

How we consulted during the preparation of the Flood Risk Supplementary Planning Document and considered the comments received

May 2020

Introduction

This document provides a summary of the consultation undertaken on the Flood Risk Supplementary Planning Document (SPD) under Regulation 12 of the Town and County Planning (Local Planning) Regulations 2012 (as amended). It provides the information required under Regulation 12 and 13 of the above mentioned regulations.

This document sets out:

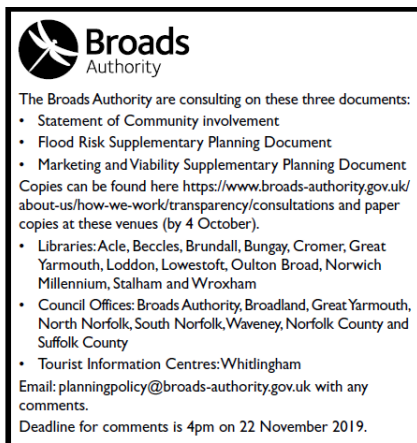
- Which bodies and persons the local planning authority invited to make representations under regulation 12,
- How those bodies and persons were invited to make representations under regulation 12,
- A summary of the main issues raised by the representations made pursuant to regulation 12,
- How these representations have been taken into account in the production of the Final Draft SPD

About the first consultation

The consultation took place over an 8 week period and commenced on Monday the 27th September 2019 and closed on Sunday 24th November 2019.

In accordance with the Councils adopted Statement of Community Involvement (SCI), direct notification of the consultation was sent to everyone on the contact database.

A press notice was included in the Eastern Daily Press on 3 October 2019.



The consultation itself was in the form of a track changed and amended version of the current SPD.

These were made available at these locations:

Local Authority offices:

Broads Authority (Norwich)

Broadland District Council (Norwich)

Great Yarmouth Borough Council

North Norfolk District Council (Cromer)

South Norfolk Council (Long Stratton)

East Suffolk Council (Lowestoft)

Norfolk County Council (Norwich)
Suffolk County Council (Ipswich)

Libraries:

Acle Library
Beccles Library
Brundall Library
Bungay Library
Cromer Library
Great Yarmouth Library
Loddon Library
Lowestoft Library
Oulton Broad
Norwich Millennium Library
Stalham Library
Wroxham Library

Tourist information centre: Whitlingham Visitor Centre

Responses received

Comments to the consultation were accepted via email to PlanningPolicy@broads-authority.gov.uk.

The consultation attracted responses from 11 individuals or organisations 49 individual comments. The following tables show the comments and how they were addressed when producing the next version of the SPD.

Generally, the comments received were providing extra detail and suggesting ways to improve the SPD, many of which were addressed as shown in the last column.

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#1	Laura Waters	Norfolk County Council	On 3rd January this year we responded directly to Natalie Beal on the Broads SPD as consulted on at the time. Elaine Simpson had various short comments to make on the document and we welcome that these comments have been included/utilised in the current document. Having had this opportunity to review the most recent consultation, as LLFA, we have no further comments to make on the SPD.	Support noted.	No change to Flood Risk SPD
#2	Lorraine Houseago	Norfolk County Council	We have no other comments to make.	Noted.	No change to Flood Risk SPD
#3	Nathan Makwana	Anglian Water Services	Having previously had the opportunity to comment and be involved on the development of the previous draft, I note that this iteration incorporates previously suggested comments. On this basis, Anglian Water have no further comment to make. We of course welcome any further opportunity to comment.	Support noted.	No change to Flood Risk SPD
#4	Penny Turner	Norfolk Policy ACLO	We have no comments on the above at this stage.	Noted.	No change to Flood Risk SPD
#5	Charlette Hounsell	Norwich City Council	Section 6.2 – it may be useful to reference in this section that consultation with neighbouring/overlapping authorities at pre-application stage is advised	Agree. Will incorporate into SPD.	6.2.2 It will also be appropriate to consult neighbouring Local Planning Authorities if scheme proposals are on or near to the border.
#6	Charlette Hounsell	Norwich City Council	Section 6.5.5 – in setting out what should be considered for a site to be reasonably available, there is no mention of site ownership or whether the owners of sites have any intention of them being developed. If owners of sites have no intention of developing them, can they be considered as reasonably available sites?	This is covered to some extent by the first bullet point, but we will expand this to address this comment.	6.5.5 A site is considered to be reasonably available if all of the following apply: • The site is available to be developed (including considering site ownership or whether the owners of sites have any intention of them being developed) ;
#7	Charlette Hounsell	Norwich City Council	Section 6.5.9 & Section 7.1.3 – Suggest inclusion of reference to the need to comply with relevant planning policies of any relevant local authorities to the development site/proposal	Noted. This is a given, but we have added some text.	6.5.9 It is acknowledged that the area of search could be outside of the Broads Authority Executive Area and would require discussions with other Local Planning Authorities (and proposals would therefore need to comply with relevant planning policies of the relevant Local Planning Authorities) . 7.1.3 It should be noted that all aspects of the development need to comply with policies of the Local Plan (adopted 2019) and that conformity with policies SP2 and DM5 does not override applicability of other policies (of the Broads Authority and other relevant Local Planning Authority) .
#8	Charlette Hounsell	Norwich City Council	Section 6.10.6 – The last sentence of this paragraph refers to flood resistance and resilience of buildings information to be found at section 5. I believe this information is found at section 7.	Agreed.	Change from 5 to 7.
#9	Charlette Hounsell	Norwich City Council	Section 9 – Suggest inclusion of web links to local authorities and LLFAs	It is not clear what links are required. The changes to the SPD as a result of other comments from Charlotte may help raise awareness of other LPAs.	No change to SPD.

