

Contents

01 Introduction	2
03 About the Broads - Spatial Portrait.....	2
04 Policy Context	3
05 Duty to Cooperate	3
06 Challenges and Opportunities	4
07 Vision, objectives and existing policies	7
08 Water	10
09 Open Space (land and water), Parks & Allotments.....	17
10 Green Infrastructure	19
11 Climate Change	22
12 Peat.....	23
13 Heritage and Historic Assets	25
14 Biodiversity	27
15 Renewable Energy	31
16 Landscape Character	32
17 Amenity and Tranquillity	36
18 Light Pollution.....	37
19 Retail	39
20 Transport	40
21 The Broads Economy	42
22 Sustainable Tourism	46
23 Navigation.....	47
24 Housing	50
25 Design	63
26 Sport and Recreation Venues/Buildings	65
27 Health and Wellbeing	66
28 Education.....	67
29 Waste and Minerals.....	67
30 Safety by the Water	68
31 Developer Contributions/Planning Obligations.....	68
32 Site-Specific Policies.....	70
Crime	73
General comment.....	74
Appendices	76
Sustainability Appraisal	77
Habitat Regulations Assessment	79

01 Introduction**Inland Waterways Association**

Habitats Regulation Assessment: This section states 'Of importance to the HRA of the Broads Local Plan is work currently being undertaken to understand the behaviour of visitors to various protected sites in Norfolk.' How is this work to be conflated with the results of this consultation? Will the impacts of the HRA be included at the time of the consultation on the draft local plan?

Broads Authority Officer Summary of Representation:

Questions relating to HRA.

Broads Authority comment:

The recreational impact work assesses visitor numbers as well as behaviour at European designated wildlife sites. This will help us and our HRA consultant understand the impact of development in Norfolk - will more people walk their dogs at a particular place for example?

The HRA is effectively a separate piece of work, required by European regulations. We will prepare policies to reflect responses from the consultations we hold as well as evidence that we commission and the HRA consultant assesses these policies.

The HRA will be completed on the Preferred Options and Publication versions of the Local Plan. The policies that go out for consultation will reflect the findings of the HRA.

03 About the Broads - Spatial Portrait**Great Yarmouth Borough Council****3.9 Access & Recreation:**

Access and recreation in the Broads can contribute to the health and quality of life of residents of neighbouring areas, especially important for those in towns and deprived populations. You may wish to add reference to this.

Broads Authority Officer Summary of Representation:

Access and recreation in the Broads can contribute to the health and quality of life of residents of neighbouring areas, especially important for those in towns and deprived populations.

Broads Authority comment:

The benefit of the Broads to health is discussed at section 23.4, but we do not explicitly state that the Broads benefits more people than those who live in it. This could be added to the health section.

Norfolk and Suffolk Boating Association

The Section 3, 'Spatial Portrait', which gives in most other regards a snapshot of what is special and even unique about the Broads is, surprisingly, silent on what is arguably the most valuable consideration - the boats, and the people who maintain and sail them. May we suggest adding:

'Visitors to the broads, taking to the network of rivers and broads in the summer months, are routinely delighted, thrilled even, to find themselves sharing the water space with Yare and Bure One Designs ('White Boats'), Broads One Designs ('Brown boats'), period launches and day boats some propelled by steam, the Broads River cruisers, (a type of yacht complying with local rules making them unique to the Broads), 'Norfolks' (varnished wooden dinghies), the racing derivatives of the traditional Norfolk punt, dozens of types of nationally and internationally recognised racing/sailing dinghy, and last but not least albeit in much smaller numbers, the restored and maintained traditional trading wherries and leisure wherries. Many of the craft in this list are of wooden construction, a proportion are pre-war or even over 100 years old, and all require significant investment of skilled maintenance and periodic restoration by their owners and local specialist boatyards. This rich variety of boating heritage is probably unrivalled anywhere in the world. An indication of the commitment of local people to heritage boats and boating on the Broads is that there are over 50

voluntarily run clubs and classes affiliated to the Norfolk and Suffolk Boating Association. Additionally, local clubs produce national and international champions from time to time, whose fame and notoriety filters back to the 'grass roots' to enthuse and encourage younger members'.

Broads Authority Officer Summary of Representation:

May we suggest adding a new section to the Spatial Portrait regarding the boats and people who maintain them.

Broads Authority comment:

Suggestion noted and will be considered as this section is reviewed.

Historic England

3.3 The landscape of the Broads, pp10-1

We welcome this text which provides a succinct description of the integrated history of the man-made landscape and built environment of the Broads.

3.6 Heritage and Culture of the Broads, pp12-3

We welcome this text. We recommend changing the title of the section to: "The historic environment and culture of the Broads".

Broads Authority Officer Summary of Representation:

We recommend changing the title of the section to: "The historic environment and culture of the Broads".

Broads Authority comment:

Noted and we will do this.

04 Policy Context

Inland Waterways Association

Policy Context: This section includes reference to recent disputes between the Broads Authority and residential boaters on Thorpe Island, the subject of legal action and saved planning policy TSA 2. IWA understands that discussions are continuing in the light of the outcome of the dispute. How are these discussions, and any conclusions or agreements, to be included in the local plan? See also comments on that section of this consultation.

Broads Authority Officer Summary of Representation:

Query regarding legal challenges on Jenner's Basin and how the Local Plan will reflect these.

Broads Authority comment:

We need to refresh and review the saved Local Plan policy, TSA2 as it is quite old. The review could reflect the findings of the most recent Planning Inspector's decision as this has been tested at court on two or three occasions. We will also consider thoughts of locals, the landowner and those who use Jenner's Basin. Whether this forms part of the Preferred Options depends on the progress of the legal process.

05 Duty to Cooperate

Great Yarmouth Borough Council

Great Yarmouth Borough Council is satisfied by the cooperation undertaken by the Broads Authority, and looks forward to continuing to cooperate on strategic and other issues of mutual interest.

Broads Authority Officer Summary of Representation:

Great Yarmouth Borough Council is satisfied by the cooperation undertaken by the Broads Authority, and looks forward to continuing to cooperate on strategic and other issues of mutual interest.

Broads Authority comment:

Support for our approach to the Duty to Cooperate is noted and welcomed.

Inland Waterways Association

Thoughts on the Authority's approach to Duty to Cooperate: The section comes across as a box-ticking exercise. Does the BA have any comments from those it has cooperated with endorsing the 'flavour' given here? Is the BA seen as a valuable and critical member of the local political scene, with a positive and balanced approach to its own three aims, and an empathetic ability to recognise their impact on those of others with whom it cooperates? Does the BA value the opportunity represented by having this duty?

Broads Authority Officer Summary of Representation:

Questions regarding the Duty to Cooperate.

Broads Authority comment:

The Duty to Cooperate is more than a tick box exercise. For the Local Plan to be found sound, we need to prove ongoing and meaningful engagement and discussions with relevant authorities. The main way we are doing this is through the production of the Norfolk Strategic Framework which seeks to produce high level agreements relating to cross boundary issues which Local Plans will address as they are produced.

Regarding Waveney, we regularly talk to them about cross boundary issues. For example. Waveney, Great Yarmouth and the BA are working together to produce an assessment of settlement fringe issues in those districts.

The Duty to Cooperate has led to Local Plans being stalled or not found sound so we need to give it full regard as we produce our Local Plan.

The BA does value this opportunity as by our very nature (being over six districts and two counties) we are a cross boundary consideration.

06 Challenges and Opportunities**Chedgrave Parish Council**

Chapter 6 of the Broads Local Plan considers challenges and opportunities, the Cllrs believe that a key threat is the impact of other public bodies making spending decisions that impact on Broads Authority key aims and result in not maintaining rights of way, reducing visitor facilities and the promotion of tourism.

Broads Authority Officer Summary of Representation:

A key threat is the impact of other public bodies making spending decisions that impact on Broads Authority key aims and result in not maintaining rights of way, reducing visitor facilities and the promotion of tourism.

Broads Authority comment:

Noted. An additional threat relating to the issue of cut in budgets and challenges organisations face in light of reduced funds could be included.

Environment Agency

We broadly agree with and support the challenges and opportunities identified within this section. We particularly welcome the opportunities highlighted in respect of adapting to flood risk, improving water quality, enhancing biodiversity and encouraging sustainable design and low carbon lifestyles. We will look to support the preparation of a Plan that enables these opportunities and challenges to be met and addressed.

Broads Authority Officer Summary of Representation:

Broadly agree with and support the challenges and opportunities

Broads Authority comment:

Agreement noted.

Great Yarmouth Borough Council

The Borough Council agrees with the generality of the issues identified.

Broads Authority Officer Summary of Representation:

The Borough Council agrees with the generality of the issues identified.

Broads Authority comment:

Noted.

Historic England

Strengths, Weaknesses, Opportunities and Threats pp22-4:

This section refers to "cultural heritage assets". The terms "cultural heritage" and "cultural heritage assets" are used throughout the document. Because of the specific meaning within the National Planning Policy Framework (NPPF) of "heritage assets" and "historic environment" we would recommend that textual amendments are made to ensure consistency with the NPPF. For example: "Extensive, diverse and very highly valued landscape, habitats, flora, fauna, cultural and heritage assets.". We welcome the identification of the attractive environment and the heritage assets. We would suggest that reference is made to palaeo-environmental and organic archaeological remains as these undesignated heritage assets are especially vulnerable and significant in the Broads. We note the identification of heritage at risk in the area and the impact of climate change on heritage. We would suggest that archaeology is specifically identified as a potential loss through climate change.

Broads Authority Officer Summary of Representation:

Because of the specific meaning within the National Planning Policy Framework (NPPF) of "heritage assets" and "historic environment" we would recommend that textual amendments are made to ensure consistency with the NPPF. We would suggest that reference is made to palaeo-environmental and organic archaeological remains as these undesignated heritage assets are especially vulnerable and significant in the Broads. We would suggest that archaeology is specifically identified as a potential loss through climate change.

Broads Authority comment:

Text to be amended. Suggestions for changes noted and will be considered as the Preferred Options is produced.

Inland Waterways Association

Thoughts on the challenges and opportunities: These challenges seem a fair assessment of what the local plan needs to address. It is not entirely clear that the plan will do this. Hopefully this will come with the first draft of the local plan.

Broads Authority Officer Summary of Representation:

These challenges seem a fair assessment of what the local plan needs to address. It is not entirely clear that the plan will do this.

Broads Authority comment:

Noted. See next version of the Plan.

Norfolk and Suffolk Boating Association

Deficiencies of moorings to meet the needs of various water-space users is one of the biggest challenges faced by The Broads.

Broads Authority Officer Summary of Representation:

Deficiencies of moorings to meet the needs of various water-space users is one of the biggest challenges faced by The Broads.

Broads Authority comment:

Noted and will consider this as we review this section.

Norfolk and Suffolk Boating Association

We suggest amending, under Strengths, page 22, 'Substantial engaged community of private boat owners' to 'Substantial engaged community of private boat owners, many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), and including children, to acquire and hone the skills required to become good sailors'.

We suggest adding, under Opportunities, page 23, 'Opportunities to encourage both local residents and visitors to join one of the many boating clubs, take part in organised events, go on formal sailing courses and gain recognised Royal Yachting Association (RYA) qualifications.'

Broads Authority Officer Summary of Representation:

1: Amend a strength to say "Substantial engaged community of private boat owners, many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), and including children, to acquire and hone the skills required to become good sailors'.

2: Suggest an additional opportunity of "Opportunities to encourage both local residents and visitors to join one of the many boating clubs, take part in organised events, go on formal sailing courses and gain recognised Royal Yachting Association (RYA) qualifications.'

Broads Authority comment:

1 and 2: These will be considered as this section of the Preferred Options is reviewed.

Residential Boat Owners Association

High reliance on tourism: Residential boats help to balance this by providing both a presence and support for the local economy throughout the year.

Lack of affordable housing: Residential boats can provide affordable housing in an area where there is both a lack of actual property, restrictions on development, and where housing prices are high due to lack of supply.

Encouraging sustainability: through the innovative design of buildings could well apply to the innovative design of residential boats, particularly for specific locations on the Broads.

Changes in patterns of recreation: including impacts of decline in hire boat fleets provide another opportunity by combining some residential moorings with leisure and hire boats to keep boat yards sustainable and increase their future viability.

High house prices: (as above for residential boats,) could provide starter accommodation for young people, encouraging them to stay in the area and move on to housing when this becomes more affordable.

Broads Authority Officer Summary of Representation:

Suggests how residential boats can benefit some of the challenges and opportunities.

Broads Authority comment:

Suggestions regarding the benefit of residential boats noted. The BA has policies relating to residential moorings and appropriate locations.

RSPB

SWOT analysis (p22): Whilst the SWOT analysis recognises threats such as fragmentation, pressure from development, threats from inappropriate management etc., as well as opportunities such as that to develop recreational management (presumably to limit impact on protected sites), no mention is made of the specific risk of damaging a legally protected site, or to the Local Plan being found to be unsound due to being undeliverable in the context of the protected sites.

Broads Authority Officer Summary of Representation:

No mention is made of the specific risk of damaging a legally protected site, or to the Local Plan being found to be unsound due to being undeliverable in the context of the protected sites.

Broads Authority comment:

Noted regarding damaging legally protected sites and this will be included.

Disagree regarding including the issue of the Local Plan being found unsound. The SWOT analysis refers to principal sustainability challenges and opportunities in the area rather than plans for the area.

Chedgrave Parish Council

In addition the Cllrs wished it to be noted that their main areas of concern are the R Chet and maintaining navigation and footpaths which in turn encourages visitors to the area which then supports the livelihoods of local people.

Broads Authority Officer Summary of Representation:

Main areas of concern are the R Chet and maintaining navigation and footpaths which in turn encourages visitors to the area which then supports the livelihoods of local people.

Broads Authority comment:

Noted and will be considered as the Preferred Options is produced.

07 Vision, objectives and existing policies

Anglian Water

Policy DP3 (Water resources and water quality) of the Development Management Policies DPD includes reference to water quality, the inclusion of water efficiency measures, sewage treatment and the provision of Sustainable Drainage Systems (SuDs). It is considered that the New Local Plan should include a revised version of Policy DP3 or a new policy which includes reference to water efficiency standards, sewage treatment, the foul sewerage network and the surface water hierarchy. Please see more detailed comments relating to these issues as set out below.

Broads Authority Officer Summary of Representation:

New Local Plan should include a revised version of DP3.

Broads Authority comment:

Noted and this is currently out intention.

Historic England

7.1 Vision, p25:

We note the identification of the special qualities of the Broads. We would suggest that the current bullet point: "History: geoheritage, cultural heritage, skills, archaeology, traditions, historic structures" is conflating two points which would best be separated into historic environment aspects and cultural heritage aspects, which can be tangible and intangible.

Broads Authority Officer Summary of Representation:

"History: geoheritage, cultural heritage, skills, archaeology, traditions, historic structures" is conflating two points which would best be separated into historic environment aspects and cultural heritage aspects, which can be tangible and intangible.

Broads Authority comment:

Noted and we will consider changing this into two points.

Inland Waterways Association

Thoughts on the special qualities of the Broads: Boating and boat activity is an essential part of the Broads, and the economy and quality of life in the local area would be very different without it. The list is a reasonable take on what is present in the area, although a little short on the fact that most of it is man-made. The 'navigable, lock free

waterways' statement omits the contribution of the North Walsham and Dilham Canal, where the North Walsham and Dilham Canal Trust is aiming and actually working for restoration of the canal.

Thoughts on objectives or vision for the Broads Local Plan: These should reflect the high level ones presented in the Broads Plan 2017, focused on the early years of that strategy needed to address urgent issues and prepare the ground for later work.

Thoughts on our existing policies: No comments

Broads Authority Officer Summary of Representation:

1: The list is a reasonable take on what is present in the area, although a little short on the fact that most of it is man-made.

2: Thoughts on objectives or vision for the Broads Local Plan: These should reflect the high level ones presented in the Broads Plan 2017, focused on the early years of that strategy needed to address urgent issues and prepare the ground for later work.

Broads Authority comment:

1: Support noted. Comment re North Walsham and Dilham Canal noted.

2: We will work closely with the authors of the Broads Plan.

Residential Boat Owners Association

Policy TSA2 Thorpe Island: As this is being retained the RBOA would support any future planning applications which assist the sustainability of the existing boatyard - see Changes in patterns of recreation above, and any such Pas should be positively considered on their own merits in that context.

Broads Authority Officer Summary of Representation:

As this is being retained the RBOA would support any future planning applications which assist the sustainability of the existing boatyard

Broads Authority comment:

Noted.

River Thurne Tenants Association

What do you like about the Broads?

The River and Broads as an amenity, for water transport and pleasure, also we like the wide and varied visual amenity of changing sky and countryside views. We enjoy the variety of the local vernacular architecture and diversity of the boats travelling through the waterways. Our members enjoy staying and living by the rivers, using the riverside properties for relaxation, family time and the pleasure of being beside the water. We enjoy the variety of wildlife that can be seen in the area.

What do you not like about the Broads?

We do not enjoy speeding boats, noisy visitors, litter, untidy, unkempt, riverside sites such as The Bridge inn site which has been derelict for many years. In Potter Heigham itself we have an abandoned, semi derelict public house(the Broads Haven Tavern)adjacent to a scheduled ancient monument, the Medieval Bridge, and an enhanced public access amenity space (Bridge Green). We do not like the difficulty in finding suitable parking for ourselves and visitors. We do not like the condition of Bastwick Staithe and the fact that it is a muddy, potholed car park, again next to the Medieval Bridge. This gets used as permanent parking, where as it should be an open Public Staithe. Since the removal of refuse compounds and suitable places for boat hirers to deposit their inevitable rubbish, there has been a great litter problem with overflowing bins and black plastic bags deposited on both Bastwick Staithe, Potter Heigham Staithe and in the private Car Park on the Bridge Inn site. The footpaths behind the bungalows on the Hickling Bank, and the Martham bank have deteriorated and are in need of maintenance. The footpath from Martham Boatyard to Potter Heigham is completely impassable, with foliage, water, slime and vegetation covering it. Walkers have to walk on the Flood defences, behind the flood wall. We do not like intrusive and unnecessary signage on the Broads, especially advertising signage.

What would you like to stay the same about the Broads?

Retention and upkeep of bungalows along the Thurne should remain. We would like public access to the Broads area to continue, the fact that people can walk, boat, cycle in the area should be encouraged. Visitors to the area must have places to stay and things to do. Therefore we would like amenities such as Public Houses, restaurants, boat hire companies, shops, hire bungalows, flats, hotels, camping and caravan sites to be encouraged. Wildlife and the varied scenery should remain, also the access to the wilder areas of the Broads system should be maintained, either by foot or by water. The biodiversity of the area is paramount, such as river and walking access to Hickling and Horsey. Areas of trees and shrubs should be encouraged as the variation of scenery is necessary to wildlife. Retention of toilet facilities is essential. Mooring spaces either on the main river, broad or in a boatyard should be retained. Quiet areas for moorings should be retained for those boating people who would like the peace and tranquillity of this unique area.

What changes would you like to see in the Broads?

In the Potter Heigham area we would like to see tasteful and sympathetic renovation of derelict sites, whilst retaining the character and tradition of the area. We would like to see improved parking in the Bridge area, especially for bungalow hirers, walkers, fishermen, day trippers and visitors. Litter bins, and places for boat refuse are essential. An evening eating establishment is essential in this area to allow boat users, walkers, etc to stop and relax in pleasant surroundings. There is no such establishment in Potter Heigham where we might have upwards of 40 cruisers moored along the river and in the boatyard, and the occupants of up to 50 bungalows who might need an evening meal.

Broads Authority Officer Summary of Representation:

1: What do you like about the Broads?

The River and Broads as an amenity, for water transport and pleasure, also we like the wide and varied visual amenity of changing sky and countryside views. We enjoy the variety of the local vernacular architecture and diversity of the boats travelling through the waterways. Our members enjoy staying and living by the rivers, using the riverside properties for relaxation, family time and the pleasure of being beside the water. We enjoy the variety of wildlife that can be seen in the area.

2: What do you not like about the Broads?

We do not enjoy speeding boats, noisy visitors, litter, untidy, unkempt, riverside sites such as The Bridge inn site which has been derelict for many years. We do not like the difficulty in finding suitable parking for ourselves and visitors. We do not like the condition of Bastwick Staithe and the fact that it is a muddy, potholed car park, again next to the Medieval Bridge. Since the removal of refuse compounds and suitable places for boat hirers to deposit their inevitable rubbish, there has been a great litter problem with overflowing bins and black plastic bags deposited on both Bastwick Staithe, Potter Heigham Staithe and in the private Car Park on the Bridge Inn site. The footpaths behind the bungalows on the Hickling Bank, and the Martham bank have deteriorated and are in need of maintenance. The footpath from Martham Boatyard to Potter Heigham is completely impassable, with foliage, water, slime and vegetation covering it. Walkers have to walk on the Flood defences, behind the flood wall. We do not like intrusive and unnecessary signage on the Broads, especially advertising signage.

3: What would you like to stay the same about the Broads?

Retention and upkeep of bungalows along the Thurne should remain. We would like public access to the Broads area to continue. We would like amenities such as Public Houses, restaurants, boat hire companies, shops, hire bungalows, flats, hotels, camping and caravan sites to be encouraged. Wildlife and the varied scenery should remain, also the access to the wilder areas of the Broads system should be maintained, either by foot or by water. Areas of trees and shrubs should be encouraged as the variation of scenery is necessary to wildlife. Retention of toilet facilities is essential. Mooring spaces either on the main river, broad or in a boatyard should be retained. Quiet areas for moorings should be retained.

4: What changes would you like to see in the Broads?

In the Potter Heigham area we would like to see tasteful and sympathetic renovation of derelict sites improved parking in the Bridge area. Litter bins, and places for boat refuse are essential. An evening eating establishment is essential in this area.

Broads Authority comment:

- 1: This information will help inform the vision and objectives of the Local Plan.
 2, 3 and 4: Noted and will be considered as the Preferred Options is produced.
-

Thomas, Mr P

My compliments on a very well presented draft document.

Broads Authority Officer Summary of Representation:

Compliments the draft document.

Broads Authority comment:

Noted with thanks.

08 Water**Anglian Water****8.5 Water Efficiency of New Dwellings**

It is noted that the Broads Authority is considering whether to require the optional higher water efficiency standard (110 litres per person per day) for new dwellings. We would support the inclusion of the optional higher water efficiency standard subject to an assessment of financial viability of the whole Local Plan by the Broads Authority.

8.6 Water Efficiency of Non Residential Development

Anglian Water would welcome water efficiency measures being included as a requirement for non-residential development subject to an assessment of financial viability of the whole Local Plan by the Broads Authority.

8.7 Water supply and wastewater infrastructure

It is noted that the Broads Authority has outlined a number of options relating to how sewage treatment will be addressed in the Broads Authority area.

Policy DP3 – Water Quality and Resources refers to a connection to a foul sewer being the preferred option for new development unless it is proven that this is not appropriate.

Where there are no public foul sewers within the area it is open to residents to make a 'Section 101A' application to Anglian Water which is for the provision of a new public sewer. This is typically done at the village scale. There is an application process for this which can take up to four months. Further information is available here: [http://www.anglianwater.co.uk/_assets/media/your_guide_to_first_time_sewerage_v4\(1\).pdf](http://www.anglianwater.co.uk/_assets/media/your_guide_to_first_time_sewerage_v4(1).pdf).

Where it is proposed that a connection will made to a public sewer the New Local Plan should include a requirement to demonstrate there is adequate sewage treatment to serve the development or that this can be made available in time for the development. It would also be helpful if the New Local Plan included a policy which required applicants to demonstrate that there is available capacity within the foul sewerage network or that capacity could be made available.

8.10 Sustainable Drainage Systems (SuDS)

Anglian Water would wish to see a policy included in the Local Plan which requires the provision of SuDs as part of new developments. As part of which it would be helpful if developers were required to provide evidence that they have followed the hierarchy as outlined in page 36 of the consultation document before proposing that surface water should be discharged into a surface water sewer.

Reference is made to whether specific SuDs methods should be required as part of the New Local Plan. Developers can apply to Anglian Water to adopt SuDS proposed as part of their development. Anglian Water's current standards for SuDs adoption are available to view at the following address:

<http://www.anglianwater.co.uk/developers/suds.aspx>

Broads Authority Officer Summary of Representation:

- 1: AWS support higher water efficiency standard subject to financial viability.

2: AWS would welcome requirement for water efficiency measures for non-residential development subject to financial viability.

3: Where it is proposed that a connection will be made to a public sewer the New Local Plan should include a requirement to demonstrate there is adequate sewage treatment to serve the development or that this can be made available in time for the development. It would also be helpful if the New Local Plan included a policy which required applicants to demonstrate that there is available capacity within the foul sewerage network or that capacity could be made available.

