (BNG) sites shall also be protected. Amend PUBDM15 part 2 as follows: 2. Depending on the nature and location of the scheme, the applicant may be required to assess the impact of proposals on the natural environment. Applicants may be required to undertake and submit a Preliminary Ecological Appraisal (PEA)/Ecological Impact Assessment (EclA) to provide information regarding the habitats and species present on site, to consider the potential impacts of the development and recommend appropriate mitigation measures.
BLP222	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM53: Source of heating	Yes	Yes	-	We support this policy, in particular the statement that oil heating of new builds and replacement dwellings will not be supported. This will help meet our commitments to reducing carbon emissions.	Not seeking changes	Support noted.	No change proposed.
BLP223	Sarah Eglington	Norfolk Wildlife Trust	Policy PUBDM21: Renewable and low carbon energy	Yes	No	-	Whilst we support the development of renewables to help meet our Net Zero requirements, it must be ensured that proposals for renewable infrastructure are nature positive in line with the Biodiversity Duty.	We recommend including the following text in relation to solar farms, as well as wind farms "The potential for impacts on birds and bats, and other wildlife, must be fully assessed and avoided and mitigated". We also recommend including the clause below for solar farms (currently applied to wind farms only) "Information relating to the vehicle routing associated with construction activities for solar farms must be provided. The proposed site access arrangements and access routes will be suitable for the construction phase, including the delivery of turbine components and construction materials, the operational phase, and the decommissioning of the proposed solar farm". We suggest that the text in 10 is strengthened to state that proposals for turbines or access routes located on peat soils Will Not be supported.	Agree to some extent.	Move 12 c) first sentence to become part 8 of general principles. Amend part 12 c) second sentence so 'this' is replaced with 'and'. Move 12 d) to become part 9 of general principles and make it generic about renewable energy rather than just referred to turbines. Checking numbering of criteria - there are two number 10s. Amend part 10 (peat) to refer to the peat policy.
BLP224	Sarah Tudhope	North Norfolk District Council	PUBDM56 - Electric Vehicle Charging Points	Yes	No	Not effective - the policy lacks clarity on the requirement for EV provision compared to NNDC's emerging Policy CC8	NNDC welcomes the inclusion of a dedicated policy on EV charging points, including the associated design, safety and location considerations. However, the policy lacks clarity on the fundamental requirement for provision. By contrast NNDC's emerging Local Plan Policy CC8 requires all new residential development (including changes of use) to provide EV charging points. As NNDC is the local housing authority, a consistent approach would provide greater clarity and benefit for applicants, residents and decision makers across the district. BA asked NNDC for clarification: Yes - our comment relates to residential development (including conversions/ changes of use). The point is that PUBDM56 currently "welcomes" provision, whereas NNDC's emerging Policy CC8 "requires" it, and NNDC is the Local Housing Authority. Clarifying a requirement for new residential development would help avoid inconsistent outcomes between the two LPA's operating within the same district.	Amend PUBDM56 to align more closely with NNDC's Policy CC8 by requiring new residential development (including changes of use) to provide EV charging points, with clear thresholds and criteria. This would ensure the policy is effective and consistent across the district.	For residential dwellings, we note that policy CC8 of the emerging NNDC Local Plan points to the building regulations. We therefore do not consider we need to talk about thresholds and standards in the policy. We could refer to the building regulations in the supporting text. We do note that there is some useful wording in the NNDC policy about the design of EV charging points which we will use. In terms of non-residential development, Suffolk County Council have detailed requirements in their current Guidance: Suffolk Guidance for Parking 2023, Section 8, page 64. Development in Suffolk is therefore covered in terms of EV charging points. As for Norfolk County Council, the current guidance was produced in 2022 and has some standards: norfolk-parking-guidelines-2022_1 (3).pdf 2022, Page 44. Generally, throughout the Local plan, we do refer to Norfolk and Suffolk parking standards and we also say that some districts set their own standards. As such, we will amend part 7 of DM29 to say that some of our districts set their own standards for electric vehicle charging and we will consider those as we assess applications. This is consistent with the text on page 167 under 'parking standards'.	Amend PUBDM56 to include wording as follows: • Proposals where vehicle parking is incorporated will include appropriate provision for electric vehicle charging points, taking account of the development type and size, the level of parking provision and its context and location. Electric vehicle parking spaces should be counted as part of the total parking provision, and bays should be clearly marked on a layout plan. The delivery of charge points should include parking space provision for people with disabilities. Proposals should specify the type of charge points to be installed. • For developments of over 10 dwellings or larger than 0.5 hectares, details of how the required electric vehicle charging points will be allocated, located and managed, including the mechanism/procedure for taking payments, will be detailed in the relevant Transport Assessment or Transport Statement. • Developments with dedicated electricity sub-stations should specify the sub-station to a sufficient capacity to fully cater for all electric vehicle charging requirements. Refer to building regulation requirements for ev charging in supporting text to PUBDM56. Amend part 7 of DM29 to say that some of our districts set their own standards for electric vehicle charging and we will consider those as we assess applications.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP225	Sarah Tudhope	North Norfolk District Council	PUBDM5 - water quality and foul drainage	Yes	Yes	Sound but could be clarified	NNDC supports PUBDM5, and in particular clause 6, and recognises the importance of managing foul drainage capacity. NNDC are signatories to the joint position statement mentioned in relation to Horning Knackers Wood Water Recycling Centre. However, the Plan would benefit from acknowledging that Horning is split with NNDC and is identified as a Small Growth Village in NNDC's emerging Local Plan, even if the village is constrained and no residential requirement is expected in the Plan period.	Retain Policy PUBDM5 as drafted, but add recognition of Horning's cross-boundary status and NNDC's joint role with Anglian Water, to aid clarity and ensure effective delivery.	This is not needed in the policy, but agree to amend the supporting text.	Amend Horning Knackers Wood Water Recycling Centre supporting text as follows: Anglian Water Services (AWS) have investigated why the WRC is receiving excessive flows, and there is a Joint Position Statement (<u>written and endorsed by the Broads Authority, North Norfolk District Council and the Environment Agency</u>) setting out more detail including actions undertaken and proposed to address the issue. The Authority will keep itself informed of progress on this issue. <u>Horning is a small growth village in the North Norfolk Local Plan.</u>