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#10	Charlette Hounsell	Norwich City Council	Does this document take account of ADEPT and EA Flood Risk Emergency Plans for New Development guidance? https://www.adeptnet.org.uk/floodriskemergencyplan	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.
#11	Charlette Hounsell	Norwich City Council	Part of utilities site is within Broads Authority area and adjacent to the East Norwich Area as defined in JCS 12 – should there be some reference to this?	The issue of cross boundary sites (which after clarification with Charlotte was what this comment sought to address) is covered by the other changes to the comments from Charlotte.	No change to SPD.
#12		Marine Management Organisation	Page 16, Section 5.5.4: Refers to the tidal influence within the Broads, as well as the National Planning Policy Framework. We would also recommend you mention the East Inshore and East Offshore Marine Plans here, or elsewhere in section 5.5. Asked for clarification: As these are recommendations, I am not able to provide specific text. We suggest that your own interpretation of the East Marine Plans informs your plans, and refer to the Marine Plans where you deem appropriate. Coastal, and tidal flooding is covered across multiple policies within the East Marine Plans such as SOC1, CC1 and Objectives 6 and 9. Other signposting includes Paragraph 249 –Coastal change management.	Noted and we will include some text.	5.4 Marine Management Organisation and flood risk 5.4.1 Coastal, and tidal flooding is covered across multiple policies within the East Marine Inshore and Off Shore Plans such as SOC1, CC1 and Objectives 6 and 9. Other references include Paragraph 249 – Coastal change management.
#13		Marine Management Organisation	Page 67: You refer to Environment Agency permits. It may also be appropriate to refer to Marine Licences from the Marine Management Organisation, as this may be relevant to applicants. Asked for clarification: With regards to referencing the Marine Management Organisations Marine Licences, lines 1552-1556 refer to the appropriate requirements for a “a permit under the Environmental Permitting 1554 (England and Wales) Regulations 2010 from the Environment Agency”. As there are exemptions, particularly within the Broads, I cannot suggest specific text. However, as this is directed at applicants this seems to be an appropriate place to note that a Marine Licence may be required for works that are carried out on tidal rivers.	Noted and we will include some text.	As requested, we will add this to the Flood Risk Tick Sheet: Also note that a Marine Management Organisation Marine Licence may be required for works that are carried out on tidal rivers.
#14	Ben Wright	East Suffolk	Para 5.4.2 refers to the Waveney SFRA (2018). This SFRA was produced for both Councils and may be better referred to as the East Suffolk SFRA.	Agree - will change text.	Change to say 'East Coast'.
#15	Ben Wright	East Suffolk	Para 5.4.3 refers to Waveney. This reference should be changed to “the former Waveney area”.	Agree - will change text.	Change to say 'the Waveney part of East Suffolk'
#16	Ben Wright	East Suffolk	Para 5.4.4 – the joint statement with the EA continually refers to Waveney. This should be changed to either East Suffolk or the former Waveney area.	Noted and that is because it was produced in 2018. It is not proposed to go through all old documents adopted put in place before April 2019 to change the refence. But as and when documents like this are updated then we will make the amendment.	No change to Flood Risk SPD