4: Anglian Water would wish to see a policy included in the Local Plan which requires the provision of SuDs as part of new developments. As part of which it would be helpful if developers were required to provide evidence that they have followed the hierarchy as outlined in page 36 of the consultation document before proposing that surface water should be discharged into a surface water sewer. Anglian Water's current standards for SuDs adoption are available to view at the following address:
<http://www.anglianwater.co.uk/developers/suds.aspx>

Broads Authority comment:

1 and 2: Support noted. We await confirmation of views from Essex and Suffolk Water. We can then consider the most appropriate policy response.

3 and 4: Policy proposals noted and will be considered as the Preferred Options version of the Local Plan is produced.

Environment Agency

8.1 Introduction :

We support the recognition in this section of the potential for development and activities to impact on the water environment in a range of ways. While many of the activities mentioned such as abstractions and discharges into waters may need permits from the Environment Agency, other activities or those of a smaller scale will not. It is important that the Plan includes an appropriately robust framework to ensure that these issues are appropriately addressed through planning.

The Water Framework Directive (WFD) is mentioned here, but there are also other relevant directives that will need to be taken into account, such as the Habitats directive protecting sensitive areas such as SACs and SPAs.

8.2 Water Framework Directive:

We welcome the reference in this section to having regard to the River Basin Management Plans (RBMP). All Local Plan approaches and policies should be considered with the objective of improving the status of waterbodies in mind. This will include considering impacts on water quality, as highlighted, but also the potential for direct physical impacts on waterbody morphology. Delivering in respect of WFD has clear benefits for water quality and biodiversity.

8.3 Water Quality:

The statements included here are welcomed, as is the inclusion of reference to the plans and aspirations to improve and protect water quality through specific programmes and partnerships. As the Plan preparation progresses, all opportunities to protect and improve water quality should be considered.

Diffuse water pollution plans have been written and are currently being reviewed. These address those Broads that are not in 'favourable condition', as defined by Natural England, where this is thought to be due to diffuse pollution. The plans attribute actions to help improve water quality and habitats. The Local Plan should also acknowledge these and seek to contribute to the actions within them where appropriate.

We would also highlight that addressing rural runoff from verge erosion can help in reducing diffuse pollution. Soil pulled off fields onto roads by inappropriate passing places contributes sediment and often phosphate (a nutrient) to the local watercourses. These can have a negative impact on the water quality. Working with the highways departments of local councils and developers to identify and resolve these issues as part of development proposals would help improve water quality. For example, there may be an opportunity to require the construction of metalised passing places if traffic will increase as a result of development.

8.4 Run off from boat wash down facilities:

We would support the inclusion of more detail within the Plan on this issue with the intention of improving understanding and therefore compliance.

8.5 & 8.6 Water Efficiency of New Dwellings/Non Residential Development:

As a contribution to securing sustainable development, we would be supportive of the Local Plan seeking the higher water efficiency standard for new residential development. We would also suggest that the promotion of water efficiency for non-residential development should also be considered.

8.7 Water Supply and Waste Water Infrastructure:

We would support an approach that highlighted the hierarchy of preferred treatment methods and also gave advice on the suitability and maintenance of non-mains systems. We do have some concerns over the inclusion of reed bed filtration systems. Whilst they can provide a very useful polishing for treatment plant effluent, we are less certain that they can always clean effluent adequately on their own. Given the sensitivity of the Broads, the role of such systems should be carefully considered.

8.8 Horning and Knackers Wood Water Recycling Centre:

We welcome the highlighting of this issue and note the intention to monitor the situation as the Plan progresses. We would support the inclusion of appropriate text in the final Plan if the situation remains an issue for future development to consider.

8.9 Flood Risk:

We support and welcome the detail provided in the Plan at this stage in respect of flood risk, which is clearly a key issue for development across the area to address. Flood risk in the Broads does have specific characteristics, and it is appropriate and important that the Plan considers this, and provides sufficiently detailed policies and guidance to ensure that development is safe and flood risk elsewhere is not increased. However, it remains equally important that the approach taken is consistent with that contained within national planning policy and guidance.

For all new development proposals there must be a robust application of the National Planning Policy Frameworks (NPPF) Sequential Test to avoid development in areas of flood risk wherever possible and to maintain the function of these areas for natural processes.

Within the Broads, consideration should be given to the low lying nature of the land and the potential magnitude of climate change impacts over a period of up to 100 years when considering proposed development. With the effects of climate change there is also the potential for tide-locking to occur.

As you are no doubt aware, we support the intention to update the Strategic Flood Risk Assessment, as highlighted in this section. We would encourage further dialogue with all relevant authorities including Anglian Water, NCC as Lead Local Flood Authority, the IDB and neighbouring LPAs.

We are aware that Waveney District Council is also intending an SFRA update in the coming months. A consistency of approach will be important. It will be particularly significant at Mutford Lock in Lowestoft, the boundary between Oulton Broad (BA) and Lake Lothing (WDC), especially if there is the potential for larger events to overtop the lock.

Updating the SFRA will mean that the latest hydraulic modelling and climate change allowances can be incorporated to inform the evidence base. Previous climate change allowances were based on projections from 2002. Since then, our understanding of the science has improved and there have been new global assessments of climate change, as well as new UK climate projections from 2009. At the UK level, the main changes are a much more detailed understanding of changes in average rainfall, as well as improvements in the scientific understanding of how different catchments respond. As a result, the changes to the guidance on fluvial flooding have been made. Sea level and storm allowances have not been changed from the previous version.

The most up to date information on climate change for planning can be found at:

<https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

We have identified a number of communities within the Broads area which we have recognized as potential 'Communities at Risk'. These communities are shown to be at risk of flooding based on our modelling and flood history investigations. These areas were all previously discussed in the Broadland Rivers Catchment Flood Management Plan 2009.

In March 2016 we published the Anglian river basin district Flood Risk Management Plan (FRMP). The flood risk management plans explain the risk of flooding from rivers, the sea, surface water, groundwater and reservoirs. FRMPs set out how risk management authorities will work with communities to manage flood risk over the next 6 years. The Anglian FRMP can be found buy using the following link <https://www.gov.uk/government/publications/anglian-river-basin-district-flood-risk->

management-plan

Whatever work is required regarding flood defences to keep communities safe in the future, affordability will be a key issue. Developer contributions should be sought where appropriate, along with partnership funding where applicable. The following links and attached document provide more information and guidance on partnership funding:

<https://www.gov.uk/government/collections/flood-and-coastal-defence-funding-for-risk-management-authorities>

<https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding-an-introductory-guide>

<https://www.gov.uk/government/publications/flood-and-coastal-resilience-partnership-funding>

8.10 Sustainable Drainage Systems (SuDS):

SuDS have the potential to not only reduce flood risk, but to also contribute to improved water quality (as highlighted for rural SuDS in this section), and provide habitat enhancement.

There are a wide range of SuDS methods available; the Plan should seek to ensure that SuDS appropriate to the Broads area and that contribute widely to key objectives are delivered. This means, for example, SuDS that secure the required level of treatment to protect water quality, and offer the greatest potential for ecological improvement, by creating and/or linking habitats. The linking of habitats is also highlighted as an important issue under Green Infrastructure, Climate Change & Biodiversity sections of the Plan.

Broads Authority Officer Summary of Representation:

1: All Local Plan approaches and policies should be considered with the objective of improving the status of waterbodies in mind.

2: 8.3 Diffuse water pollution plans have been written and are currently being reviewed. The plans attribute actions to help improve water quality and habitats. The Local Plan should also acknowledge these and seek to contribute to the actions within them where appropriate. We would also highlight that addressing rural runoff from verge erosion can help in reducing diffuse pollution. Working with the highways departments of local councils and developers to identify and resolve these issues as part of development proposals would help improve water quality.

3: 8.4 We would support the inclusion of more detail within the Plan on this issue with the intention of improving understanding and therefore compliance.

4: 8.5 & 8.6 We would be supportive of the Local Plan seeking the higher water efficiency standard for new residential development. We would also suggest that the promotion of water efficiency for non-residential development should also be considered.

5: 8.7 We would support an approach that highlighted the hierarchy of preferred treatment methods and also gave advice on the suitability and maintenance of non-mains systems. We do have some concerns over the inclusion of reed bed filtration systems. Whilst they can provide a very useful polishing for treatment plant effluent, we are less certain that they can always clean effluent adequately on their own.

6: 8.8 We would support the inclusion of appropriate text in the final Plan if the situation remains an issue for future development to consider.

7: 8.9 Flood risk in the Broads does have specific characteristics, and it is appropriate and important that the Plan considers this, and provides sufficiently detailed policies and guidance to ensure that development is safe and flood risk elsewhere is not increased. However, it remains equally important that the approach taken is consistent with that contained within national planning policy and guidance. As you are no doubt aware, we support the intention to update the Strategic Flood Risk Assessment, as highlighted in this section. We would encourage further dialogue with all relevant authorities including Anglian Water, NCC as Lead Local Flood Authority, the IDB and neighbouring LPAs. We are aware that Waveney District Council is also intending an SFRA update in the coming months. Updating the SFRA will mean that the latest hydraulic modelling and climate change allowances can be incorporated to inform the evidence base. We have identified a number of communities within the Broads area which we have recognized as potential 'Communities at Risk'. These communities are shown to be at risk of flooding based on our modelling and flood history

investigations. These areas were all previously discussed in the Broadland Rivers Catchment Flood Management Plan 2009. In March 2016 we published the Anglian river basin district Flood Risk Management Plan (FRMP).

8: 8.10 There are a wide range of SuDS methods available; the Plan should seek to ensure that SuDS appropriate to the Broads area and that contribute widely to key objectives are delivered.

Broads Authority comment:

1: Noted. The various policies in the water section should contribute to this aim.

2: Diffuse water pollution plans to be assessed. Issue of verges to be considered as the Preferred Options is produced.

3: Noted.

4: Support to address water efficiency noted.

5: Support regarding a policy approach noted. Concern re reed beds noted.

6: Noted and all parts of the Issues and Options will be updated to reflect the situation at writing the Preferred Options.

7: FRMP 2016 noted.

8: Advice noted.

Inland Waterways Association

EU Water Framework Directive is mentioned here, referring to the need to protect, enhance and restore water bodies to 'good' status. Assuming the Broads and some of the water bodies linking them together are in reality heavily modified water bodies, the WFD requires these water bodies to reach 'good potential' not good status. Details of the definitions are:

European Environment Agency website: 'The Water Framework Directive distinguishes between two types of altered water bodies: Heavily Modified Water Body (HMWB) and Artificial Water Body (AWB):

- HMWB are bodies of water which as a result of physical alterations by human activity are substantially changed in character and cannot, therefore, meet "good ecological status" (GES). In this context physical alterations mean changes to e.g. the size, slope, discharge, form and shape of river bed of a water body.
- AWBs are surface water bodies which have been created in a location where no water body existed before and which have not been created by the direct physical alteration, movement or realignment of an existing water body.'

Run off from boat wash in the new Local Plan: IWA agrees this needs to be subject of a separate improved policy to address the issue, within the context of a need to maintain a thriving local economy. Practices such as those used in garages to separate oil may be suitable, with modification.

How to address water efficiency of residential developments in the Local Plan: Option 2, proposing 110 l/hd/d for new dwellings, seems an appropriate response to water resources for the future, and the impacts of water usage on the Broads environment.

Thoughts on how the local plan should address water usage on non-residential premises: This seems a good idea, and standards for equivalent industries, premises or processes may be suitable for using as 'good practice' which BA might expect to be achieved. Equally, BA could contact local or national water companies to see whether they have standards which could be applied. Care will be needed to ensure the effect is not to simply accelerate the closure of businesses.

How to address sewerage treatment in the Broads: This title is incorrect, and should be restated to 'How to address sewage treatment in the Broads'. Guidance PPG4 is no longer available on EA's website. However, some more formal policy should better assist domestic properties reduce the pollution from their property. Care will be needed to ensure BA do not over-prescribe solutions which can quickly become out of date or inappropriate, and prevent innovative solutions being deployed. Realistic, pragmatic outcome-based policy is needed. Reed bed solutions are very effective at providing high standards of treatment for domestic sewage, given sufficient land availability and maintenance of the reed bed.

Thoughts on flood risk in the Broads Executive, how the Local Plan should address it and whether there should be a Broads specific exceptions test: It is hard to see how flood risk on the Broads differs from that elsewhere. However there could be a case for deploying 'local solutions' as a requirement for some types and locations of properties in potentially flooded areas. Provided the sea defences are not breached as in 1952 the major flood risk to the Broads is at Yarmouth, from a tidal surge. The Local Plan needs to highlight this issue, and see whether consideration of a tidal surge flood barrier is needed, similar to that projected at Boston.

SUDS and the Local Plan: There is a role for exploiting SUDS/ Rural SUDS in areas where there is sufficient space, and where groundwater conditions are suitable- not the case for many parts of the Broads. Equally, combining SUDS type retention systems and reed beds could provide both detention and slow release of run-off water and improvement in its chemical and biological quality before reaching a water body. This could therefore be usefully encouraged in the local plan, provided the SUDS systems have credible ownership, operation and maintenance plans.

Broads Authority Officer Summary of Representation:

- 1: Assuming the Broads and some of the water bodies linking them together are in reality heavily modified water bodies, the WFD requires these water bodies to reach 'good potential' not good status.
- 2: Run off from boat wash in the new Local Plan: IWA agrees this needs to be subject of a separate improved policy to address the issue, within the context of a need to maintain a thriving local economy.
- 3: Proposing 110 l/hd/d for new dwellings, seems an appropriate response to water resources for the future, and the impacts of water usage on the Broads environment.
- 4: Thoughts on how the local plan should address water usage on non-residential premises: This seems a good idea, and standards for equivalent industries, premises or processes may be suitable for using as 'good practice' which BA might expect to be achieved.
- 5: Sewage rather than sewerage. A formal policy should better assist domestic properties reduce the pollution from their property.
- 6: It is hard to see how flood risk on the Broads differs from that elsewhere. However there could be a case for deploying 'local solutions' as a requirement for some types and locations of properties in potentially flooded areas. The Local Plan needs to highlight this issue, and see whether consideration of a tidal surge flood barrier is needed, similar to that projected at Boston.
- 7: There is a role for exploiting SUDS/ Rural SUDS in areas where there is sufficient space, and where groundwater conditions are suitable- not the case for many parts of the Broads. Equally, combining SUDS type retention systems and reed beds could provide both detention and slow release of run-off water and improvement in its chemical and biological quality before reaching a water body. This could therefore be usefully encouraged in the local plan, provided the SUDS systems have credible ownership, operation and maintenance plans.

Broads Authority comment:

- 1: noted.
 - 2, 3, 4, 5, 6, 7: Support for various options and comments noted.
-

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage includes: Water quality/resources/flood risk issues.

Broads Authority Officer Summary of Representation:

Note that the issues scoped in at this stage includes Water quality/resources/flood risk issues.

Broads Authority comment:

Noted.

Residential Boat Owners Association

8.4: We support the use of filtration systems to reduce the contamination from washing down of vessels. We encourage the development and use of less toxic anti-fouling paints but note that the leisure boating industry needs further investment to ensure that this is taken up. In this context it should be noted that ecological sustainability can be furthered very effectively by a reduction in the need for mains supplies.

Broads Authority Officer Summary of Representation:

We support the use of filtration systems to reduce the contamination from washing down of vessels

Broads Authority comment:

Support noted.

RSPB

Issue 1: how should we address run off from boat wash in the new Local Plan?

The Authority must ensure that, whichever option is chosen, they are confident that the use of anti-fouling paint is managed in a way that ensures that it does not cause damage to the ecosystem, particularly to designated features or habitats.

Issue 3: How to address sewerage treatment in the Broads

Tertiary treatment of waste water has been a long standing discussion in The Broads. It is the RSPB's understanding that there are current technological limitations to improving effluent discharge to the rivers and reedbeds as an additional filtration system may provide a solution to helping meet Water Framework Directive, Natura 2000 and SSSI targets. The development of additional reedbed habitat could deliver multiple benefits, especially helping to maintain and enhance ecological networks and landscape character.

The use of SuDS (p36): Appropriate use of SuDS and RSuDS can benefit the environment, for example by correctly using reedbed filtration systems. The RSPB has published guidance which can be found at https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf.

Broads Authority Officer Summary of Representation:

1: Issues 1: The Authority must ensure that, whichever option is chosen, they are confident that the use of anti-fouling paint is managed in a way that ensures that it does not cause damage to the ecosystem, particularly to designated features or habitats.

2: Issue 3: The development of additional reedbed habitat could deliver multiple benefits, especially helping to maintain and enhance ecological networks and landscape character.

3: The RSPB has published guidance on SuDS which can be found at https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf.

Broads Authority comment:

1: That is the reason for looking into this issue in the Issues and Options.

2 and 3: Noted.

Anglian Water

Essex and Suffolk Water also provide water services to part of the Broads Authority area and their views should also be sought on the Local Plan consultation document.

Therefore the following comments relate to Anglian Water's area of responsibility only.

Broads Authority Officer Summary of Representation:

Noted.

Broads Authority comment:

N/A

09 Open Space (land and water), Parks & Allotments**Great Yarmouth Borough Council**

9.3 Play, Open Space (land), Allotments and our Constituent Authorities

The footnote (no.15) refers to the Great Yarmouth Core Strategy being at examination in May 2015. It was adopted in December 2015. Site Allocations, as well as the Development Management Policies mentioned, are currently in preparation.

Broads Authority Officer Summary of Representation:

Core Strateg was adopted in December 2015. Site Allocations, as well as the Development Management Policies mentioned, are currently in preparation.

Broads Authority comment:

Noted. This will be updated in future versions of the Local Plan.

Chedgrave Parish Council

Chapter 9 - Open space, play and allotments, the Cllrs support Option 4. They would also propose that Loddon & Chedgrave be included when considering the lack of public launching facilities as there has been a long standing demand for these facilities in the area.

Broads Authority Officer Summary of Representation:

Support Option 4. Loddon & Chedgrave be included when considering the lack of public launching facilities as there has been a long standing demand for these facilities in the area.

Broads Authority comment:

Support for option 4 noted.

Comment regartding public launching facilities to be passed onto Waterways and Recreation Team.

Inland Waterways Association

Thoughts on water open space, staithes and slipways: Recreation is play...the Broads has plenty of potential water recreation capabilities, and BA could more actively deploy/ exploit this. This is also necessary to maximise safety of children in an otherwise more hazardous water environment. Retention and new provision of staithes and slipways is an important issue, for recreation and commercial transport/ green transport on the water. Plugging the gaps in a programmed and opportunistic way will be vital to feed the pipeline of future water recreational users, as well as maintain the opportunity for 'green transportation' in the Broads area. Once provided, there may be a role for maintenance in local communities and a preparedness to take it on, if they can see the potential benefit.

Broads Authority Officer Summary of Representation:

1: Broads has plenty of potential water recreation capabilities, and BA could more actively deploy/ exploit this.

2: Safety of children in an otherwise more hazardous water environment

3: Retention and new provision of staithes and slipways is an important issue.

Broads Authority comment:

1: The BA does promote the appropriate use of the Broads. That is one of its statutory purposes.

2: We are producing a safety by the water section of the Local plan.

3: Noted and will be considered as the Preferred Options is produced.

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage includes:

Open space – For more information see the Accessible Natural Greenspace Standard (ANGSt) [weblink].

Broads Authority Officer Summary of Representation:

For more information see the Accessible Natural Greenspace Standard (ANGSt) [weblink].

Broads Authority comment:

Link and further information noted.

Norfolk and Suffolk Boating Association

9.4, page 41 ‘Water Open space’:

Whilst we commend the reference to staithes and the rights and entitlements enjoyed variously by the public and parishioners, there is inadequate weight on restoring staithes at key sites (such as Ludham Bridge) back to their legally protected status. Staithes have traditionally been used for mast raising and lowering at bridges as well as for loading and unloading.

Launching facilities: We support the improved provision of accessible slipways and canoe launching facilities, and in addition would urge the Authority, when constructing or improving access facilities, to ensure that local users are consulted in detail about their requirements and preferences for the details of materials and layout.

Broads Authority Officer Summary of Representation:

1: There is inadequate weight on restoring staithes at key sites (such as Ludham Bridge) back to their legally protected status.

2: Ensure that local users are consulted in detail about their requirements and preferences for the details of materials and layout.

Broads Authority comment:

1: Noted. The Authority is undertaking work to understand staithes in the Broads further.

2: Noted and will be passed onto the Waterways and Recreation Team.

Norfolk County Council

Public Health welcome the acknowledgements given to the value of open spaces, play etc. to public health and the consideration given to approaches to address land-based open space, allotments and play requirements in the Broads.

Broads Authority Officer Summary of Representation:

Public Health welcome the acknowledgements given to the value of open spaces, play etc. to public health

Broads Authority comment:

Support noted.

River Thurne Tenants Association

Where in the Broads do you think there are areas of ‘Local Green Space’ and why do you think that?

Bridge Green at Potter Heigham is an important green space for this community. The Picnic Area at Pugg Street Staithe is also an area used by walkers and residents on the riverbank. (owned by the Thurne Bungalows Management Company) There is an area to the East of Potter Heigham Bridge (on the old Bridge Inn Site) which is an open space but would benefit from enhancement works and seating areas.

Broads Authority Officer Summary of Representation:

Suggestions include: Bridge Green at Potter Heigham, Pugg Street Staithe, East of Potter Heigham Bridge.

Broads Authority comment:

Suggestions noted. RTTA will be asked to complete forms.

RSPB

Issue 4: How to address land-based open space, allotments and play requirements in the Broads

The RSPB considers that there does need to be a guiding principle established as to the requirement for open space and play areas to be included in the design of developments. It should be clear what would be expected to be provided, although the scale of provision could be determined by the planning process.

Broads Authority Officer Summary of Representation:

There does need to be a guiding principle established as to the requirement for open space and play areas to be included in the design of developments.

Broads Authority comment:

Noted.

10 Green Infrastructure**Broadland District Council**

Issue 5: how do we address Green Infrastructure in the Broads Executive Area?

It is suggested that these two options are taking forward:

[Agree] Option 2: A Strategic Green Infrastructure Policy

[Agree] Option 3: Specific Policies covering some GI projects

As in similar approach to the Council's DMDPD the provision of green infrastructure could be of particular importance to address potential impacts of increased visitor pressure on Natural 2000 sites whilst increasing ecological connectivity in the area.

Broads Authority Officer Summary of Representation:

Support Option 2 and 3.

Broads Authority comment:

Support for options 2 and 3 as well as the benefits of GI are noted.

Environment Agency

Section 10: Green Infrastructure

We would suggest that 'blue infrastructure' be considered as part of this section, given the close linkages between the two in the Broads area. Measures that provide flood risk management, including SuDS, have the potential to provide further benefits in addition to the primary role. This multifunctional approach should be a key aspect of all green and blue infrastructure, and should be incorporated as part of new development proposals at the design stage. There are also links to WFD, and the need to ensure that any physical impacts on waterbodies, and resultant mitigation, are considered as part of any planning application.

Broads Authority Officer Summary of Representation:

Blue infrastructure, multifunctionality of SuDS and WFD important considerations.

Broads Authority comment:

Blue infrastructure is talked about at section 9.4 of the Issues and Options - water open space.

SuDS is talked about at section 8.10 of the Issues and Options.

Water Framework Directive is referred to throughout section 8 of the Issues and Options.

Inland Waterways Association

Strategic Green Infrastructure:

Setting out a strategic role for green infrastructure in the Broads is key to demonstrating the benefit of living in and visiting such a location. The Broads should aim for leadership in this area, given its higher dependence on green solutions to current problems. Ideally, the plan would show how deploying green infrastructure would achieve equally effective outcomes for locals and visitors, with better sustainability and lower impact on the Broads environment. An evolving strategy would allow new innovations and pilots to be trialled then rolled out if suitable.

Areas suitable to designate as local green space: At this stage no sites have been identified for designation

Broads Authority Officer Summary of Representation:

Setting out a strategic role for green infrastructure in the Broads is key to demonstrating the benefit of living in and visiting such a location. Ideally, the plan would show how deploying green infrastructure would achieve equally effective outcomes for locals and visitors, with better sustainability and lower impact on the Broads environment.

Broads Authority comment:

Support for a policy on GI noted.

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage includes:

Green infrastructure – we advise that the Plan should ensure the creation, protection, enhancement and management of green infrastructure. For more information, see the PPG on Green Infrastructure [weblink].

Broads Authority Officer Summary of Representation:

Advise that the Plan should ensure the creation, protection, enhancement and management of green infrastructure. For more information, see the PPG on Green Infrastructure [weblink].

Broads Authority comment:

Link and further information noted.

Norfolk and Suffolk Boating Association

Section 10, Green Infrastructure, and Section 22, Sustainable Tourism:

We failed to find any reference in either of these sections, to the most sustainable form of transport and the most sustainable form of tourism, that is, transport by engineless boat propelled by the harnessing of wind and tide.

Broads Authority Officer Summary of Representation:

We failed to find any reference in either of these sections, to the most sustainable form of transport and the most sustainable form of tourism, that is, transport by engineless boat propelled by the harnessing of wind and tide.

