

Date: 26 September 2025
Enquiries to: Georgia Teague



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Dear Natalie Beal,

Broads Authority Local Plan Regulation 19 Consultation - Submission

Thank you for consulting Suffolk County Council (SCC) on the Broads Local Plan at Regulation 19 Submission Stage.

This letter will set out where there may be issues which make the plan unsound, as set out in paragraph 36 of the NPPF. SCC wish to be constructive and considers that the plan can be made sound and will provide support to do so where necessary. Please note that the main focus of our comments will be on Suffolk and not Norfolk.

Where amendments to the plan are recommended, deleted text will be in ~~strikethrough~~ and added text will be in *italics*.

General

SCC would suggest that it would be easier to read and navigate this local plan if there were paragraph numbers for the supporting text.

Section 6: Policy Context

It is noted that the plan produced by Suffolk County Council, the "Suffolk Minerals and Waste Local Plan 2020" is not acknowledged directly in main text of the Regulation 19 draft document nor are there any specific mention of maps or policies from the plan relating to the minerals safeguarding (Notably the 'safeguarding and proposals map' and the policy 'MP10: Minerals safeguarding'.

However, the Minerals and Waste Local Plan and its safeguarding requirements are mentioned and assessed as part of the site assessment policies in the Regulation 19 draft document (for example Policy PUBOUL1: Boathouse Lane Leisure Plots).

Therefore, it would be best practice to list and acknowledge the Suffolk Minerals and Waste Local Plan 2020 and its safeguarding maps and policies in the main body of the document in 'Section 6 – Policy context'. This would ensure that the plan is positively prepared.

Development Management Policies

Policy PUBDM1: Major Development in the Broads

Point 3 outlines what proposals for major development need to demonstrate but makes no reference to highway impacts. It may be considered that this is covered through sub-point 'f'; however, the policy could be clearer in the need to ensure highway impacts are suitably assessed and suitable mitigation is delivered to prevent a severe cumulative impact on the highway network and/or unacceptable impacts on highway safety, in accordance with NPPF paragraph 115 part d).

PUBDM3: Pollution and Hazards in development and protecting environmental quality

SCC suggests the following added text, to be in line with NPPF paragraph 182:

This includes the design of Sustainable Drainage Systems (SuDS) *which should comply with the CIRIA pollution assessment best practices.*

Policy PUBDM8: Development and flood risk

For supporting text 'SuDS' page 73, SCC would suggest the following added text, to be in line with NPPF paragraph 182:

There is a range of possible SuDS techniques that can be used, although not all techniques will be appropriate for individual development sites *but a preference should be given to green, open features such as raingardens, tree pits, conveyance swales, and green/blue roofs.*

PUBDM9: Surface water run-off

SCC as the LLFA would recommend that point b) should be above point a). Water reuse is the highest form of capture and should be prioritised. New Government non-technical statutory guidance reinforces this.

Suggested rewording for point 2:

The surface water runoff rate that will occur as a consequence of the development is required to be no more than the existing pre-development greenfield runoff rate. *In the first instance, brownfield sites should aim to match the greenfield discharge rate to provide betterment, should this not be achievable the applicant should seek to significantly improve upon existing discharge rate.* The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant, sewerage undertaker.

Suggested rewording for point 3:

Sustainable Drainage Systems (SuDS) shall always be used. These should be designed and implemented to be multifunction and follow the general principles set out at Appendix 9 as well as any relevant guidance or standards that are in place such as Lead Local Flood Authority guidance on drainage design.

99.9% of sites that say they cannot provide a SuDS solution is because of bad engineering and planning, not because a SuDS systems is not feasible. This point should not offer an 'out' to excuse bad site planning.

Policy PUBDM10: Open space on land, play space, sports fields and allotments

SCC particularly support part 2) part f) - engaging children for green/play spaces. It is suggested to have considerations for children with disabilities and also spaces for girls (i.e. not just skateparks). This would help the plan to meet wider population needs.

Policy PUBDM11: Green and blue infrastructure and Public Rights of Way

This policy is very welcomed as it highlights the importance of green access networks in enhancing people's physical and mental wellbeing and providing necessary access options. This policy could be strengthened in recognising the role the PRow network plays in linking people to services, employment and facilities as well as green destinations by offering sustainable travel options. It is noted that such references have been made elsewhere in the plan, especially on page 162 regarding active travel.

