

Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
SPC1	10	Chapter 1 Introduction	Rewrite to reflect status of document.	General update needed to reflect the stage of the Local Plan.	Factual update
SPC2	10	Chapter 1 Introduction	Remove list of evidence - just link to examination library.	To make Plan more succinct.	Succinct
SPC3	11	Chapter 2 About this consultation	Remove this chapter.	Not needed in final version of Local Plan.	Factual update
SPC4	13	Chapter 4 Sustainability Appraisal and Habitats Regulation Assessment	Amend and update to briefly say what SA and HRA are and to point to the various versions.	To make Plan up to date and more succinct.	Succinct
SPC5	14	Chapter 5 Timeline and stages for the production of the Local Plan for the Broads	Remove this chapter.	Not needed in final version of Local Plan.	Factual update
SPC6	16	Section 6.2 National Planning Policy Guidance (NPPG) (ongoing)	Remove list of what NPPG covers.	To make Plan more succinct.	Succinct
SPC7	18	Section 6.4 East Inshore and Offshore Marine Plans (2014)	May need to be updated, depending on progress of the review of these plans	To ensure the Local Plan is up to date.	Factual update
SPC8	19	Section 6.7 Current Broads Planning Policy Documents	Remove reference to Flood Risk SPD	Would no longer be in place on adoption of the Local Plan. And most of SPD within Local Plan.	Factual update
SPC9	20	First bullet point	Amend 'East Suffolk Affordable Healthy Environments Supplementary Planning Document (SPD)'	To address comment BLP45	REG19 representation
SPC10	20	Section 6.10 Neighbourhood Plans	Update list and date the list reflects.	To ensure the Local Plan is up to date.	Factual update
SPC11	20	Section 6.8 Neighbouring Local Planning Authority Planning Policy Documents	Make past tense	To reflect the Local Plan has been produced.	Factual update
SPC12	20	Section 6.9 Norfolk Strategic Planning Framework (NSPF) (2021)	Refer to most recent version and amend hyperlink.	Most recent version endorsed August/September 2025.	Factual update
SPC13	20	Section 6.10 Neighbourhood Plans (p20)	Update the list of Neighbourhood Plans at the time of the adoption of the Local Plan.	To address comment BLP227	REG19 representation
SPC14	30	Section 8 - Duty to Cooperate , 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>	To address comment BLP226	REG19 representation
SPC15	30	Section 8.3 Planning White Paper and Levelling Up Act	Delete this section.	The Local Plan would have been adopted using Duty to Cooperate so reference to future ways of cooperating is not required.	Factual update
SPC16	31	Section 9.2 part n	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> ”.	Related to comment BLP33c	REG19 representation
SPC17	32	9.2	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.	To address comment BLP191	REG19 representation
SPC18	32	9.2	9.2 w) <u>An area 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>	To address comment BLP191	REG19 representation
SPC19	32	Section 9.2 Strengths, part u	Check and amend	Does not make sense as written.	Grammatical
SPC20	32	Section 9.3 Weaknesses, part i	Remove reference to COVID19	To update the weakness as the impact of COVID19 has reduced.	Factual update
SPC21	39	Section 11	Remove reference to 'pub'	To reflect that stage of the Local Pan has been completed and the polices are final.	Factual update
SPC22	45	Add to above Circular Economy	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>	To address comment BLP28	REG19 representation

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SPC23	46	Policy PUBDM3: Pollution and Hazards in development and protecting environmental quality, part 6	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). Associated footnotes: * Typically less than 400m, although this may vary based on local topography. ^ There may be the potential for a hydrological link.	To address comment BLP22	REG19 representation
SPC24	46	Policy PUBDM3: Pollution and Hazards in development and protecting environmental quality. Part 6	This includes the design of Sustainable Drainage Systems (SuDS) <u>which should comply with the CIRIA pollution assessment best practices.</u>	To address comment BLP60	REG19 representation
SPC25	49	Policy PUBSP1: Responding to the Climate Emergency	Add a new criterion as follows: j) <u>Avoiding development in areas at risk of future flood risk due to the impacts of climate change.</u>	To address comment BLP207	REG19 representation
SPC26	56	Horning Knackers Wood Water Recycling Centre supporting text	Anglian Water Services (AWS) have investigated why the WRC is receiving excessive flows, and there is a Joint Position Statement (written and endorsed by the Broads Authority, North Norfolk District Council and the Environment Agency)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>	To address comment BLP225	REG19 representation
SPC27	58	Policy PUBDM7: Water efficiency and re-use	See 90l/h/d topic paper for proposed changes. https://www.broads-authority.gov.uk/_data/assets/pdf_file/0014/221072/Water-usage-90-l-h-d-Topic-Paper.pdf	To address comment BLP249, 243, 158, 159, 160, 4	REG19 representation
SPC28	60	Policy PUBSP2: Strategic flood risk policy	Make the last part of 1b a new criterion so it is 1c.	This is an important consideration and is lost at the end of 1b.	Improved wording
SPC29	60	Policy PUBSP2: Strategic flood risk policy, 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>	To address comment BLP80	REG19 representation
SPC30	61	Policy PUBDM8: Development and flood risk, 2b	Remove part 2b).	To address comment BLP198	REG19 representation
SPC31	61	Policy PUBDM8: Development and flood risk, 2	Add reference to climate change allowances to part 2 of the policy.	To address comment BLP206	REG19 representation
SPC32	61	Policy PUBDM8: Development and flood risk, new part 1	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>	To address comment BLP202	REG19 representation
SPC33	63	Policy PUBDM8: Development and flood risk, part 5	Part 5 of PUBDM8 could be removed and placed in PUBDM50 as a new point 5.	To address comment BLP199	REG19 representation
SPC34	63	Policy PUBDM8: Development and flood risk, 6	6a: The site is available to be developed (including considering site ownership or whether the owners of sites have any intention of them being developed);	To address comment BLP200	REG19 representation
SPC35	64	Policy PUBDM8: Development and flood risk , part 12	The policy includes the following repetition at point 12 on page 64, which has been copied over from a typographical error in EA's Preferred Options consultation response: <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; 	To address comment BLP17	REG19 representation
SPC36	67	First paragraph under sequential test	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.	To address comment BLP202	REG19 representation