BLP226	Sarah Tudhope	North Norfolk District Council	Section 8 - Duty to Cooperate (p30)	Yes	Yes	Sound but could be reinforced	NNDC supports the recognition of cross-boundary issues in Section 8 and the ongoing work under the Duty to Cooperate. Given the importance of cross-boundary coordination at Hoveton/Wroxham, NNDC wishes to emphasise that retail and town centre planning must remain a key focus of future joint working.	Strengthen Section 8 by acknowledging retail/town centre coordination at Hoveton/Wroxham as an example of cross-boundary issues that require ongoing joint working.	It is presumed this refers to section 8.2. As per the text, the list is not exhaustive. What is already written are strong examples. However, we will add this as another one of the examples.	To 8.2 add: <u>Working with District Councils on bespoke, location specific cross-boundary issues, such as retail/village/district centre coordination where a centre spans the Broads Authority Executive Area and a neighbouring local planning authority (for example Hoveton Village Centre across the Broads Authority and North Norfolk District Council areas and Oulton Broad District Centre across the Broads Authority and East Suffolk Council), so that retail policy, including sequential and impact considerations, is applied to the centre as a whole rather than separately within each administrative area.</u>
BLP227	Sarah Tudhope	North Norfolk District Council	Section 6.10 Neighbourhood Plans (p20)	Yes	No	Not justified. Needs factual correction	The list of Neighbourhood Plans omits Hoveton Neighbourhood Plan. This is a factual error. Stalham NP is correctly included.	Update Section 6.10 to add Hoveton Neighbourhood Plan to the list of Neighbourhood Plans in preparation.	Noted. The list was correct at the time of writing and will be updated on adoption.	Update the list of Neighbourhood Plans at the time of the adoption of the Local Plan.
BLP228	Sarah Tudhope	North Norfolk District Council	PUBHOV5 Hoveton Village Centre and areas adjacent to the Village Centre	Yes	Yes	Yes, sound but could be strengthened	NNDC welcomes the recognition in PUBHOV5 that Hoveton Town Centre should be considered as a whole, across local authority boundaries, and in coordination with NNDC's Development Plan. This reflects the established joint approach. NNDC wishes to ensure that the wording remains fully consistent with its emerging Local Plan and that monitoring continues to maintain alignment.	Ensure that PUBHOV5 wording is aligned with NNDC's emerging Local Plan retail/town centre policy for Hoveton/Wroxham and consider minor amendments to reinforce the shared approach. This will ensure the plan is effective in addressing cross-boundary retail issues and consistent with the agreed joint approach already in place. This could be achieved either by a small addition to the policy wording itself or, alternatively, by a short line in the supporting text confirming that decisions and monitoring will continue to be coordinated across BA/NNDC, so the shared approach is maintained.	Agree.	Add text to HOV5 that refers to decisions and monitoring will continue to be coordinated across BA/NNDC.
BLP229	Sarah Tudhope	North Norfolk District Council	PUBDM35 Retail development in the Broads	Yes	No	Not effective - does not reference cross-boundary retail matters at Hoveton/Wroxham	NNDC notes that PUBDM35 sets criteria for retail development in the Broads but does not reference the cross-boundary issues at Hoveton/Wroxham. This omission weakens the effectiveness of the policy, as it risks decisions being made without recognition of the joint town centre approach that has been consistently agreed between the Broads Authority and NNDC and is included in our Local Plan and Duty to Co-operate documents. BA asked NNDC for clarification: On cross-boundary retail issues, our representation was focused on the need for PUBDM35 (Retail Development in the Broads) to include an explicit reference to Hoveton/Wroxham and the joint/whole settlement approach. While PUBHOV 5 (the site-specific policy) does already refer to NNDC and the shared approach, PUBDM35 currently does not. Our concern is that without this, developers and decision makers may rely on PUBDM35 alone and overlook the fact that Hoveton/Wroxham is a joint town centre spanning both authorities. The aim is to ensure the joint approach is signalled in both the overarching retail policy and the site-specific policy, so there is no scope for uncertainty.	Insert an explicit reference in PUBDM35 to the need to consider cross-boundary retail issues at Hoveton/Wroxham, to align with NNDC's emerging Local Plan and ensure the shared approach is clear across both generic and site-specific policies. The clarity does already appear in PUBHOV5, but not until later in the plan. Our suggestion was, therefore, for a small addition in DM35, not to change the policy's intent, but to flag earlier on that Hoveton/Wroxham is addressed through a joint approach across the NNDC and BA plans. This would strengthen the overarching retail policy by making the cross-boundary approach clearer and more user friendly for applicants and decision makers. By way of example only, this could be achieved through a short line such as: "Proposals for retail and main town centre uses in Hoveton/Wroxham should be considered in the context of the joint approach established across both the Broads Authority and NNDC Local Plans."	Agree.	<u>Proposals for retail and main town centre uses should be considered in the context of the joint approach established across both the Broads Authority and relevant district council Local Plans.</u>
BLP229a	Steve Gower	Norfolk Constabulary	-	-	-	-	<i>In response to the second Regulation 19 consultation. Provided some detailed advice. Generally content with how the Local Plan refers to crime prevention.</i>	None	Noted. Will pass on detailed information to Development Management colleagues.	No change proposed.