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#17	Jessica Nobbs	Water Management Alliance	<p>Section 8.3.5 of the document refers to Land Drainage Consent. It is identified that consent would be required from the relevant Internal Drainage Board (IDB) where alterations to a watercourse (including infilling, culverting or amending) are proposed as per the Board's Byelaws (specifically Byelaw 4) and Section 23, Land Drainage Act 1991. In addition to this, we feel it would be relevant to refer to other consents that may be required from the Board by including the two following statements:</p> <p>- If a surface water (or treated foul water) discharge is proposed to a watercourse within an Internal Drainage District (IDD) (either directly or indirectly), then the proposed development will require a Land Drainage Consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's charging policy.</p> <p>- If there is a Board Adopted watercourse within/adjacent to the site boundary and should works be proposed within 9 metres of the watercourse, consent would be required to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure).</p>	Noted and will amend text.	<p><u>Other consents that may be required from the IDB include:</u></p> <ul style="list-style-type: none"> <u>• If a surface water (or treated foul water) discharge is proposed to a watercourse within an Internal Drainage District (IDD) (either directly or indirectly), then the proposed development will require a Land Drainage Consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment a surface water development contribution fee, calculated in line with the Board's charging policy.</u> <u>• If there is a Board Adopted watercourse within/adjacent to the site boundary and should works be proposed within 9 metres of the watercourse, consent would be required to relax Byelaw 10 (no works within 9 metres of the edge of drainage or flood risk management infrastructure).</u>
#18	Jessica Nobbs	Water Management Alliance	<p>Maps of the Broads (2006) Internal Drainage District and the Norfolk Rivers Internal Drainage District are available here and here. These maps show which watercourses are designated as Adopted Watercourses by each Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. The designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse).</p>	Noted and will amend text.	<p><u>4.8.4 Maps of the Broads (2006) Internal Drainage District and the Norfolk Rivers Internal Drainage District are available here and here. These maps show which watercourses are designated as Adopted Watercourses by each Board. The adoption of a watercourse is an acknowledgement by the Board that the watercourse is of arterial importance to the Internal Drainage District and as such will normally receive maintenance from the IDB. This maintenance is not necessarily carried out on an annual basis but on a recurrence deemed necessary to meet water level management requirements. The designations are made under permissive powers (meaning there is no obligation for IDBs to fulfil any formal maintenance requirement and there is no change in the ownership or liability associated with the watercourse</u></p>
#19	Liam Robson	Environment Agency	<p>In relation to paragraph 5.5.8 it should be noted that Environment Agency flood warnings cover both tidal and fluvial flooding.</p>	Noted and will amend text.	<p>Although tidal surges can develop rapidly within 6-12 hours because of the movements of weather systems in the North Sea, the Environment Agency Flood Warning System covers the whole of the Broads area which could provide early warning <u>(for fluvial and tidal flooding).</u></p>