Policy PUBDM16: Biodiversity Net Gain

SCC welcome the ambition to delivery 20% BNG, above and beyond the 10 % requirement set out in the Environment Act, and detail and Topic Paper justifying this policy.

SCC would draw attention to paragraph 4 which states that:

“Exempted developments must achieve no net loss of biodiversity. They will be required to provide biodiversity enhancements (see the Natural Environment policy (PUBDM15))”

SCC queries how it is expected that developers will demonstrate that exempted developments will “achieve no net loss”. For this to be achievable, it must be quantifiable and would require the developer to undertake a BNG metric on the site to show that the “biodiversity enhancements” are achieving a certain amount of net gain to offer the development and result in “no let loss”.

SCC would suggest the following replacement paragraph:

4. Developments exempt from the Biodiversity Net Gain (BNG) under the Environment Act 2021 will still be required to adequately assess any biodiversity loss and ensure this loss is adequately addressed and compensated through “biodiversity enhancements” (PUBDM15).

As currently written, this policy is not considered sound as it is not clear and unambiguous, in line with NPPF paragraph 16 part 6).

Policy PUBDM25: Utilities infrastructure development

SCC raises concerns that part 1 part c) might not always be achievable, given that in Part 1.a) this already refers to proposals which have an essential role in the provision of a regional and national network. SCC would recommend the following minor addition:

c) There is no significant adverse impact on the character of the locality, the wider landscape, character and significance of the historic environment and the amenity of neighbours.

Policy PUBDM28: Light pollution, dark skies and nocturnal character

Part 5 of the supporting text to this policy on page 156 includes to the lowest Correlated Colour Temperature (CCT). It is suggested that this also be incorporated into the policy directly.

Policy PUBDM30: Recreation facilities parking areas

SCC suggests the following additional text, to be in line with NPPF paragraph 182:

iii) High quality design of surface, landscaping and boundary treatments including to address management of water (run off and avoiding pollution) and integration of high-quality SuDS features

Policy PUBDM29: Transport, highways and access

For section 3 of the policy, Transport Assessments and Transport Statements (3): it should be clear that the Transport Assessment or Statement should be “multi-modal”, meaning it considers all modes of travel to ensure that sustainable and active travel objectives are at the centre of the assessment. This would feed in well to Points 4 and 5, which detail importance of travel plan measures.

To encourage sustainable travel, as per Chapter 9 of the NPPF, and thus achieve sustainable development.

Policy PUBDM30: Recreation facilities parking areas

SCC notes that in the supporting text there is a typo on page 168, which SCC would suggest amending as follows:

The Authority expects proposals to include an appropriate number of disabled parking spaces.

Policy PUBDM44: Residential development within defined Development Boundaries

The policy states “New residential development will only be permitted within defined development boundaries and must comply with other policies of the Development Plan”. However on the map supporting this policy, the red line boundaries for Oulton part 3) a) (and the other sites but is our focus as Oulton is in Suffolk) are very tightly drawn, and SCC believe that it would be hard to input any housing in here, even infill.

Policy PUBDM48: Elderly and specialist needs housing

SCC welcomes this policy, which currently focuses on “Elderly and Specialist Needs Housing”. SCC would suggest that the policy could advocate for a broader scope that includes housing to meet the needs of diverse population groups, e.g. ageing population, those with physical and/or mental disabilities and accommodation for children and young people.

It is suggested to add in reference to M4(2) and M4(3) housing, which would meet the needs of not only an ageing population but also those with disabilities, as per NPPF Paragraph 63.

Policy PUBDM49: Residential ancillary accommodation,

SCC suggest considering adding reference for these dwellings to be adaptable and accessible to meet a wider range of occupants needs, i.e., built to M4(2) and/or M4(3) standards. This would help the plan to help meet the needs of a wider population, as per NPPF Paragraph 63.

Policy PUBDM51: Custom/self-build

SCC notes what appears to be a minor formatting error in part g), where there are ellipsis and the end of the point and at the start of following segment.

Policy PUBDM52: Design

SCC would recommend for part f) to insert "secure" storage of bicycles.