BLP230	Steven Gray	-	Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	No	No	Positively Prepared, justified, effective, consistent with National Policy	I object to the proposed designation of this land as Settlement Fringe for the following reasons: Character of the Land - The land does not meet the policy's definition of a Settlement Fringe area. Much of it is already fully developed and forms part of the established settlement. There is no site-specific justification provided for this designation. Existing Environmental Designations and Constraints - The remaining undeveloped parts of the site are already designated as Priority Habitat: Deciduous Woodland and Lowland Fen, and lie entirely within Flood Zones 2 and 3. These existing designations provide sufficient protection, and an additional designation is unnecessary. Private Ownership and Long-standing Use - This land is privately owned, and most of the trees have been planted by the landowners over the years. The area consists of residential gardens and land already restricted from further residential development. Established Commercial Use and Economic Contribution - The local boatyards have long used the area for boat storage, general storage, and customer parking. These commercial operations are important to the local economy and community. Assessment Methodology - It appears the designation may have been based on aerial photography, which does not accurately reflect the land's current use or character. A site visit would provide a more accurate and fair assessment. Conclusion - Given the existing protections, the developed nature of the area, and its economic and community value, the designation as Settlement Fringe is unjustified. I respectfully request that this site be excluded from the proposed designation	Given the existing protections, the developed nature of the area, and its economic and community value, the designation as Settlement Fringe is unjustified. I respectfully request that this site be excluded from the proposed designation.	See Appendix G .	See Appendix G .
BLP230a	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBSP15 – Residential Development	yes	yes	-	<i>In response to the second Regulation 19 consultation. The Borough Council previously expressed their support through the previous Broads Local Plan Regulation 19 Consultation for the objectively assessed housing need from the part of the Broads within the Borough likely needing to be met in those parts of the borough outside of the Broads, in accordance with Agreement 13 of the Norfolk Strategic Planning Framework (NSPF), and reiterated through the 2025 Statement of Common Ground between the Broads Authority and Great Yarmouth Borough Council.</i>	Not seeking changes	Support noted.	No change proposed.
BLP230b	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBFLE1 – Broadland Sports Club	yes	yes	-	<i>In response to the second Regulation 19 consultation. The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation that they are keen to support the continued use and potential improvement to Broadland Sports Club as a health and wellbeing facility that supports the area. The Council maintains their support for Policy PUBFLE1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV1, ENV3, ENV4, ENV7, SOC4 and ENV6, and the stronger wording around walking, cycling, car parking and light pollution in comparison to the 2019 Local Plan policy.</i>	Not seeking changes	Support noted.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP230c	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBGT1 – Marina Quays (Port of Yarmouth Marina)	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation that they would support the re-use and enhancement of the space for river and other leisure activities where compatible with the flood risk of the site, particularly as this site benefits from planning consent. The Council maintains their support for Policy PUBGT1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV10, EV11, SOC4 and SOC6 and SOC8.	Not seeking changes	Support noted.	No change proposed.
BLP230d	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBORM1 – Ormesby Waterworks	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support of the protection of Ormesby Water treatment works from development which may adversely affect the proper functioning of the water works, and its contribution to the landscape and visual amenity of the locality. The Ormesby waterworks provide much of the public water supply to the Great Yarmouth Borough, and the upgrading and maintenance of these works are important in supporting economic and population growth in the Borough. The Council maintains their support for Policy PUBORM1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV2, ENV3, ENV4, ENV10, ENV11 and SOC4.	Not seeking changes	Support noted.	No change proposed.
BLP230e	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBTHU1 - Tourism development at Hedera House, Thurne	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support for the allocation of the site for tourism uses and a proportionate amount of general market housing enabling development. The Borough Council recognises that the allocation may assist in supporting the small-scale range of services and facilities within Thurne (including the local convenience store and public house. Whilst Policy PUBTHU1 is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV3, ENV4, ENV7, ENV10, ENV11 SOC1, SOC4 and ECO1 it was assessed as having a negative impact on objectives ENV1 and SOC6. The policy rated negative in terms of access to services and facilities as well as impact on roads due to likely single occupancy car use. However, THU1 was allocated in the 2014 Sites Specifics Local Plan by the Inspector, and the allocation has been rolled forward into the subsequent Local Plan and now benefits from planning permission. The Sustainability Appraisal shows that the overall impact of the policies in combination as positive and subsequently the council maintains its support for PUBTHU1.	Not seeking changes	Support noted.	No change proposed.
BLP230f	Sunny Raggett	Great Yarmouth Borough Council	PUBSSTRACKS – Former Rail Trackways	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support for the Policy and its potential to expand and integrate the networks of paths, cycleways, and bridleways which benefits residents and visitors whilst considering impacts on habitats sites, as well as seeking development to deliver the tracks. The policy would align with adopted Policy GSP7 of the Great Yarmouth Local Plan Part 2 (and emerging Policy SUT1 of the publication final Local Plan) by seeking to use former rail trackways to provide a link between Bradwell, Belton and areas outside of the borough to the south-west. The Council maintains their support for Policy PUBSSTRACKS, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV1, ENV3, ENV4, SOC1 and ECO3.	Not seeking changes	Support noted.	No change proposed.
BLP230g	Sunny Raggett	Great Yarmouth Borough Council	Policy PUBSSA47 – Road Schemes on the Acle Straight (A47)	yes	yes	-	<i>In response to the second Regulation 19 consultation.</i> The Borough Council previously noted within the previous Broads Local Plan Regulation 19 Consultation the provision of a Policy that would be used to assess proposals for changes to the Acle Straight. Realising the full dualling of the Acle Straight continues to be a key ambition of the Borough Council and is critical to the long-term health of industries and job growth in the borough, which are of importance to the wider and national economy. The Borough Council welcomed the potential identification of a strategic cycling route between Acle and Great Yarmouth, as required to be considered by criterion '8' of the Policy. The Council acknowledges the emphasis placed on climate change resilience, and notes the overall positive impact on objectives ENV1, ENV2, ENV3, ENV4, ENV5, ENV6, ENV9, ENV10 and ENV11 in the Sustainability Appraisal.	Not seeking changes	Support noted.	No change proposed.
BLP231	Tanya Rowlandson	Strumpshaw Parish Council	The whole plan	Not specified	Not specified	Not specified	First and foremost, we congratulate you and your team on the Local Plan for the Broads. It is a major undertaking and clearly very comprehensive, thorough and well structured. Having recently 'reviewed' our Neighbourhood Plan, with consultants to facilitate and support the drafting, we are at least somewhat aware of the magnitude of your task!	Not seeking changes	Support noted.	No change proposed.