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#20	Liam Robson	Environment Agency	Paragraph 5.5.9 states the standard of protection in the Broads area. It should be noted that some defences have a 1 in 200 standard or higher.	Noted and will amend text.	5.6.9 Existing flood defences in the Broads area offer a low standard of protection (typically up to a 1 in 7-year standard <u>and some defences have a 1 in 200 standard or higher</u>), so they may be overtopped during a flood event.
#21	Liam Robson	Environment Agency	The tidal flood risk section of this document states that "...the prior has defences to protect up to the 0.5% annual probability tidal flood". It should be noted that not all defences may be up to this standard.	Noted, although this was copied verbatim from the SFRA. Will amend text.	There is acute risk of tidal flooding in Great Yarmouth and across the Broads within the study area; the prior has defences to protect up to the 0.5% annual probability tidal flood (<u>although not all defences may be up to this standard</u>).
#22	Liam Robson	Environment Agency	The fluvial section of this table states how climate change will significantly influence the predicted flood levels as a consequence of changes to mean sea level. As this is in the fluvial section, it should mention climate change increasing river flows (between 25% and 65% increase).	Noted, but that is the fluvial column in a few tables, not just Great Yarmouth's. In the absence of a suggestion that addresses all of the tables, some text will be added to section 4.1.	4.1.1 Fluvial flood risk is flooding from rivers because of a river overflowing or its banks being breached. <u>It should be noted that climate change is likely to result in increased river flows (between 25% and 65% increase)</u>
#23	Liam Robson	Environment Agency	It is good to see the inclusion of paragraph 6.3.2 however, it is unclear that this is the only flood risk issue mentioned in detail in this summary section. This could therefore be moved to a more detailed section. Section 7.6.1 would be best, as it links to the need to let water in and adopt flood resilient construction measures if more than 600mm of water around the building.	Agree. Will move text.	6.3.2 moved to 7.6.1.
#24	Liam Robson	Environment Agency	In relation to point i in paragraph 6.10.3, the FRA should show the accurate location of the flood zones on their site based on a comparison of EA flood levels and GPS site survey, not just using our flood maps.	Noted and will amend text.	i) Flood risk zones 1 – 3 within the site with reference to the SFRA/EA Flood Zone maps. <u>The FRA should show the accurate location of the flood zones on the site based on a comparison of EA flood levels and GPS site survey;</u>
#25	Liam Robson	Environment Agency	It appears that the document states that what is considered to be safe will be taken on a case-by-case basis. You may want to consider further what safe specifically looks like.	EA were asked for their thoughts about what safe would look like but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#26	Liam Robson	Environment Agency	The mention of whether less vulnerable development at risk of flooding would be safe seems to indicate that you will not allow more vulnerable to flood. The SPD could therefore be enhanced by explicitly saying this as we require more vulnerable flood levels to be above actual risk 1%/0.5 cc flood levels (unless replacement dwellings). It should probably be under 6.10.5, could be under 6.10.6 but does not relate to residual risk, just actual risk. Perhaps a new paragraph between the two referring to the need for new more vulnerable development to not flood in the actual risk 1%/0.5% climate change flood event, through defences, raised land or raised floor levels.	Noted. Will add a new paragraph	<u>6.10.6 It is important to note that the Environment Agency need new more vulnerable development to not flood in the actual risk 1%/0.5% climate change flood event, through the provision of defences, raised land or raised floor levels.</u>

