



Local Plan for the Broads

Statement of Common Ground

Between the Broads Authority & Suffolk County Council

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

November 2025

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1. Introduction

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

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

2. Areas of agreement

| Part of Local Plan | Why you consider this part of the Plan is not legally compliant or sound/comment | What change(s) you consider necessary to make the Plan legally compliant or sound. | Broads Authority response to comment | Proposed change to Local Plan. |
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| general | <p>Thank you for consulting Suffolk County Council (SCC) on the Broads Local Plan at Regulation 19 Submission Stage.</p> <p>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.</p> | n/a | Background information noted. | No change proposed. |
| general | 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. |
| section 6 policy context | <p>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).</p> | <p>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.</p> | 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. |
| Policy PUBDM1: Major Development in the Broads | amend for clarity, accuracy and ease of reading | <p>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).</p> | 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. |
| PUBDM3: Pollution and Hazards in development and protecting environmental quality | amend for clarity, accuracy and ease of reading | <p>SCC suggests the following added text, to be in line with NPPF paragraph 182: This includes the design of Sustainable Drainage Systems (SuDS) <u>which should comply with the CIRIA pollution assessment best practices.</u></p> | Agree. | Add text as proposed. |
| Policy PUBDM8: Development and flood risk | Amend for clarity, accuracy and ease of reading | <p>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, treepits, conveyance swales, and green/blue roofs.</u></p> | 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, treepits, conveyance swales, and green/blue roofs.</u> |

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| PUBDM9: Surface water run-off | amend for clarity, accuracy and ease of reading | <p>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.</p> <p>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. <i>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.</i> The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant, sewerage undertaker.</p> | Agree to some extent. | <p>Norfolk LLFA raised a similar point, and this change is proposed.</p> <p>2.The surface water runoff rate that will occur as a consequence of the development is required to be no more than the existing pre-development greenfield runoff rate. <u>Brownfield sites must discharge at the original pre-development (greenfield) runoff rate.</u> Brownfield sites should aim to reduce runoff as close to greenfield rates as possible. The discharge rate for brownfield sites should be no more than the rate prior to any new development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals for brownfield sites. The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant, sewerage undertaker.</p> |
| PUBDM9: Surface water run-off | amend for clarity, accuracy and ease of reading | <p>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.</p> <p>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.</p> | Agree to some extent. | <p>Norfolk LLFA raised a similar point, and this change is proposed.</p> <p>3. Sustainable Drainage Systems (SuDS) <u>that are proportionate to the nature and scale of the proposal</u> shall be used unless, following adequate assessment, soil conditions and/or engineering feasibility dictate otherwise. These should be designed and implemented to be multifunction and follow the general principles set out at Appendix 9 as well as any relevant guidance or standards that are in place such as Lead Local Flood Authority guidance on drainage design.</p> |
| Policy PUBDM10: Open space on land, play space, sports fields and allotments | 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> |
| Policy PUBDM11: Green and blue infrastructure and Public Rights of Way | 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> |
| Policy PUBDM16: Biodiversity Net Gain | 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 | <p>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></p> <p>As currently written, this policy is not considered sound as it is not clear and unambiguous, in line with NPPF paragraph 16 part 6).</p> | 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. |

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| | 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 net loss”. | | | |
| Policy PUBDM25: Utilities infrastructure development | 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 <i>significant</i> 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. | Savills/Essex & Suffolk Water made a similar comment and this change is proposed: 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 |
| Policy PUBDM28: Light pollution, dark skies and nocturnal character | 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: <u>Use the warmest colour with the lowest Correlated Colour Temperature [CCT] possible.</u> |
| Policy PUBDM30: Recreation facilities parking areas | 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) <i>and integration of high-quality SuDS features</i> | 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> |
| Policy PUBDM29: Transport, highways and access | 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. |
| Policy PUBDM30: Recreation facilities parking areas | 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. |
| Policy PUBDM44: Residential development within defined Development Boundaries | 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. |
| Policy PUBDM48: Elderly and specialist needs housing | 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 | 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. | No change re first part of comment. Cross refer to design policy and M4(2) and M4(3). |