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SPC37	70	5th paragraph	the over-riding principle in respect of development is that it should not increase <u>flood</u> risk now or in the future.	To address comment BLP203	REG19 representation
SPC38	73	First paragraph	There is a range of possible SuDS techniques that can be used, although not all techniques will be appropriate for individual development sites but a preference should be given to green, open features such as raingardens, tree pits, conveyance swales, and green/blue roofs.	To address comment BLP61	REG19 representation
SPC39	73	Policy PUBDM8: Development and flood risk supporting text	Remove: 'Status of the 2020 Flood Risk Supplementary Planning Document on adoption of the Local Plan' section	Would no longer be in place on adoption of the Local Plan. And most of SPD is within Local Plan.	Factual update
SPC40	73	Policy PUBDM8: Development and flood risk supporting text, under 'Other consents that may also be required'	First sentence - remove random 'a'	Typo	Typo
SPC41	74	Above Policy PUBDM9	Include reference to the LLFA's Developer Guidance on the Norfolk County Council website.	To address comment BLP204	REG19 representation
SPC42	74	Policy PUBDM9: Surface Water Runoff, 1	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.</u> in accordance with a surface water drainage hierarchy so that, in order of priority, they: 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	To address comment BLP192	REG19 representation
SPC43	75	Policy PUBDM9: Surface water run-off, 4d	Aimed 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.	To address comment BLP24	REG19 representation
SPC44	75	Policy PUBDM9: Surface Water Runoff, 2	In the absences of suggested text, the following change is proposed: 2.The surface water runoff rate that will occur as a consequence of the development is required to be no more than the existing pre-development greenfield runoff rate. <u>Brownfield sites must discharge at the original pre-development (greenfield) runoff rate.</u> Brownfield sites should aim to reduce runoff as close to greenfield rates as possible. The discharge rate for brownfield sites should be no more than the rate prior to any new development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals for brownfield sites. The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant, sewerage undertaker.	To address comment BLP194	REG19 representation
SPC45	75	Policy PUBDM9: Surface Water Runoff, 3	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.	To address comment BLP195	REG19 representation
SPC46	77	First paragraph	<u>The IDB have their own local surface water policy which takes precedence over national best practice (Development - Water Management Alliance (wlma.org.uk)). Watercourses in the Broads within Internal Drainage Boards; internal drainage districts (IDD) are regulated by the Internal Drainage Board (IDB) and maintained by private landowners or the IDB where designated as arterial. IDBs are regulators of surface water discharges within IDs and have their own local surface water policy which takes precedence over national best practice (Development - Water Management Alliance (wlma.org.uk)). 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 IDB's regulation and that of Local Planning Authorities. From the WMA website (https://www.wlma.org.uk/) you can access maps and contact details to determine which IDB area a development falls into, if any.</u>	To address comment BLP51 and BLP52	REG19 representation

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SPC47	77	Under Designing SuDS	<u>No surface water flows will be accepted into the foul drainage network.</u>	To address comment BLP240	REG19 representation
SPC48	78	Last paragraph	Update text to reference the new National Standard for SUDS.	To address comment BLP196	REG19 representation
SPC49	80	Policy PUBDM10: Open space on land, play space, sports fields and allotments, part 2	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>	To address comment BLP64	REG19 representation
SPC50	80	Policy PUBDM10: Open space on land, play space, sports fields and allotments, 1b	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,</u> will be supported'.	To address comment BLP37	REG19 representation
SPC51	80	Policy PUBDM10 Open space on land, play space, sports fields and allotments.	Amend 1a as follows: a) Development that would result in the loss of existing sport, recreational (including play space), allotment or amenity open space as <u>(which may be identified on the policies maps and/or identified by the Authority's constituent district councils in their evidence base, as well as such spaces not mapped or identified in evidence)</u> will only be permitted if it can be demonstrated (through a local assessment) that:	Because some open space may be new or not mapped.	Factual update
SPC52	82	Fifth paragraph	Include reference to Local Plan Policy PUBDM3 and contaminated land pages on gov.uk https://www.gov.uk/contaminated-land .	To address comment BLP25	REG19 representation
SPC53	83	Orange box	Delete.	Not needed in final version of Local Plan.	Factual update
SPC54	86	First paragraph	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>	To address comment BLP65	
SPC55	87	First paragraph	Make Biodiversity Enhancements Guide link the right one and delete hyperlink for 'successor document'.	To ensure correct hyperlinks in Local Plan.	Factual update
SPC56	90	Policy PUBSP3: Soils	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>	To address comment BLP148	REG19 representation
SPC57	90	Policy PUBSP3: Soils, part 3	Replace 'were' with 'are'.	Typo	Typo
SPC58	92	Paragraph 2	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.	To address comment BLP23	REG19 representation
SPC59	99	Policy PUBDM13: Heritage Assets	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>	To address comment BLP29	REG19 representation