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#27	Liam Robson	Environment Agency	In terms of safe refuge, we require all more vulnerable developments to have safe refuge above the extreme climate change flood level, unless agreed in consultation with emergency planners that it can be made safe through a flood response plan without refuge. It could be beneficial if the SPD were to have comments on refuge requirements e.g. are stairwells acceptable and when is refuge required?	Asek for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broads. EA were asked for their thoughts about if stairwells are acceptable and when a refuge is required but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#28	Liam Robson	Environment Agency	Paragraph 6.11.3 states that a Flood Risk Assessment should propose mitigation measures. These should be provided up to the design flood event (1% fluvial/0.5% tidal) including climate change for the lifetime of the development.	Noted and will amend text.	6.11.3 A Flood Risk Assessment should consider whether this will happen and propose mitigation measures <u>which should be provided up to the design flood event (1% fluvial/0.5% tidal) including climate change for the lifetime of the development.</u> These may include for example the provision of compensatory floodplain storage,
#29	Liam Robson	Environment Agency	Paragraph 6.11.3 also references compensatory storage. It would be beneficial to define what compensatory storage is here i.e. the lowering of higher land levels to provide additional flood storage at the same level as the flood storage is removed. Therefore, this is difficult to achieve in the Broads as the floodplain is very flat with little higher land available to lower.	Noted and will amend text.	although this can be difficult to achieve in the Broads area. <u>Compensatory floodplain storage is the lowering of higher land levels to provide additional flood storage at the same level as the flood storage is removed. Therefore, this is difficult to achieve in the Broads as the floodplain is very flat with little higher land available to lower.. One of the only options in the Broads is the raising of buildings on stilts to provide voids underneath and not remove flood storage.</u> Such measures would need to be designed to ensure that water is always stored under the building and can empty after a flood. This would require intermittent boarding, no storage under the building and regular maintenance.
#30	Liam Robson	Environment Agency	Paragraph 6.11.3 also includes a sentence which states “such measures would need to be designed to ensure that water is always stored under the building and can empty after a flood”. This is not compensatory storage and is instead providing a void under the building to reduce the volume of flood storage removed. There should therefore be a sentence before this one saying that ‘one of the only options in the Broads is the raising of buildings on stilts to provide voids underneath and not remove flood storage’.	Noted and will amend text.	
#31	Liam Robson	Environment Agency	The Flood Response Plan may be one aspect of the proposed management measures that make a development safe and acceptable in flood risk terms. So the development might not be acceptable terms until the Flood Response plan is submitted and considered.	Noted.	No change to Flood Risk SPD
#32	Liam Robson	Environment Agency	The Environment Agency and the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) have produced some joint guidance on flood risk emergency plans for new development which can be downloaded at https://www.adeptnet.org.uk/floodriskemergencyplan . The SPD should ensure that it follows the requirements.	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#33	Liam Robson	Environment Agency	Raising Floor Levels In relation to paragraph 7.2.3; we require raised floor levels (above 1% cc/0.5% cc) for residential building conversions, unless it is confirmed in consultation with emergency planners that the safety of the development can be managed through other means such as resilience/resistance measures and flood response plan. It could be beneficial if the SPD specifies when this would be acceptable and when raised floor levels required?	Asek for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broads. EA were asked what specific changes they would like but eplied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#34	Liam Robson	Environment Agency	In terms of paragraph 7.2.4 We require the finished floor levels of new residential development to be above the actual risk design flood level including 100 years of climate change (1% fluvial plus cc / 0.5% tidal plus cc). We also require higher refuge above the extreme 0.1% cc flood level, unless in consultation with emergency planners that the development can be safe without higher refuge through evacuation and the Flood Response Plan. The SPD could therefore be enhanced by specifying when higher refuge is required.	Asek for clarification on this. Currently, Emergency Planners of the districts are not involved in Flood Response Plans/applications in the Broads. EA were asked what specific changes they would like but replied saying they did not object to the SPD. They were asked again for wording changes but did not provide any by the deadline for Planning Committee.	Liaise with Emergency Planners regarding this comment. If any further comments are received then these will be reported to Planning Committee. Otherwise, no change.
#35	Liam Robson	Environment Agency	Please note the sentence for citation 50 at the bottom of the page under line 962 is incomplete.	It is, it just is on the next page.	No change to Flood Risk SPD
#36	Liam Robson	Environment Agency	Environment Agency This paragraph states the Agency has principle responsibility for river flooding. This should also state tidal/coastal flooding.	Noted and will amend text.	The Agency has principle responsibility for river, <u>tidal and coastal</u> flooding.
#37	Liam Robson	Environment Agency	Chapter 1: Flood Response Plan Guidance The Environment Agency and the Association of Directors of Environment, Economy, Planning and Transport (ADEPT) have produced some joint guidance on flood risk emergency plans for new development which can be downloaded at https://www.adeptnet.org.uk/floodriskemergencyplan . This appendix should ensure that it follows the requirements of the ADEPT guidance. The ADEPT guidance goes into more detail on how information on safe access routes and refuge provision should be included in the Emergency Plan, perhaps some of this can be included? But the minimum is to ensure the ADEPT guidance is referenced in Appendix D.	The guide has been reviewed and a link included in the SPD and parts referenced throughout Appendix D. Generally, we feel the Broads SPD covers the thrust of the guide, but if any specific changes are required, please let us know as part of the next round of consultation on the SPD.	Text added to section 1. Link added to Section 3 of Appendix D.
#38	Liam Robson	Environment Agency	Introduction Line 1264 states that "...if not submitted with an application, are often required by planning condition if permission is issue". ADEPT guidance says this is not allowed, the Flood Response Plan needs to be submitted upfront, as it is necessary to determine the safety of the development.	Noted and will amend text.	This guidance has been produced to assist with the preparation of Flood Response Plans (FRP). FRPs should need <u>to be provided as part of a Flood Risk Assessment where this is necessary to accompany a planning. application or, if not submitted with an application, are often required by planning condition if permission is issued.</u>
#39	Charlie Middleton	Beccles Town Council	The Planning Committee, replying on behalf of Beccles Town Council, consider all three documents provide comprehensive support for the planning policies of the Broads Authority.	Support noted.	No change to SPD
#40	Iain Withington	North Norfolk District Council	Section 5.1.1 and 5.2.1: Could usefully insert into both paragraphs text around Climate change flood extents, that are incorporated in the SFRA and that development should also have regard to these food risk extents from all sources of flooding.	Noted and will amend text.	Add this text to 5.1.1: <u>Development should also have regard to the climate change flood extents (from all sources of flooding) and these are mapped in the Strategic Flood Risk Assessment (see 5.5).</u> Add this text to 5.1.2: <u>As mentioned</u>