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| | | 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. | Agree re reference to M4(2) and M4(3). | |
| Policy PUBDM49: Residential ancillary accommodation | 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. |
| Policy PUBDM51: Custom/self-build | 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 ... <i>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.</i> | Could make it clearer as follows: ... <u>then these unsold plots</u> 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. |
| Policy PUBDM52: Design | 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) |
| Policy PUBDM54: Heat resilient design | 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. |
| Policy PUBDM59: Designing places for healthy lives | recommended amendments for clarity and accuracy. | 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'. 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. There are two further instances in Appendix 12 where the term | Agree to make the reference consistent. Agree with other changes to some extent. | Ensure references to the Protocol is 'Planning in Health Protocol'. 'In terms of part 2a of the policy, working with Norfolk and Suffolk Public Health and Norfolk and Waveney NHS colleagues...' 'In terms of part 2b of the policy, working with health colleagues, we have produced a small sites checklist to reflect smaller development...' |

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| | | <p>'Norfolk and Waveney Health Protocol' is used, and one reference of 'Norfolk Health Protocol checklist'. These may also need to be updated to '<i>Planning in Health Protocol</i>' for accuracy and consistency.</p> <p>To improve usability, it is recommended that the implementation details of the Policy are separated under clear subheadings:</p> <ul style="list-style-type: none"> • 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 '<i>2b</i>'. | | |
| Policy PUBDM59: Designing places for healthy lives | recommended amendments for clarity and accuracy. | <p>Public Health recommend strengthening the following sentences:</p> <ul style="list-style-type: none"> • '...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>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:</p> <ul style="list-style-type: none"> • 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'). | Agree with proposed changes. | <ul style="list-style-type: none"> • ...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>Add a title as suggested: <u>Further guidance</u>.</p> |
| PUBSP2: Strategic flood risk policy | amend for clarity, accuracy and ease of reading | <p>SCC suggest the following added text, in line with NPPF paragraph 182:</p> <p><i>5. Preference should be made towards high quality, green open SuDS features over less sustainable solutions such as attenuation crates.</i></p> | Agree, but that would fit best with 1b). | 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> |
| Policy PUBSP5: Biodiversity | 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> | Agree. | e) <u>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> |
| Policy PUBSP8: Accessibility and Transport | to encourage sustainable travel, as per Chapter 9 of the NPPF, and thus achieve sustainable development. | 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 | Agree. | 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. |

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| | | <p>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>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> |
| general - Site Specific / Allocation Policies | 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. | <p>Yes. Your commentary is correct, but conclusion is not and the comment includes snippets of a paragraph and excludes a linked footnote.</p> <p>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'.</p> <p>In terms of PUBSP15, part 7 a) i) see footnote 126 which again sets the situation out clearly.</p> | No change proposed. |
| Policy PUBOUL1: Boathouse Lane Leisure Plots | 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. |
| Policy PUBOUL2: Oulton Broad - Former Pegasus / Hamptons Site | recommended amendments for clarity and accuracy. | <p>SCC notes that this allocation is a “carry-over” from the previous Broads Local Plan.</p> <p>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.</p> <p>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</p> | <p>The application was approved 2014.</p> <p>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.</p> | <p>Please note that this allocation received planning permission in 2012 <u>2014</u> for 76 market dwellings, office accommodation, and moorings.</p> <p>It is anticipated that the dwellings <u>permitted as part of the extant planning permission</u> will be delivered as follows: End 2028: 15 End 2029: 15 After 2030: 46</p> |

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| | | 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). | | |
| Policy PUBSSLGS: Local Green Space | 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. |
| Policy PUBSSA47: Road schemes on the Acle Straight (A47T) | 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. |
| Appendix 12 | 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 Norfolk-Planning in Health Protocol 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> <u>Part 1: must be completed for all new housing, commercial, and recreational developments (unless the Planning in Health Protocol applies).</u> <u>Part 2: in addition, developments of 1–49 dwellings must also complete Part 2.</u> | Agree. | Appendix 12: Small Site Healthy Planning Checklist This checklist is based on the Norfolk-Planning in Health Protocol 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> <u>Part 1: must be completed for all new housing, commercial, and recreational developments (unless the Planning in Health Protocol applies).</u> <u>Part 2: in addition, developments of 1–49 dwellings must also complete Part 2.</u> |
| Appendix 12, cnt'd | 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 |

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| | | | | <ul style="list-style-type: none"> • development that involves the significant loss of public open space |
| Appendix 12, cnt'd | 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 <u>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.</u></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 <u>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.</u></p> |

3. Areas of disagreement

None.

4. Signed

For the Broads Authority: Natalie Beal, Planning Policy Officer, 12 November 2025

For Suffolk County Council: Peter Freer, Planning Strategy Manager, 02 December 2025