BLP232	Tanya Rowlandson	Strumpshaw Parish Council	The whole plan - SuDS	Not specified	Not specified	Not specified	SuDS (e.g. p. 72) are generally considered to be a positive intervention, as in the Broads Local Plan. However, not highlighted is the fact that they can have negative impacts on surrounding vegetation and habitats for wildlife. For instance, an old farm pond within our Parish no longer has water year-round because, based on a planning condition, surface run-off water from a small adjacent development (10 properties) was contained on site using SuDS. Also, two mature ornamental trees (10+ metres height) between the development and the pond died within 2 years of the SuDS intervention.	Consider highlighting the potential for negative effects from SuDS.	This issue is addressed at point 4b and 4c. The impact will be assessed on a case by case basis with a view to not having a negative impact on existing features, habitat or wildlife.	No change proposed.
BLP233	Tanya Rowlandson	Strumpshaw Parish Council	PUBDM18: Mitigating Nutrient Enrichment Impacts	Not specified	Not specified	Not specified	Nutrient enrichment and other potential negative impacts on designated protected areas are considered throughout the Local Plan, for example Policy PUBDM18 states that "Any development proposal for overnight accommodation which is located within the catchments of the Broads Special Area of Conservation (SAC) and Broadland Ramsar site70... [must] not increase nutrient loads." In this instance no mention is made of Broadland Special Protection Area (SPA), which may be an oversight given that elsewhere (e.g. pp 304, 385, 411) in the Local Plan it is frequently mentioned that XXXX "... is a component SSSI of Broadland SPA and Ramsar site and The Broads SAC." Perhaps more surprising is the absence of any mention of Breydon Water SPA and Ramsar site with specific regard to Policy PUBDM18.	Check if DM18 needs to also refer to Broadland SPA, Breydon Water SPA and Ramsar Site; and elsewhere in cases where only the Broads SAC and Ramsar site are mentioned.	Comment noted. The letter from Natural England, March 2022, referred to the following areas which is reflected in the policy: The Broads SAC/Ramsar (only the following are included): • Bure Broads and Marshes SSSI • Trinity Broads SSSI • Yare Broads and Marshes SSSI • Ant Broads and Marshes SSSI • Upper Thurne Broads and Marshes SSSI https://www.southnorfolkandbroadland.gov.uk/asset-library/imported-assets/ne-water-quality-and-nutrient-neutrality-advice-16-03-2022-issue-1-final.pdf	No change proposed.
BLP234	Tanya Rowlandson	Strumpshaw Parish Council	Mapping	Not specified	Not specified	Not specified	Understanding the relationships between nationally and internationally designated protected areas within the Broads National Park (and other UK national parks) can be challenging for planners and developers, let alone members of the general public! There can be considerable overlap between them and across the different international designations. For example: * Breydon Water SPA (1,203 ha) is also a Ramsar site (1,203 ha), comprising Breydon Water SSSI (513 ha) and part (690 ha) of the adjacent Halvergate Marshes SSSI. i.e. The SPA and Ramsar site occupy the same area, which is all under SSSI status, albeit two different SSSIs. * More complex is the Broads SAC (5,889.43 ha), which overlaps considerably with Broadland SPA (5,509 ha) and Broadland Ramsar site (4,623 ha). Clearly, not all of the Broads SAC meets Ramsar Convention criteria as being internationally important wetland, especially for waterfowl. In the case of the Broads SAC, which is habitat-oriented at a European scale, it comprises 28 adjacent or overlapping SSSIs; whereas the European birds-oriented Broadland SPA comprises 26 adjacent or overlapping SSSIs. Damgate Marshes, Acle and the Trinity Broads SSSIs are not included in the SPA. * Both Broadland SPA and the Broads SAC include the same set of 8 National Nature Reserves (NNRs). The point to be made here is that a glance at a map can communicate information so much more quickly than reading the text. A few A4-4 size maps illustrating the different layers of protection afforded to the landscape, habitats and bird species at national, European and global levels could be very helpful to examiners, planners, developers and other stakeholders in assimilating the natural (and cultural) context within which they need to work. Much, if not all, of this information is available from the impressive interactive map provided by the Broads Authority as part of the Local Plan for the Broads. However, it is not intuitive to the lay person as to how to generate such maps and best left with a GIS technician to provide a clear, succinct set of maps of NNRs and SSSIs overlaid with SPAs, SACs and Ramsar sites for incorporating into the Local Plan.	Provide a succinct set of pdf maps showing the extent to which nationally designated protected areas (SSSIs and NNRs) are also designated as SACs and SPAs at European level and as Ramsar sites at global level. This can be achieved, for example, by means of 3 overlays: national, European and global. Each type of protected area (5 types) and type of overlay (3) should be distinguishable. Each SSSI and NNR should be numbered and their name listed in a legend.	Support of interactive map noted and welcomed. We will explore the idea of PDF maps showing the constraints suggested. These could be included in the policies maps section when the Local Plan is adopted.	No change proposed. Provide PDF maps of some wildlife constraints.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP235	Tanya Rowlandson	Strumpshaw Parish Council	The whole plan	Not specified	Not specified	Not specified	Our final observation concerns the juxtaposition of Strumpshaw Parish, with approximately half of the Parish lying inside the National Park and benefiting from greater levels of heritage protection, both natural and cultural, demanded by the Broads Local Plan; and the other half potentially buffering the core values of the National Park within the framework of Strumpshaw's Neighbourhood Plan. Tranquillity is a prominent element of our Neighbourhood Plan, along with areas of high landscape value (woodlands, marshes, fens, green space and local heritage) that will be protected to complement the designated reserves. Thus, in the Broads Local Plan, it is particularly noteworthy that tranquillity in the Broads (PUBSP7) will be supported by some key policies, including protection and enhancement of settlement fringe landscape character (PUBDM26) and light pollution, dark skies and nocturnal character (PUBDM28). Alongside tranquillity are opportunities to explore sustainable tourism (PUBSP12), potentially supported by accessibility and transport (PUBSP8), recreational access around the Broads area (PUBSP9), recreation facilities and parking areas (PUBDM30) and other policies that sustain and enhance a prosperous local economy (PUBSP10). Key assets within the parish include: 2 pubs, 3 churches (one near-derelict), garage, recycling centre, Steam Museum at Strumpshaw Hall, Buckenham Railway Station, regular bus service, RSPB's Strumpshaw Fen, Buckenham Ancient Woodland, NCC's former landfill site (open to public), and historical and archaeological features (including meteorite sites), many of which would benefit from applying some of the policies in our respective Plans. This suggests that the Parish Council might do well to pilot some joint action planning with the Broads Authority and other partners, as appropriate. Working together to buffer the core values of the National Park, we can also enhance tranquillity in the parish through an array of distinctive sustainable initiatives aligned with our respective Plans.	Not seeking changes. Rather, looking to the future and how best Strumpshaw Parish Council and the B.A. can work together to apply their respective policies in ways that re-enforce each other's agendas ... working in partnership on initiatives of mutual interest/importance.	Response noted. Offer of joint working noted. This will be passed on to other Officers in the Broads Authority.	No change proposed.