Broads Authority comment:

Comment noted and we will consider this as the Preferred Options is produced.

Norfolk County Council

The green infrastructure team strongly support the need for a policy-based approach to the delivery of strategic GI and have provided more detailed comments as set out in appendix 1.

Appendix 1:

Issue 5: Delivery of Green Infrastructure (GI)

- We strongly support the need for a policy-based approach to the delivery of strategic GI.
- Both Option 2, a Strategic GI Policy, and Option 3, Specific GI policies for specific locations/projects, would appear to be suitable delivery mechanisms.
- Areas for consideration could include:
 - Requiring development to contribute to the Public Rights of Way (PRoW) network by providing links to - or enhancements to – the existing PRoW, Norfolk Trails (three are within the Broads Authority area) and strategic cycle routes (existing or planned e.g. The Three Rivers Way, The Broadland Way) (see NPPF para 75).
 - Requiring development to take measures to minimise impacts from recreational on the internationally designated biodiversity sites (the Natura 2000 network) in compliance with the Conservation of Habitats and Species Regulations 2012.
 - Requiring development to contribute to ecological networks and connectivity (NPPF para 117), both within the Broad Authority area and to the wider network of Norfolk
- Issues relating to Open Space and allotments (Issue 9) could be covered by a strategic GI policy as they are included in the GI definition used in the Issues and Options report.
- We would support either option 2 or 3 of Issue 5.

Broads Authority Officer Summary of Representation:

1: Both Option 2, a Strategic GI Policy, and Option 3, Specific GI policies for specific locations/projects, would appear to be suitable delivery mechanisms.

Areas for consideration could include requiring development to

* contribute to the Public Rights of Way (PRoW) network

* take measures to minimise impacts from recreational on the internationally designated biodiversity sites

* contribute to ecological networks and connectivity (NPPF para 117), both within the Broad Authority area and to the wider network of Norfolk

2: Open Space and allotments (Issue 9) could be covered by a strategic GI policy as they are included in the GI definition used in the Issues and Options report.

3: We would support either option 2 or 3 of Issue 5.

Broads Authority comment:

1: Support for option 2 and 3 noted. Suggested requirements also noted.

2: Suggested approach noted and will be considered as the Preferred Options is produced.

3: Support for option 2 and 3 noted.

RSPB

Issue 5: how do we address Green Infrastructure in the Broads Executive Area?

Subject to the outcome of the Recreational Impact Study, and the Sustainable Tourism Consultation, and complementary to them, a Strategic Green Infrastructure policy that identified, protected and linked the best conservation areas, and allowed for climate change adaptation, would be a valuable strategic planning tool. This would lead us to conclude that Option 2 would be the most appropriate.

Broads Authority Officer Summary of Representation:

Option 2 would be the most appropriate.

Broads Authority comment:

Support for option 2 of Issue 5 noted.

Suffolk Wildlife Trust

Green Infrastructure (Issue 5): We support Option 2, a Strategic Green Infrastructure Policy. Such a policy could also be expanded to include specific GI projects (in line with Option 3), where these have been identified.

Broads Authority Officer Summary of Representation:

Green Infrastructure (Issue 5): We support Option 2, a Strategic Green Infrastructure Policy. Such a policy could also be expanded to include specific GI projects (in line with Option 3), where these have been identified.

Broads Authority comment:

Support for option 2 and 3 noted.

11 Climate Change

Historic England

Mitigating against the projected effects of climate change is a considerable challenge to the special qualities of the Broads. We would expect that the evidence base for this section would include Historic England's advice Energy Efficiency and Historic Buildings- Application of Part L of the Building Regulations to historically and traditionally constructed buildings <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/>. It should be noted that listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. These considerations need to be taken into account when considering how best to mitigate against climate change in historic buildings and areas. Therefore, any policy coming forward should take into account its effect on such buildings and areas.

Broads Authority Officer Summary of Representation:

We would expect that the evidence base for this section would include Historic England's advice Energy Efficiency and Historic Buildings- Application of Part L of the Building Regulations to historically and traditionally constructed buildings. It should be noted that listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. These considerations need to be taken into account when considering how best to mitigate against climate change in historic buildings and areas. Therefore, any policy coming forward should take into account its effect on such buildings and areas.

Broads Authority comment:

Comments noted and will be considered as the Preferred Options is produced.

Inland Waterways Association

How should we address climate change in the Local Plan?

Option 3: Scoping of development type and scale seems the more appropriate response in the local plan. At this stage, Option 5 seems more difficult to specify and implement given the uncertainty around effective solutions and the quantum of need.

Broads Authority Officer Summary of Representation:

Scoping of development type and scale seems the more appropriate response in the local plan. At this stage, Option 5 seems more difficult to specify and implement given the uncertainty around effective solutions and the quantum of need.

Broads Authority comment:

Comments noted and will be considered as the Preferred Options is produced.

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage includes:

Climate change – we advise that the Plan should detail the approach to mitigation of and adaptation to climate change.

Broads Authority Officer Summary of Representation:

Advise that the Plan should detail the approach to mitigation of and adaptation to climate change.

Broads Authority comment:

Noted.

RSPB

Issue 6: how should we address climate change in the Local Plan?

A strategic approach to climate change which, for example, connected areas to allow for movement of species, or identified and adapted areas which would be able to take extra water in the future, should be adopted.

Broads Authority Officer Summary of Representation:

A strategic approach to climate change which, for example, connected areas to allow for movement of species, or identified and adapted areas which would be able to take extra water in the future, should be adopted.

Broads Authority comment:

Noted and will be considered as we address climate change in the Preferred Options.

12 Peat

Historic England

We welcome the identification of archaeology and palaeoenvironments in the introduction (please also refer to our comments on pp22-4 above) and the inclusion of the Wetland and Waterlogged Heritage Survey within the evidence base. As policies are developed, consideration should be given to how potential archaeological deposits are conserved when faced with development proposals. This may include requiring archaeological assessments, given the high archaeological potential and limited archaeological information about the Broads. We note the irony of drafting a policy to protect peat when the Broads were formed through peat extraction.

Broads Authority Officer Summary of Representation:

As policies are developed, consideration should be given to how potential archaeological deposits are conserved when faced with development proposals.

Broads Authority comment:

Comments noted and will inform this section as it is progressed.

Inland Waterways Association

How should we address peat affected by land use change in the Broads?

If useful and not unduly onerous, provision of guidance in Option 4 seems the better way to address peat exploitation.

Broads Authority Officer Summary of Representation:

If useful and not unduly onerous, provision of guidance in Option 4 seems the better way to address peat exploitation.

Broads Authority comment:

Support for option 4 noted.

RSPB

Issue 7: how should we address peat affected by land use change in the Broads?

As outlined in the document, peat is a finite, ecologically valuable resource that supports internationally important species and habitats. It is not possible to mitigate for its loss as it cannot be recreated in any reasonable timeframe. The chosen option needs to minimise disruption, protect and restrict removal of peat soils. The wording needs to be carefully considered as some operations which are beneficial to the conservation of the Broads and the maintenance of internationally important species and habitats requires the carefully controlled and monitored removal of peat for conservation purposes, e.g. the creation of turf ponds and scrapes. A combination of Options 2 and 6, with a caveat that disturbance or small-scale removal for the management of land for conservation should be permitted, could be used to ensure the correct level of protection is appropriately applied.

Broads Authority Officer Summary of Representation:

It is not possible to mitigate for its loss as it cannot be recreated in any reasonable timeframe. The chosen option needs to minimise disruption, protect and restrict removal of peat soils. The wording needs to be carefully considered as some operations which are beneficial to the conservation of the Broads and the maintenance of internationally important species and habitats requires the carefully controlled and monitored removal of peat for conservation purposes, e.g. the creation of turf ponds and scrapes. A combination of Options 2 and 6, with a caveat that disturbance or small-scale removal for the management of land for conservation should be permitted, could be used to ensure the correct level of protection is appropriately applied.

Broads Authority comment:

Noted and will be considered as we look into the issue of peat in the Preferred Options.

Natural England

- Soils (including protection of BMV land) – the issues of peat and mineral resources have been identified but we advise that soils in the wider sense should also be scoped in. Soil is a finite resource and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity. We advise that the Plan policies refer to the Defra Code of practice for the sustainable use of soils on construction sites. Reference should also be made to Best and Most Versatile (BMV) agricultural land. BMV land is defined as Grades 1, 2 and 3a in the Agricultural Land Classification (ALC) system. The plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land.

Broads Authority Officer Summary of Representation:

The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity. We advise that the Plan policies refer to the Defra Code of practice for the sustainable use of soils on construction sites. Reference should also be made to Best and Most Versatile (BMV) agricultural land. BMV land is defined as Grades 1, 2 and 3a in the Agricultural Land Classification (ALC) system. The plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land.

Broads Authority comment:

Comment noted and will be considered as the Preferred Options is produced.

13 Heritage and Historic Assets**Historic England**

We note that this section is primarily about the historic environment, although wider heritage issues are contained within it. As before, consistency with the NPPF in respect of the terms "historic environment" and "heritage assets" would improve clarity. If you wish to keep elements of the cultural aspects of the Broads in this section in the next iteration, we would suggest renaming the section "Historic Environment and Cultural Heritage", however, we recommend that the cultural elements are separated from the historic environment and that this chapter is renamed "historic environment".

Introduction, p55:

We would recommend this specific textual change: "The Broads has a rich and varied historic environment recognised by the statutory..." We would recommend deleting the word "landmark" from the second paragraph as not all buildings, structures, historic landscapes or features that contribute to local character will be landmarks.

Issue 8, p56:

We would welcome development of a policy on the Local List and undesignated heritage assets given the significance and uniqueness of the Broads and the vulnerability to various types of heritage assets from a variety of factors as outlined in the issues and options consultation.

13.4 Drainage Mills, pp58-60

We would recommend this textual amendment: "drainage mills are a defining feature of the historic landscape of the Broads..." We would welcome the development of a policy on drainage mills in principle, however, we note that these buildings and their locations pose particular difficulties and that the options suggested in the consultation document all have significant issues attached. We would recommend that further work and discussion, following the consultation, is undertaken to see if a realistic local policy is achievable.

13.5 Archaeology, pp60-2:

We welcome the recognition of the Broads as an area of exception waterlogged heritage.

13.7 Evidence, p63

In addition to the documents already referred to, we would also direct you to Historic England's Advice Notes 1-6.

HE Advice Note 1- conservation area designation, appraisal and management: <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>

HE Advice Note 2- making changes to heritage assets: <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

HE Advice Note 3- site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

HE Advice Note 4- tall buildings: <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

HE Advice Note 5- setting up a listed building heritage partnership agreement:

<https://historicengland.org.uk/images-books/publications/eh-good-practice-advice-note-drawing-up-listed-building-heritage-partnership-agreement/>

HE Advice Note 6- drawing up a local listed building consent order: <https://historicengland.org.uk/images-books/publications/eh-good-practice-advice-note-drawing-up-local-listed-building-consent-order/>

Broads Authority Officer Summary of Representation:

- 1: As before, consistency with the NPPF in respect of the terms "historic environment" and "heritage assets" would improve clarity.
- 2: Suggest renaming the section "Historic Environment and Cultural Heritage", however, we recommend that the cultural elements are separated from the historic environment and that this chapter is renamed "historic environment".
- 3: Introduction, p55: We would recommend this specific textual change: "The Broads has a rich and varied historic environment recognised by the statutory..." We would recommend deleting the word "landmark" from the second paragraph as not all buildings, structures, historic landscapes or features that contribute to local character will be landmarks.
- 4: We would welcome development of a policy on the Local List and undesignated heritage assets given the significance and uniqueness of the Broads and the vulnerability to various types of heritage assets from a variety of factors as outlined in the issues and options consultation.
- 5: We would recommend this textual amendment: "drainage mills are a defining feature of the historic landscape of the Broads...." We would welcome the development of a policy on drainage mills in principle, however, we note that these buildings and their locations pose particular difficulties and that the options suggested in the consultation document all have significant issues attached.
- 6: We welcome the recognition of the Broads as an area of exception waterlogged heritage.
- 7: England's Advice Notes 1-6.

Broads Authority comment:

- 1: Noted and will be amended in the next version.
 - 2: We will consider this as the Preferred Options is produced.
 - 3: Noted and will be amended in the next version.
 - 4: Support for a policy noted.
 - 5: Noted and will be amended in the next version. Support for a policy noted.
 - 6: Noted.
 - 7: Advice notes will be considered and inform the Preferred Options.
-

Inland Waterways Association

The introduction mentions many of the Broads heritage assets but none relating to those around boats and navigation- a significant omission given how many there are, and how they impact the landscape. How do we give further weight to the Local List and undesignated heritage assets

Option 3 a stronger policy to help manage changes to undesignated assets is needed.

On drainage mills, Option 2 an additional generic policy on reuse of historic and heritage assets will improve the focus on how these can be kept or brought into useful existence, and demonstrate a more flexible response to innovative ideas and good design. This would also avoid the cost and 'big brother' approach of listing which might put people off investing.

Broads as an area of exceptional waterlogged heritage: This proposal by Historic England seems an unhelpful 'blunderbuss' approach to anyone who wants to conduct any development. Simply saying the whole area is involved merely means increased costs will be incurred by everyone, often unnecessarily. A more focused approach is needed, to help identify smaller areas or sites which have a high likelihood of needing investigation or protection.

How can the Local Plan address interpretation of the historic environment and culture in the

Broads? Option 2 using a policy or criteria relating to interpretation seems a low key but useful route to follow.

Broads Authority Officer Summary of Representation:

- 1: The introduction mentions many of the Broads heritage assets but none relating to those around boats and navigation- a significant omission given how many there are, and how they impact the landscape.
- 2: Option 2 an additional generic policy on reuse of historic and heritage assets will improve the focus on how these can be kept or brought into useful existence, and demonstrate a more flexible response to innovative ideas and good design.
- 3: This proposal by Historic England seems an unhelpful 'blunderbuss' approach to anyone who wants to conduct any development. A more focused approach is needed, to help identify smaller areas or sites which have a high likelihood of needing investigation or protection
- 4: Option 2 using a policy or criteria relating to interpretation seems a low key but useful route to follow.

Broads Authority comment:

- 1: Noted, however the introduction is a reflection of fact – those are the structures on the local list. The Historic Environment Manager plans to look into staithe and boatyards over the coming years.
 - 2: Support for Option 2 noted.
 - 3: Noted, but it is an allocation by Historic England which we need to consider.
 - 4: Support for Option 4 noted.
-

River Thurne Tenants Association

Do you think linking to the past use of a site is important? YES

Why do you think this?

The merits of sites vary from area to area, and the previous uses that they had. The Broads Authority could develop a heritage trail around redundant Broads sites with suitable signage or interpretation to pinpoint the former use of these sites. Where, for instance, can you still find a working traditional Staithe?

Broads Authority Officer Summary of Representation:

Support heritage interpretation. Suggest a heritage trail.

Broads Authority comment:

Support for a policy in the Local Plan relating to heritage interpretation noted. A trail is a specific project and the idea will be passed to the Authority's Historic Environment Manager.

14 Biodiversity**Inland Waterways Association**

How can we give undesignated sites recognition?

Surely a more measured approach should start with why is it necessary to do this, given NPPF statements. If local people don't support going further than current planning, why does the BA think it necessary to tell them that it is? Why not have a process to identify local areas (ie Local Wildlife Sites?) which are nationally or regionally significant, and then support them?

How can we protect habitats and species on brownfield sites?

It needs to be born in mind that providing off-site compensation is not always possible for small private developers.

How can we compensate for residual adverse biodiversity impacts arising from a development after mitigation measures have been taken?

Option 2 a compensation policy seems rather like a ransom proposal, and will no doubt be challenged at some point in the courts. The relative powers of the BA and a small developer are disproportionate, and the assessments of adverse impacts too easy to use to swing work the BA cannot afford to undertake onto others who are unable to afford the evidence needed to counter the BA's precautionary principles. More work needs to be done on how residual adverse biodiversity impacts will be

measured before a policy can be drawn up, otherwise there is no process to implement the policy. Alternatively BA could find someone else already successfully implementing such a policy, and copy it.

Broads Authority Officer Summary of Representation:

1: Surely a more measured approach should start with why is it necessary to do this, given NPPF statements. If local people don't support going further than current planning, why does the BA think it necessary to tell them that it is? Why not have a process to identify local areas (ie Local Wildlife Sites?) which are nationally or regionally significant, and then support them?

2: It needs to be born in mind that providing off-site compensation is not always possible for small private developers.

3: Option 2 a compensation policy seems rather like a ransom proposal, and will no doubt be challenged at some point in the courts. The relative powers of the BA and a small developer are disproportionate, and the assessments of adverse impacts too easy to use to swing work the BA cannot afford to undertake onto others who are unable to afford the evidence needed to counter the BA's precautionary principles. More work needs to be done on how residual adverse biodiversity impacts will be measured before a policy can be drawn up, otherwise there is no process to implement the policy. Alternatively BA could find someone else already successfully implementing such a policy, and copy it.

Broads Authority comment:

Comments noted and will be considered as the Preferred Options is produced.

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage includes:

Biodiversity – we advise that the Plan should ensure protection and enhancement of biodiversity and geodiversity. Distinction should be made between the protected sites hierarchy of European (i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites), national (i.e. Sites of Special Scientific Interest (SSSIs)) and local (e.g. Local Wildlife Sites (LWS)) sites. The Plan should also make clear that any proposal which would adversely affect a European site, or cause significant harm to a SSSI will not normally be granted permission. Criteria should also be set out to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity and geodiversity.

Broads Authority Officer Summary of Representation:

1: Criteria should also be set out to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity and geodiversity.

2: Distinction should be made between the protected sites hierarchy of European (i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites), national (i.e. Sites of Special Scientific Interest (SSSIs)) and local (e.g. Local Wildlife Sites (LWS)) sites.

3: The Plan should also make clear that any proposal which would adversely affect a European site, or cause significant harm to a SSSI will not normally be granted permission.

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

Norfolk County Council

Issue 11: Recognition of non-designated wildlife sites

- We support the concept of adding what effectively will be a fourth tier of biodiversity sites (international, national, local sites (i.e. CWS) and the proposed non-designated sites).

- Paragraph 14.3 indicates the potential of such sites to contribute to ‘habitat corridors’. The NPPF (para. 117) requires LPAs to “identify and map local ecological networks (and) wildlife corridors” and the proposed non-designated wildlife sites could contribute to this aim.

- Therefore we would strongly support Option 2 of Issue 11.

We note that the Issues and Options document refers to the production of Biodiversity Enhancement Guidance (para. 14.1). We support this idea but consider that the small scale enhancements mentioned in para. 14.2 could be more ambitious.

Issue 12: Protecting habitats and species on Brownfield Sites

- There are clearly opportunities likely to arise for development to occur on brownfield sites within the lifespan of the emerging plan. This may reduce pressure on other sites within the LPA boundary, the brownfield sites can have significant biodiversity value in themselves.

- We would support Option 2 of Issue 12 that focusses on a criteria-based policy to protecting species and habitats on Brownfield sites.

Issue 13: Compensation for residual adverse impacts on biodiversity

- The NPPF states that the ‘mitigation hierarchy’ (avoidance, mitigation, compensation) should be followed, and if adverse impacts on biodiversity cannot be mitigated or compensated, then planning permission should be refused. It follows that if there are residual impacts i.e. ones that cannot be compensated for on-site, off-site compensation can be considered. This approach is increasingly used in Norfolk.

- The principle of off-site compensation is already permitted by the NPPF and so Issue 13 is really only asking if greater specificity is required to deliver this approach to dealing with residual impacts.

- We are of the opinion that matters of this nature should be considered on a case-by-case basis. The compensation policy of Option 2 seems unwieldy and may prove difficult to deliver. Mechanisms for delivering off-site compensation already exist in Norfolk (e.g. the Connecting Nature Fund administered by FWAG/NCC and included in the consultation draft of the emerging Broads Plan).

- Our view of Issue 13 is that as off-site compensation is already permitted by the NPPF, no specific policy is necessary (Option 1).

We note that the recreation impact study mentioned in Para.14.3 only addresses issues at International sites (Natura 2000 sites).

Broads Authority Officer Summary of Representation:

1: We support the concept of adding what effectively will be a fourth tier of biodiversity sites. Strongly support Option 2 of Issue 11.

2: We would support Option 2 of Issue 12

3: Our view of Issue 13 is that as off-site compensation is already permitted by the NPPF, no specific policy is necessary (Option 1).

Broads Authority comment:

Support for various options is noted and will be considered as the Preferred Options is produced.

RSPB

Issue 11: how can we give non-designated sites recognition?

The allocation of non-designated, but biologically and ecologically important sites would be valuable. The acknowledgement of the features that are important to the Broads would help ensure that planners could ensure that developers fully understood the impacts of their developments and sought to minimise harm and enhance the recognised features. This would ensure that strategically, developments would enhance existing ecological networks and contribute to the aim of bigger, better and more joined up areas for conservation. Option 2 would be appropriate.

Issue 12: how can we protect habitats and species on brownfield sites?

The Local Plan should acknowledge the possibility that brownfield sites could be of ‘High Environmental Value’ and should require the developer to establish whether that is the case as part of the application process. Option 2 would therefore be appropriate.

Issue 13: how can we compensate for residual adverse biodiversity impacts arising from a development after mitigation measures have been taken?

This issue and policy can only realistically apply to non-designated areas, and we would expect that to be stated. Unless carefully worded, there is a danger that this policy could be confused with the requirements of the Habitats Regulations and infer that residual adverse biodiversity impacts from developments in Natura 2000 sites (SPA, SAC, Ramsar) could be considered. It is only in exceptional circumstances, where there are no alternative solutions, that a plan or project may meet the tests of Imperative Reasons of Overriding Public Interest (IROPI), which then requires demonstration that appropriate compensation will be provided to ensure the integrity of the Natura 2000 network is not compromised. Given the rigour of these tests, the presumption is that plans or projects that could adversely affect Natura 2000 sites will not be approved. In practice, schemes which qualify for IROPI are extremely rare and are very unlikely to fall under the Council's remit for decision-making. Development in Natura 2000 sites cannot normally therefore be allowed to take place if there would be a 'residual adverse biological impact', and this requirement supersedes the NPPF paragraph 118 referenced in the document. As above, a map showing these areas, with an explanation of their designated features, the Habitats Regulations process, and the fact that if an impact cannot be avoided or prevented through mitigation, development cannot take place, should be included in the Local Plan.

In the case of SSSIs, the Authority has a duty under Section 28G(2) of the Wildlife and Countryside Act, public bodies must:

"...take reasonable steps, consistent with the proper exercise of the authority's functions, to further the conservation and enhancement of the flora, fauna or geological or physiographical features by reason of which the site is of special scientific interest".

In any event, the tests of the NPPF require that benefits of the proposed development must be weighed against the harm to the SSSI and the broader network, and not the residual harm of the proposal taking into account any proposed compensation. Compensation is a last resort (as set out in paragraph 118) and should only be considered when it has been proven that no alternatives to the proposal exist, and that the benefits outweigh the harm to the SSSI in its notified state without the development.

We support Footprint Ecology comments in the HRA for the Broads Plan (Appendix 3, comments on point

6.1.3), which addresses issues of legality i.e. it is not possible to permit development which cause adverse impacts on European Sites, and language i.e. use of the word 'compensation'.

We would welcome a policy that confirmed the hierarchy described in NPPF paragraph 118, and which required measures to address residual harm to biodiversity in non-designated areas, but any policy would need to state that it excluded development within or near European Sites which would require HRA. The word 'compensate' should not be used in this option and would cause confusion.

Broads Authority Officer Summary of Representation:

Issue 11: The allocation of non-designated, but biologically and ecologically important sites would be valuable. Option 2 would be appropriate.

Issue 12: The Local Plan should acknowledge the possibility that brownfield sites could be of 'High Environmental Value' and should require the developer to establish whether that is the case as part of the application process. Option 2 would therefore be appropriate.

Issue 13: This issue and policy can only realistically apply to non-designated areas, and we would expect that to be stated. Unless carefully worded, there is a danger that this policy could be confused with the requirements of the Habitats Regulations and infer that residual adverse biodiversity impacts from developments in Natura 2000 sites (SPA, SAC, Ramsar) could be considered. We would welcome a policy that confirmed the hierarchy described in NPPF paragraph 118, and which required measures to address residual harm to biodiversity in non-designated areas, but any policy would need to state that it excluded development within or near European Sites which would require HRA. The word 'compensate' should not be used in this option and would cause confusion.

Broads Authority comment:

Preferred Options and advice noted and will be considered as the Preferred Options is produced.

Suffolk Wildlife Trust

Issue 11: We support Option 2, the allocation of sites for recognition of their local wildlife value. We would be happy to discuss such an approach, and the identification of suitable sites, with you further. We would also suggest that if this option is pursued, the County Wildlife Site designation panels in Norfolk and Suffolk could provide helpful input in to the process.

Issue 12: We support Option 2 for protecting the biodiversity value of brownfield sites.