SCC strongly supports part i) requiring M4(2) standards for all new dwellings, although it is considered that the M4(3) requirements for affordable dwellings could be higher. Oftentimes, the need for affordable housing and disabilities go hand-in-hand.

In the supporting text, SCC notes that the RTPi Dementia link is broken.

Please try: <https://www.rtpi.org.uk/media/t0nb4xfz/dementiapracticeadvice4pagesummary2017.pdf> or <https://www.rtpi.org.uk/new-from-the-rtpi/dementia-and-town-planning/>

Policy PUBDM54: Heat resilient design

SCC is supportive of this policy. A minor query: the diagram displays up to the year 2020, but the text above states to 2018.

Policy PUBDM59: Designing places for healthy lives

The policy states under point 2a): ‘For developments of over 50 dwellings, developments of fewer than 50 dwellings but which are deemed to impact health services potentially significantly, development that includes care homes, housing for the elderly, or student accommodation and development that involves the significant loss of public open space, the Norfolk and Waveney Health Protocol shall apply”.

It is noted that the term ‘the Norfolk and Waveney Health Protocol, may have been used in error. The following Paragraph ‘Delivery and implementation of the policy’ refers instead to the ‘Planning in Health Protocol’. It is suggested that the text is changed for consistency.

There are two further instances in Appendix 12 where the term ‘Norfolk and Waveney Health Protocol’ is used, and one reference of ‘Norfolk Health Protocol checklist’. These may also need to be updated to ‘Planning in Health Protocol’ for accuracy and consistency.

To improve usability, it is recommended that the implementation details of the Policy are separated under clear subheadings:

- Add ‘2a’ beneath the heading ‘Delivery and Implementation of the Policy’.
- Replace the current wording ‘The threshold of this policy is all new housing, commercial and recreational development’ with a new sub-heading ‘2b’.

Public Health recommend strengthening the following sentences:

- ‘...although if the threshold for undertaking the Planning in Health Protocol is met, then that will take precedence.’
- All new housing, commercial and recreational development are required to produce a statement saying how their proposal addresses supports and promotes:

The penultimate paragraph currently feels disjointed, it introduces the Sport England guidance immediately after a summary of Small Sites Checklist requirements and before the closing text. Given the range of relevant local and national policies on healthy placemaking, it may be more effective to:

- Relocate the Sport England reference (and similar resources) to an Appendix or dedicated guidance section, or
- Group them under a short sub heading within the main text (e.g. ‘*Further Guidance and Resources*’).

recommended amendments for clarity and accuracy.

Strategic Policies

PUBSP2: Strategic flood risk policy

SCC suggest the following added text, in line with NPPF paragraph 182:

5. Preference should be made towards high quality, green open SuDS features over less sustainable solutions such as attenuation crates.

Policy PUBSP5: Biodiversity

Part e) appears to refer to mitigation hierarchy (without saying as much) but stops short of requiring compensation for unmitigable adverse impacts and effects, as does the justification. (Policy PUBDM15: Natural Environment does address this in part c))

PUBSP5 further only talks about mitigating 'significant' effects. SCC consider that, while potential 'significant effects' should be mitigated to be reduced to 'non-significant', this should not mean that 'non-significant' effects need no mitigation.

Policy PUBSP8: Accessibility and Transport

Part (2): it could be clearer that the development impacts on the highway network need to be suitably assessed to prevent a severe cumulative impact on the highway network and/or unacceptable impacts on highway safety, contrary to Paragraph 116 of the NPPF. Furthermore, it could be clear that safe and suitable access is required for all, in accordance with paragraph 115 of the NPPF.

part (6): it could be clearer that development should give priority first to pedestrian and cycle movements and second to public transport, in accordance with Paragraph 117 of the NPPF. It is noted that this is outlined within Policy PUBDM29 (point 1).

SCC welcomes the reference to the Suffolk Local Transport Plan in the supporting text. Please note that the Suffolk Local Cycling & Walking Infrastructure Plan has been updated from 2021 to 2024, and can be found here: <https://storymaps.arcgis.com/stories/4b0713ff2b1049e19ffb896c47898fda>

Site Specific / Allocation Policies

Page 214 in section 30.1 states "No sites for residential dwellings are allocated in the Local Plan", however policy PUBSP15 then states that there are residential site allocations in the plan in part 7) a) of the policy. SCC considers that the plan is unsound as currently written, and thus further clarity is required here, as per paragraph 16 part d) of the NPPF which requires policies to be clear and unambiguous.