BLP236	Tessa Saunders	Anglian Water Services	PUBDM3: Pollution and Hazards in development and protecting environmental quality	Yes	Yes	-	Anglian Water is supportive of the policy requirements, specifically clause 3(c) which should ensure that new development is not sited close to any existing hazards or existing sensitive development. Anglian Water provides guidance on asset encroachment for our water recycling centres (WRCs) and sewage pumping stations to ensure developments provide a suitable buffer between sensitive receptors and our assets to avoid adverse impacts due to odour or noise – so the 'agent of change' principle is appropriately addressed. https://www.anglianwater.co.uk/developing/planning-capacity/asset-encroachment/	N/A	Support noted and welcomed.	No change proposed.
BLP237	Tessa Saunders	Anglian Water Services	Policy PUBDM25: Utilities infrastructure development	Yes	No	Justified, effective.	Whilst the reasoned justification states that the policy applies to telecommunications, electricity, gas and water infrastructure, we would suggest that the wording is more appropriately assigned to telecommunications and electricity infrastructure, which is often above ground. Anglian Water assets include underground sewers and water mains, in addition to sewage pumping stations, water recycling centres and water treatment works above ground. New infrastructure is likely to be related to new development, or provision of public sewerage networks (first time sewerage schemes) to areas currently served by septic tanks, in order to improve water quality issues. The natural beauty and biodiversity importance of The Broads is recognised, and it is considered that other policies in the Plan would be sufficient to guide new water/sewerage infrastructure, where planning permission is required. The requirement to remove any utilities equipment when it is redundant is too generic when applied to all utilities infrastructure, particularly when many of our assets are underground. However, in the context of The Broads as a designated landscape it is understandable in relation to telecommunications masts for example.	We would suggest that the purpose of the policy is either solely related to electricity and telecommunications networks or that criteria in the policy are split between those that are generic to all utility infrastructure and those specifically related to electricity and telecommunications networks.	Agree to some extent. In general, the criteria are relevant to all infrastructure types and AWS do have some infrastructure above ground.	1a) <u>The need for the infrastructure being located in the Broads is fully justified and there are no suitable alternative locations outside the Broads protected landscape; The proposal has an essential role in the provision of a regional and national network</u> 1b) <u>For electricity infrastructure, there is no opportunity for undergrounding or no suitable alternative locations outside the Broads protected landscape;</u> 2. The operator will also be required to remove any above ground utilities equipment when it is redundant.
BLP238	Tessa Saunders	Anglian Water Services	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	Yes	Yes		Anglian Water recognises the need for an appropriate policy to address nutrient neutrality requirements of the designated sensitive catchment. We welcome the reference to the appropriate section of the Levelling Up and Regeneration Act with regard to nutrient removal at nutrient significant plants (our WRCs serving a population equivalent of 2,000 or more) within the catchment areas, which will be progressed during AMP8 (2025-2030).	N/A	Support noted and welcomed.	No change proposed.
BLP239	Tessa Saunders	Anglian Water Services	Policy PUBDM11: Green and blue infrastructure and Public Rights of Way	Yes	Yes		Anglian Water welcome the policy aims to support the delivery of green and blue infrastructure and alignment with the emerging Local Nature Recovery Strategies for Norfolk and Suffolk. We also support the reference to new green and blue infrastructure incorporating SuDS as part of the multi-functional benefits that can be provided.	N/A	Support noted and welcomed.	No change proposed.
BLP240	Tessa Saunders	Anglian Water Services	Policy PUBDM9: Surface water run-off	Yes	Yes		Anglian Water supports policy to ensure all development proposals follow the drainage hierarchy for surface water. Discharge to a combined sewer will only be agreed in very exceptional circumstances, which are set out in our surface water risk management guidance which can be found here. We recommend that it might be helpful to reference our new guidance with additional sources of information in the supporting text. Anglian Water will seek to separate any surface water from any new developments to relieve the existing pressures and treatment requirements. It should be made clear in the policy or supporting text that no surface water flows will be accepted into the foul drainage network. The misconnection of surface water sources into our foul drainage network is the main contributor to hydraulic overloading, leading to spills and pollution events. See our Pollution Incident Reduction Plan 2025 for further information. Clause 2: Anglian Water agrees that betterment should be sought and encouraged particularly on brownfield sites, or on any site which could provide betterment for surface water flooding issues experienced more locally. Furthermore, we agree that run-off rates need to be agreed with Anglian Water, as the sewerage undertaker, where connections to our network are required. https://www.anglianwater.co.uk/corporate/strategies-and-plans/pollution-incident-reduction-plan/	It should be made clear in the policy or supporting text that no surface water flows will be accepted into the foul drainage network.	Agree.	Add suggested text to supporting text.
BLP241	Tessa Saunders	Anglian Water Services	Policy PUBDM8: Development and flood risk	Yes	Yes		Anglian Water supports the policy approach to ensure that new development follows national policy and guidance. The Environment Agency's release of NaFRA2 provides the most up to date information to inform sustainable and resilient growth in The Broads Executive Area.	N/A	Support noted and welcomed.	No change proposed.