Issue 13: We consider that any consideration of residual impacts on biodiversity can only be considered once the preceding steps of the mitigation hierarchy have been appropriately and fully applied. In this situation we would support the use of Option 2, a compensation policy. We would also query the use of such a policy for compensating for impacts on sites designated for their European nature conservation importance.

Broads Authority Officer Summary of Representation:

Issue 11: We support Option 2.

Issue 12: We support Option 2

Issue 13: would support the use of Option 2, a compensation policy. We would also query the use of such a policy for compensating for impacts on sites designated for their European nature conservation importance

Broads Authority comment:

Preferred approaches and offers of assistance noted.

Natural England

- Priority habitats and species – whilst biodiversity in general has been scoped in, we advise that the Plan should specifically promote protection and recovery of priority habitats and species. For more information, Habitats and species of principal importance in England lists priority species and habitats (i.e. those material to planning).
- Ecological networks – we advise that the Plan should ensure that ecological networks are enhanced.
- Ancient woodland – we advise that the Plan should ensure that ancient woodland is protected. For more information see Ancient woodland and veteran trees: protecting them from development.

Broads Authority Officer Summary of Representation:

- 1: The Plan should specifically promote protection and recovery of priority habitats and species
- 2: The Plan should ensure that ecological networks are enhanced.
- 3: Plan should ensure that ancient woodland is protected

Broads Authority comment:

- 1: Policy CS2 currently addresses this and could be rolled forward.
 - 2: There is potential to update ecological networks on a county level, with all authorities working together. This issue will be addressed in the Preferred Options.
 - 3: Ancient Woodland will be considered as the Preferred Options is produced.
-

15 Renewable Energy

Historic England

We welcome the Authority's consideration not to allocate land for wind turbines based on the effect on the Broads Landscape sensitivity.

Broads Authority Officer Summary of Representation:

We welcome the Authority's consideration not to allocate land for wind turbines based on the effect on the Broads Landscape sensitivity.

Broads Authority comment:

Support noted.

Inland Waterways Association

Stance on Wind Turbines:

Notwithstanding that current wind turbines are closely related to the windmills and drainage mills of the Broads heritage, they seem now to be out of scale for the landscape, and inappropriate.

Broads Authority Officer Summary of Representation:

Notwithstanding that current wind turbines are closely related to the windmills and drainage mills of the Broads heritage, they seem now to be out of scale for the landscape, and inappropriate.

Broads Authority comment:

Stance noted.

16 Landscape Character

Environment Agency

16.5 Land Raising:

As highlighted in this section, land raising has the potential to increase flood risk, which would be contrary to national planning policy. Therefore, any such proposals would need to assess and manage this impact appropriately. Flood Defence Consent, if within 8m of a Main River or Land Drainage Consent, if affecting an ordinary watercourse, may be required. Additionally, the disposal of material must be in accordance with the requirements of the Environmental Permitting Regulations 2010.

Broads Authority Officer Summary of Representation:

Flood Defence Consent, if within 8m of a Main River or Land Drainage Consent, if affecting an ordinary watercourse, may be required. Additionally, the disposal of material must be in accordance with the requirements of the Environmental Permitting Regulations 2010.

Broads Authority comment:

Further information such as consents and permits noted and will be considered as this section is progressed.

Historic England

16 Landscape Character:

We note the chapter on landscape character and welcome references to archaeology and built heritage.

Issue 18: Settlement fringe, p80

We would recommend that Historic England's Advice Note 3- site allocations in local plans:<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/> forms part of the evidence for this chapter and informs your thinking on issue 18 and the development of policy.

Broads Authority Officer Summary of Representation:

Historic England's Advice Note 3-

Broads Authority comment:

Advice notes will be considered as the Preferred Options is produced.

Inland Waterways Association

Landscape Character & its Assessment:

Section 16 Landscape Character, 16.1 Introduction, second paragraph could also include the challenge to control the growth of scrub and trees not only on river banks but also in the reed beds, which are slowly affecting the landscape character.

It is not clear why having an LCA adds anything to the Broads, already itself identified as unique. The only apparent benefit from having guidance on how to interpret them is to judge how a planning application might be impacted, which seems little different to what would be obtained from local planning officers.

How should we consider land-raising in the new Local Plan?

It is not clear from the section whether land raising only applies to physically raising the land surface, or also includes buildings erected on stilts, or indeed perhaps buildings which can float in floods. Once this has been made clearer, Option 3 seems bureaucratic and unlikely to reflect the more positive approach the BA is trying to project. Therefore, Option 2 seems to be preferable. Other options could then include (if not already in) buildings on stilts, or floating buildings to avoid the need for land raising.

How should we consider disposing of excavated material in the new Local Plan?

Option 2 addresses the potential for diverting the material to a more 'green' solution, and identifies the importance of making effective disposal arrangements.

Landscaping design in the new Local Plan

Option 3 provision of a guide offers the potential to truly help developers and reach better solutions. However this will depend on how the guide is written and implemented.

How should we address overhead lines in the new Local Plan?

Given the fact of existing Permitted Development Rights, working to implement a protocol seems more sensible. For example, effectively banning improvements in broadband type services will significantly affect business and domestic quality of life in the area, so some compromise is needed.

How should we consider settlement fringe in the new Local Plan?

Option 2 Criteria based policy provides guidance for anyone considering such development.

Broads Authority Officer Summary of Representation:

1: 16.1 Introduction, second paragraph could also include the challenge to control the growth of scrub and trees not only on river banks but also in the reed beds, which are slowly affecting the landscape character.

2: It is not clear why having an LCA adds anything to the Broads, already itself identified as unique. The only apparent benefit from having guidance on how to interpret them is to judge how a planning application might be impacted, which seems little different to what would be obtained from local planning officers.

3: It is not clear from the section whether land raising only applies to physically raising the land surface, or also includes buildings erected on stilts, or indeed perhaps buildings which can float in floods. Option 3 seems bureaucratic and unlikely to reflect the more positive approach the BA is trying to project. Therefore, Option 2 seems to be preferable. Other options could then include (if not already in) buildings on stilts, or floating buildings to avoid the need for land raising.

4: Option 2 addresses the potential for diverting the material to a more 'green' solution, and identifies the importance of making effective disposal arrangements.

5: Option 3 provision of a guide offers the potential to truly help developers and reach better solutions.

6: Given the fact of existing Permitted Development Rights, working to implement a protocol seems more sensible. For example, effectively banning improvements in broadband type services will significantly affect business and domestic quality of life in the area, so some compromise is needed.

7: Option 2 Criteria based policy provides guidance for anyone considering such development.

Broads Authority comment:

1: Noted and will be raised with the BA's Landscape Consultant.

2: The Landscape Character Assessment is a study of the Broads developed to aid decision-making that could affect its condition or visual quality. The study has concentrated on identifying a series of areas each with a unique set of characteristics, which combine to give them their own distinct sense of place. The process of Landscape Character Assessment has evolved over the last decade to become an increasingly important tool in planning and decision-making. The work has a range of potential applications from a strategic level through to the production of detailed guidance. Production of a Landscape Character Assessment is part of the information gathering exercise recommended by Government as part of the Local Development Framework process.

3: This is raising of land on which buildings sit. Not use of buildings on stilts. Support for option 2 noted.

4: Support for option 2 noted.

- 5: Support for option 3 noted.
 6: Comments noted.
 7: Support for option 2 noted.
-

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage includes:

Landscape (including protected landscapes) – we advise that the Plan should ensure protection and enhancement of landscape (both direct and indirect pressures can impact on character).

Broads Authority Officer Summary of Representation:

Advise that the Plan should ensure protection and enhancement of landscape (both direct and indirect pressures can impact on character).

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

Norfolk County Council

Question: Do you have any thoughts how the LCA could be interpreted to aid the planning application process?

- There are opportunities to produce guidance derived from the Landscape Character Assessment which is more accessible to the public and potential applicants; guidance could briefly outline the key landscape features within each character type and, where appropriate, provide guidance on details such as typical planting type or form for each area.

Issue 14 – Land Raising

- Option 2 would make allowance for flexibility over time, providing an adaptive approach which could respond to climate change and any other advances in knowledge or technology.
- Although land-raising can result in visual impact, it is a process which has occurred historically in the Broads and in some areas, contributes to overall landscape character. The NPPF (Para. 61) requires planning policies to “...address the connections between people and places and the integration of new development into the natural, built and historic environment”.
- We would support Option 2 of Issue 14 as it is not restrictive, allows the significance of different landscape features to be assessed and can be flexible into the future.

Issue 15 – Disposing of excavated material

- This section links with land-raising under Issue 14.
- The requirement of detailed information concerned with excavated material will help to inform other aspects of any given proposed development and may give rise to opportunities for landscape character and habitat enhancements, contributing to a more holistic approach.
- We would support option 2 of Issue 15 that seeks to formalise and better regulate the disposal of excavated material.

Issue 16 – Landscaping Design

- We believe that Option 2 would clarify the difference between landscape character and landscaping, and could be underpinned by guidance for applicants.
- We would support option 2 of Issue 16 which could be accompanied by supplementary guidance as discussed under the Section 16 Landscape question.

Issue 17 – Overhead Lines

- Overhead lines can be seen as a detractor on the Broads landscape. With regard to landscape, a positive move toward reducing and preventing further implementation of overhead lines, particularly in the more sensitive areas of the Broads, would be favourable.
- It is noted that some development is covered by permitted development rights, and so a policy would not necessarily safeguard all areas. With this in mind, we would support Options 2 or 3.

Issue 18 – Settlement Fringe

- Option 3 would identify the most sensitive settlement fringes, however there would be a need to take different types of development into consideration due to the varying degrees potential landscape impact.
- Should other landscape guidance be produced, as discussed elsewhere, the need for location specific design criteria may then not be required to such an extent as proposed under Option 3.
- Option 2 would see schemes assessed on a case by case bases, and could result in a similar development outcome as if Option 3 were in place. With informative from other landscape guidance Option 2 may provide a comprehensive enough approach, as particularly sensitive landscapes and settlement fringes could be outlined elsewhere.
- We would favour Option 2 in a situation where it could sit alongside landscape guidance as discussed under Section 16 Landscape Question.

Broads Authority Officer Summary of Representation:

- 1: There are opportunities to produce guidance derived from the Landscape Character Assessment which is more accessible to the public and potential applicants; guidance could briefly outline the key landscape features within each character type and, where appropriate, provide guidance on details such as typical planting type or form for each area.
- 2: Support Option 2 of Issue 14 as it is not restrictive, allows the significance of different landscape features to be assessed and can be flexible into the future.
- 3: Support option 2 of Issue 15 that seeks to formalise and better regulate the disposal of excavated material.
- 4: Support option 2 of Issue 16 which could be accompanied by supplementary guidance as discussed under the Section 16 Landscape question.
- 5: Some overhead line development is covered by permitted development rights, and so a policy would not necessarily safeguard all areas. With this in mind, we would support Options 2 or 3.
- 6: Favour Option 2 in a situation where it could sit alongside landscape guidance as discussed under Section 16 Landscape Question.

Broads Authority comment:

Support and reasons noted and will be considered as the Preferred Options is produced.

RSPB

Issue 14: how should we consider land-raising in the new Local Plan?

As above, this can only apply to non-designated areas. Any land-raising in European sites will require assessment under the Habitats Regulations.

Issue 15: how should we consider disposing of excavated material in the new Local Plan?

As above, this can only apply to non designated areas. Any disposal of excavated material in European sites will require assessment under the Habitats Regulations.

Broads Authority Officer Summary of Representation:

Issue 14 and 15 - only apply to non-designated areas.

Broads Authority comment:

Noted.

17 Amenity and Tranquillity

Great Yarmouth Borough Council

The types and speeds of movement in the landscape is another important dimension of tranquillity, and you may wish to mention this. (It may be of relevance to the A47 Dualling at 26, below.)

Broads Authority Officer Summary of Representation:

The types and speeds of movement in the landscape is another important dimension of tranquillity, and you may wish to mention this.

Broads Authority comment:

Noted and we will consider this as we produce the Preferred Options.

Inland Waterways Association

Do we have any thoughts on policy DP 28? Given no information is provided on DP28, other than an implication that it might refer to Amenity, we do not have any comments.

Are there other areas which IWA considered are tranquil or offer quiet recreation which should be specifically protected? No comment

How should we address tranquillity? Option 3 have a strategic policy, criteria based, which supports the enhancement of tranquillity.

Broads Authority Officer Summary of Representation:

1: Given no information is provided on DP28, other than an implication that it might refer to Amenity, we do not have any comments.

2: Option 3 have a strategic policy, criteria based, which supports the enhancement of tranquillity.

Broads Authority comment:

1: DP28 is in the Development Management DPD. Policies that are already in place were generally not copied into the Issues and Options, rather those interested could go to them on-line.

2: Support for option 3 noted.

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage includes:

Tranquillity – we advise that any areas of tranquillity should be considered, mapped (or otherwise spatially identified) and provided appropriate policy protection within the Plan.

Broads Authority Officer Summary of Representation:

Advise that any areas of tranquillity should be considered, mapped (or otherwise spatially identified) and provided appropriate policy protection within the Plan.

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

Norfolk County Council

Issue 19 - Addressing the issue of tranquillity

- There is an inherent tension in that the quieter areas of the Broads tend to be used by priority species of wildlife (e.g. used for nesting by Marsh Harriers). Encouraging the use of these areas for recreation - even quiet recreation - may be detrimental to the biodiversity and, in the case of 'designated features' of the Natura 2000 sites, may contravene the Habitat Regulations 2012.
- The impacts from any proposal of this nature will need to be assessed under the Habitat Regulation Assessment.

Broads Authority Officer Summary of Representation:

Encouraging the use of these areas for recreation - even quiet recreation - may be detrimental to the biodiversity and, in the case of 'designated features' of the Natura 2000 sites, may contravene the Habitat Regulations 2012

Broads Authority comment:

Agree that if sites allocated for their tranquill nature, they could be come more attractive to visitors than they are now. This willbe a consideration as the Preferred Options is produced. A HRA is needed for the entire plan.

River Thurne Tenants Association

Where in the Broads do you think you 'get away from it all' and why do you think that?

Hickling, Horsey and any other part of the Broads where there are fewer people and traffic. The bungalows are particularly tranquil during the early hours and evening times.

Broads Authority Officer Summary of Representation:

Hickling, Horsey. The bungalows are particularly tranquil during the early hours and evening times.

Broads Authority comment:

Noted. These areas already benefit from a tranquillity related policy - XNS2 of the Sites Specifics Local Plan.

Natural England

- Air quality – we advise that, in particular, any potential traffic impacts of new development including agricultural (e.g. intensive pig and poultry) on European sites and SSSIs may pose a risk to air quality.

Broads Authority Officer Summary of Representation:

Advise that, in particular, any potential traffic impacts of new development including agricultural (e.g. intensive pig and poultry) on European sites and SSSIs may pose a risk to air quality.

Broads Authority comment:

Noted.

18 Light Pollution

Inland Waterways Association

How should we address light pollution? Via a BA bespoke light pollution guidance- many people do not notice light pollution, or realise there are ways of reducing and avoiding it.

Broads Authority Officer Summary of Representation:

Via a BA bespoke light pollution guidance

Broads Authority comment:

Support for guidance noted.

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage includes:

Light pollution – light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Policies (usually design policies) should address impacts on the natural environment.

Broads Authority Officer Summary of Representation:

Light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Policies (usually design policies) should address impacts on the natural environment.

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

Norfolk and Suffolk Boating Association

One additional point we would raise is the need for planning control of bright waterside lighting (the examples on Horning Racing Reach and at Great Yarmouth are typical). The lights interfere with helms' night vision and have an impact on safety. They also provoke retaliation in the form of the use of searchlights on boats, which should be discouraged on the Broads.

Broads Authority Officer Summary of Representation:

Support to address light pollution.

Broads Authority comment:

Support to address light pollution noted.

Norfolk County Council

Issue 20 – Light Pollution

- There are synergies between Options 2 and 3 of Issue 20.
- NPPF (Para.125) states that planning policies should "...limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation." Consideration of impacts from lighting on biodiversity, particularly on bats is necessary.
- We would support Options 2 and 3 coming forward together.

Broads Authority Officer Summary of Representation:

We would support Options 2 and 3 coming forward together.

Broads Authority comment:

Support to address light pollution noted. The suggested approach will be considered as the Preferred Options Local Plan is produced.

River Thurne Tenants Association

Do you think the Broads Authority should try and address light pollution? YES

Why do you think this?

Areas such as the Thurne Bungalows do not have street lighting, traffic lighting, or shop lighting. We appreciate this as it allows starlight to be visible from house and garden. The total absence of lights allows star, planet, comet, meteorite and space station gazing.

Broads Authority Officer Summary of Representation:

Support tackling light pollution.

Broads Authority comment:

Support noted.

19 Retail**Broadland District Council**

Issue 34: how to address retail issues in the Broads Local Plan

As the NPPF supports a prosperous rural economy it is recommended that a combination of the following options be considered further:

[Agree] Option 2: set primary and secondary frontages

[Agree] Option 3: Retail hierarchy

[Agree] Option 5: Safeguard existing retail units

It is understood that this could involve a retail study. This approach is in line with the NPPF which suggests using a proportionate evidence base.

Broads Authority Officer Summary of Representation:

Combination of the following options be considered further:

[Agree] Option 2: set primary and secondary frontages

[Agree] Option 3: Retail hierarchy

[Agree] Option 5: Safeguard existing retail units

Broads Authority comment:

Noted. On reflection, it would appear sensible to work with North Norfolk and Waveney Council in relation to the areas of retail that are identified. Waveney Council for example has completed a retail study that addresses all of Waveney. We will talk to North Norfolk about their plans relating to retail as we produce the Preferred Options.

Inland Waterways Association

How to address retail issues in the Broads Local Plan: Option 4 Retail impact assessment requirement. What account is BA going to take of demand- such as hire boaters, outside the area? How is BA going to provide for retail changes through the plan period such as more home delivery of on-line shopping from outside the area which makes existing retail unsustainable, and how might BA try to encourage outlets such as service providers like pubs and restaurants, linked to tourism/ boating?

Broads Authority Officer Summary of Representation:

1: What account is BA going to take of demand- such as hire boaters, outside the area?

2: How is BA going to provide for retail changes through the plan period such as more home delivery of on-line shopping from outside the area which makes existing retail unsustainable, and how might BA try to encourage outlets such as service providers like pubs and restaurants, linked to tourism/ boating?

Broads Authority comment:

1 and 2: This policy addresses the types of land use as discussed at 25.2 as well as those types of centres. It does not refer to retail outside of the areas discussed at this stage. Evidence has been produced by Waveney that covers some of the retail areas discussed in the Issues and Options and we will work with them to formulate an appropriate and consistent policy approach. The same with North Norfolk - discussion regarding their future evidence on retail are on going.

Residential Boat Owners Association

19. Retail

RBOA policy identifies residential moorings in appropriate locations as supporting the local retail centres, particularly out-of-centre developments away from the main tourist areas and outside the main tourist seasons.

Broads Authority Officer Summary of Representation:

RBOA policy identifies residential moorings in appropriate locations as supporting the local retail centres, particularly out-of-centre developments away from the main tourist areas and outside the main tourist seasons.

Broads Authority comment:

Noted.

20 Transport**Great Yarmouth Borough Council****26.4 A47 Dualling:**

The dualling of the Acle Straight has long been an ambition of the Borough Council, and is important for the long term health of industries in the Borough which are important to the wider and national economy.

Whilst the Borough does not disagree that the dualling has some potential for significant adverse impacts, but there are also benefits which could potentially be achieved as part of the development, and the approach to the dualling could be framed in a more positive way. (That there is a rare species in the vicinity of the existing road would seem to indicate that development and the environment are not as incompatible as commonly assumed.)

For example, tree or other screening of the vehicles (especially their lights) on the road is now largely absent, but could potentially be included as part of the development of a dual carriageway, achieving a net gain for the landscape and tranquillity. (It is understood that when the Acle Straight was originally constructed it was lined for its entire length with (pollarded) willows, primarily for the consolidation of the road embankment by their roots, but also resulting in significant screening of traffic. Sadly, these trees have now been lost for most of the Straight's length, as has occurred elsewhere in and around the Broads.)

As another example, low noise road surface would help reduce traffic noise.

Hence the Borough Council considers that it could be appropriate for the Broads to have a policy which supported the development of the dualled road, subject to realistic criteria for appropriate protections and enhancements of the area's special qualities.

26.6 The Integrated Access Strategy

The Borough Council supports the objectives of the current Strategy to improve access links to local settlements, and to improve links between public transport provision and visitor destination points and access routes. Broads recreation has the potential to be an even greater contributor than at present to the health and quality of life for residents in surrounding areas such as Great Yarmouth (some of whom suffer severe deprivation), and access improvements could help realise some of that potential.

26.8 Safeguarding and Protecting Recreation Routes

The Borough Council is sympathetic to the proposal to protect the remaining undeveloped parts of the former railway trackway between Great Yarmouth and Fritton/St.Olaves. The Borough Council is keen to work with the Broads Authority to explore the recreational potential of these routes, and will consider protecting those parts of the route within the Borough Council's planning area in its own future Local Plan documents.

Broads Authority Officer Summary of Representation:

- 1: Hence the Borough Council considers that it could be appropriate for the Broads to have a policy which supported the development of the dualled road, subject to realistic criteria for appropriate protections and enhancements of the area's special qualities.
- 2: Broads recreation has the potential to be an even greater contributor than at present to the health and quality of life for residents in surrounding areas such as Great Yarmouth (some of whom suffer severe deprivation), and access improvements could help realise some of that potential.
- 3: The Borough Council is keen to work with the Broads Authority to explore the recreational potential of these routes, and will consider protecting those parts of the route within the Borough Council's planning area in its own future Local Plan documents.

Broads Authority comment:

- 1: Support for a policy on the Acle Straight noted. The wording of the policy will reflect the corporate stance on the dualling.
 - 2: Noted.
 - 3: Support noted.
-

Historic England

We would expect consideration of the historic environment in any policy development for this section.

Broads Authority Officer Summary of Representation:

We would expect consideration of the historic environment in any policy development for this section.

Broads Authority comment:

Noted.

Inland Waterways Association

How can the waterways be used more for freight and transport purposes? As has already been stated, planning must preserve access to waterways, and could limit 'excessive' road transportation especially for large developments. This will build an awareness of the value and utility of water transport, as well as entrepreneurs prepared to grow a business offering it. The BA could engage with organisations of water transport to ask them to assist. IWA can provide links if needed.

How can the Local Plan safeguard future recreation routes? Option 2, with a policy which safeguards routes.

How to address car parking in the Local Plan? Option 2, a policy relating to car parks. This should try to stick to principles, not specifics as, for example, electric charging might be some way off, however boat trailers might be an important issue now.

Broads Authority Officer Summary of Representation:

- 1: As has already been stated, planning must preserve access to waterways, and could limit 'excessive' road transportation especially for large developments. The BA could engage with organisations of water transport to ask them to assist. IWA can provide links if needed.
- 2: Option 2, with a policy which safeguards routes.
- 3: Option 2, a policy relating to car parks.

Broads Authority comment:

- 1: Comments noted and will be considered as the Local Plan is progressed.
 - 2: Support for option 2 noted.
 - 3: Support for option 2 noted.
-

Natural England

Natural England welcomes that Plan appears to address most of the relevant environmental issues within our remit. We note that the issues scoped in at this stage include: Transport – we advise that full account should be taken of any impacts from transport (and associated infrastructure) on the natural environment

Broads Authority Officer Summary of Representation:

Advise that full account should be taken of any impacts from transport (and associated infrastructure) on the natural environment.

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

21 The Broads Economy**Broadland District Council**

Issue 38: what should the Authority's approach be for redundant boatyards or boatyard Buildings?

It is felt that the approach could involve a combination of the following options:

[Agree] Option 2: Less restrictive policy and allow other uses and,

[Agree] Option 3: Seek to retain sites in employment use. Taking full account of flood risk per NPPF guidance.

Issue 39: How to address location of new employment land in the Local Plan

[Agree] Option 3: allocate employment areas.

Another option could be to prepare a 'criteria based policy'. Location will depend on what type of employment and other constraints such as proximity and impact on nature conservations, flood risk etc. It is unclear whether there is an employment need, apart from the obvious demand for tourism related.

Broads Authority Officer Summary of Representation:

1: Issue 38: support options 1 and 2

2: Issue 39: support option 3. Another option could be to prepare a 'criteria based policy'.

Broads Authority comment:

BDC's preferred approaches noted and will be considered as the Preferred Options document is produced.

Environment Agency

27.2 Economic Issues & 27.3 Location of Economic Development:

Flood risk is a key issue for many development proposals in the Broads area. Where sites are considered in flood risk areas, the selection of sites must be based on the application of the Sequential Test. Suitability will be subject to the Exception Test (where applicable), and an appropriate Flood Risk Assessment.

Broads Authority Officer Summary of Representation:

Refers to the issue of flood risk.