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
					<u>previously, the impact of climate change needs to be considered (see 5.1.1)</u>
#41	Iain Withington	North Norfolk District Council	5.3: CC flood extents are mentioned here but greater emphasis that the SFRA demonstrates the CC flood extents and these should also be used as a basis for further comment and assessment i.e. through site specific FRAs	Noted and will amend text.	Add this text to 5.3.1: <u>(and the SFRA demonstrate the climate change flood extents).</u>
#42	Iain Withington	North Norfolk District Council	5.4.1: Could use the wording climate change flood extents rather than impacts	Noted and will amend text.	Change to say: they consider the impacts of climate change <u>flood extents</u>
#43	Iain Withington	North Norfolk District Council	5.4.3: Could mention that CC allowances have been agreed with the Environment Agency and LLFA in the SFRA and with all the Norfolk authorities	Noted and will amend text.	Add: <u>In Norfolk, climate change allowances have been agreed with the Environment Agency and LLFA in the SFRA and with all the Norfolk authorities.</u>
#44	Iain Withington	North Norfolk District Council	5.4.4: Add text around the precautionary approach adopted by the SFRA and expected time line for the updated modelling rather than as time goes by wording.	Noted and will amend text.	Amend text as follows: <u>If a proposed development is shown to be in Flood Zone 3, further investigation should be undertaken as part of a detailed site specific Flood Risk Assessment to define and confirm the extent of Flood Zone 3b. This may require detailed hydraulic modelling. so a site-specific flood risk assessment is required to assess actual flood risk to the site.</u> To cover this, a joint position statement has been produced between the Broads Authority and the Environment Agency. <u>The Joint Position Statement indicates that modelling on the Broadland Flood Alleviation Project Area (much of the area without modelling) will be completed by the end of 2021.</u>
#45	Iain Withington	North Norfolk District Council	6.3: Include reference to CC flood extents.	Noted and will amend text.	Amend text to say: Developers should carefully assess the full range of issues associated with all sources of flood risk when producing development proposals, <u>including climate change flood extents.</u>

Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#46	Iain Withington	North Norfolk District Council	<p>Horning development: I can see no reference to the joint position statement with Anglian water on the development restrictions in the Horning water recycling centre catchment , i.e. Knackers wood WRC Reference should be given to the SCG which states that : 'New development likely to give rise to additional foul drainage output will not be permitted where either (a) this intensifies the use of non-mains foul drainage arrangements, or (b) this intensifies the use of mains foul sewer ahead of essential sewerage infrastructure works and demonstration that there is sufficient capacity at the sewage treatment works to serve the proposed development without harming nearby designated sites.'</p> <p>The SCG goes on to say "This means that there will be a presumption against developments that increase flows to the WRC in the short term. Similarly, there will be a presumption against developments that rely upon stand alone foul water treatment solutions as they too have the potential to adversely affect water quality."</p> <p>As far as I am aware the situation has not moved on and this still stands .see below AW text</p>	<p>Noted. This SPD is about flood risk, not wastewater. The Position Statement is havily referenced in the Local Plan. We will reference this in the table for North Norfolk under foul sewere.</p>	<p>Add this text: Of relevance to the North Norfolk area is the Joint Position Statement relating to Horning Knackers Wood Water Recycling Centre . To summarise, due to capacity issues, development that increases foul drainage output is not likely to be permitted.</p>
#47	Iain Withington	North Norfolk District Council	<p>Hoveton Anglian water have also commented on proposals in out emerging local plan with regard Hoveton, where it is understood they are developing a position statement . these comments stem from the acknowledgment of particular issues of discharge and flooding from the river into the drainage systems. "Policy DS13 states that a wider water catchment strategy and foul water drainage strategy are required for this allocation site. However the supporting text refers to the water catchment strategy being aligned with the overall catchment strategy. Any site specific strategy would need to be aligned with any wider catchment strategy. Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. To be effective there is a need to clarify what is the requirement for the applicant in relation to foul drainage and how this relates to any further technical work or investigation(s) undertaken by Anglian Water rather than the developer." You may like to flag these issues for consideration in your NNDC tables for foul sewer and WRC</p>	<p>Noted and will amend text. Also will request that NNDC keep us informed of the progress on this issue.</p>	<p>Add this text: At the time of writing, there are early discussions between the Environment Agency, North Norfolk District Council and the Broads Authority about particular issues of discharge and flooding from the river into the drainage systems.</p>