BLP242	Tessa Saunders	Anglian Water Services	Policy PUBSP2: Strategic flood risk policy	Yes	Yes		Anglian Water supports the approach of this strategic policy and welcome in the inclusion of climate change allowances, when taking account of flood risk in new development proposals. We agree that SuDS should be the principal method of mitigating surface run-off in accordance with the drainage hierarchy. NOTE: Clause 4 lists the risk management authorities that would be consulted in relation to managing flooding risks. Anglian Water is also a Risk Management Authority, as identified in the Flood and Water Management Act 2010, in respect of managing the risk of flooding to water supply and sewerage facilities, and flood risks from the failure of infrastructure. We work with developers to assess the risk of new development connecting to our networks and provide guidance to assist with managing surface water flood risk. https://www.anglianwater.co.uk/siteassets/developers/development-services/aws-surface-water-guide-sm.pdf	N/A	Support noted and welcomed.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP243	Tessa Saunders	Anglian Water Services	Policy PUBDM7: Water efficiency and re-use	Yes	Yes		<p>Anglian Water considers the policy is SOUND in principle, however, with the publication of the Shared Standards for Water Efficiency in Local Plans, we are now advising local planning authorities to introduce tighter water efficiency standards using the evidenced approach. Given The Broads Local Plan is at an advanced stage, we are mindful that the Shared Standards represents a step change, but the Shared Standards would provide the evidence required to support the policy specification "any higher standards established... locally". The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. We recommend that LPAs include Local Plan Policies that: •Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible. •Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. •Require new major non-domestic developments to include water saving measures and water reuse in their design. These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. It is considered that a modification to Policy PUBDM7 can help make development in The Broads more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives.</p>	<p>All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to ± 90 litres per head per day of mains supplied potable water or any tighter water efficiency higher-standard subsequently established nationally through Building Regulations Part G or locally. Measures to reduce water demand further will be encouraged and supported.</p> <p><u>A Water Efficient Design Statement must be submitted with the application at the earliest stage to demonstrate how policy requirements have been met and will be maintained in relation to water efficient design. The statement shall provide, as a minimum, the following:</u></p> <p><u>c) Baseline information relating to existing water use within a development site; and</u></p> <p><u>d) Full calculations relating to expected water use within a proposed development (such as water efficient fixtures and fittings, rainwater/stormwater harvesting and reuse, or greywater recycling).</u></p> <p><u>e) Prior to the first occupation of development a completion certificate shall be submitted to the Local Planning Authority confirming the design standard under part 1 a or b (as relevant) has been verified and fully implemented.</u></p>	<p>Comment noted. Prior to the publication of the REG19 version of the Local Plan, working with Anglian Water, Environment Agency and Essex & Suffolk Water, on receiving the 'Shared Standards', the Authority tried to amend the draft policy to 90l/h/d. Following research, it was found that there was no guaranteed way of checking the delivery of this policy. This is beyond the optional building regulations and so it would not be checked by building regulations. As such, it was agreed to not include the standard but if the organisations above wished to raise it as part of their response to the Local Plan, it could be considered through the Examination. We also note that there is a consultation out relating to the building regulations: https://consult.defra.gov.uk/water-efficiency-demand/review-of-water-efficiency-standards/. This public consultation includes an option to revise the minimum Water Efficiency Standard in new houses through fittings from 125 l/p/d to 105 l/p/d, and the optional technical standard from 110 l/p/d to 100 l/p/d. Does the organisation still want to pursue 90l/h/d?</p>	<p>The Authority would be content in amending the use to 90l/h/d, but as stated in the response, delivery cannot be monitored or guaranteed.</p> <p>Accept the other proposed changes or similar as proposed by other organisations.</p>
BLP244	Tessa Saunders	Anglian Water Services	Policy PUBDM7: Water efficiency and re-use	Yes	Yes		<p>It is recognised that the Broads Local Plan is at an advanced stage in its preparation, but this consultation provides an opportunity to include a tighter water efficiency standard that can be justified by evidence set out in the annexes supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that: •The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations. There are non-domestic water restrictions in both Anglian Water and Essex & Suffolk Water areas which are referenced in the supporting text to Policy PUBDM7. •Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SSSIs in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. The Norwich and the Broads water resource zone (WRZ) is identified as one of the WRZs with deterioration risk as a result of abstraction pressures. •At present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs. For example, Anglian Water offer a £500 incentive for residential properties that achieve a water efficiency standard of 90 l/p/d which would be within the shared standards water efficiency parameters of 85-95 l/p/d suggested for Local Plan policies. These incentives can support the viability of delivering water efficiency measures. Based on the Shared Standards introducing a 'locally established water efficiency standard', Policy PUBDM7 could be modified to reflect the recommendations in the Shared Standards. Whilst the overall level of development in The Broads is low, it is considered the evidence set out in the Shared Standards is clear that tighter water efficiency standards are necessary for sustainable growth and nature recovery, which supports the National Park purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks, and the long term vision and fundamental principles for the Broads National Park in the Broads Plan 2022-2027.</p>	<p>Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to be water efficient and should aim to achieve full credits within the 4 water categories: (WAT01, WAT02, WAT03, and WAT04) under the BREEAM standard, with a minimum score of 3 credits within WAT01 Water Consumption.</p>	<p>Agree to some extent. Water standard of BREEAM cannot be used in isolation. As such, we have introduced a BREEAM standard (see policy Policy PUBDM55: Non-residential development and BREEAM) which refers to a requirement to meet credits in WAT01 and other WAT calculators. So to include reference to that would be repeating another policy. The wording as included is aimed at all non-domestic buildings, including those that are below the 250sqm threshold.</p>	<p>No change proposed.</p>