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SPC60	99	Policy PUBDM13: Heritage Assets part 3	<p>3. Identified and unidentified non-designated heritage assets</p> <p>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"> • the <u>the</u> significance of the heritage asset, • the <u>the</u> scale of any harm or loss, and • the <u>the</u> public benefits of the proposal. <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>	To address comment BLP32	REG19 representation
SPC61	100	Policy PUBDM13: Heritage Assets part 4	<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 <u>that are demonstrably of equivalent</u> 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.</u> In the case of substantial harm/loss of a Scheduled Monument and other archaeological heritage assets that are demonstrably of equivalent significance, <u>proposals must also meet the following requirements:</u></p> <p>i. There is no less harmful viable option;</p> <p>ii. The amount of harm has been reduced to the minimum possible; and</p> <p>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.</p>	To address comment BLP33	REG19 representation
SPC62	106	Policy PUBDM14: Re-use, Conversion or Change of Use of Historic Buildings, delivery and implementation	a Heritage Statement (<u>which could be included</u> within the Design and Access Statement where required)	A Heritage Statement may be required and a D and A statement not. Or the Heritage Statement might be submitted separate to the D and A Statement.	Improved wording
SPC63	108	Policy PUBSP5: Biodiversity, 2e	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	To address comment BLP81	REG19 representation
SPC64	108	Policy PUBSP5: Biodiversity, 2a	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) <u>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.</u> Biodiversity Net Gain (BNG) sites shall also be protected.	To address comment BLP221	REG19 representation
SPC65	108	Policy PUBSP5: Biodiversity, 2b	2b) protect against the loss of <u>protected Section 41 habitats and species</u>	To address comment BLP50	REG19 representation
SPC66	110	First paragraph	Update as LNRS is adopted	To ensure the Local Plan is up to date.	Factual update
SPC67	110	Policy PUBDM15: Natural Environment 1e	Amend 1 e) as follows: e) Assist in the delivery of <u>Take account of the</u> Local Nature Recovery Strategies (Norfolk and Suffolk)	To address comment BLP267	REG19 representation
SPC68	110	Policy PUBDM15: Natural Environment	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. <u>Applicants may be required to undertake and submit a Preliminary Ecological Appraisal (PEA)/Ecological Impact Assessment (EIA) to provide information regarding the habitats and species present on site, to consider the potential impacts of the development and recommend appropriate mitigation measures.</u>	To address comment BLP221	REG19 representation

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SPC69	111	Policy PUBDM15: Natural Environment part 7	Remove brackets of (which is not also subject to an international designation).	To address comment BLP47	REG19 representation
SPC70	112	Policy PUBDM15: Natural Environment, part 13	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 maintain and enhance the ability of the network to restore and enhance habitats and provide eco-system <u>ecosystem</u> services in line with the Local Nature Recovery Strategy.'	To address comment BLP124 and BLP46	REG19 representation
SPC71	113	Para under 'protected sites and species'	Delete first sentence and delete 'also' in second sentence.	Repeats the previous paragraph.	Improved wording
SPC72	113	First paragraph under protected sites and species	In particular, proposals should take opportunities for the restoration and enhancement of the core opportunity areas for nature areas <u>that will deliver the priorities for and priority</u> habitats and species identified in the Local Nature Recovery Strategy and incorporate appropriate beneficial biodiversity conservation features'	To address comment BLP125	REG19 representation
SPC73	115	Bottom of page 115, top of page 116 - Local Nature Recovery Strategy	Update as LNRS is adopted	To ensure the Local Plan is up to date.	Factual update
SPC74	115	Second full paragraph	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. <u>This includes Key Species and all of the species included in habitat species assemblages.</u>	To address comment BLP126	REG19 representation
SPC75	115	Fifth bullet point	<u>•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 Nature Local Nature Recovery Strategies</u>	To address comment BLP127	REG19 representation
SPC76	116	Fourth bullet point	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 <u>(e.g. swift bricks which are a universal nest brick for small bird species)</u> 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, <u>with reference to best-practice guidance such as BS 42021 or equivalent.</u>	To address comment BLP188	REG19 representation
SPC77	116	First paragraph	Amend supporting text to say: Applications will be required to address the requirements take account of the Local Nature Recovery Strategy.	To address comment BLP267	REG19 representation
SPC78	118	Policy PUBDM16: Biodiversity Net Gain	Combine points 5 and 6.	To address comment BLP44	REG19 representation
SPC79	118	Policy PUBDM16: Biodiversity Net Gain, part 4	Delete part 4 of PUBDM16.	To address comment BLP66	REG19 representation
SPC80	118	Policy PUBDM16: Biodiversity Net Gain, parts 5 and 6	Combine points 5 and 6.	To address comment BLP161, 44	REG19 representation
SPC81	119	Consultation on changes to the approach to BNG	Update as required.	To ensure the Local Plan is up to date.	Factual update
SPC82	119	Policy PUBDM16: Biodiversity Net Gain, part 8	Amend part 8: Biodiversity gain sites need to avoid the best and most versatile agricultural land thoroughly justify using <u>BMV land and show why land of other soil grades cannot be used.</u>	To address comment BLP149	REG19 representation
SPC83	121	Para above PUBDM17	Add information about the self-build proforma and potential for UU.	To ensure the Local Plan is up to date.	Factual update
SPC84	121	Policy PUBDM17: Mitigating Recreational Impacts, part 1a and 1b	'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) <u>(and any successors)</u> - 13 km ZOI around the relevant Habitats Sites in the Suffolk Coast area.	To address comment BLP130	REG19 representation
SPC85	121	Policy PUBDM17: Mitigating Recreational Impacts, part 2	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.	To address comment BLP131	REG19 representation

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SPC86	121	Policy PUBDM17: Mitigating Recreational Impacts, part 3	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.	To address comment BLP132	REG19 representation
SPC87	121	Policy PUBDM17: Mitigating Recreational Impacts, part 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. This will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace Standard.	To address comment BLP133	REG19 representation
SPC88	121	Policy PUBDM17: Mitigating Recreational Impacts , part 1	Amend as follows: '...which are identified within the following strategies and Zones of Influence (ZOI) <u>(or successor documents or subsequent iterations)</u> ...	To address comment BLP43	REG19 representation
SPC89	122	References to Suffolk RAMS	Update as Suffolk RAMS review may be completed prior to adoption.	To ensure the Local Plan is up to date.	Factual update
SPC90	123	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts, part 1	'1. Within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site: <ul style="list-style-type: none"> •Any residential development proposal for that results in an increase in the level of overnight accommodation stays; and •any non-residential development that by virtue of its scale and type may draw people from outside the above catchments; •and/or may generate unusual quantities of surface water; •and/or, by virtue of the processes undertaken, may contain unusual pollutants within surface water run-off; 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.	To address comment BLP134	REG19 representation
SPC91	123	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts, part 2	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.	To address comment BLP135	REG19 representation
SPC92	123	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts, part 3	3. The Norfolk Nutrient Calculator / <u>or the</u> Natural England Nutrient Calculator will need to be <u>completed 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 may <u>will</u> use legal agreements to ensure this mitigation is secured and in place and will be delivered.'	To address comment BLP136	REG19 representation
SPC93	123	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts, part 3	Add 'or successor calculators'	In case the calculators are updated.	Improved wording
SPC94	124	Bottom paragraph, last sentence	Potentially update reference to Natural England mitigation scheme.	To ensure the Local Plan is up to date.	Factual update
SPC95	124	Paragraph 2	Define 'unusual quantities of surface water'	For clarity	Improved wording
SPC96	125	Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development, part 5	5. Details of appropriate measures for the establishment and long-term maintenance of new tree planting will need to be provided. <u>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.</u>	To address comment BLP218	REG19 representation
SPC97	125	Policy PUBDM19: Trees, woodlands, hedges, scrubs and shrubs and development, part 1	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.	To address comment BLP168	REG19 representation
SPC98	126	Bottom of page	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</u> will not always be appropriate.	To address comment BLP146	REG19 representation

Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
SPC99	126	Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development, part 6	Add 'or successor standard'	In case the standards are updated.	Improved wording
SPC100	126	Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development, part 7	...and a suitable compensation strategy is provided <u>and agreed</u> .'	To clarify the requirements.	Improved wording
SPC101	127	Make this the first full paragraph	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>	To address comment BLP146	REG19 representation
SPC102	127	Make new second paragraph after reasoned justification.	Refer to para 136 of NPPF - 'Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible'.	Improved reference to trees in the NPPF.	Factual update
SPC103	128	A new 6a) and then re-letter the rest of the bullet points at part 6.	6 a) Choose native species. Some of the following criteria refer to species and tolerance to climate change and certain locations. There are native species that are more drought tolerant, hardy to changing conditions etc.	To address comment BLP212a.	REG19 representation
SPC104	129	Policy PUBDM20: Energy demand and performance of new buildings (including extensions) part 4.	Refer to section 8 of the policy as there is no part 10.	Correct wording.	Typo
SPC105	130	Future Homes Standard	Update as required.	To ensure the Local Plan is up to date.	Factual update
SPC106	132	Policy PUBDM21: Renewable and low carbon energy	Checking numbering of criteria - there are two number 10s.	To address comment BLP223	REG19 representation
SPC107	132	Policy PUBDM21: Renewable and low carbon energy part 10	proposals	To make plural, consistent with other use of this term in the policy.	Improved wording
SPC108	133	New title - battery storage	Include text as follows in supporting text: 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 .	To address comment BLP26	REG19 representation
SPC109	133	Policy PUBDM21: Renewable and low carbon energy, 12c	Move 12 c) first sentence to become part 8 of general principles.	To address comment BLP223	REG19 representation
SPC110	133	Policy PUBDM21: Renewable and low carbon energy, 12c	Amend part 12 c) second sentence so 'this' is replaced with 'and'.	To address comment BLP223	REG19 representation
SPC111	133	Policy PUBDM21: Renewable and low carbon energy, 12d	Move 12 d) to become part 9 of general principles and make it generic about renewable energy rather than just referred to turbines.	To address comment BLP223	REG19 representation
SPC112	133	Policy PUBDM21: Renewable and low carbon energy, part 10 (at end of policy)	Amend part 10 (peat) to refer to the peat policy.	To address comment BLP223	REG19 representation
SPC113	133	Policy PUBDM21: Renewable and low carbon energy part 12f	turbine(s)	To make plural, consistent with other use of this term in the policy.	Improved wording
SPC114	136	Orange box	Delete.	Not needed in final version of Local Plan.	Factual update
SPC115	144	First paragraph	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>	To address comment BLP21	REG19 representation
SPC116	144	Policy PUBDM25: Utilities infrastructure development, 1b	1b) For electricity infrastructure, there is no opportunity for undergrounding or no suitable alternative locations outside the Broads protected landscape;	To address comment BLP237	REG19 representation

Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
SPC117	144	Policy PUBDM25: Utilities infrastructure development, 2	2. The operator will also be required to remove any <u>above ground</u> utilities equipment when it is redundant.	To address comment BLP237	REG19 representation
SPC118	144	Policy PUBDM25: Utilities infrastructure development, 1a	a) <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>	To address comment BLP156	REG19 representation
SPC119	149	Policy PUBDM27: Amenity, part 1	development will not be permitted if it would have an unacceptable impact on the amenity of existing or potential neighbouring properties or uses	To address comment BLP271	REG19 representation
SPC120	151	Policy PUBSP7: Tranquillity in the Broads	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>	To address comment BLP1	REG19 representation
SPC121	152	Policy PUBDM28: Light Pollution, Dark Skies and Nocturnal Character, after part 3	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.</u>	To address comment BLP2	REG19 representation
SPC122	153	Policy PUBDM28: Light pollution, dark skies and nocturnal character, part 15	Add a new criterion: <u>Use the warmest colour with the lowest Correlated Colour Temperature [CCT] possible.</u>	To address comment BLP68	REG19 representation
SPC123	155	Under delivery and implementation	Then in supporting text, refer to the Norfolk Coast National Landscape as an area of dark skies.	To address comment BLP2	REG19 representation
SPC124	158	Policy PUBSP8: Accessibility and Transport	1. Development will be well located and designed to maximise the use of sustainable forms of transport appropriate to its particular location. <u>Safe and suitable access is required for all.</u> 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> 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>	To address comment BLP82	REG19 representation
SPC125	159	Bullet point 2	Update link to Suffolk Local Cycling and Walking Infrastructure Plan.	To address comment BLP82	REG19 representation
SPC126	162	Policy PUBDM29: Transport, highways and access, 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.	To address comment BLP70	REG19 representation
SPC127	163	Policy PUBDM29: Transport, highways and access, part 8	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.	To address comment BLP272	REG19 representation
SPC128	163	Policy PUBDM29, part 7	Amend part 7 of DM29 to say that <u>some of our districts set their own standards for electric vehicle charging and we will consider those as we assess applications.</u>	To address comment BLP224	REG19 representation
SPC129	167	Policy PUBDM30: Recreation facilities parking areas, part 3	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>	To address comment BLP69	REG19 representation
SPC130	170	Policy PUBDM31: New employment development, 1m	Remove 'and' from end of part m and move to end of part l	To correct a typo	Typo
SPC131	171	Policy PUBDM31: New employment development	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>	To address comment BLP254	REG19 representation
SPC132	172	Para starting 'the policy seeks new employment sites...'	Delete 'the authority'.	Better wording.	Improved wording
SPC133	182	Policy PUBDM34: Development on waterside sites in employment or commercial use, including boatyards, part 8	<u>Where storage of potentially polluting material, for example oils, is proposed, this will be and implemented in such a way that pollution is avoided, including during flood events</u>	Better wording.	Improved wording
SPC134	186	Paragraph under reasoned justification	<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>	To address comment BLP229	REG19 representation

Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
SPC135	192	Supporting text, first paragraph	Make The Sustainable Tourism and Recreation Strategy a hyperlink and add (or successor strategy)	For convenience as well as to refer to any successor document	Factual update
SPC136	195	Paragraph 2	see previous <u>earlier</u> paragraph regarding marketing and independent review of viability assessments	The previous paragraph is not the relevant one.	Typo
SPC137	195	Penultimate para on HRA	Cross refer to Natural Environment section.	For convenience.	Factual update
SPC138	196	Policy PUBSP13: Navigable water space part 4	Include reference to the Waterways Management Strategy Action Plan (or successor document)	To address comment BLP182	REG19 representation
SPC139	199	Para relating to Environmental Permitting Regulations	Delete first sentence	Superfluous.	Improved wording
SPC140	201	Para relating to Environmental Permitting Regulations	Delete first sentence	Superfluous.	Improved wording
SPC141	214	Second paragraph	Update to reflect any monitoring period that has passed prior to adopting of the Plan	To ensure the Local Plan is up to date.	Factual update
SPC142	214	Section 30.1	Add site names to para 3 of section 301. 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	To address comment BLP49	REG19 representation
SPC143	215	Policy PUBSP15: Residential development, part 4	which is a 5-Year need for the Broads part of Great Yarmouth is for <u>of</u> 10 pitches'.	Typo	Typo
SPC144	216	Table	Amend so total is divided by 21 rather than 22 years.	Error in calculations.	Factual update
SPC145	217	A new 4th paragraph	<u>The need for residential caravans (non Gypsy and Traveller) was identified as 12 in the Broads part of Great Yarmouth. And then a footnote to this study: https://www.broads-authority.gov.uk/data/assets/pdf_file/0019/132553/Great-Yarmouth-and-Broads-Authority-GTRCAA-Report-June-2022.pdf</u>	Text relating to residential caravans missing.	Factual update
SPC146	218	Part i)	Update to reflect any monitoring period that has passed prior to adopting of the Plan	To ensure the Local Plan is up to date.	
SPC147	218	Part ii)	This <u>The</u> Preferred Options version of the Local Plan	Error - left over wording from Preferred Options.	Factual update
SPC148	218	Part iii)	Refer to the updated NSPF 2025, including the agreements	To ensure the Local Plan is up to date.	Factual update
SPC149	219	Part iv)	Update text to reflect adoption version of the Local Plan.	To ensure the Local Plan is up to date.	Factual update
SPC150	220	New paragraph above 'Map 3 Key Diagram'	<u>For residential caravans</u> <u>Again, despite three calls for sites, no suitable sites came forward for allocation. There are 4 areas with development boundaries within the Broads where such caravans would be appropriate, subject to details, which could result in more caravans over the plan period.</u>	Text relating to residential caravans missing.	Factual update
SPC151	226	Footnote 136	Update if NNDC Local Plan is adopted	To ensure the Local Plan is up to date.	Factual update
SPC152	226	Add to 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>	To address comment BLP152	REG19 representation
SPC153	226	Penultimate paragraph	Refer to East Suffolk Affordable Housing Supplementary Planning Document (SPD) in the supporting text to DM43.	To address comment BLP45	REG19 representation
SPC154	226	Top of page	This is because the opportunities for schemes of <u>10</u> 9+ dwelling	Typo	Typo
SPC155	226	Top of page	To be clear, the policy goes further than the NPPF by requiring off-site contributions to affordable housing for schemes of fewer than 9 <u>9</u> or fewer dwellings	Typo	Typo
SPC156	236	Flood risk paragraph	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.	To address comment BLP18	REG19 representation
SPC157	238	Part 9 of PUBMD46: New residential moorings	Additional condition relating to main and sole residence: 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 principal residence of the occupier.</u>	Related to comment BLP38a	REG19 representation

Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
SPC158	241	Definition of a residential mooring and what can moor there.	Resi moorings definition amendments: 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.	Related to comment BLP38a	REG19 representation
SPC159	242	Penultimate paragraph	Add GIL1	GIL1 is missing from the list of allocated residential mooring sites.	Improved wording
SPC160	244	Policy PUBDM47: Permanent and temporary dwellings for rural enterprise workers, part 3	Footnote 2 is missing. Add footnote to say: The NPPG (Use of planning conditions - GOV.UK (www.gov.uk)) says 'It will rarely be justifiable to grant a second temporary permission (except in cases where changing circumstances provide a clear rationale, such as temporary classrooms and other school facilities). Further permissions can normally be granted permanently or refused if there is clear justification for doing so. There is no presumption that a temporary grant of planning permission will then be granted permanently'.	Missing footnote	Improved wording
SPC161	246	Last paragraph	With regard to criterion j5b),	The correct reference is 5b	Improved wording
SPC162	248	Add to 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>	To address comment BLP 152	REG19 representation
SPC163	248	Under delivery and implementation	Cross refer to design policy and M4(2) and M4(3).	To address comment BLP73	REG19 representation
SPC164	253	Policy PUBDM50: Replacement dwellings	<u>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.</u>	To address comment BLP199	REG19 representation
SPC165	254	First paragraph	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>	To address comment BLP30	REG19 representation
SPC166	255	Policy PUBDM51: Custom/self-build	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.	To address comment BLP75	REG19 representation
SPC167	256	Last paragraph	Update section re self and custom build register to reflect the slight change to the register and how it is not clear if we have an exemption currently or not.	To ensure the Local Plan is up to date.	Factual update
SPC168	257	Last paragraph	Sort reference to the status of the design SPD	To ensure the Local Plan is up to date.	Factual update
SPC169	258	Policy PUBDM52: Design	Amend 4f) provision for the <u>secure</u> storage of bicycles	To address comment BLP76	
SPC170	261	First paragraph	Sort reference to the status of the design SPD	To ensure the Local Plan is up to date.	Factual update
SPC171	261	Siting and layout, bullet 2	Amend RTP1 Dementia link.	To address comment BLP76	
SPC172	265	First paragraph	Update section relating to 2020 consultation on adaptable dwellings	To ensure the Local Plan is up to date.	Factual update
SPC173	266	Policy PUBDM52A: Proposals for residential extensions, PART 1	Add this text to the policy: <u>new part e) consider and address flood risk issues in line with the flood risk section of the Local Plan and National Policy.</u>	To address comment BLP20	REG19 representation
SPC174	267	Policy PUBDM53: Source of heating	Add a new part 5 to policy that says: 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 needs 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.	To address comment BLP11	REG19 representation
SPC175	267	Supporting text, above Policy PUBDM53	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>	To address comment BLP20	REG19 representation

Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
SPC176	268	Above Policy PUBDM54	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>	To address comment BLP11	REG19 representation
SPC177	268	Supporting text, above Policy PUBDM54	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.	To address comment BLP27	REG19 representation
SPC178	271	Policy PUBDM56 - Electric Vehicle Charging Points	Amend PUBDM56 to include wording as follows: <ul style="list-style-type: none"> 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. 	To address comment BLP224	REG19 representation
SPC179	271	Policy PUBDM56 - Electric Vehicle Charging Points, part 1	point1: not 'are welcomed', use 'are supported'	So DM56 and DM29 are consistent	Improved wording
SPC180	272	Reasoned justification, first para	Refer to building regulation requirements for ev charging in supporting text to PUBDM56.	To address comment BLP224	REG19 representation
SPC181	273	Policy PUBDM57: Fibre to the Premises (FTTP)	NNDC Inspector deleted it and replaced with HC5. This may need to follow that. Potentially amend policy as per North Norfolk Local Plan.	To address comment BLP151	REG19 representation
SPC182	273	Third paragraph	Delete: If, during the production of this Local Plan, regulations are put in place that address the locations of charging points, the policy may not be required.	To ensure the Local Plan is up to date.	Factual update
SPC183	281	Last paragraph	Link to most up to date health protocol and amend text accordingly.	To ensure the Local Plan is up to date.	Factual update
SPC184	281	Last paragraph	<u>In terms of part 2a of the policy, working with Norfolk and Suffolk Public Health and Norfolk and Waveney NHS colleagues...</u>	To address comment BLP78	REG19 representation
SPC185	282	Second paragraph after bullet points	<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>	To address comment BLP78	REG19 representation
SPC186	282	Paragraph with Roman Numeral bullet points.	<ul style="list-style-type: none"> All new housing, commercial and recreational development are required to produce a statement saying how their proposal <u>addresses supports and promotes:</u> 	To address comment BLP79	REG19 representation
SPC187	282	Paragraph 2	<ul style="list-style-type: none"> ...although if the threshold for <u>undertaking the Planning in Health</u> Protocol is met, then that will take precedence. 	To address comment BLP79	REG19 representation
SPC188	282	Paragraph after Roman Numeral bullet points	Add a title as suggested: Further guidance.	To address comment BLP79	REG19 representation
SPC189	301	Constraints and features	Refer to Broadland SPA.	To address comment BLP143	REG19 representation
SPC190	306	Policy PUBCAN1 - Cantley Sugar Factory - criterion c and d	For criterion c and d add reference to policy PUBDM27: Amenity.	To address comment BLP260	REG19 representation
SPC191	306	Policy PUBCAN1 - Cantley Sugar Factory - criterion k	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>	To address comment BLP262	REG19 representation
SPC192	306	Policy PUBCAN1: Cantley Sugar Factory, 3n	Cross refer to Policy PUBDM31 and PUBDM55 for consistency.	To address comment BLP248	REG19 representation
SPC193	308	First paragraph	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.	To address comment BLP263	REG19 representation

Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
SPC194	308	Paragraph 2	Cantley Sugar factory receives substantial amounts of raw material from local farms, requiring substantial amounts of HGV movements <u>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.</u> 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.	To address comment BLP264	REG19 representation
SPC195	309	Footnote 169	Amend footnote 169 to refer to the installation of the new waster water treatment plant.	To address comment BLP265	REG19 representation
SPC196	309	Orange box	Delete	Not needed in final version of Local Plan.	Factual update
SPC197	312	Last paragraph	It is anticipated that the moorings will be in place after 2025 , by 2030.	Plan will be adopted after 2025	Factual update
SPC198	314	Policy PUBDIT1: Maltings Meadow Sports Ground, Ditchingham, 2g	an Exception Test may be needed as part of <u>any</u> planning application	Typo	Typo
SPC199	314	Policy PUBDIT1: Maltings Meadow Sports Ground, Ditchingham, part 5	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 <u>Minerals and Waste Local Plan Policy MP11 – mineral safeguarding areas and mineral consultation areas</u> Core Strategy Policy CS16 – Safeguarding mineral and waste sites and mineral resources or successor policy/document). "	To address comment BLP34	REG19 representation
SPC200	317	Policy PUBFLE1: Broadland Sports Club, 2, iv)	an Exception Test may be needed as part of <u>any</u> planning application	Typo	Typo
SPC201	318	Under delivery and implementation	Add to supporting text: <u>Please note that there is a dwelling that is linked to the Broadland Sports Club which cannot be sold off separately - the area which this policy covers also includes that dwelling and its grounds.</u>	To explain the area to which the policy applies.	Factual update
SPC202	320	Last paragraph	that the sites itself is	Improved wording	Improved wording
SPC203	321	First paragraph	It is anticipated that the moorings will be in place after 2025 , by 2030.	Plan will be adopted after 2025	Factual update
SPC204	323	Last paragraph	that the sites itself is	Improved wording	Improved wording
SPC205	334	Supporting text, Bullet point 3	Hoveton Parish Council has previously stated that it wishes ed to see Granary Staithe kept open	Typo	Typo
SPC206	335	Orange box	Delete	Not needed in final version of Local Plan.	Factual update
SPC207	337	Policy PUBHOV3: Brownfield land off Station Road, Hoveton, 2, i	expand: Proposals to provide car parking <u>ancillary to a proposed use of the site</u> must be thoroughly justified and if the need is proven, must be well designed	To clarify that this excellently located site, between the station and town centre, overlooking the river, that is part of the town centre, could have some car parking ancillary to the proposed use.	Improved wording
SPC208	337	Policy PUBHOV3: Brownfield land off Station Road, Hoveton, 3	Clarify which building is which using an an noted map/plan.	To provide clarity	Factual update
SPC209	339	Paragraph 2.	This end of the village has many car parking spaces, with more on the other side of the railway, and the Authority is aware that some people would like to see more car parking in this area of the village. Any proposals for car parking for public use must be thoroughly justified through a car park assessment undertaken at peak times over a suitable time period, assessing weekend and weekdays. The proposals also need to be well designed, with safety a key factor.	Links back to change proposed in policy itself.	Improved wording
SPC210	342	Policy PUBHOV5 Hoveton Village Centre and areas adjacent to the Village Centre, part 5	Add text to HOV5 that refers to decisions and monitoring will continue to be coordinated across BA/NNDC.	To address comment BLP228	REG19 representation
SPC211	343	Constraints and features, bullet 3	Hoveton Village Centre is classed as a Medium Town Centre in the emerging-adopted North Norfolk District Council Local Plan.	NNDC Local Plan now adopted	Factual update
SPC212	343	Hoveton section	Replace 'town' with 'village'.	Village is the correct term	Factual update
SPC213	345	Last paragraph	Village Centre and <u>Primary Shopping Area PSA</u> , the areas adjacent to the Village Centre	Clarify what is meant by PSA	Factual update
SPC214	350	Policy PUBNOR1: Utilities Site, 2d	design guide <u>SPD</u>	To ensure the Local Plan is up to date.	Factual update
SPC215	353	Policy PUBORM1: Ormesby waterworks, part 2	Development reasonably required for the operation of the water treatment works, and the operator's statutory duties as a water supply undertaker, will be supported where...	To address comment BLP164	REG19 representation

Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
SPC216	353	Policy PUBORM1: Ormesby waterworks	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 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.	To address comment BLP165	REG19 representation
SPC217	357	First paragraph under reasoned justification	Please note that this allocation received planning permission in 2012 -2014 for 76 market dwellings, office accommodation, and moorings.	To address comment BLP85	REG19 representation
SPC218	358	Paragraph above policy PUBOUL3	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	To address comment BLP85	REG19 representation
SPC219	359	Policy PUBOUL3: Oulton Broad District Shopping Centre, part 6	an Exception Test may be needed as part of <u>any</u> planning application	Typo	Typo
SPC220	360	First paragraph	Check most recent monitoring data and amend.	To ensure the Local Plan is up to date.	Factual update
SPC221	362	Policy PUBPHRB1: Bridge Area, 6bii	an Exception Test may be needed as part of <u>any</u> planning application	Typo	Typo
SPC222	366	Orange box	Delete	Not needed in final version of Local Plan.	Factual update
SPC223	368	Policy PUBSOM1: Somerleyton Marina Residential Moorings, 1a	1a) site singular	Typo	Typo
SPC224	371	Last paragraph	Refer to the permission for ten resi moorings and talk about how a permission for an extra five will be cumulated to require 1 pupil place.	To ensure the Local Plan is up to date.	Factual update
SPC225	373	constraints and features, bullet 6	Complete sentence	Typo	Typo
SPC226	374	Policy PUBTSA1: Cary's Meadow and maps	Cary's meadow is a Local Nature Reserve	To ensure the Local Plan is up to date.	Factual update
SPC227	375	Last paragraph	Delete reference to 2025	Plan will be adopted after 2025	Factual update
SPC228	384	Policy PUBTHU1: Tourism development at Hedera House, Thurne, 1v	A sequential test may be required, and development will be sequentially location <u>located</u> on site to reflect the flood risk	Typo	Typo
SPC229	384	Policy PUBTHU1: Tourism development at Hedera House, Thurne, 1x	"Proposals must ensure no adverse effects on the conservation objectives and qualifying features of the nearby <u>Broadland SPA and associated SSSI.</u> "	To address comment BLP144	REG19 representation
SPC230	384	Policy PUBTHU1: Tourism development at Hedera House, Thurne, 1iv	Delete reference to Ludham-Walton Hall Water Recycling Centre capacity issues. Amend part 1 iv) <u>Demonstration of a suitable and appropriate foul water disposal method that is in conformity with Policy PUBDMS5 that there is adequate capacity in the water recycling centre (sewage treatment works) and the foul sewerage network to serve the proposed development,</u> and that proposals demonstrate they will not have an adverse impact on surface or ground water in terms of quality and quantity;	To address comment BLP247	REG19 representation
SPC231	386	Penultimate paragraph	that the sites itself is	Improved wording	Improved wording
SPC232	389	Orange box	Delete	Not needed in final version of Local Plan.	Factual update
SPC233	389	Third paragraph	Tawny owls and ground nesting birds currently occupy land within the extension <u>area covered by this policy</u> and are	Correct wording	Improved wording
SPC234	400	Penultimate paragraph	(Local Planning Authority, Local Highways Authority, Local Transport Authority and National Highways)	Local Highways Authority/Local Transport Authority is the same thing	Factual update
SPC235	400	Reasoned justification, first para	The highway authorities and Norfolk County Council have recommended that the Authority continues protecting these routes from any development that undermines their wider purpose or highway safety.	Norfolk County Council is a highways authority.	Factual update
SPC236	410	Orange box	Delete	Some text not needed in final version of Local Plan.	Factual update