Broads Authority comment:

It is noted that flood risk is a cross cutting theme in the Broads.

Inland Waterways Association

What should the Authority's approach be for redundant boatyards or boatyard buildings? Option 3: Seek to retain sites in employment use. This should be modified to ensure moorings, slippage and parking facilities for visiting boats and canoes are retained. This will have the advantage that continued provision of services to boaters such as water, visitor moorings etc. will be maintained. These facilities are important to retain, otherwise gaps will appear along the water network. Any new development on the site must also be so designed to prevent a wind shadow or turbulence impairing the use of the adjacent navigation by traditional yachts and wherries. For certain marine uses, providing starter units might also work well in retaining some of the character and boat interest in a site.

How to address location of new employment land in the Local Plan: It is better to do encouragement through 'promote starter units' and other ways to provide what is needed, than try to guess where businesses want to go and make them go there. What does BA know about what conditions businesses need to go somewhere? What shortfalls are there currently?

Broads Authority Officer Summary of Representation:

1: Option 3: Seek to retain sites in employment use. This should be modified to ensure moorings, slippage and parking facilities for visiting boats and canoes are retained. This will have the advantage that continued provision of services to boaters such as water, visitor moorings etc. will be maintained. Any new development on the site must also be so designed to prevent a wind shadow or turbulence impairing the use of the adjacent navigation by traditional yachts and wherries. For certain marine uses, providing starter units might also work well in retaining some of the character and boat interest in a site.

2: It is better to do encouragement through 'promote starter units' and other ways to provide what is needed, than try to guess where businesses want to go and make them go there. What does BA know about what conditions businesses need to go somewhere? What shortfalls are there currently?

Broads Authority comment:

1: Support for option 3 with suggested content noted.

2: Work to understand the economy is being looked into at a Norfolk-wide level. The BA also rely on the knowledge of its districts' Economic Development Officers.

Littlewood, Mr & Mrs P

The adjacent working boat yards are an important area for the continued survival for both Chedgrave and Loddon business, as these facilities bring in important trade and employment to the area. We therefore support Options 1 or 3 in Issue 38, Broads Economy Chapter 21.

Broads Authority Officer Summary of Representation:

Support Options 1 or 3 in Issue 38, Broads Economy Chapter 21.

Broads Authority comment:

Support for options 1 or 3 noted.

Norfolk County Council

Response to Issue 38

It is felt that either no change to the existing policy or having a less restrictive policy would be the preferred options in relation to redundant boat yards or buildings from an economic development perspective.

Response to Issue 39

It is felt that reintroducing the approach from the 1997 local plan with development boundaries relating to employment development would be the preferred option from an economic development perspective.

Broads Authority Officer Summary of Representation:

1: Either no change to the existing policy or having a less restrictive policy would be the preferred options in relation to redundant boat yards

2: Reintroducing the approach from the 1997 local plan with development boundaries relating to employment development would be the preferred option from an economic development perspective.

Broads Authority comment:

Prerences noted and will inform the production of the Preferred Options.

Residential Boat Owners Association

21 The Broads Economy

Boatyard Industry: The RBOA supports the increase in the diversity and robustness of this sector, which would very effectively support the viability of adjoining communities. Appropriate residential moorings can support the viability of boatyards by maintaining regular income streams, regular need for boatyard facilities, maintenance, fuel etc and by providing affordable accommodation for boatyard operatives. Whilst understanding that some boatyard operations do not need to be carried out adjacent to the water, it is important to conserve this traditional connection.

Broads Authority Officer Summary of Representation:

Appropriate residential moorings can support the viability of boatyards by maintaining regular income streams, regular need for boatyard facilities, maintenance, fuel etc and by providing affordable accommodation for boatyard operatives. Whilst understanding that some boatyard operations do not need to be carried out adjacent to the water, it is important to conserve this traditional connection.

Broads Authority comment:

Information noted and will be considered as we produce the Preferred Options.

River Thurne Tenants Association

It is becoming increasingly difficult for small boat yards to succeed and so do we leave the sites vacant? It would be better to encourage a wide diversity of uses and/or businesses rather than a derelict site which could then be vandalised and become an eyesore.

Broads Authority Officer Summary of Representation:

Suggest encouraging a wide variety of uses and businesses in redundant boatyards.

Broads Authority comment:

Preferred approach noted.

Evolution Town Planning

(Please note that the actual representation had much background in. This text relates to the Issues and Options consultation).

As stated above Somerleyton Marina Ltd are looking to achieve a future policy context that is flexible and positive towards the potential extension of the Somerleyton marina and boatyard supporting and responding to the demands of economic development and tourism.

As we have identified above; existing strategic objectives and Development Management policies DP16, DP19 and DP20 in particular currently provide a clear and positive framework but work is needed to bring them in line with more up to date national planning policy.

6.6 Despite recognising the importance of marinas and boatyards to economic prosperity the Issues and Options consultation document does not identify the need to provide policy guidance on the identification, recognition, development and expansion of existing sites. Issue 38 deals with redundant boatyards and is not relevant to the aspirations for Somerleyton Marina.

Issue 39 questions how the Broads Authority should address the location of new employment land and this is the closest to the matter we are concerned with:

Issue 39 Option 1:

Option 1 proposes to continue the approach in the Development Management DPD. As we set out above we would find this approach acceptable on the proviso that the new strategic policies were more positive and went further than they often do in 'maintaining' employment sites by 'encouraging' their expansion in circumstances where it is shown to be sustainable to do so. I.e. Somerleyton marina and boatyard. For example CS23 states "a network of waterside employment sites will be maintained throughout the system in employment use...". A simple but effective addition to this policy would be to say "a network of waterside employment sites will be identified, maintained and enhanced/promoted throughout the system in employment use...". Therefore at Somerleyton Marina the potential expansion of the marina and the boatyard could be encouraged rather than the status quo maintained. This approach would respond to "the increase in private boat ownership can offer an opportunity for the provision of other services, such as boatbuilding, repair and maintenance, in addition to maintaining demand for re-fuelling, pump-out and mooring facilities" discussed in the Issues and Options document. It would also reflect the sustainable location and the proximity to facilities and services in the village of Somerleyton nearby.

Issue 39 Option :

Option 2 proposes to reintroduce the approach taken to new employment sites reportedly taken in the 1997 local plan; which was to allow employment development in principle inside [residential] development boundaries and to resist it elsewhere unless it related to 'certain circumstances' such as 'boatyards'. Insofar as Somerleyton

Marina are concerned the reintroduction of the approach taken in the 1997 Local Plan would only be acceptable if the earlier policy exception for 'certain circumstances relating to boatyards' was included. Otherwise, being outside of any development boundary and unlikely to feature in any future development boundary, sustainable expansion of the existing employment offer at the marina and boatyard could find itself contrary to local planning policy. The Broads Authority would also need to satisfy themselves that the approach taken in the 1997 local plan was compliant with current national planning policy imperatives.

Issue 39 Option 3:

Option 3 proposes to identify existing employment sites and to allocate land for this use. Somerleyton Marina could accept this way forward provided that, if a site specific approach were taken, a hierarchy of sites were developed that allowed smaller rural employment sites such as Somerleyton marina and boatyard to come forwards and be recognised for its sustainable characteristics. The criterion based approach discussed against Option 3 would be favourable to Somerleyton Marina if it contained updated policy criteria from DP16, DP19 and DP20. Any less than this and we could not support it. However recognising that such a policy would need to be applicable to many different types and sizes of sites this approach may be impractical. It is conceivable that a site specific policy, such as that for St Olaves in the adopted Site Specific Policies DPD, could be written for Somerleyton marina providing a bespoke framework for its expansion. It is acknowledged that a Call for Sites would need to be undertaken and contextual information and evidence would need to be provided to support this approach.

Our Preferred Option:

Given that existing Development Management policies are broadly acceptable in their current form as a means to judge the future potential expansion of the marina and boatyard at Somerleyton, and on the proviso of more positively worded strategic policies, we would prefer Option 1 as a means to guide and support our clients development aims. Option 3 would require a greater amount of input and therefore be less efficient than Option 1. Plus Option 3 includes a degree of uncertainty at this stage about whether and how generalised criteria intended for all employment sites could apply to Somerleyton marina. Equally if a site specific approach were taken, whether a size threshold might mean Somerleyton marina were excluded, despite its sustainability credentials. We would prefer Option 1 over Option 3. Option 2 could be acceptable but the risk to Somerleyton marina that the boatyard exception criteria were missed out or poorly worded is too great at this stage to lend this Option any support. We would prefer Option 3 over Option 2 and then Option 1 over Option 3. I.e. our preferred ranking of the options with the most preferable first is:

- Option 1 (preferred) maintain the approach in the Development Management DPD on the proviso that the strategic policies were more positively worded.
- Option 3 could be supported provided a bespoke site specific policy for Somerleyton marina and boatyard were adopted.
- Option 2 could only be supported if the boatyard exception were retained.

Broads Authority Officer Summary of Representation:

Somerleyton Marina Ltd are looking to achieve a future policy context that is flexible and positive towards the potential extension of the Somerleyton marina and boatyard supporting and responding to the demands of economic development and tourism. Existing strategic objectives and Development Management policies DP16, DP19 and DP20 in particular currently provide a clear and positive framework but work is needed to bring them in line with more up to date national planning policy. Despite recognising the importance of marinas and boatyards to economic prosperity the Issues and Options consultation document does not identify the need to provide policy guidance on the identification, recognition, development and expansion of existing sites. Issue 38 deals with redundant boatyards and is not relevant to the aspirations for Somerleyton Marina.

Our Preferred Option:

Given that existing Development Management policies are broadly acceptable in their current form as a means to judge the future potential expansion of the marina and boatyard at Somerleyton, and on the proviso of more positively worded strategic policies, we would prefer Option 1 as a means to guide and support our clients development aims. Option 3 would require a greater amount of input and therefore be less efficient than Option 1. Plus Option 3 includes a degree of uncertainty at this stage about whether and how generalised criteria intended for all employment sites could apply to Somerleyton marina. Equally if a site specific approach were taken, whether a size threshold might mean Somerleyton marina were excluded, despite its sustainability credentials. We would prefer Option 1 over Option 3. Option 2

could be acceptable but the risk to Somerleyton marina that the boatyard exception criteria were missed out or poorly worded is too great at this stage to lend this Option any support. We would prefer Option 3 over Option 2 and then Option 1 over Option 3. I.e. our preferred ranking of the options with the most preferable first is:

- * Option 1 (preferred) maintain the approach in the Development Management DPD on the proviso that the strategic policies were more positively worded.
- * Option 3 could be supported provided a bespoke site specific policy for Somerleyton marina and boatyard were adopted.
- * Option 2 could only be supported if the boatyard exception were retained.

Broads Authority comment:

Assessment of options noted. Preferred Option noted.

22 Sustainable Tourism

Broadland District Council

Issue 40: how to address sustainable tourism in the Local Plan?

As the NPPF supports a prosperous rural economy, it is felt that the approach could involve a combination of the following options:

[Agree] Option 2: Seek to retain tourist facilities through general policy

[Agree] Option 3: Site Specific policies for larger tourist attractions

The potential effects will need to be assessed through SA and HRA.

Broads Authority Officer Summary of Representation:

Supports Options 2 and 3.

Broads Authority comment:

BDC's preferred approaches noted and will be considered as the Preferred Options document is produced.

Inland Waterways Association

Sustainable Tourism: IWA is keen to ensure the BA manages the balance between the importance of tourism to the local economy, and navigation & conservation. Both the latter are also important in maintaining a dynamic tourism industry, and offering visitors something which represents the reality and diversity of things to see and do which the Broads has. Sustainability is vital for all aspects.

How to address sustainable tourism in the Local Plan? IWA considers that the best way forward in the plan is with Options 3 & 4, site specific policies for larger tourist attractions and generic ones to help small scale attractions. This will allow the larger sites to use their expertise working within a framework the BA provides, and for local small sites guidance

and help from the BA will both simplify their task of putting on a professional attraction with high standards, and ensure there is a commonality running through all Broads attractions.

Broads Authority Officer Summary of Representation:

1: IWA is keen to ensure the BA manages the balance between the importance of tourism to the local economy, and navigation & conservation. Both the latter are also important in maintaining a dynamic tourism industry, and offering visitors something which represents the reality and diversity of things to see and do which the Broads has.

2: IWA considers that the best way forward in the plan is with Options 3 & 4

Broads Authority comment:

1; Noted and that is what the Sustainable Tourism Broads Plan and Local Plan will try to do - balance the three purposes of the BA.

2: Support for options 3 and 4 noted.

Norfolk and Suffolk Boating Association

Section 10, Green Infrastructure, and Section 22, Sustainable Tourism:

We failed to find any reference in either of these sections, to the most sustainable form of transport and the most sustainable form of tourism, that is, transport by engineless boat propelled by the harnessing of wind and tide.

Broads Authority Officer Summary of Representation:

We failed to find any reference in either of these sections, to the most sustainable form of transport and the most sustainable form of tourism, that is, transport by engineless boat propelled by the harnessing of wind and tide.

Broads Authority comment:

Comment noted and we will consider this as the Preferred Options is produced.

Norfolk County Council

It is felt that no new policy is needed for sustainable tourism and existing policies would cover what is required from an economic development perspective.

Broads Authority Officer Summary of Representation:

It is felt that no new policy is needed for sustainable tourism and existing policies would cover what is required from an economic development perspective.

Broads Authority comment:

Noted.

23 Navigation**Historic England**

We would note that the potential disturbance to, and loss of archaeological deposits should be considered when considering sediment management and bank erosion together with the necessary measures for assessment, protection or recording of remains. We also note that where historic bridges are liable to damage or potential pressure for alteration we trust that the advice of your conservation officer, and Historic England where appropriate, will be sought.

Broads Authority Officer Summary of Representation:

Raises issues of loss of archaeological deposits when considering sediment management and bank erosion and issue of damage to historic bridges.

Broads Authority comment:

Comments noted and will be considered as the Local Plan is progressed.

Inland Waterways Association

As one of the Broads' three major areas, navigation is also a key element of the ingredients that make the Broads so unique to residents and visitors. Navigation keeps the Broads free of weed and reed, creates jobs, maintains a spectacle and provides a large part of the leisure income the area generates.

Maintenance of the various facilities is essential to keep the attraction functioning and able to provide an experience on a par with its costs to the visitor. In the short term maintenance may well be low-level, however costs of raising bridges and dredging & disposing of material will create one-off and programme cost increases. Likewise changes in technology in the boating industry will lift investment needs for new craft with more equipment, and greener power systems.

The report mentions moorings, with the suggestion that the Broads Authority would like others to become involved. Whilst this may be feasible, it is likely to revolve around a 'premium offering' to ensure some boaters are prepared to pay the extra required to fund such facilities, with such elements as mains power hook-ups, recharging for electric boats, wi-fi and other new technologies as time passes. Some will be prepared to pay for very quiet exclusive locations, others for prime moorings

with all facilities to hand. If provision is going to be available, planning will need to start soon and should be in the local plan. Any levies by BA to fund their provision will need to be hypothecated to ensure they do not go to fund work the BA is already funded for, and there will be issues of fair competition to address.

In summary, IWA agrees that the current policy needs an update, as suggested in Option 3. However there are several important issues as well as some 'futurecasting' to do in order to be able to present a comprehensive and thought out local plan within which sites may come forward and investment be found.

On electric charging points and their delivery, IWA would suggest a standard approach, using proven commercial kit to a single common Broads design (if not wider across other navigations in the UK) rather than a new specific BA design. There will be benefit in going to others in the same situation to see how they do it, or discuss with organisations like AINA to canvass their ideas. This will also extend to issues like how to collect payment for such things as moorings and electricity- either simple payment cards or some form of payment deduction system via phones or bank / credit cards. BA may think it worth having a universal system covering car parking and land based charges, as well as mooring and other water based charges.

Broads Authority Officer Summary of Representation:

1: Navigation keeps the Broads free of weed and reed, creates jobs, maintains a spectacle and provides a large part of the leisure income the area generates. Maintenance of the various facilities is essential to keep the attraction functioning and able to provide an experience on a par with its costs to the visitor.

2: The report mentions moorings, with the suggestion that the Broads Authority would like others to become involved. Whilst this may be feasible, it is likely to revolve around a 'premium offering' to ensure some boaters are prepared to pay the extra required to fund such facilities, with such elements as mains power hook-ups, recharging for electric boats, wi-fi and other new technologies as time passes. Any levies by BA to fund their provision will need to be hypothecated to ensure they do not go to fund work the BA is already funded for, and there will be issues of fair competition to address. In summary, IWA agrees that the current policy needs an update, as suggested in Option 3.

3: On electric charging points and their delivery, IWA would suggest a standard approach, using proven commercial kit to a single common Broads design (if not wider across other navigations in the UK) rather than a new specific BA design.

Broads Authority comment:

1: Benefits of navigation noted.

2: Support for policy 3 noted. Extra information noted.

3: Suggestions noted.

Norfolk and Suffolk Boating Association

We note and agree with your list of 6 threats to navigation: 'Sediment management, bank erosion, riverside scrub and tree management, aquatic plant maintenance, navigation safety

and bridges. We also note your remark that planning is not directly linked to all of these threats, but would suggest that policies are appropriate to inform development control in the event of any proposals, such as the Broadland Flood Alleviation project, which would have an impact on any of these threats.

One additional point we would raise is the need for planning control of bright waterside lighting (the examples on Horning Racing Reach and at Great Yarmouth are typical). The lights interfere with helms' night vision and have an impact on safety. They also provoke retaliation in the form of the use of searchlights on boats, which should be discouraged on the Broads.

Regarding Issue 41, Page 110, 'Mooring provision as a result of related development', we would recommend Option 3: 'Improve the existing Policy'.

Regarding wild and informal moorings, Page 111. We concur with your remarks about not formalising these through the local plan process.

Regarding the provision of electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains

power in any case. As such, landscape issues are not primary considerations at busy 24 hour mooring sites. However, we would expect this provision to cross refer to both the Green Infrastructure and Sustainable Tourism sections.

Broads Authority Officer Summary of Representation:

- 1: Section 23. We also note your remark that planning is not directly linked to all of these threats, but would suggest that policies are appropriate to inform development control in the event of any proposals, such as the Broadland Flood Alleviation project, which would have an impact on any of these threats.
- 2: Issue 41 we would recommend Option 3: 'Improve the existing Policy'.
- 3: Regarding wild and informal moorings, Page 111. We concur with your remarks about not formalising these through the local plan process.
- 4: Re electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case.

Broads Authority comment:

- 1: Point taken. The text referred to the direct provision or carrying out of these issues which tend to be delivered through partners or other teams in the BA.
 - 2: Support for Option 3 noted.
 - 3: Support noted.
 - 4: Views noted and will be considered as the Preferred Options is produced.
-

Residential Boat Owners Association

Mooring Design Guidance: The RBOA is very supportive of good design and appropriate location of moorings and is prepared to assist with this from its experience elsewhere on issues such as safety, security, surface material, sustainability, ecological viability and protection. It is noted that the BAS is producing an Updated Mooring Strategy and will consider this in full. It would be good to see moorings fully integrated between visitor, permanent leisure and residential as we believe that the later can add security and other benefits. Servicing of moorings is an important issue for all users and whilst supporting the provision of charging points it would be very useful would to explore the option of residential moorings using renewable energy sources.

Broads Authority Officer Summary of Representation:

It would be good to see moorings fully integrated between visitor, permanent leisure and residential as we believe that the later can add security and other benefits. Servicing of moorings is an important issue for all users and whilst supporting the provision of charging points it would be very useful would to explore the option of residential moorings using renewable energy sources.

Broads Authority comment:

Comments noted and will be considered as the Local Plan and Mooring Strategy are produced.

Thomas, Mr P

Regarding safety, the key is to promote a culture of safe thinking and proper leadership by example. The Norwich Riverside development is a prime example of safety barriers being erected at the river bank and drunks climbing over them and falling in.

Broads Authority Officer Summary of Representation:

Culture of safe thinking is needed.

Broads Authority comment:

Comment noted, however this section refers to ways of getting out the water if you have climbed over the fence and fallen in. It also talks about throw lines and the like. Not all incidences of people falling in the water relate to alcohol. Whilst there is of course a role for education with regards to safety by the water, this section of the Local Plan refers to the equipment side of the issue that helps people if they do fall in, no matter what the reason is.

23 Navigation**Codling, Mr R**

With regards to the consultation on both plans above I would like to see more commitment on preserving the navigational rights into the centre of Norwich. I note that in the Navigational committee minutes of 11/12/14 there were proposals by Network Rail to replace the rail swing bridge with a fixed bridge, this would in turn lose Norwich its historic port authority status. So I would ask if this status could be preserved and included in both the broads plan and the broads local plan.

Broads Authority Officer Summary of Representation:

would like to see more commitment on preserving the navigational rights into the centre of Norwich.

Broads Authority comment:

Discussions are ongoing with Network Rail. Were the rail bridge to be replaced with a fixed bridge appropriate compensation will be required to mitigate.

24 Housing**South Norfolk Council**

I have a query on OAN. The text on page 165 says that OAN is 253 or 274 (and page 120 refers to 274). Page 113 (reflecting the figures in Figure 94 on page 166) says that OAN is 320. Is there an explanation for this?

Broads Authority Officer Summary of Representation:

Different OAN figures in the document.

Broads Authority comment:

As South Norfolk will be aware, the Broads Authority's OAN changed from the draft version saying 274 dwellings to 320 dwellings in the final report. This section was written to reflect the draft version of the SHMA and had not been updated. The OAN for the Broads is 320 dwellings. The change in numbers reflects better understanding of second and holiday homes.

Anglian Water**20.2 Housing and 20.5 Settlement Hierarchy**

It is noted that the Broads Authority will identify a housing target for the plan area and prepare a settlement hierarchy which will outline the scale of housing development at specific locations. Anglian Water would wish to comment on the implications for our existing infrastructure when the scale and distribution of additional housing development is known. As part of which consideration we will need to be given to any further evidence prepared by the Broads Authority relating to a water and water recycling infrastructure to inform the New Local Plan. Similarly we would wish to comment further on any additional employment and retail allocation sites which are identified by the Broads Authority.

Developer contributions and Planning Obligations:

Views are sought on 'rolling forward' Policy DP30 (Developer Contributions) of the Development Management Policies DPD.

Foul network improvements (on-site and off-site) are generally funded/part funded through developer contribution via the relevant sections of the Water Industry Act 1991. The cost and extent of the required network improvement are investigated and determined when we are approached by a developer and an appraisal is carried out. Similarly water infrastructure provision will be dependant on location and scale of the development and contributions for upgrades or strategic schemes will be obtained through provisions in the Water Industry Act 1991.

As set above we seek contributions directly from developers in accordance with the provisions of the Water Industry Act 1991. Therefore Anglian Water would not expect there to be provision within planning obligations or the Council's CIL Charging Schedule for water or water recycling water infrastructure.

Broads Authority Officer Summary of Representation:

1: Anglian Water would wish to comment on the implications for our existing infrastructure when the scale and distribution of additional housing development is known. Similarly we would wish to comment further on any additional employment and retail allocation sites which are identified by the Broads Authority.

2: Anglian Water would not expect there to be provision within planning obligations or the Council's CIL Charging Schedule for water or water recycling water infrastructure.

Broads Authority comment:

1: This will form part of the Preferred Options version of the Local Plan. AWS will likely be contacted for their views on some allocations prior to the consultation as well.

2: Explanation regarding developer contributions to water infrastructure is noted.

Broadland District Council

Issue 22 – how can the Local Plan address the Full Objectively Assessed Housing Need of the Broads?

[Agree] Option 2: Meet full objectively assessed housing need in the broads in accordance with National guidance. In addition, HRA assessment will need to be undertaken to ensure no significant effects arise as a result of increased visitor pressure and any identified mitigation measures are implemented.

Affordable Housing – Para 20.3

It is understood that is intended to role forward the policy approach of using the percentages of your districts.

Q. Do you have any comments on this approach?

This is an acceptable approach

Issue 23 – How can the Local Plan address Gypsy and Traveller needs?

Gypsy, Travellers and Travelling Show People Need in the Broads - Para 20.4

This section states that the Broad's Authority is not aware of existing sites within the Broads Executive Area, nor it is aware of any unauthorized sites. However, there is no mention of Boat people or Travellers by boat. There may be a potential need for this specific group and in which case any needs identified should be accommodated within the Broads.

Settlement Hierarchy and Development Boundaries - Paragraph 20.5

This section describes the purpose of a development boundary to 'consolidate development around exiting built up communities where there is clearly defined settlement and where further development, if properly designed and constructed, would not be incongruous or intrusive because of the size of the settlement'. Furthermore, four areas in the Broads Executive Area with development boundaries are listed. It is also understood that a Settlement Hierarchy for the Broads is currently underway and as part of this the Methodology seeks to assess what facilities a settlement has within or nearby. We note that there is no mention of 'Norwich' which forms part of the built-up area and the facilities within are accessible to nearby settlements with the potential for growth.