BLP245	Tessa Saunders	Anglian Water Services	Policy PUBDM5: Water quality and foul drainage	Yes	Yes		<p>Anglian Water supports the policy approach in terms of the need to demonstrate adequate foul drainage and adequate sewage provision is available to accommodate wastewater flows from new development, including residential moorings with associated pump-out facilities. This approach aligns with similar policies in other Local Plans across our region. Anglian Water advises developers to seek early engagement on their proposals for wastewater connections. For example, we may require a sustainable point of connection to our network, particularly where a site may trigger a number of risks - such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding. We welcome the supporting text which encourages developers to undertake pre-planning engagement. We endorse the policy requirement regarding Horning Knackers Wood water recycling centre (WRC) and the explanation in the supporting text. Work has been completed to bring the WRC into permit compliance for dry weather flow. However, this will require monitoring to assess whether the specific constraints and challenges in the WRC catchment have been successfully mitigated by this investment. Anglian Water has provided The Broads Authority with details of capacity at our WRCs for the residential allocations within the Local Plan. Our investment during successive 5-year asset management periods (AMPs) must remain within the limits as approved in our final determination from Ofwat. We are currently in the process of preparing our next Drainage and Wastewater Management Plan (DWMP) which will assess numerous factors, including forecasted growth in all 1,100 of our WRC catchments and review our risk of compliance performance against the discharge permit (as issued by the Environment Agency). We work with the Environment Agency to prioritise those catchments where investment in additional treatment capacity is required and to secure funding for this from Ofwat via the Price Review process.</p>	<p>N/A</p>	<p>Support noted and welcomed.</p>	<p>No change proposed.</p>
BLP246	Tessa Saunders	Anglian Water Services	Policy PUBWH1: Whitlingham Country Park plus adjacent land	Yes	Yes		<p>Anglian Water supports the policy approach – particularly the reference to safeguarding our existing assets within the country park.</p>	<p>Not seeking changes</p>	<p>Support noted and welcomed.</p>	<p>No change proposed.</p>
BLP247	Tessa Saunders	Anglian Water Services	Policy PUBTHU1: Tourism development at Hedera House, Thurne	Yes	No	Justified	<p>Anglian Water does not have a sewerage network in Thurne, and therefore existing properties will be served by private wastewater treatment systems such as septic tanks or package treatment plants. Clause 1.iv) would require modification to be consistent with Policy PUBDM5 with regard to wastewater disposal, where it is not feasible to connect to the mains sewer. Similarly, the constraint listed in the supporting text regarding capacity issues at Ludham-Walton Hall WRC is not relevant.</p>	<p>Clause 1.iv) would require modification to be consistent with Policy PUBDM5 with regard to wastewater disposal, where it is not feasible to connect to the mains sewer. Similarly, the constraint listed in the supporting text regarding capacity issues at Ludham-Walton Hall WRC is not relevant.</p>	<p>Agree.</p>	<p>Delete reference to Ludham-Walton Hall Water Recycling Centre capacity issues.</p> <p>Amend part 1 iv) Demonstration of a suitable and appropriate foul water disposal method that is in conformity with Policy PUBDM5 that there is adequate capacity in the water recycling centre (sewage treatment works) and the foul sewerage network to serve the proposed development; and that proposals demonstrate they will not have an adverse impact on surface or ground water in terms of quality and quantity;</p>
BLP248	Tessa Saunders	Anglian Water Services	Policy PUBCAN1: Cantley Sugar Factory	Yes	Yes		<p>Anglian Water supports criterion 2(n) regarding water efficiency and re-use. We would recommend that this is cross referenced to Policy PUBDM31 for consistency. We also welcome reference to our existing water main within the site in criterion 2(o).</p>	<p>We would recommend that this is cross referenced to Policy PUBDM31 for consistency.</p>	<p>Agree.</p>	<p>Cross refer to Policy PUBDM31 and PUBDM55 for consistency.</p>

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP249	Tessa Saunders	Anglian Water Services	Policy PUBDM55: Non-residential development and BREEAM	Yes	Yes		Anglian Water supports this policy regarding the "Water efficiency" requirements of the BREEAM water calculators which align with our recommended approach in the Shared Standards for Water Efficiency in Local Plans (see our commentary under Policy PUBDM7).	However, it might be more relevant to include these requirements in PUBDM7 or PUBDM31 for consistency. https://www.anglianwater.co.uk/siteassets/developers/new-content/p--c/shared-standards-in-water-efficiency-for-local-plans.pdf	Agree to some extent. Water standard of BREEAM cannot be used in isolation. As such, we have introduced a BREEAM standard (see policy Policy PUBDM55: Non-residential development and BREEAM) which refers to a requirement to meet credits in WAT01 and other WAT calculators. So to include reference to that would be repeating another policy. The wording as included is aimed at all non-domestic buildings, including those that are below the 250sqm threshold.	Clarify part 4 of PUBDM7 and cross refer to DM55. Then in supporting text, explain the criterion better and cross refer to DM55.
BLP250	Tessa Saunders	Anglian Water Services	Policy PUBDM52: Design	Yes	Yes		Anglian Water supports the policy aims for design particularly those that relate to safeguarding on site utilities infrastructure, sustainable design including water efficiency measures, and flood risk and resilience. This reflects our comments on similar policy themes.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP251	Tessa Saunders	Anglian Water Services	Policy PUBDM46: New residential moorings	Yes	Yes		Anglian Water agrees that proposals for residential moorings should have adequate access to pump out facilities that connect to the main sewer (and available headroom at the receiving WRC) consistent with the requirements in Policy PUBDM5 – unless there are alternative private treatment facilities in locations that are not within a reasonable distance to connect to the mains sewer.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP252	Tessa Saunders	Anglian Water Services	Policy PUBSP15: Residential development	Yes	Yes		Anglian Water agrees with the aims of the policy and the need to be consistent with other policies in the plan. We acknowledge that the statement in the supporting text that "Development within settlements will be permitted only where it meets criteria covering issues such as flood risk, satisfactory provision of infrastructure, and design", would address our key concerns around flood risk, infrastructure capacity, and resilience over the longer term.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP253	Tessa Saunders	Anglian Water Services	Policy PUBDM40: Moorings, mooring basins and marinas	Yes	Yes		Anglian Water agrees that proposals for moorings, particularly permanent moorings, should have adequate access to pump out facilities that connect to the main sewer (and available headroom at the receiving WRC) consistent with the requirements in Policy PUBDM5 – unless there are alternative private treatment facilities in locations that are not within a reasonable distance to connect to the mains sewer.	Not seeking changes	Support noted and welcomed.	No change proposed.