Policy PUBOUL1: Boathouse Lane Leisure Plots

SCC raises no objection to this policy. We note the reference to the Suffolk Minerals & Waste Local Plan in the supporting text on page 355.

Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site

SCC notes that this allocation is a "carry-over" from the previous Broads Local Plan.

SCC raises a query regarding timelines: the supporting text states that planning permission was granted in 2012, however planning application reference BA/2012/0271/FUL (found in footnote 175) states planning committee & site visit took place in April 2013¹. According to SCC records, SCC were consulted in Dec 2012, and the S106 was signed and sealed in 2014.

Therefore, SCC would recommend the review of the supporting text of this policy for accuracy.

It also queried what is meant by "optionally housing", as planning permission has been granted for 76 market dwellings, and the final section of the supporting text sets out the estimated phasing and timings of housing to come forwards, which indicates that there are residential allocations for housing taking place. Therefore, as currently written, this policy is not considered sound and clarity is sought to make the policy clear and unambiguous, in line with NPPF paragraph 16 part d).

¹ https://www.broads-authority.gov.uk/_data/assets/pdf_file/0014/109130/BA20120271FUL-Pegasus-Boatyard-Caldecott-Road-Oulton-Broad-Lowestoft-pc260413.pdf

Non-Settlement Based Policies

Policy PUBSSLGS: Local Green Space

Overall, SCC supports this policy, however it is noted that the link to the Local Green Spaces maps document has some errors: the map for Chedgrave (page 2), and map for Beccles rowing club (page 6) do not have titles like the others included within the document.

It is also noted that page 7 just says “playing field”, and it would be considered useful to add the village name/location.

Policy PUBSSA47: Road schemes on the Acle Straight (A47T)

Regarding the supporting text Surface Water section (page 417), SCC suggests the following text amendments, to be in line with the surface water drainage hierarchy and NPPF paragraph 182:

Surface water disposal location, prioritised in the following order: reuse and harvesting of water, disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration.

Appendices

Appendix 12

It is recommended that Appendix 12 be reframed to improve clarity, using the following wording:

Appendix 12: Small Site Healthy Planning Checklist

This checklist is based on the ~~Norfolk~~ Planning in Health Protocol checklist but amended to be more applicable to the types and scale of schemes we see in the Broads. It is a self-assessment checklist that will be required as part of relevant applications.

~~The checklist is split into two – the first part is to be filled in for all new housing, commercial and recreational development (that does not meet the threshold relating to the Norfolk and Waveney Health Protocol). As well as filling out the first part of the checklist, schemes for one or more dwelling(s), but less than 50 dwellings, need to fill out the second part.~~

When to use this checklist

Part 1: must be completed for all new housing, commercial, and recreational developments (unless the Planning in Health Protocol applies).

Part 2: in addition, developments of 1–49 dwellings must also complete Part 2.

Exemptions

~~This checklist does not apply if any of these criteria are met:~~ This checklist does not apply to:

- Developments of over 50 dwellings
- developments of less than 50 dwellings but which are deemed to impact health services potentially significantly
- development that includes care homes, housing for the elderly, or student accommodation
- development that involves the significant loss of public open space

If any of the above apply, use the Planning in Health Protocol (see Policy PUBDM59: Designing places for healthy lives).

You can get some additional guidance from these two resources: Guidance and resources:

- Sport England offers guidance on designing and adapting where we live to encourage activity in our everyday lives (Sport England, Active Design | Sport England)
- Building for a Healthy Life (2020).

- Housing and health needs assessment (2024) - Healthy Suffolk

~~If the above criteria are met, the Norfolk and Waveney Health Protocol shall apply (see Policy PUBDM59: Designing places for healthy lives in this Local Plan).~~

~~Some of the questions in the checklist also have related policy requirements. your scheme may address those issues. Your response *Where this is the case, your application* may include the cross refer to relevant policies y in this Local Plan (or indeed Neighbourhood Plan) and detail how your proposal address meets their requirements.~~

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. As previously mentioned, the county council is willing to discuss anything raised in this response.

Yours sincerely,

Georgia Teague
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Growth, Highways, and Infrastructure