Residential Moorings - Para 20.6

Q. Are there any areas which you think are suitable for residential moorings?

Appendix F 'Residential Moorings – call for suitable areas' appears to cover the necessary criteria to help in assessing appropriate location - subject to outcome of HRA assessment on visitor pressure.

Floating Buildings - Para 20.7

Q. What are your thoughts on floating buildings? Do you have any evidence to address the issues raised?

The options of houseboats, residential moorings and floating buildings as defined in the DM DPD are welcomed. However, the impact will need to be assessed through SA and HRA assessment. The issue raised about Design could be addressed through 'design codes' as per NPPF para 59. Furthermore, it is acknowledged that the adverse impact on navigation should be avoided, as well as the other points raised such as potential landscape impact.

Issue 24: How can the Local Plan address the issue of rural enterprise dwellings?

It is felt that the NPPF provides sufficient policy to address this issue.

[Agree] Option 3: make a short guidance note for determining planning applications may be of assistance also.

Issue 25: How should the Local Plan address second homes in the Broads?

It is suggested that legal advice is sought on this subject, as it is understood that second home owners cannot be treated differently in planning terms.

Issue 26: How can the Local Plan support those who wish to build their own homes?

[Agree] Option 2: Set a requirement for self-build plots as part of site allocation policies.

Any policy should ensure that development is only allowed in suitable and sustainable locations.

Broads Authority Officer Summary of Representation:

- 1: Supports meeting full objectively assessed housing need in the broads in accordance with National guidance. HRA will be needed.
- 2: Deferring to relevant district's affordable housing policy supported.
- 3: There is no mention of Boat people or Travellers by boat.
- 4: No mention of Norwich in the Settlement Hierarchy section.
- 5: Appendix F 'Residential Moorings – call for suitable areas' appears to cover the necessary criteria to help in assessing appropriate location - subject to outcome of HRA assessment on visitor pressure.
- 6: The impact of houseboats, floating buildings and residential moorings will need to be assessed through SA and HRA assessment. The issue raised about Design could be addressed through 'design codes' as per NPPF para 59.
- 7: Rural Enterprise Dwellings - it is felt that the NPPF provides sufficient policy to address this issue. [Agree] Option 3: make a short guidance note for determining planning applications may be of assistance also.
- 8: It is suggested that legal advice is sought on this subject, as it is understood that second home owners cannot be treated differently in planning terms.
- 9: [Agree] Option 2: Set a requirement for self-build plots as part of site allocation policies. Any policy should ensure that development is only allowed in suitable and sustainable locations.

Broads Authority comment:

- 1: HRA will assess the next version of the Local Plan. Support to meet for OAN noted.
- 2: Support for continuing approach to affordable housing noted.
- 3: The Housing and Planning Bill is not an Act currently. That sets the requirement to assess houseboat need. However, the requirement is for Housing Authorities, not Local Planning Authorities. As such, the Broads Authority would liaise with the Housing teams of our districts on this issue. In reality, houseboats are likely to need moorings. We discuss the issue of residential moorings in the Issues and Options as well as do a call for suitable sites for residential moorings. Additionally we are likely to roll forward our criteria based policy relating to residential moorings as well as our support for these near to development boundaries and other areas discussed in the Sites Specifics Local Plan as being considered suitable for residential moorings. At this stage, the Authority are not aware of what more can be done.
- 4: Norwich is being assessed as part of the settlement study.
- 5: Support for call for residential moorings process noted. HRA will be completed on Preferred Options.
- 6: SA and HRA will be completed on the Preferred Options. Design code suggestion noted and will be explored.
- 7: Support for a short guide noted. Noted that BDC considers the NPPF to provide enough guidance.
- 8: Suggestion to get legal advice if the Authority seeks to address second and holiday homes noted. We are aware of the LynPlan Neighbourhood Plan policy that is adopted as well as the St Ives Neighbourhood Plan policy approach that is due to be voted for at referendum. Specific evidence on this subject is being finalised which will also inform the suggested way forward.

9: Support to set a requirement for self-build plots as part of site allocation policies noted. Location of such sites is important and will likely be in line with development boundaries and settlement hierarchy.

Littlewood, Mr & Mrs P

We feel that with the vast amount of new housing developments that have already been agreed for the area by South Norfolk Council, there is a real need to maintain our very precious natural environment and the continued respect of our flood plains for our future generations and thriving communities.

Broads Authority Officer Summary of Representation:

There is a real need to maintain our very precious natural environment and the continued respect of our flood plains for our future generations and thriving communities

Broads Authority comment:

Noted. We will consider this view as we produce the local plan.

Environment Agency

20.2 Housing:

When considering how to address housing need for the Broads area, it will be essential to make decisions based on a robust evidence base. This will include, if necessary, ensuring that compliance with the flood risk Sequential Test can be demonstrated. Defining appropriate criteria on which to assess the Sequential Test, including the area of search, will be key to this.

20.6 Residential moorings & 20.7 Floating buildings:

We recognise that planning law in respect of residential moorings is very complicated. Where Local Plans contain policies relating to floating structures, they must be informed by the flood risk Sequential Test and Exception Test. For such development to be acceptable, it must also not increase flood risk elsewhere; reduce flood risk overall wherever possible; and be safe for its lifetime taking into account climate change.

The appropriateness of such development must be considered based upon its Flood Risk Vulnerability Classification from Table 2 of the Flood Risk and Coastal Change Planning Practice Guidance. The vulnerability classification of floating structures is not formally defined, this is for the LPA to decide based upon national planning policy and guidance, and we can assist in discussions on this. The main channel of rivers is usually considered as Flood Zone 3b, the functional floodplain. Only residential accommodation associated with water-compatible uses (as defined by Table 2), is appropriate in FZ3b.

We also offer the following more detailed points that would need to be considered before such floating structures could be permitted:

Access and Egress - Floating houses would need to offer safe access and egress routes to non-flooded areas should, for example, power or water supplies be lost which make the house no longer safe or habitable.

Floating structures in the channel of a Main River or within byelaw distance will require Flood Defence Consent. There may also be fisheries, navigation, water quality and aquatic biodiversity issues to consider.

The potential 'downstream' effects on flood risk of floating buildings and residential moorings would also need to be taken into account in an FRA. Compensatory storage may need to be provided to at least equal displacement of the loaded structure. We should also be satisfied that the building or structure does not obstruct flows, and does not present a risk of breaking free and obstructing flow channels.

During a flood, debris such as large branches or even cars that are carried in the floodwater can hit the structure below or above the waterline. At high velocities that could damage the structure, including the undercroft area or tanks that provide the floatation.

After a flood the structure may be designed to settle back down upon its foundations. However if debris has come to rest underneath this will be trapped, potentially meaning the house does not settle evenly. This can cause structural stress and also make it very challenging to remove the debris. This would be a particular risk for

buildings using stilts or piling as a mechanism to retain a structure in place. The design would also need to ensure its anchorage mechanism can withstand the floodwater velocities. It is not within our remit to endorse the mechanics of the structure. The LPA would need to consider this.

The responsibility and cost of long term maintenance is likely to rest with the householder, who will need to ensure the building will function properly throughout its design lifetime. There is a risk that routine maintenance is not undertaken or key parts of the structure, e.g. the underneath, cannot be accessed and inspected. A fault or failure in any part of the design which compromises the structure's ability to operate properly may only become apparent during a flood. The LPA should satisfy itself that the structure can be maintained over its lifetime and apply appropriate conditions.

Such development would also need to consider WFD impacts through an assessment of direct effects on river morphology. Generally the objective should be to soften embankments where possible. If larger scale projects are planned, then it may be sensible to consider mitigation improvements in other areas of the system, i.e. have a habitat improvement plan / bank to offset development.

Broads Authority Officer Summary of Representation:

- 1: when considering how to address housing need, require robust evidence base including sequential test.
- 2: Where Local Plans contain policies relating to floating structures, they must be informed by the flood risk Sequential Test and Exception Test. For such development to be acceptable, it must also not increase flood risk elsewhere; reduce flood risk overall wherever possible; and be safe for its lifetime taking into account climate change.
- 3: The vulnerability classification of floating structures is not formally defined, this is for the LPA to decide based upon national planning policy and guidance, and we can assist in discussions on this. The main channel of rivers is usually considered as Flood Zone 3b, the functional floodplain. Only residential accommodation associated with water-compatible uses (as defined by Table 2), is appropriate in FZ3b.
- 4: Other considerations:
 - *Floating houses would need to offer safe access and egress routes to non-flooded areas
 - *Floating structures in the channel of a Main River or within byelaw distance will require Flood Defence Consent
 - *There may also be fisheries, navigation, water quality and aquatic biodiversity issues to consider.
 - *The potential 'downstream' effects on flood risk of floating buildings and residential moorings would also need to be taken into account in an FRA. Compensatory storage may need to be provided to at least equal displacement of the loaded structure.
 - *We should also be satisfied that the building or structure does not obstruct flows, and does not present a risk of breaking free and obstructing flow channels.
 - *During a flood, debris such as large branches or even cars that are carried in the floodwater can hit the structure below or above the waterline. At high velocities that could damage the structure, including the undercroft area or tanks that provide the floatation.
 - *After a flood the structure may be designed to settle back down upon its foundations. However if debris has come to rest underneath this will be trapped, potentially meaning the house does not settle evenly
 - *The design would also need to ensure its anchorage mechanism can withstand the floodwater velocities
 - *A fault or failure in any part of the design which compromises the structure's ability to operate properly may only become apparent during a flood. The LPA should satisfy itself that the structure can be maintained over its lifetime and apply appropriate conditions
 - *Such development would also need to consider WFD impacts through an assessment of direct effects on river morphology. Generally the objective should be to soften embankments where possible. If larger scale projects are planned, then it may be sensible to consider mitigation improvements in other areas of the system, i.e. have a habitat improvement plan / bank to offset development.

Broads Authority comment:

- 1: noted and will be completed in relation to any allocations.

2, 3 and 4: advice and considerations relating to floating buildings noted and will be considered as we look into this issue further.

Great Yarmouth Borough Council

20.2 Housing

The Borough Council considers that the constraints and special qualities of the Broads mean that it is unlikely to be desirable to provide significant housing within the Broads. It accepts that some, perhaps all, of any need arising within that part of the Broads within Great Yarmouth Borough should be met in those parts of the Borough outside the Broads.

Indeed, the Borough Council and Broads Authority have a Memorandum of Understanding to this effect, and the planned housing growth in the Borough Council's adopted Core Strategy is based on the 'objectively assessed needs' for the whole of the Borough, including that part within the Broads. There is therefore no need for the Broads Local Plan to provide for that part of its 'objectively assessed need' relating to the Great Yarmouth Borough part of the Broads.

That is not to say that there will not be opportunities for housing development in the Broads that would benefit the local community, provide environmental enhancements, or strengthen the sustainability of settlements. The Borough Council is keen to liaise with the Broads Authority to investigate whether there may be such opportunities in those settlements that straddle the boundary between the two planning authorities.

Where housing does come forward in the Broads part of the Borough, either through allocations or as 'windfall' permissions, the Borough Council anticipates continuing the practice of counting these towards the whole Borough housing targets, as provided in the Memorandum of Understanding.

Having said that, the scale of the Broads' housing needs suggested in Appendix E is surprisingly high (notwithstanding the text suggesting it is low). As no calculations are shown it is not clear how the figures have been arrived at, and whether the unusually extreme age and socio-economic structure of the Broads population has been adequately factored in.

20.5 Settlement Hierarchy and Development Boundaries

The Borough Council would be keen to liaise with the Broads Authority to ensure complementary development boundaries in settlements which straddle the shared planning boundary.

Broads Authority Officer Summary of Representation:

1: It accepts that some, perhaps all, of any need arising within that part of the Broads within Great Yarmouth Borough should be met in those parts of the Borough outside the Broads. the planned housing growth in the Borough Council's adopted Core Strategy is based on the 'objectively assessed needs' for the whole of the Borough, including that part within the Broads. There is therefore no need for the Broads Local Plan to provide for that part of its 'objectively assessed need' relating to the Great Yarmouth Borough part of the Broads. That is not to say that there will not be opportunities for housing development in the Broads that would benefit the local community, provide environmental enhancements, or strengthen the sustainability of settlements. The Borough Council is keen to liaise with the Broads Authority to investigate whether there may be such opportunities in those settlements that straddle the boundary between the two planning authorities. Where housing does come forward in the Broads part of the Borough, either through allocations or as 'windfall' permissions, the Borough Council anticipates continuing the practice of counting these towards the whole Borough housing targets, as provided in the Memorandum of Understanding.

2: Having said that, the scale of the Broads' housing needs suggested in Appendix E is surprisingly high (notwithstanding the text suggesting it is low).

3: The Borough Council would be keen to liaise with the Broads Authority to ensure complementary development boundaries in settlements which straddle the shared planning boundary.

Broads Authority comment:

- 1: GYBC's stance noted and welcomed. It is the GYBC HMA area of the Broads where, according to analysis of completions, permissions and allocations, there is a residual need of around 50 dwellings. We have received advice from PAS on this issue as well as some initial legal advice. We will look into this issue further and will meet with GYBC to discuss the approach.
 - 2: We were trying to get across that the figures are low compared to our surrounding district's need. The link to the Central Norfolk SHMA is at section 20.13. The Appendix E was only supposed to be a short summary rather than copy much of the SHMA. The figure averages at 13 per year which is not too dissimilar to that which have been permitted over recent years according to the AMR. The figure does reflect recent evidence into second and holiday homes which show that around 40% of homes in the Broads area of North Norfolk (for example) are vacant homes.
 - 3: Noted. We will consider this as we produce the Preferred Options.
-

Historic England

We welcome the recognition of the special qualities of the Broads in respect of design. We would expect to see locally-specific text and policies on design in respect of "floating houses" in the next iteration of the Broads Local Plan.

Broads Authority Officer Summary of Representation:

We would expect to see locally-specific text and policies on design in respect of "floating houses" in the next iteration of the Broads Local Plan.

Broads Authority comment:

Noted and that is the purpose of the Preferred Options.

Inland Waterways Association

Housing and meeting the objectively assessed needs of the Broads area: Although the BA has previously deferred to the policies of its surrounding districts, there will be opportunities to provide new housing within the Broads area and these should be sought to make a contribution to the overall need. Given the Broads special situation, there may also be opportunities to provide innovative housing such as floating housing as deployed in Holland to contribute. This would also apply to affordable housing, indeed these may be especially suitable if procured as 'factory built'. However such structures must not interfere with the ability of all craft to navigate the adjacent waterways.

How can the Local Plan address Gypsy and Traveller needs? As far as IWA is aware, there are not any genuine ethnic water travellers however criteria-based policy should prepare for claims in this area. There are individuals who adopt a travelling water-borne lifestyle, within the legal system of other navigation authorities licencing systems. Enforcement is an essential part of these regimes, to ensure those who adhere to the 'system' are encouraged to do so, and those who do not appreciate the consequences.

Areas potentially suitable for residential moorings: Potentially redundant boatyards which have large spaces of off-line mooring and good land-based services would be suitable for conversion to residential mooring. This may help maintain boater facilities for visitors as well as residents. Given sufficient water space, similar facilities may also allow development of floating houses as they usually have space for car parking, provided such structures do not interfere with the ability of all craft to navigate the adjacent waterways. It may be worth considering criteria for reuse of boatyards to include, if not prioritise their assessment for residential or floating home use.

Floating buildings: IWA does not have direct experience of floating buildings. However we are prepared to assist BA in developing thoughts around this subject if this is helpful. Floating buildings appear to offer an opportunity to produce factory-built units which can combine good design with a standard product and connection system, and be fitted into the type of environs present within the Broads area. However such structures must not interfere with the ability of all craft to navigate the adjacent waterways.

How should the Local Plan address second homes in the Broads? Second homes which are not rented out seem to create a double- whammy of little occupation or revenue much of the time, whilst preventing local occupants taking up underused property. As has been seen elsewhere this can quickly degrade an area if second home ownership is relatively intensive. Option 4 A policy approach that relates to locations seems the better way to plan for this eventuality.

Broads Authority Officer Summary of Representation:

- 1: There will be opportunities to provide new housing within the Broads area and these should be sought to make a contribution to the overall need. Given the Broads special situation, there may also be opportunities to provide innovative housing such as floating housing as deployed in Holland to contribute. However such structures must not interfere with the ability of all craft to navigate the adjacent waterways.
- 2: As far as IWA is aware, there are not any genuine ethnic water travellers however criteria- based policy should prepare for claims in this area. There are individuals who adopt a travelling water- borne lifestyle, within the legal system of other navigation authorities licencing systems. Enforcement is an essential part of these regimes, to ensure those who adhere to the 'system' are encouraged to do so, and those who do not appreciate the consequences.
- 3: Potentially redundant boatyards which have large spaces of off-line mooring and good land- based services would be suitable for conversion to residential mooring. This may help maintain boater facilities for visitors as well as residents. Given sufficient water space, similar facilities may also allow development of floating houses as they usually have space for car parking, provided such structures do not interfere with the ability of all craft to navigate the adjacent waterways. It may be worth considering criteria for reuse of boatyards to include, if not prioritise their assessment for residential or floating home use.
- 4: IWA are prepared to assist BA in developing thoughts around this subject if this is helpful. Floating buildings appear to offer an opportunity to produce factory- built units which can combine good design with a standard product and connection system, and be fitted into the type of environs present within the Broads area. However such structures must not interfere with the ability of all craft to navigate the adjacent waterways.
- 5: Option 4 A policy approach that relates to locations seems the better way to plan for this eventuality.

Broads Authority comment:

- 1: Noted and there is a section on floating buildings.
 - 2: It is not clear what the message here is. IWA to be contacted to clarify.
 - 3: Suggestions noted.
 - 4: Suggestions noted. Offers of assistance noted.
 - 5: Support for option 4 noted.
-

King Line Cottages

We as a professional Holiday home provider with a number of holiday cottages, are disadvantaged by planners passing plans for new or altered properties, owners or operators being given planning permission with a holiday let proviso. This puts us at a disadvantage, and gives an unfair advantage to them.

I list the reasons below:

At the present time we

Pay full business rates for 2016 £6600 paid out. (This is not the rateable value) on 5 properties.

We also pay VAT on all income @ 20%

We pay our Taxes

We also pay for Visit England star rating

We have a full time member of staff as well as 2 part-timers when required. This keeps a high standard of accommodation for the Broads & employment in the area.

An Individual Property advantage owned by speculative buyer/owner:

If they elect to pay business rates, they do not pay any Rates (as a small business).

They spend little into the community, as they bring their own provisions.

They do not pay VAT on their earnings

No wages to pay.

Standards are lower due to living away (using contract cleaners).

No personal touch.

No tourist Board accreditation.

Our own observation of these speculative purchase of second holiday home, are a disadvantage to the local community. The first year of purchase they may visit many times, the second year only a few visits, the third year they start to look at ways to rent as a holiday home. This does not help the professional holiday home renters by having amateurs trying to do a professional hire. The local community needs full time occupancy to support the local community.

The Broads have a number of disused boat yards with moorings, these are the perfect locations for holiday accommodation, use these locations.

Individual properties that apply for planning , are more suitable for full time accommodation, not with a ruling, must be used for holiday lets x number of weeks a year.

Please in the next planning consultation give a fair playing field to the small established

Holiday providers.

Broads Authority Officer Summary of Representation:

1: Suggested differences between professional holiday home providers and individuals who offer holiday homes.

2: The Broads have a number of disused boat yards with moorings, these are the perfect locations for holiday accommodation, use these locations.

3: Individual properties that apply for planning , are more suitable for full time accommodation

4: Please in the next planning consultation give a fair playing field to the small established Holiday providers.

Broads Authority comment:

1: Noted

2: Noted and will be considered as we look into the issue of redundant boatyards.

3: Noted, although we assess planning applications to reflect what the promoter wishes to do.

4: King Line Cottages to be contacted to clarify some of their comments as the Preferred Options is produced.

Littlewood, Mr & Mrs P

Living in Chedgrave we feel very lucky to be able to walk in tranquil unspoilt areas along the river, both in Chedgrave and across the river in Loddon, watching birds, otters, deer and other wildlife. We would therefore continue to support Option 1 in the Housing Section, Chapter 24, Issue 22, as housing development in this area, within the Broads Authority boundary, could only be in and around the boatyards. Even a suggestion that building housing may be possible could lead to loss of habitat and landscape. <<comment contained detail and has been made more generalised: local example of where land has been cleared of trees and other habitat before a planning application was submitted>>. <<Refers to a recent application. Application number removed>>. The surrounding dykes, marsh and carr continue to be abundant with wildlife because they are left in their natural state.

Broads Authority Officer Summary of Representation:

1: Support Housing requirement of zero

2: Raise issue of land cleared of trees and wildlife before planning permission granted.

Broads Authority comment:

1: Support for zero housing requirement noted.

2: This issue will be raised with ecologists and planning colleagues.

Milner, Mr A

I completed your on line survey but was disappointed that it did not include a section on the proposed option of having a specific housing allocation. This seems to me to be particularly controversial. I am therefore sending this supplementary email.

I wish to express my support for Option 1, Housing requirement of zero. Issue 22, Housing, Chapter 24:

1. The general housing provision is being met by the relevant District Councils and the BA area is recognised as an area of general restraint to avoid compromising its statutory aims. However, the BA does contribute by “windfall permissions” and by having exceptions policies eg for providing affordable housing for local need and rural businesses.
2. The boundaries of the BA Local Planning Area are tightly drawn to reflect its statutory purposes which restrict the number of potential sites within it.
3. The areas within the boundary are largely within or adjacent to the flood plain further restricting potential sites and the BA needs to exercise caution as there is the danger that global warming will increase risk of flooding in the adjacent areas.
4. The demand outside the current exceptions is largely for expensive, often second homes with riverside moorings with developers/buyers attracted by the unique landscape of the Broads, but which frequently detract from it and tend to exclude less wealthy visitors from facilities – no mooring or footpaths here! The consequent inflated the land and property values will also make it very difficult to provide affordable housing quotas or cater for local need within the BA boundary.
5. There is an increasing phenomenon of landowners/developers clearing sites to remove trees and habitat before submitting planning applications. There are 3 local examples in Loddon and Chedgrave and a call for sites will perversely result in habitat loss even if planning permission is subsequently denied. One of the three sites was in the BA area(BA/2015/0123/FUL). Even though the application was subsequently withdrawn further habitat has been removed, including that which the Bas own ecological survey suggested should be retained if any development went ahead.
6. The development of one piece of land usually impacts adjacent areas with edge of development problems constantly spreading outwards as landowners seek to maximise the value of their investment frequently by downgrading habitat either by act or neglect.
7. Residential developments frequently have a negative effect on nearby employment activity. It is easier to make money from development than by successfully running a boatyard or related activity. It is very difficult to disentangle a genuinely “redundant boatyard” from one where the owner wishes to retire or their business model has failed.

Broads Authority Officer Summary of Representation:

Express support for Option 1, Housing requirement of zero. Issue 22, Housing, Chapter 24:

- 1: District Councils meeting BA housing needs.
- 2: BA boundary tightly drawn so little opportunity for development.
- 3: Much of the Broads is flood plain.
- 4: Housing demand is for expensive dwellings. Affordable housing viability issues.
- 5: Already wildlife land is degraded before planning permission received. A call for sites would make this worse.
- 6: landowners seek to maximise the value of their investment frequently by downgrading habitat either by act or neglect.
- 7: Housing has negative impact on nearby businesses. Issue of why a boatyard is redundant.

Broads Authority comment:

Support for zero housing target noted.

As background, the BA is required to understand its housing need for its area as it is the Local Planning Authority. The OAN is 320 from 2012 to 2036. It is important to note that since 2012 we have met the need in two of our Housing Market Areas. The Authority needs to find around 50 dwellings in the GYBC Housing Market Area. We will take representations such as this into account as we consider the way forward with meeting our housing need.

To address the particular points raised:

- 1: That was the case. The East of England Plan did not allocate a housing number to the Broads, so yes, effectively the districts provided the housing with any development in the Broads being taken off their target. Now, the NPPF says that all Local Planning Authorities must understand their housing need and meet that need unless doing so would go against other policies in the NPPF. This is why we are asking for views on this subject.
 - 2: Yes, we agree with that point. There are and have been some opportunities for large development, as allocated in the Sites Specifics Local Plan.
 - 3: Yes, the impact of flood risk and indeed that of climate change is an important consideration.
 - 4: Types of housing delivered in the Broads varies from town houses and flats to larger housing. In the last 5 years or so, around 13 affordable houses have been delivered in the Broads (in Norwich) with other developments proving on site provision to be financially unviable. These particular schemes are subject to a clawback whereby if profits increase above the baseline considered when planning permission given, money is paid by the developer towards affordable housing. But generally, yes, viability is an issue when considering all types of planning obligations, not just affordable housing.
 - 5 and 6: This will be raised with the ecologists and planning team at the Broads.
 - 7: Amenity is an important consideration when assessing development proposals... will a development negatively impact existing residents and will future residents be negatively affected by an existing business. We do look into the issue of redundant boatyards in the Issues and Options.
-

Residential Boat Owners Association

The RBOA is involved at national level in promoting the contribution that residential boats can make to the supply of housing which does provide a alternative, diverse and affordable solution in appropriate locations. Government is recognising this in its current Periodic Review of Housing Needs by noting it under special housing needs. [We are under discussion about the confusing term “bargees”.]