BLP254	Tessa Saunders	Anglian Water Services	Policy PUBDM31: New employment development	Yes	Yes		Anglian Water considers the policy sound in principle, and supports the policy requirement 1(j) in relation to non-household developments and non-domestic water requirements, which reflects our submission to the Preferred Options Local Plan consultation in 2024. However, our Non-Domestic Water Requests Position Statement has subsequently been updated (December 2024) such that any requests for non-domestic water that exceed 20m ³ /day will be declined, in order to protect existing supplies and the environment. Consequently, we will no longer require a Water Resources Assessment to be submitted for non-domestic water requests, as it is now a binary decision on whether the request is equal to or less than 20m ³ /day, or greater. Furthermore, the non-domestic water requirement may not only apply to major development, as it is rather the type of business, not necessarily the scale.	We recommend the policy is amended to state: j) non-household developments that require significant non-domestic water use need to undertake early discussions with the relevant water company (Anglian Water or Essex & Suffolk Water) to ascertain water availability and feasibility of their scheme, and also demonstrate how they will reduce water demand;	Agree.	Amend j) to say: <u>non-household developments that require significant non-domestic water use need to undertake early discussions with the relevant water company (Anglian Water or Essex & Suffolk Water) to ascertain water availability and feasibility of their scheme, and also demonstrate how they will reduce water demand</u>
BLP255	Tom Wignall	Avison Young on behalf of National Gas Transmission	Policy PUBDM52: Design	Yes	Yes	-	Support policy and provide comments - document is Appendix B to this report .	Not seeking changes	Support noted.	No change proposed.
BLP256	Tracey Smyth	-	Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	Yes	Not specified	Not specified	I wish to object to the current ongoing fringe settlement. The land in question which has been nominated for protection isn't applicable in regards to what the policy is trying to protect. The majority of this area is fully developed and there is no formal justification for the site designation. The remaining sections are designated as priority habitat. This is all private land as the trees have been planted by the land owners. The gardens and land are already restricted from residential development. This area in question have always been used for customer cars, boat storage and general storage, these are crucial to the local economy and are important commercial businesses in the area. I strongly object to this area being designated as settlement fringe.	Remove Chet valley from settlement fringe.	See Appendix G .	See Appendix G .
BLP257	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBCAN1 - Cantley Sugar Factory	-	-	-	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.	-	Background information noted.	No change proposed.
BLP258	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBCAN1 - Cantley Sugar Factory	-	-	-	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 products. 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: * Animal feed from residual sugar beet fibre which is supplied to the livestock industry; * Topsoil from soil recovered from sugar beet which is used primarily by the landscaping industry; * LimeX, a liming material supplied to agriculture; * On-site power generation (Combined Heat and Power) and the export of electricity into the electrical grid, and * Aggregates from stones recovered from sugar beet which is used by civil engineering, road building and construction industries. 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 waste water 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.	-	Background information noted.	No change proposed.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP259	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBCAN1 - Cantley Sugar Factory	Yes	No	Positively prepared, justified and consistent with national policy	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 in the supporting paragraph are 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.	See following specific comments.	See following specific comments.	See following specific comments.
BLP260	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBCAN1 - Cantley Sugar Factory - criterion d	Yes	No	Positively prepared, justified and consistent with national policy	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. 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." 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 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. 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.	It should be either deleted or specific impacts or considerations to be given to the pub should be identified in the policy.	Comment noted. The types of issues are listed in the PUBDM27: Amenity and therefore PUBCAN1 could refer to the amenity policy.	For criterion c and d add reference to the PUBDM27: Amenity.
BLP261	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBCAN1 - Cantley Sugar Factory - criterion g	Yes	No	Positively prepared, justified and consistent with national policy	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. 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).	Retains and does not impact the tree belt along the eastern edge of the track to the river, wherever possible (See policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development).	The trees are not classified as ancient woodland on our mapping system. 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. Furthermore, NPPF Para 136 and 187 sets the basis for protecting trees and the wording in this policy reflects that. 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.	No change proposed.
BLP262	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBCAN1 - Cantley Sugar Factory - criterion k	Yes	No	Positively prepared, justified and consistent with national policy	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. 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.	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>
BLP263	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	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.	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 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 designed with minimal carbon dioxide emissions in mind.	Agree to some extent.	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.
BLP264	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	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.	Cantley Sugar factory receives substantial amounts of raw material from local farms, requiring substantial amounts of HGV movements 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. 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.	Agree.	Make change as suggested.

Rep #	Name:	Organisation/Group:	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	Proposed change to Local Plan.
BLP265	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	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.	The policy requires seeks improvements in the water efficiency of the site. This is an area that British Sugar have made significant improvements, including the installation of a new waste water treatment plant , 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.
BLP266	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	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 (https://www.broads-authority.gov.uk/_data/assets/pdf_file/0023/134357/HELAA-September-2023.pdf , 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 BLP260 relating to the reference to the pub within the policy itself.
BLP267	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBDM15: Natural Environment and supporting paragraph	Yes	No	Positively prepared, justified and consistent with national policy	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 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.	We request that the wording of the policy and the supporting paragraph should be amended so that development proposals have regard to 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) Assist in the delivery of Take account of the Local Nature Recovery Strategies (Norfolk and Suffolk) Amend supporting text to say: Applications will be required to address the requirements take account of the of the Local Nature Recovery Strategy.
BLP268	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	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 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.	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, 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.	No change proposed.
BLP269	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	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). https://www.bristol.gov.uk/files/documents/6894-bristol-local-plan-main-document-publication-version-nov-2023/file	No change proposed.
BLP270	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	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 the Broads. We consider this to be contrary to the NPPF Paragraph 168.	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 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.	No change proposed.
BLP271	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBDM27: Amenity	Yes	No	Justified and consistent with national policy	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 "potential 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 or potential neighbouring properties or uses
BLP272	Wakako Hirose (Rapleys)	British Sugar Plc C/O Rapleys LLP	Policy PUBDM29: Transport, highways and access	Yes	No	justified and consistent with national policy	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, 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.	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.