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SPC237	410	Paragraph 2	As part of this review of the Local Plan for the Broads, a call for sites for areas of Local Green Space was held (end of 2022), and three new sites were put forward. The Parish Councils relevant to the Local Green Spaces allocated in the 2019 Local Plan for the Broads were contacted to ascertain if they wanted the status to continue. The analysis of local green spaces can be found in the Local Green Space Topic Paper.	Not needed in final version of Local Plan.	Factual update
SPC238	412	Background to the A47 and Acle Straight, para 2	New Anglia Local Enterprise Partnership's Economic Strategy considers this route of strategic importance.	Not relevant any more	Factual update
SPC239	413	First paragraph	Update first paragraph	To ensure the Local Plan is up to date.	Factual update
SPC240	413	Penultimate paragraph	a new <u>walking and cycling</u> route alongside a dualled road,	To clarify what is meant.	Improved wording
SPC241	417	Surface water, para 2, bullet 1	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.	To address comment BLP87	REG19 representation
SPC242	420	Section 60	Delete	Not needed in final version of Local Plan.	Factual update
SPC243	421	Appendix 1	Keep for main mods consultation, then delete.	Not needed in final version of Local Plan.	Factual update
SPC244	443	Appendix 7: Flood Risk Assessment Tick Sheet	Replace tick sheet with: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0021/217740/APPENDIX-F-November-2025-Flood-Risk-tick-sheet.pdf .	To address comment BLP19	REG19 representation
SPC245	449	Update housing and resi moorings trajectories	To reflect monitoring periods that have gone by before adoption.	To ensure the Local Plan is up to date.	Factual update
SPC246	453	First paragraph	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>	To address comment BLP88	REG19 representation
SPC247	453	Fourth paragraph	Exemptions This checklist does not apply if any of these criteria are met: This checklist does not apply to: <ul style="list-style-type: none"> • 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 	To address comment BLP89	REG19 representation
SPC248	453	Third paragraph	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: <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 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). 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 <u>cross refer to relevant policies in this Local Plan (or indeed Neighbourhood Plan) and detail how your proposal address meets their requirements.</u>	To address comment BLP90	REG19 representation
SPC249	463	Throughout Appendix 13	Delete repeated word - 'strategic' in some cells: If appropriate to a scheme, policy used to help determine application. Strategic. Strategic Policies relevant to Neighbourhood Plans.	Typo	Typo

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SPC250	470	Third column of table	Delete reference to New Anglia LEP	To ensure the Local Plan is up to date.	Factual update
SPC251	-	Throughout Local Plan	Throughout, replace 'likely significant adverse effects' with 'no adverse impacts/effects on site integrity'.	To address comment BLP140	
SPC252	-	Numbering of policies - the 'A' ones - 42A and 52A	Update numbering throughout the Local Plan, HRA and SA for the final version.	To ensure the Local Plan is up to date.	Factual update
SPC253	-	Throughout the Plan	Refer to the updated NSPF 2025	To ensure the Local Plan is up to date.	Factual update
SPC254	-	Throughout the Plan and on Policies Maps	Remove 'PUB' from policy references.	To reflect that stage of the Local Pan has been completed and the polices are final.	Factual update
SPC255	Maps	Filby Development Boundary Policies Map	Remove area y	Erroneously kept in - had intended to ask a question, but following advice from Planning Inspector, who said not to ask questions, the development boundary does not need to show part y.	Factual update
SPC256	Maps	Mapping	Provide PDF maps of some wildlife constraints.	To address comment BLP234	REG19 representation
SPC257	Maps	Policies Maps	Show were NN applies on policies maps.	For convenience.	Factual update
SPC258	Maps	Policy PUBSSLGS: Local Green Space	Check map titles and ensure locations are obvious. Check maps for consistency.	To address comment BLP86	REG19 representation
SPC259	Maps	Area to which PUBHOV3 applies	Remove northern part of HOV3 from area to which policy applies - it is a car park.	The northern part of HOV3 has permission for a temporary car park. It is surface and well designed and welcomed by the community. The time period for that temporary permission has lapsed. The Authority are working with the owner/applicant. It may be that the applicant needs to undertake marketing for 12 months before applying for it to be permanent. It is therefore likely to be logical to remove this from the area to which PUBHOV3 applies.	Factual update
SPC260	Maps	Interactive map	Amend dark sky boundary around Oulton Broad. PDF map is correct.	Error in displaying dark sky zone around Oulton Broad.	Factual update
SPC261	Maps	Area to which PUBDIT1 applies	Amend to include football pitch.	To ensure the area to which the policy applies is correct.	Factual update
SPC262	Maps	Area to which PUBFLE1 applies	Amend to remove house.	To ensure the area to which the policy applies is correct.	Factual update
SPC263	Maps	Area to which Beccles Local Green Space applies and names of spaces	Amend to remove buildings and amend names as they are the wrong way round.	To ensure the area to which the policy applies is correct.	Factual update
SPC264	Maps	PUBSSTRACKS	Page 401 of the local plan links to the preferred options tracks bundle. The reference is PO rather than PUB. Like all maps, need to ensure the final reference is correct and the base layer is up to date.	To ensure the Local Plan is up to date.	Factual update
SPC265	Maps	Local Green Space on maps	Currently, local green spaces allocated in Neighbourhood Plans are shown on policies maps. Either make sure these are up to date to reflect any other made Neighbourhood Plans, or remove - on adoption.	To ensure Local Plan us up to date.	Factual update
SPC266	Maps	Appendix 17 and policies maps	Amend Settlement Fringe area around Chedgrave as per this Topic Paper. https://www.broads-authority.gov.uk/__data/assets/pdf_file/0022/217741/APPENDIX-G-Settlement-Fringe,-Chedgrave,-Topic-Paper.pdf	To reflect comments numerous comments made, although does not propose removing the Chet Valley as settlement fringe - paper seeks to check and amend boundary.	REG19 representation
SPC267	Throughout	168 last paragraph, 325 second paragraph, 336 third paragraph	Amend the three occurrences of this typo: The Authority expects proposals to include an appropriate number of disabled parking spaces.	To address comment BLP71	Typo
SPC268	Throughout	Throughout	Ensure references to the Protocol is 'Planning in Health Protocol'.	To address comment BLP78	Factual update
SPC269	Throughout	Throughout	Consider paragraph numbers.	To address comment BLP57	Formatting
SPC270	Throughout	Throughout	Replace 'rain bursts' with 'intense rainfall events'.	Related to comment BLP91c	REG19 representation