20.6 Residential Moorings: The RBOA support the extension to the areas likely to permit residential moorings. It is understood the general requirement is to relate these to existing settlements with good facilities, and agree that there may be options outside existing development boundaries. Presently, we are working with our local members to identify suitable sites which comply with the criteria DP25.

20.7 Floating Buildings: The RBOA support the concept of floating housing (defined differently to residential boats) as a viable way to meet the need to build within flood risk areas and would be interested in discussing this further with the Broads Authority. We believe that the Broads would be an ideal environment to progress good design of floating buildings appropriate to their location. We understand the uncertainty of the definitions boat/ houseboat/ floating home and would be interested to pursuing this further for mutual benefit.

Broads Authority Officer Summary of Representation:

- 1: The RBOA is involved at national level in promoting the contribution that residential boats can make to the supply of housing which does provide a alternative, diverse and affordable solution in appropriate locations. Government is recognising this in its current Periodic Review of Housing Needs by noting it under special housing needs.
- 2: The RBOA support the extension to the areas likely to permit residential moorings. Presently, we are working with our local members to identify suitable sites which comply with the criteria DP25.
- 3: The RBOA support the concept of floating housing (defined differently to residential boats) as a viable way to meet the need to build within flood risk areas and would be interested in discussing this further with the Broads Authority. We understand the uncertainty of the definitions boat/ houseboat/ floating home and would be interested to pursuing this further for mutual benefit.

Broads Authority comment:

1: Noted.

2 and 3: Support and offer of assistance noted.

River Thurne Tenants Association

What do you think about floating buildings in general? Like them? NO

Do you have any comments?

Some Broads folk have always lived in floating buildings.. if by that you mean eel boats, painting studios, floating holiday bungalows/houseboats such as those at Martham, Wayford Bridge , Hickling, Stalham. These are traditionally used as holiday accommodation and provided they are sited sympathetically in the Broads landscape they serve a purpose and could be retained. Caravans or something similar NOT designed for the purpose of floating are unpleasant, intrusive and generally not liked by our members. However if something such as the purpose- built floating Dutch and Scandinavian buildings, in areas susceptible to flooding or on lakes can be pleasant, beautiful and quite desirable, even in the Broads landscape. It all depends on the design and location of the 'floating buildings'.

How do you think second homes affect your community?

On the River Thurne there are 200 holiday homes, the majority of these are second homes, and not let commercially. These second homes have led to an area of social diversity, with some families having owned their properties through 3 generations, and by using their bungalows they take part in the local community, use the local facilities and help the home economy, boatyards, businesses, restaurants, etc. Indeed some of these businesses might not be viable without these bungalow owners. The Broads benefits from this in the number of tolls paid by the bungalow owners most of whom have at least one craft on the water.

If we could somehow restrict second homes in your area, is that something you would support? Against? NO

Do you have any comments?

We, as bungalow owners value and indeed love our waterside properties and would not like to see them restricted in any way. These properties are not part of the local housing stock and even if these wooden bungalows use were restricted then how else could they be used?

How can the Broads Authority make it easier for people to build their own homes?

Could the BA release more brown field sites for housing development and residential development?

Broads Authority Officer Summary of Representation:

1: What do you think about floating buildings in general? Like them? NO

Do you have any comments?

Some Broads folk have always lived in floating buildings. These are traditionally used as holiday accommodation and provided they are sited sympathetically in the Broads landscape they serve a purpose and could be retained. Caravans or something similar NOT designed for the purpose of floating are unpleasant, intrusive and generally not liked by our members. However if something such as the purpose- built floating Dutch and Scandinavian buildings, in areas susceptible to flooding or on lakes can be pleasant, beautiful and quite desirable, even in the Broads landscape. It all depends on the design and location of the 'floating buildings'.

2: How do you think second homes affect your community?

On the River Thurne there are 200 holiday homes, the majority of these are second homes, and not let commercially. These second homes have led to an area of social diversity, with some families having owned their properties through 3 generations, and by using their bungalows they take part in the local community, use the local facilities and help the home economy, boatyards, businesses, restaurants, etc. Indeed some of these businesses might not be viable without these bungalow owners. The Broads benefits from this in the number of tolls paid by the bungalow owners most of whom have at least one craft on the water.

If we could somehow restrict second homes in your area, is that something you would support? Against? NO

Do you have any comments?

We, as bungalow owners value and indeed love our waterside properties and would not like to see them restricted in any way. These properties are not part of the local housing stock and even if these wooden bungalows use were restricted then how else could they be used?

3: How can the Broads Authority make it easier for people to build their own homes?

Could the BA release more brown field sites for housing development and residential development?

Broads Authority comment:

1: Noted. Design seems to be the main issue here.

2: Support for second homes noted.

3: The BA do not own such land. But the BA could allocate such land if appropriate.

Thomas, Mr P

As the bulk of the area is a flood flood plain and we are being constantly warned of anticipated rising sea levels, conventional housing would be at risk and probably almost impossible to insure. "Floating accommodation" or building on stilts hardly sounds viable.

I'm not aware of a tradition of the gypsy (conventional, or the more recent water variety) culture on the Broads. Surely preference should be given to preserving and promoting the traditional Broads cultures and traditions.

Broads Authority Officer Summary of Representation:

1: "Floating accommodation" or building on stilts hardly sounds viable.

2: Unaware of Gypsy culture on the Broads. Preference should be on preserving tradions and culture.

Broads Authority comment:

1: If we have a policy that allows some sort of floating building, it would be the requirements of that policy that are assessed for financial viability, not the cost of actually delivering a floating building. The cost of delivering a floating building, like a dwelling on land, would be down to the details of the design.

2: As a Local Planning Authority, the Broads Authority is required by Government to assess the needs of Gypsy, Travellers and Travelling Show People. The Local Plan would be unsound without consideration for this sector of the community. Understanding the needs of Gypsy and Travellers is not at the expense of other areas of the Local Plan.

Tubby, Mr J

(Full comment not included here as it contained personal information. The general part of the comment included.)

It came as a shock last year to find, when the Broads Authority took over the planning area around the Broads, that my garden was excluded, without any formal landowner notification, from its original status of being within the development area for Chedgrave. I therefore request that the Broads Authority reinstate the plot as shown in scan 2 shaded blue to be included in the Local Plan as a development area, as it was before the Broads Authority took over this area.

Broads Authority Officer Summary of Representation:

Would like property to be allocated or in a development boundary.

Broads Authority comment:

Comments and request noted and will be considered as the Preferred Options is produced.

Vanston, Mr R

- At the moment the Local District Council is proposing to grant permission to build in the region of 300 new homes in the immediate area on land more suited for this type of development and which does not impinge on any flood plain.

- There is an increasing trend in the number of landowners clearing sites to remove trees and destroying habitat before submitting planning applications as happened in a recent application for development of <<comment amended to make more general: nearby land which was also designed in a way that could affect amenity of

neighbours>> It is a concern that altering any boundaries could encourage this problem and eventually result in the complete loss of habitat for the rich wildlife we all enjoy and hopefully maintain for future generations.

Broads Authority Officer Summary of Representation:

Concern that allowing development in some areas is unsuitable and can affect habitat and wildlife.

Broads Authority comment:

Concern noted and is a consideration if sites are allocated or development boundaries put in place.

24 Housing

Sabberton, Mr P

The Broads Authority executive area is primarily an undeveloped natural environment. However due to the way boundaries have been drawn it incorporates parts of existing settlements towns and villages. The needs objectives and possibilities for these areas are very different to the predominantly undeveloped landscape of the broads as a whole. In order to not only protect but enhance the living and working areas that are (accidentally?) included policies need to be sufficiently flexible to provide for and promote the needs of existing and growing communities.

As part of the review of the broads local plan I would like to see some flexibility introduced to allow consideration of development opportunities in areas that are either too small or that may not have been identified in the formal plan process as suitable for development.

<comment amended to make more generalise rather than refer to a specific development proposal: Respondent sought planning permission for a small development and following advice, withdrew the application. Felt that this development was suitable and that the planning system is too regimented.>

Whilst appreciating that development particularly on larger scale has a significant impact upon an area and needs to be carefully controlled and sited very small scale development can be absorbed into the existing landscape with only minor impacts. Towns and villages have historically grown organically and I would like to suggest that some flexibility should be introduced into the plan process to enable such sympathetic growth to continue in locations which may not have been identified at the time of formulation of the long term plan. Such small developments are ideal to cater for local need and contribute to the viability of existing local facilities and services.

Broads Authority Officer Summary of Representation:

Some parts of towns and villages incorporated into the Broads Executive Area. Policies need to be flexible in relation to developments that are small or not identified as suitable for development. Small scale development can be absorbed into the landscape with minor impacts. . Such small developments are ideal to cater for local need and contribute to the viability of existing local facilities and services.

Broads Authority comment:

Comment noted and will be considered as the Preferred Options is produced. It is important to note that there are many issues that are often competing and need to be balanced when producing a Local Plan.

25 Design

Environment Agency

We would support the adoption of an approach that secures design which delivers multiple benefits through a joined up approach. As highlighted above, and recognised in part in this section, an informed design approach can ensure that individual features such as SuDS deliver wider benefits that can contribute to for example reducing flood risk, securing water quality and enhancing biodiversity. However, such features will usually require integration within the initial scheme design.

Broads Authority Officer Summary of Representation:

Support the adoption of an approach that secures design which delivers multiple benefits through a joined up approach.

Broads Authority comment:

Noted and will be considered as this section of the Preferred Options is progresses.

Historic England

We welcome the intention to update the building by the waterside design guides.

21.4 Energy Efficiency: Please refer to the comments we made above in respect of chapter 11 on climate change.

Broads Authority Officer Summary of Representation:

We welcome the intention to update the building by the waterside design guides. Refers to climate change section.

Broads Authority comment:

Noted and support welcomed.

Inland Waterways Association

How to address design in the Broads Local Plan: Options 2 & 3 both suggest some form of guidance, for differing sizes of development. Both could equally be catered for by standard design briefs for sites, locations or types of sites.

How to address energy efficiency in the Local Plan: Option2, Fabric first would enable energy efficiency to be well integrated into a development rather than retrofitted.

This seems a more appropriate way to design and build an energy efficient and effective development.

How can the Local Plan address the issue of residential items and equipment associated with residential moorings? These need to be managed through site specific policies. Setting expectations and carefully enforcing them will be essential.

How should we consider leisure plots in the new Local Plan? Option 2 a more flexible approach should be designed to cater for leisure plots in the local plan.

Space standards: No comment on this issue. It does not seem important compared to other issues, and could be market- led.

Broads Authority Officer Summary of Representation:

1: Options 2 & 3 both suggest some form of guidance, for differing sizes of development. Both could equally be catered for by standard design briefs for sites, locations or types of sites.

2: Option 2, Fabric first would enable energy efficiency to be well integrated into a development rather than retrofitted. This seems a more appropriate way to design and build an energy efficient and effective development.

3: These need to be managed through site specific policies. Setting expectations and carefully enforcing them will be essential.

4: Option 2 a more flexible approach should be designed to cater for leisure plots in the local plan.

5: It does not seem important compared to other issues, and could be market- led.

Broads Authority comment:

1: Support for options 2 and 3 noted.

2: Support for option 2 noted.

3: Suggestion noted.

4: Support for option 2 noted.

5: Maybe so, but it is something we should look into as stated in the NPPG.

Norfolk County Council

Issues 27 – Design

- Design needs to be considered at all scales of development, the options provided are not necessarily comparable.

- DP4 takes the matters concerned within Options 2 and 3 into account but in the instance of larger development, does not prescribe any specific requirements, such as a design code, or promote mixed use development (NPPF, Para. 38).
- Our view is that the content noted in Options 2 and 3 require further exploration and could be taken forward into an updated DP4 Policy.

Broads Authority Officer Summary of Representation:

The content noted in Options 2 and 3 require further exploration and could be taken forward into an updated DP4 Policy.

Broads Authority comment:

Suggested way forward noted and will be considered as the Preferred Options is produced.

Residential Boat Owners Association

21.4 Energy Efficiency

Issue 29, residential items and equipment associated with residential moorings:

The RBOA is well aware of the detrimental impact that such paraphernalia can have on the visual impact of residential moorings and hence on their acceptance by the local community. We believe that this can be resolved by satisfactory design of appropriate storage facilities linked to active management of the site. We are happy to discuss examples of good practice from elsewhere. We agree that this should reflect any special qualities of any area.

Broads Authority Officer Summary of Representation:

Issue 29: We believe that this can be resolved by satisfactory design of appropriate storage facilities linked to active management of the site. We are happy to discuss examples of good practice from elsewhere.

Broads Authority comment:

Support in addressing this issue noted.

River Thurne Tenants Association

Do you think design of development is important? YES

What design aspects do you like? What kind of design do you not like?

We would prefer quality design, quality materials and integration of structures into the landscape. It might be an important enough issue to have a design panel who could meet to review individual planning applications, so that both design and materials are sympathetic with the Broads area. In this particular area most structures are single storey and made from wood.

What do you think about requiring houses to be more water efficient? Support? YES

Do you have any comments?

This is important as water will be an issue for us all in the future.

Broads Authority Officer Summary of Representation:

1: Design is important.

2: Water efficiency is important.

Broads Authority comment:

Comments relating to design and water efficiency noted.

26 Sport and Recreation Venues/Buildings

Inland Waterways Association

Sport and Recreational Buildings: No comment

Broads Authority Officer Summary of Representation:

No comment.

Broads Authority comment:

Noted.

Sport England

Sport England would support the option to include site specific policies relating to existing sport and recreational facilities within the Broads area, as this will give more detailed policy guidance, and will be based on an up to date evidence base (The Greater Norwich Indoor Sports Strategy). However, we also believe that a generic policy should be included to cover any applications received for new sports facilities or changes of use relating to sports activities within the Broads. Whilst the NPPF gives general policy guidance on this subject, the unique nature of the Broads and therefore the sport and recreational activities that take place within it, requires a more detailed approach to policies relating to the protection, provision and enhancement of sports facilities within the Broads area.

Broads Authority Officer Summary of Representation:

Supports site specific policies relating to existing sport and recreational facilities within the Broads area. Also believe that a generic policy should be included to cover any applications received for new sports facilities or changes of use relating to sports activities within the Broads

Broads Authority comment:

Comments noted and will be considered as the Preferred Options is produced.

Thomas, Mr P

Regarding indoor sports facilities, the Broads area is essentially an outdoor experience.

Whilst the provision of training facilities related to outdoor activities would clearly be of benefit (particularly with regard to teaching safety), gyms, squash courts and the like would be a distraction.

Broads Authority Officer Summary of Representation:

The Broads is an outdoor experience and provide of gyms etc would be a distraction.

Broads Authority comment:

This section of the Issues and Options relates to the existing venues that are operating in the Broads. It acknowledges how important they are to the local community.

These venues are already in place and a policy approach would seek to address any future changes to these sites. We do not consider these a distraction to the Broads, but realise that these facilities are important to locals.

27 Health and Wellbeing**Inland Waterways Association**

How can we design places for healthy lives? Option 2 providing a checklist for design, ideally one which is common across the UK. Work by NHS and others seems likely to produce the basis of such a checklist at some point in the future, and until then there is little to be gained by trying to create one without any evidence.

Broads Authority Officer Summary of Representation:

Option 2 providing a checklist for design, ideally one which is common across the UK.

Broads Authority comment:

Support for option 2 noted.

Norfolk County Council

Public Health

Response to question 2 – Public Health would like to see reference to the Broads as a health promoting environment in this section.

Health and Wellbeing (Section 27)

Public Health welcomes the consideration to the health status and well-being of the residents of the Broads Authority area and the inclusion of information on the wider determinants of health, such as the index of multiple deprivation in the opening statements. Public Health also welcome the inclusion of well-being within the three key themes and the attention to health and wellbeing in section 27.

In section 7 it is felt that there is an opportunity to promote the health and well-being benefits of the Broads and the connection to the natural environment, as evidenced by Newton (2007) Wellbeing and the Natural Environment, and by the RSPB report 'Natural Thinking (Bird 2007).

Response to Issue 33 – Public Health

Strongly support option two: designing places for healthy lives checklist. Norfolk County Council Public Health in collaboration with planning colleagues are continuing work on the shared engagement protocol and checklist for designing places for healthy lives. The commitment under 23.8, health assessment of the local plan, reflects this draft protocol.

Reference is made under 23.7 to the Norfolk 'HUDU' model. The draft shared engagement protocol includes a Norfolk model for estimating health infrastructure need.

Broads Authority Officer Summary of Representation:

1: Public Health would like to see reference to the Broads as a health promoting environment in this section.

2: Strongly support option two: designing places for healthy lives checklist.

Broads Authority comment:

1: This is acknowledged at section 23.4 of the Issues and Options.

2: Support for the checklist option noted.

28 Education**Inland Waterways Association**

Provision of Schools and education: Given that others do not see any need for extensions in the Broads area, there seems no need to consider creating opportunities for them in the local plan.

Broads Authority Officer Summary of Representation:

Given that others do not see any need for extensions in the Broads area, there seems no need to consider creating opportunities for them in the local plan.

Broads Authority comment:

Noted.

29 Waste and Minerals**Environment Agency**

We would support the adoption of an approach that seeks to promote the management of waste from development sites in accordance with the waste hierarchy.

Broads Authority Officer Summary of Representation:

We would support the adoption of an approach that seeks to promote the management of waste from development sites in accordance with the waste hierarchy.

Broads Authority comment:

Noted.

Inland Waterways Association

How to address waste in the Broads Local Plan: There seems no real requirement for this, and no policy seems a good position to adopt.

Broads Authority Officer Summary of Representation:

There seems no real requirement for this, and no policy seems a good position to adopt.

Broads Authority comment:

Noted, however this section includes snippets of the NPPG which says that Local Planning Authorities are expected to help deliver the waste hierarchy.

Norfolk County Council

Norfolk County Council in its capacity as the Mineral Planning Authority welcomes the inclusion of the references to mineral planning and mineral safeguarding within the Issues and Options document. In particular the reference that Norfolk County Council is the county planning authority for the Norfolk part of the Broads and that the Council's responsibilities include minerals and waste planning, is welcomed.

The Mineral Planning Authority will be conducting a review of the Local Development Scheme later in 2016, which will include revised dates for the review of the Minerals and Waste Local Plan.

Norfolk County Council in its capacity as the Mineral Planning Authority considers that in terms of mineral planning the Issues and Options document correctly address these issues in the context of the Broads Authority Executive Area.

Broads Authority Officer Summary of Representation:

and Waste Local Plan.

Norfolk County Council in its capacity as the Mineral Planning Authority considers that in terms of mineral planning the Issues and Options document correctly address these issues in the context of the Broads Authority Executive Area.

Broads Authority comment:

Support noted.

30 Safety by the Water

Inland Waterways Association

How should we consider safety by the water in the new Local Plan? It is important to provide reasonable safety systems and support for incidents around the water. This could be an unfamiliar hazard for visitors, and overfamiliar for young residents. Option 2 guidance should, if developed as experience dictates, be a valuable way of indicating what works and what does not, and ensuring that provision is adequate and maintained appropriately.

Broads Authority Officer Summary of Representation:

Option 2 guidance should, if developed as experience dictates, be a valuable way of indicating what works and what does not, and ensuring that provision is adequate and maintained appropriately.

Broads Authority comment:

Support for option 2 noted.

31 Developer Contributions/Planning Obligations

Environment Agency

Section 31: Developer Contributions/Planning Obligations

We would recommend that discussions should be held with partner organisations who are seeking to deliver actions across the area. This might include for example us and the Broadland Catchment Partnership. Through a coordinated approach, there may be opportunities for the measures required to make the development acceptable to also make a contribution to those actions.

Broads Authority Officer Summary of Representation:

We would recommend that discussions should be held with partner organisations who are seeking to deliver actions across the area.

Broads Authority comment:

EA to be contacted to clarify what is suggested.

Inland Waterways Association

S106 and CIL do have a role to play in building and maintaining a community rather than just a group of houses. IWA believes these should be used in part to provide and maintain moorings and staites, including provision of power and similar services. This should also include commuted sums for maintenance, unless the BA considers that these would not be eligible. These would form part of the 'greater good' facilities which normally come with roads, footpaths and similar which in the Broads are in part replaced by water navigations.

Broads Authority Officer Summary of Representation:

IWA believes these should be used in part to provide and maintain moorings and staites, including provision of power and similar services. This should also include commuted sums for maintenance, unless the BA considers that these would not be eligible.

Broads Authority comment:

Suggestions noted.

Norfolk County Council

The County Council welcomes the inclusion of the references to developer contributions from new development and the different mechanisms which will be used to secure funding. Public Health welcomes the inclusion of provision for health infrastructure under the priorities for developer contributions and would advise consultation with healthcare commissioners (Clinical Commissioning Groups and NHS England) in this regard.

Broads Authority Officer Summary of Representation:

General support.

Broads Authority comment:

Support noted.

River Thurne Tenants Association

What parish do you live in? Potter Heigham

What do you think developer money should be spent on in your community and why?

1. Footpaths along Weavers Way, enhancing the surface of the footpath.
2. Roundabout at the Post Office.
3. Enhancement works within the area of Potter Heigham Bridge.

Broads Authority Officer Summary of Representation:

1. Footpaths along Weavers Way, enhancing the surface of the footpath.
2. Roundabout at the Post Office.
3. Enhancement works within the area of Potter Heigham Bridge.

Broads Authority comment:

Suggestions noted and will be shared with Development Management Officers.

RSPB

The Authority needs to ensure that it receives sufficient funds from development to manage pressures on Natura 2000 and other designated sites. This includes monitoring the level of increased recreational use against predicted levels, monitoring to assess adverse impacts on the ecology of the sites and their designated features, and, if it becomes apparent that an LSE may occur on a Natura 2000 site, funding appropriate visitor control and management actions in order to prevent that LSE from occurring.

Broads Authority Officer Summary of Representation:

The Authority needs to ensure that it receives sufficient funds from development to manage pressures on Natura 2000 and other designated sites.

Broads Authority comment:

Noted.

32 Site-Specific Policies**Broadland District Council**

Thorpe Island - para 32.3

Issue 44 – how to address Thorpe Island Local Plan?

It is understood that the Planning Inspector allowed the mooring of up to 25 boats subject to a number of specific conditions. Also that the conditions were not complied with and that in January the permission lapsed. Furthermore, that this decision has been challenged and the outcome is expected imminently.

The consultation document only offers two options:

Option 1: to roll Policy from 1997 Local Plan or,

Option 2: A Refreshed criteria based policy –reflecting on recent decisions.

There may be potential for a third and fourth option which could potentially involve:

a) allocating the site as a Specific Policy as set in the planning permission or, b) based on the owners' proposal an alternative that should be considered.

Broads Authority Officer Summary of Representation:

There may be potential for a third and fourth option which could potentially involve:

a) allocating the site as a Specific Policy as set in the planning permission or, b) based on the owners' proposal an alternative that should be considered.

Broads Authority comment:

The additional options noted and will be considered as the Preferred Options is produced.

Environment Agency

32.4 Ferry Corner, Horning:

We would highlight that this site is partially impacted by Flood Zone 3; as such a flood risk assessment would be required for any application for a change of use. This would need to demonstrate that the proposal would be safe for its lifetime, having regard to climate change and the revised (increased) climate change allowances for fluvial flood risk.

32.5 Other sites:

All sites listed are subject to flood risk. For any proposed changes of use, as detailed above, an FRA would be required to demonstrate that the development would be safe for its lifetime taking into account the updated climate change allowances. Where new build development is proposed, it will also be subject to the requirements of the Sequential Test and Exception Test as appropriate.

Broads Authority Officer Summary of Representation:

1: We would highlight that this site is partially impacted by Flood Zone 3; as such a flood risk assessment would be required for any application for a change of use.

2: All sites listed are subject to flood risk. For any proposed changes of use, as detailed above, an FRA would be required to demonstrate that the development would be safe for its lifetime taking into account the updated climate change allowances.

Broads Authority comment:

1 and 2: advice noted and will be considered as this section of the Preferred Options is progressed.

Historic England

Issue 43: How do we protect the car parking area near Staithe and Willow?

This allocation relates to the allocation of the existing car park which was previously allocated as open space under existing sites allocation HOR2. This allocation falls within the conservation area and any future works to the car park would need to take account of the requirements of conservation law and policy. Ivy House (grade II) lies to the east and is unaffected by this allocation amendment.

Issue 44: How to address Thorpe Island in the Local Plan?