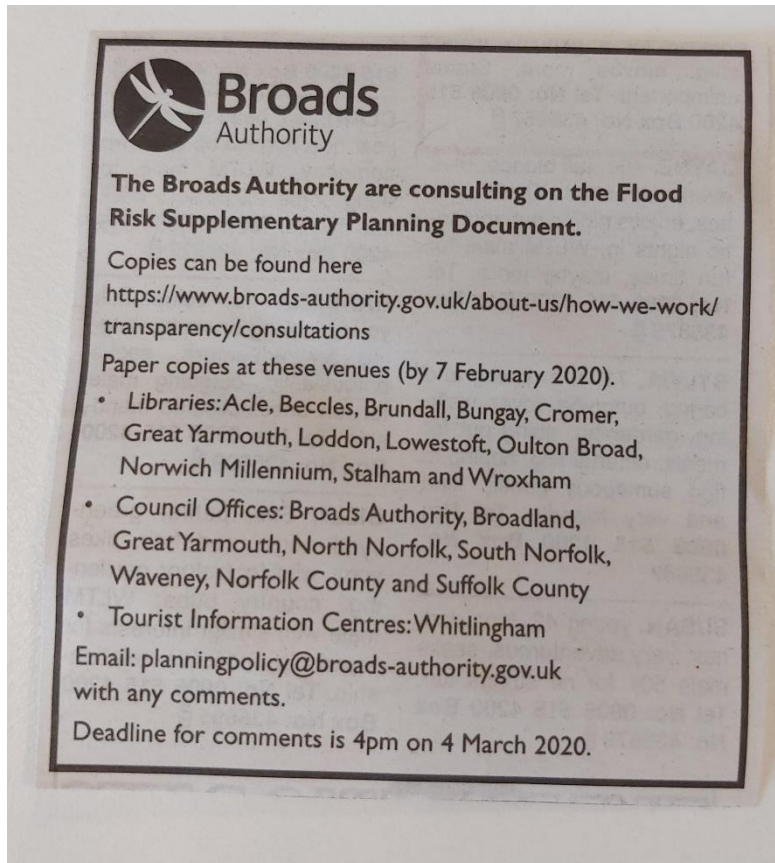
Reference	Name	Organisation	Comment	BA Responses	Proposed changes
#48	Iain Withington	North Norfolk District Council	<p>Comment to NNDC Local Plan consultation from Anglian Water Services - for information. Horning WRC: There have been a number of recorded incidents of flooding within the Horning sewerage catchment from surface water, groundwater and fluvial sources which are the responsibility of multiple agencies. This reduces the available capacity of foul sewerage network for additional foul flows from additional development within the catchment as outlined in the Joint Position Statement for Horning. Anglian Water has undertaken CCTV surveys of the existing public sewerage network at Horning to investigate the cause(s) of these flooding incidents. Following the completion of surveys we have undertaken repairs in February/March 2018 to mitigate surface water ingress where it interacts with the foul sewerage network in Anglian Water's ownership. We have also been actively working with relevant (flood) risk management authorities to address historic flooding in the Horning sewerage catchment where it relates to Anglian Water's assets. As part of which we been liaising with North Norfolk District Council to enable the removal of existing surface water connections to the foul sewerage network from existing residential and commercial properties so that existing surface water flows can be discharged to suitable alternatives e.g. watercourses. The Environment Agency has also committed to undertaking threshold surveys within the sewerage catchment to establish flood risk from the Broads for every household within the catchment. The Joint Position Statement for Horning is to be updated to reflect the current position relating to the investigation and works undertaken to date by Anglian Water and by other risk management authorities within the catchment.</p>	Noted.	No change to SPD
#49	Iain Withington	North Norfolk District Council	<p>Comment to NNDC Local Plan consultation from Anglian Water Services - for information. Hoverton: Anglian Water is currently preparing a position statement relating to Hoverton catchment which follows recent discussions with Cllr Dixon. It is intended to set out the current position relating to this catchment including historic issues within the network and the implications for new development.</p>	Noted.	No change to SPD

About the second consultation

The consultation took place over a 4 week period and commenced on Monday the 31 January 2020 and closed on 4 March 2020.