Historic England understands that Policy TSA2 as applies to Thorpe Island is the only saved policy of the 1997 Local Plan. The current legal case will be very relevant to the future planning status of Thorpe Island. The detail of the policy will be important when seeking to protect the relationship between the attractive wooded backdrop and the conservation area.

This site is located along the southern boundary of the Thorpe St Andrew conservation area. To the north and also within the conservation area a group of listed buildings sit between the River Yare and the Yarmouth Road, including Garden House (grade II*), the Kings Head Inn (grade II), the Town House Hotel (grade II), 18-20 Yarmouth Road (grade II), Walpole House (grade II*), the Manor House (grade II), Manor Cottage (grade II) and 10 Yarmouth Road (grade II).

Issue 45 Do we protect the live/work units at Ferry Corner through the Local Plan?

No historic environment issues appear to be raised by issue 45.

Other sites- noted as paragraph 32.5

Beccles Old Hotel site: This site is located on outskirts of the town and away from the conservation area to the north-east. No historic environment issues appear to be raised by this potential allocation.

Bridge Hotel Potter Heigham: It is difficult to determine if this site is within or outside the Potter Heigham conservation area. Should this be progressed the allocations would need to denote this site on a plan.

Little Precinct in Hoveton: No historic environment issues appear to be raised by this potential allocation. Wroxham Bridge (scheduled monument) is located to the south but by some distance and this historic asset would be unaffected by any upgrading work to this shopping precinct. If the land is to come forward for redevelopment

Historic England would require that consideration is given to the scheduled monument, to ensure its setting is protected.

Former Waterside Rooms at Hoveton: This site would appear to have potential to improve the surrounding townscape. This site does not appear to raise any issues involving the historic environment.

Former Loaves and Fishes pub at Beccles: This site falls within the northern edge of the Beccles conservation area. Any policy details that emerge here will need to consider this relationship. This will mean that any development has a neutral or enhancing effect upon the character and appearance of the conservation area.

Broads Authority Officer Summary of Representation:

1: Issue 43: This allocation falls within the conservation area and any future works to the car park would need to take account of the requirements of conservation law and policy. Ivy House (grade II) lies to the east and is unaffected by this allocation amendment.

2: Issue 44: This site is located along the southern boundary of the Thorpe St Andrew conservation area. To the north and also within the conservation area a group of listed buildings sit between the River Yare and the Yarmouth Road, including Garden House (grade II*), the Kings Head Inn (grade II), the Town House Hotel (grade II), 18-20 Yarmouth Road (grade II), Walpole House (grade II*), the Manor House (grade II), Manor Cottage (grade II) and 10 Yarmouth Road (grade II).

3: No historic environment issues appear to be raised by issue 45.

4: Other sites

Beccles Old Hotel site: No historic environment issues appear to be raised by this potential allocation.

Bridge Hotel Potter Heigham: It is difficult to determine if this site is within or outside the Potter Heigham conservation area.

Little Precinct in Hoveton: No historic environment issues appear to be raised by this potential allocation. Wroxham Bridge (scheduled monument) is located to the south but by some distance and this historic asset would be unaffected by any upgrading work to this shopping precinct. If the land is to come forward for redevelopment

Historic England would require that consideration is given to the scheduled monument, to ensure its setting is protected.

Former Waterside Rooms at Hoveton: This site would appear to have potential to improve the surrounding townscape. This site does not appear to raise any issues involving the historic environment.

Former Loaves and Fishes pub at Beccles: This site falls within the northern edge of the Beccles conservation area. Any policy details that emerge here will need to consider this relationship. This will mean that any development has a neutral or enhancing effect upon the character and appearance of the conservation area.

Broads Authority comment:

Information noted and will inform the Preferred Options

River Thurne Tenants Association

What do you think about the Bridge Hotel Site at Potter Heigham? What could it be used for?

Please see above. We feel that this is an area that is wasted and should be developed. The difficulty is that it is privately owned. No improvements have been made to the site in approximately 20 years. It is at present used as temporary car parking for holiday makers hiring bungalows and for owners of riverside bungalows, fisherman and contractors working on the riverside properties. A pleasant, thoughtful and well designed space/area, respectful of this unique site next to an ancient monument would greatly enhance this part of the Broads. We would value this as a riverside community.

Are there any other sites in the Broads that you think we should specifically look at through the Local Plan and what could they be used for?

We think that you could look at the Broads Haven Tavern Site which is in danger of becoming derelict. As a public house it has a history of failure, it now has new owners who are considering the future of the business. The Broads Authority should do all it can to assist a long term use of this facility, either as a functioning Public House or an imaginative design let solution that will enable this important site, again next to the Ancient monument, to be used by the public, residents and visitors to the area.

Broads Authority Officer Summary of Representation:

1: Feel that the Bridge Hotel Site at Potter Heigham is an area that is wasted and should be developed. A pleasant, thoughtful and well designed space/area, respectful of this unique site next to an ancient monument would greatly enhance this part of the Broads.

2: Could look at the Broads Haven Tavern Site which is in danger of becoming derelict. The Broads Authority should do all it can to assist a long term use of this facility.

Broads Authority comment:

1: We understand the strength of feeling of the RTTA following a recent meeting with representatives. We will look into ways of seeking improvements to the area as the Preferred Options is produced.

2: This area could be looked into with Potter Heigham Bridge area.

Inland Waterways Association

Site Specific Policies for the local plan: In general, any site specific plans need to protect adjacent navigation by traditional yachts and wherries by designing buildings and structures so they do not cause wind shadows or turbulence.

Protecting the car parking area near Staithe and Willow: Protecting the car park in the same way as that in Site Specific Policy HOR2 seems sensible.

How to address Thorpe Island in the Local Plan? Based on IWA's limited understanding of the various discussions and legal action over this, a revised criteria-based policy seems a good way of learning from the exercise and moving forward, for all concerned.

Protecting the live/work units at Ferry Corner through the Local Plan and how? Option 3 mixed use of the development seems a sensible site specific alteration to accommodate the extension of uses of the site.

Other sites: IWA does not have any views on these other sites.

Broads Authority Officer Summary of Representation:

- 1: In general, any site specific plans need to protect adjacent navigation by traditional yachts and wherries by designing buildings and structures so they do not cause wind shadows or turbulence.
- 2: Protecting the car parking area near Staithe and Willow: Protecting the car park in the same way as that in Site Specific Policy HOR2 seems sensible.
- 3: How to address Thorpe Island in the Local Plan? A revised criteria-based policy seems a good way of learning from the exercise and moving forward, for all concerned.
- 4: Protecting the live/work units at Ferry Corner through the Local Plan and how? Option 3 mixed use of the development seems a sensible site specific alteration to accommodate the extension of uses of the site.

Broads Authority comment:

Comments on the sites noted and will be considered as the Preferred Options of the Local Plan is produced.

Crime

Norfolk Constabulary

Expertise in crime prevention processes, products and criminal methodology helps the police fight crime, protect properties, businesses and visitors from unnecessary loss. We recommend the Broads Plan includes the security principles of deterring, delaying, denying and detecting criminal activity. Designing in good security processes with developers and builders at the outset is essential to combat criminality and its consequences.

As a result of considering the strategic priorities and spatial planning policies for the management of the Broads please consider the following comments in parallel to ongoing proactive policing activity/initiatives across the Broads area:

- The adoption of CPTED (Crime Prevention Through Environmental Design) principles in building design and development across the Broads National Park. This would help protect new dwellings, existing buildings, commercial developments from loss
- With a significant number of architectural and historical sites in the Broads National Park, CPTED will also help safeguard cultural heritage, which remains high on the list for protection Access to the countryside and local amenity areas must be balanced by the potential for the criminal to use the same highways & byways to commit crime and escape detection. Unnecessary pedestrian and vehicular permeability should be reconsidered or removed
- Communal areas (including public open spaces) & leisure facilities should be assessed to prevent the occurrence of anti-social behaviour
- Secure boundary treatments should be considered proportionate to criminal statistics and not solely aesthetic considerations
- Suitable security lighting provides safety for occupiers and visitors, reduces the fear of crime (Secured by Design, New Homes 2014) and is a significant deterrent for the criminal, who seeks to avoid being seen
- Ongoing vigilance, effective natural surveillance and speedy reporting of emergency, urgent or suspicious activity will benefit all who live, work and visit the Broads National Park

The promotion of CPTED principles and practices will be a significant step towards protecting the wonder and heritage of the Broads National Park, for future generations to use and enjoy.

Broads Authority Officer Summary of Representation:

- 1: We recommend the Broads Plan includes the security principles of deterring, delaying, denying and detecting criminal activity. Designing in good security processes with developers and builders at the outset is essential to combat criminality and its consequences.
- 2: The adoption of CPTED (Crime Prevention Through Environmental Design) principles in building design and development across the Broads National Park. The promotion of CPTED principles and practices will be a significant step towards protecting the wonder and heritage of the Broads National Park, for future generations to use and enjoy.
- 3: Unnecessary pedestrian and vehicular permeability should be reconsidered or removed
- 4: Communal areas (including public open spaces) & leisure facilities should be assessed to prevent the occurrence of anti-social behaviour
- 5: Secure boundary treatments should be considered proportionate to criminal statistics and not solely aesthetic considerations
- 6: Suitable security lighting provides safety for occupiers and visitors, reduces the fear of crime (Secured by Design, New Homes 2014) and is a significant deterrent for the criminal, who seeks to avoid being seen
- 7: Ongoing vigilance, effective natural surveillance and speedy reporting of emergency, urgent or suspicious activity will benefit all who live, work and visit the Broads National Park

Broads Authority comment:

- 1 and 2: These principles could be included in a future reviewed design policy.
 - 3, 4, 5: Noted and will be considered as allocations are worked up.
 - 6: Noted. Whilst the Authority may address light pollution, this does not necessarily mean that lighting should not be installed. It is about the design of the lighting.
 - 7: Noted, although there is limited scope to address this in the Local Plan as it is more of an education theme.
-

General comment**Environment Agency**

Thank you for consulting us on this stage of the new Local Plan, which we have found to be generally comprehensive in its coverage of issues, and establishes a good basis for preparing the final Plan. We have reviewed the document and have provided comments below, grouped in accordance with the sections of the Issues and Options consultation document. We would welcome the opportunity for on-going engagement as the Plan progresses.

Broads Authority Officer Summary of Representation:

General introduction to their response.

Broads Authority comment:

Noted.

Great Yarmouth Borough Council

The Borough Council congratulates the Broads Authority on its clear, nicely presented and seemingly comprehensive consultation document, and is supportive of the generality of it. The Borough Council's officers offer the following specific comments (in the order presented of the consultation document), and would be happy to discuss any of these if it would be helpful.

Broads Authority Officer Summary of Representation:

General introduction to their comments.

Broads Authority comment:

Noted.

Health and Safety Executive

Thank you for your request to provide a representation on the Broads Authority Public Consultations: Broads Plan and Broads Local Plan consultation document. When consulted on land use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved. We have concluded that we have no representation to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed. In the absence of this information, HSE is unable to give advice regarding the compatibility of future developments within the consultation zones of major hazard establishments and MAHPs located in the area of your local plan.

Broads Authority Officer Summary of Representation:

We have concluded that we have no representation to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed.

Broads Authority comment:

Noted. The Preferred Options document will have more detail in.

Historic England

Historic England has published a number of Good Practice Advice Notes which you may find useful in developing your local plan. In addition to the reference to GPA 1-3 in the documents, we would particularly highlight: Advice Note 3 - site allocations in local plans <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>.

As a general comment, we find the consultation plan well-presented and accessible. Our specific comments on the issues and options follow.

Broads Authority Officer Summary of Representation:

Refers to advice notes and that the consultation plan is well presented and accessible.

Broads Authority comment:

Advice notes noted. Compliments noted.

Marine Management Organisation

After Review of the consultation draft it highlighted that there are references to the East Marine Plan and Marine Policy Statement. It is recommended that these references should be maintained within the final plan.

As most of the Broads are at or below sea level there is the potential for them to be highly influenced by marine processes. Therefore, decisions taken in relation to activities and development within the Broads will be capable of affecting the UK marine area and should consider the East Marine Plan. Specific East Marine Plan policies of note given the nature of the Boards and the activities occurring there are BIO1 and BIO2 (biodiversity protection and enhancement potential), CC1 (climate change), FISH 2 (protection of fish spawning and nursery areas), SOC2 (maintaining access to the coast for wellbeing), SOC3 (terrestrial and marine character consideration), TR2 (maintaining recreation boating routes), TR3 (promoting sustainable tourism) and PS2 (maintaining shipping channels).

We advise that East Cambridgeshire provides details of how the East marine plans and policies directly relate to your local plan.

Broads Authority Officer Summary of Representation:

Decisions taken in relation to activities and development within the Broads will be capable of affecting the UK marine area and should consider the East Marine Plan.

Specific East Marine Plan policies of note given the nature of the Boards and the activities occurring there are BIO1 and BIO2 (biodiversity protection and enhancement potential), CC1 (climate change), FISH 2 (protection of fish spawning and nursery areas), SOC2 (maintaining access to the coast for wellbeing), SOC3 (terrestrial and marine character consideration), TR2 (maintaining recreation boating routes), TR3 (promoting sustainable tourism) and PS2 (maintaining shipping channels).

Broads Authority comment:

Comment noted. Further liaison with the MMO could be of benefit to the Local Plan.

Norfolk County Council

The County Council welcomes the opportunity to comment on the above Local Plan Issues and Options document. The County Council has not answered all the issues set out in the consultation document, but has instead concentrated on responding to the key strategic issues effecting the Authority in respect of its:

- Infrastructure delivery role
- Minerals and Waste Authority responsibility - ensuring that County Council policies and projects are not compromised;
- Economic Development role
- Delivery of Green Infrastructure.

Broads Authority Officer Summary of Representation:

NCC have concentrated on some certain issues.

Broads Authority comment:

Approach noted.

Residential Boat Owners Association

The RBOA's remit is exclusively for residential boat owners, and the Committee feels that it would only be appropriate to address those areas of the Local Plan Consultation that have direct relevance to such home owners. To that end all the comments are addressed under the references in the whole Local Plan as found on the Broads Authority website.

Broads Authority Officer Summary of Representation:

Sets out how the RBOA have responded to the consultation.

Broads Authority comment:

Approach noted.

Appendices

Natural England

Comments on the Broads Local Plan form: Summary questionnaire, Call for Areas of Tranquillity, Call for Areas Suitable for Residential Moorings and Call for Areas of Local Green Space: We have no comments to make on these documents.

Broads Authority Officer Summary of Representation:

Comments on the Broads Local Plan form: Summary questionnaire, Call for Areas of Tranquillity, Call for Areas Suitable for Residential Moorings and Call for Areas of Local Green Space: We have no comments to make on these documents.

Broads Authority comment:

Noted.

Great Yarmouth Borough Council

The maps in Appendix A (and the similar maps used elsewhere in the document) misrepresent the Broads population they are intend to characterise, and are based on a fundamental methodological error.

In each of the areas by which the indices of deprivation are mapped, the Broads population (if any) is only a tiny fraction of the total. The Broads population's characteristics are obscured by the prevalence of the very different types of populations outside the Broads which, in most cases, comprise the vast majority of the population being measured and indicated by area.

The population of the Broads has been shown by work undertaken by the Broads Authority itself, based on that Census data which is available specifically for the Broads Area, to be distinct from that of the wider county. It is very predominantly elderly, well educated, having high levels of car ownership, home ownership, outright home ownership, and with a large proportion of retirees but with a substantial proportion of those who are in work in higher employment groups. These characteristics can be taken to indicate low levels of deprivation.

There is also no observable evidence on the ground that the population within the Broads varies in the way the maps appear to indicate.

Broads Authority Officer Summary of Representation:

The maps in Appendix A (and the similar maps used elsewhere in the document) misrepresent the Broads population they are intended to characterise, and are based on a fundamental methodological error.

Broads Authority comment:

Concern noted. Acknowledge that a Super Output Area does not fall entirely within the Broads Executive Area.

We do have data that shows how many dwellings of a Super Output Area is within the Broads and how many are outside of the Broads. In the deprivation topic paper, this information could be included to give some clarity in this issue.

These are the best maps we have to show deprivation in the Broads, but we note the concern of GYBC.

H E Hipperson Ltd

Appendix F - Residential Moorings

Suggestions of locations for 4 residential moorings at H E Hipperson Ltd, Gillingham Dam, Beccles.

Broads Authority Officer Summary of Representation:

Suggestions of locations for 4 residential moorings at H E Hipperson Ltd, Gillingham Dam, Beccles.

Broads Authority comment:

Forms completed and will be assessed separately to this consultation database.

Sustainability Appraisal

Natural England

Natural England are satisfied that the methodology and baseline information used to inform the appraisal appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. We welcome that there is an objective to protect and enhance the natural environment, including biodiversity, geodiversity and landscape. We have no further comments to make at this stage but look forward to advising further on the SA as the plan evolves.

Broads Authority Officer Summary of Representation:

General support to the methodology and baseline of the SA.

Broads Authority comment:

Support noted.

Historic England

Historic England welcomes in principle the SA Objectives; 'To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.' and 'to improve education and skills including those related to local traditional industries'.

The planning authority have responded to previous comments as raised by Historic England when at the scoping stage and as,

- (1) To take account of Historic England guidance on Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment,
- (2) To take into account enhancements with the revision 'The process will seek to minimise any negative impacts but also seek to maximise any positive impacts'
- (3) To convene an expert group to include the Council's heritage officer
- (4) That baseline data will include numbers of heritage assets
- (5) To take into account the status and content of the PPS5 Practice Guide.
- (6) To progress a discussion of SA objectives with further dialogue with Historic England in January 2015.

We now note that PPS5 Practice Guide has been superseded by National Planning Policy Guidance, Good Practice Guidance Notes (as produced by Historic England on behalf of the sector) and Advice Notes (as produced by Historic England).

We now note SA objective ENV4: To conserve and enhance the quality and focal distinctiveness of landscapes and towns and villages and ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings. These are in response to our previous comments at scoping stage. Historic England welcomes this additional detail.

The reporting of positive and negative significant environmental effects is relatively easy to follow in the assessment of options, with SA objectives plotted against the options. As the document is taken forward we would welcome additional commentary in explanatory script at the bottom of each option. This will assist in orientation of the issues and it may be preferable that each SA objective is given a title as well, which can be added to the assessment tables. For example ENV9 would be 'cultural and heritage assets or simply heritage assets'. This would reflect the specific meaning within the NPPF of heritage assets and the historic environment.

Where a question mark is denoted (unknown impact on SA objective), additional commentary in explanation of this uncertain outcome would be welcomed as the evaluation of options progresses.

The further development of issue 10 is to be supported in the production of a positive strategy for the conservation and enhancement of the historic environment. (Issue 10: How can the Local Plan address interpretation of the historic environment and culture in the Broads?)

Issue 43 | 44 | 45 relate to site allocations and we comment separately on these. We note that issue 44 at Thorpe Island has an unknown impact on SA objectives as they affect ENV 4 and ENV 9. The implications for the conservation area and nearby listed buildings will be the subject of further appraisal.

The current issues and options consultation includes other potential site allocations in addition to issues 43 | 44 and 45 and will be included in the SA as it progresses.

The baseline (appendix 4) reports at (g) Conservation Area Appraisals Reviewed and the number of Listed Buildings at Risk, plotted from 2011 to 2015. This level of detail is supported. We support the inclusion of Heritage Counts in the literature review.

Broads Authority Officer Summary of Representation:

- 1: We now note that PPS5 Practice Guide has been superseded by National Planning Policy Guidance, Good Practice Guidance Notes (as produced by Historic England on behalf of the sector) and Advice Notes (as produced by Historic England).
- 2: We now note SA objective ENV4 and ENV9. These are in response to our previous comments at scoping stage. Historic England welcomes this additional detail.
- 3: As the document is taken forward we would welcome additional commentary in explanatory script at the bottom of each option.
- 4: Where a question mark is denoted (unknown impact on SA objective), additional commentary in explanation of this uncertain outcome would be welcomed as the evaluation of options progresses.

Broads Authority comment:

- 1: Noted.
- 2: Support noted
- 3: This will of course be done as there will be policy wording to assess.

4: We do this in the interim SA under each table if required.

Habitat Regulations Assessment

Natural England

Natural England welcomes that a commitment is made to carry out HRAs on subsequent versions of the Plan (pg. 5). We advise that this is crucial to ensure the Plan will not adversely affect the integrity of European designated sites and look forward to being consulted on these in due course.

Broads Authority Officer Summary of Representation:

Natural England welcomes that a commitment is made to carry out HRAs on subsequent versions of the Plan (pg. 5)

Broads Authority comment:

HRA will be undertaken as the Preferred Options and later stages of the Local Plan are produced.

RSPB

In general, we agree that the Plan correctly identifies and considers some major areas of concern for the environmental conservation of the Broads, and the Authority's commitment to halt and reverse the decline in species and habitats. The environment within the Broads is recognised, legally and otherwise, to be an important and sensitive area for a number of habitats and species. The risks to habitats and species posed by development, water abstraction, tourism etc. which have been identified in the Plan should be of the highest consideration when deciding which options will be preferred. This is necessary given the intrinsic link with other qualities of the Broads (e.g. landscape and recreation) that make The Broads such an attraction for residents and visitors.

We note the inclusion of an Interim Sustainability Appraisal, and the intention to carry out a Habitats Regulations Assessment (HRA), at the Preferred Options stage. We note that it would have been possible to carry out a HRA on the various options available at this stage, and this would have helped in forming an opinion as to which should be the correct option to pursue. However, we acknowledge that there was no specific requirement to undertake this assessment at the Issues and Options stage.

Many of the issues raised by the option choices in the draft Local Plan are covered under the HRAs for the Broads Plan and the Sustainable Tourism in the Broads 2016-20 document. We agree with many of the conclusions drawn in those HRAs and would expect the Authority to be cognisant of those when deciding which options to pursue in the future Local Plan Preferred Options document.

Having reviewed the draft Local Plan, we have concerns that it currently lacks a map showing the locations of protected sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs) etc. This should be included, together with an explanation of their important features, legal protection and vulnerabilities. The lack of map, and lack of discussion of these sites or inclusion of them as named areas, causes concern that these sites are not being accorded their required importance. In this instance there has been a missed opportunity to provide information to members of the public with information regarding the importance of the sites, and a context to provide realistic aspirations for a variety of activities they may wish to recommend. We would suggest that future iterations of this document include such information.

We look forward to the publication of the Recreational Impact Study that is currently being undertaken, and which is due in Spring/Summer 2016. This should provide an indication of the vulnerability of Natura 2000 sites to increased recreational pressure and provide a baseline understanding to inform the future HRA. It may also influence the options that the Broads Authority choose to take forward at the Preferred Options stage.

Broads Authority Officer Summary of Representation:

1: In general, we agree that the Plan correctly identifies and considers some major areas of concern for the environmental conservation of the Broads, and the Authority's commitment to halt and reverse the decline in species and habitats. The risks to habitats and species posed by development, water abstraction, tourism etc. which have been identified in the Plan should be of the highest consideration when deciding which options will be preferred.

2: We note that it would have been possible to carry out a HRA on the various options available at this stage, and this would have helped in forming an opinion as to which should be the correct option to pursue. However, we acknowledge that there was no specific requirement to undertake this assessment at the Issues and Options stage. Many of the issues raised by the option choices in the draft Local Plan are covered under the HRAs for the Broads Plan and the Sustainable Tourism in the Broads 2016-20 document. We agree with many of the conclusions drawn in those HRAs and would expect the Authority to be cognisant of those when deciding which options to pursue in the future Local Plan Preferred Options document.

3: Having reviewed the draft Local Plan, we have concerns that it currently lacks a map showing the locations of protected sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs) etc. The lack of map, and lack of discussion of these sites or inclusion of them as named areas, causes concern that these sites are not being accorded their required importance. We would suggest that future iterations of this document include such information.

4: We look forward to the publication of the Recreational Impact Study that is currently being undertaken, and which is due in Spring/Summer 2016. This should provide an indication of the vulnerability of Natura 2000 sites to increased recreational pressure and provide a baseline understanding to inform the future HRA. It may also influence the options that the Broads Authority choose to take forward at the Preferred Options stage.

Broads Authority comment:

1: support noted.

2: As RSPB state there is no requirement to undertake a HRA and it would have added significantly to the extra cost of producing the HRA.

3: Noted. Whilst there is no specific chapter or map showing the designated sites, we disagree with the RSPB's interpretation that this means the sites are not being given their required recognition. This will be considered as the Preferred Options is produced.

4: Noted.

RSPB

As above, we expect options to be chosen with full regard for the impact on species and biodiversity, whether impacting upon a statutorily designated site or not. We look forward to the Preferred Options version of the Local Plan, and accompanying HRA, and anticipate commenting further at that stage.

Broads Authority Officer Summary of Representation:

Expect options to be chosen with full regard for the impact on species and biodiversity, whether impacting upon a statutorily designated site or not. We look forward to the Preferred Options version of the Local Plan, and accompanying HRA, and anticipate commenting further at that stage.

Broads Authority comment:

Noted.