In accordance with the Councils adopted Statement of Community Involvement (SCI), direct notification of the consultation was sent to everyone on the contact database.

A press notice was included in the Eastern Daily Press on 7 Feb 2020.



The consultation itself was in the form of a track changed and amended version of the SPD amended following the first consultation.

These were made available at these locations:

Local Authority offices:

Broads Authority (Norwich)

Broadland District Council (Norwich)

Great Yarmouth Borough Council

North Norfolk District Council (Cromer)

South Norfolk Council (Long Stratton)

East Suffolk Council (Lowestoft)

Norfolk County Council (Norwich)

Suffolk County Council (Ipswich)

Libraries:

Acle Library

Beccles Library

Brundall Library

Bungay Library
Cromer Library
Great Yarmouth Library
Loddon Library
Lowestoft Library
Oulton Broad
Norwich Millennium Library
Stalham Library
Wroxham Library

Tourist information centre: Whitlingham Visitor Centre

Responses received

Comments to the consultation were accepted via email to PlanningPolicy@broads-authority.gov.uk.

The consultation attracted responses from 19 individuals or organisations 43 individual comments. The following tables show the comments and how they were addressed when finalising the SPD.

Generally, the comments received were providing extra detail and suggesting ways to improve the SPD, many of which were addressed as shown in the last column.

Ref	Name	Organisation	Comment	BA response	How SPD changed/amended
#1	Stewart Patience	Anglian Water Services	Thank you for the opportunity to provide comment on the amended draft Flood Risk SPD for the Broads Authority. Having previously had the opportunity to comment and be involved on the development of an earlier draft, the current version incorporates previously suggested comments. The proposed changes made following the previous consultation on the SPD do not appear to any issues of relevance for Anglian Water. On this basis, Anglian Water have no further comment to make and supports the current version of the SPD.	Support noted	No change to SPD
#2	Penny Turner	Norfolk Police	Thank you for the notification of the amended Flood Risk Supplementary Planning Document for the Broads. We have no specific comment regarding the content of this guidance.	Noted	No change to SPD
#3	John Ash	Broads Authority Member	79 After Intense rainfall you may want to add which may increase with climate change	Agree. Will add reference to climate change to 4.2.2.	4.2.2 Intense rainfall, often not lasting a long time, that is unable to soak into the ground or enter drainage systems, can run quickly off land and result in local flooding. Surface water flooding problems are linked to issues of poor drainage, or drainage blockage by debris, and sewer flooding. <u>Instances of intense rainfall may increase as a result of climate change.</u>
#4	John Ash	Broads Authority Member	320 I think it is not helpful saying the flooding is shallow. From my experience flooding can be over 1m in depth in places depending on the topography. 321 add: in or beside a breach in defences where the flow will be greater and the risk would	Noted. Will amend 5.6.9.	The nature of flooding in the Broads is such that flood water is likely to have a slow velocity, <u>may be</u> shallow in depth and <u>may be</u> low hazard (<u>depending on topography</u>), unless it is in <u>an area</u> or beside a breach in defences where the flow <u>could will</u> be greater and the risk would subsequently be higher.
#5	John Ash	Broads Authority Member	1327 add application at the end of the sentence.	Agree. Will amend.	Add 'application'.
#6	Lewis Chappell	Norfolk County Council LLFA	We welcome that comments made previously by the LLFA have been included in the draft provided for consultation. We recommend the following information to be included: Reference to Norfolk County Council (NCC) – Lead Local Flood Authority (LLFA) Statutory Consultee for Planning: Guidance Document should be made within the document. This outlines the LLFA guidance for developers regarding surface water flooding, drainage design and sustainable development. At this point, we have no further recommendations to make.	Agree. Will include a reference.	Will add reference to this document and this link in Section 9: https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf
#7	Laura Waters	Norfolk County Council	Thank you for your consultation on the Flood Risk SPD for the Broads, as previous comments on the document have been included/utilised in the current document we have no further comments to make on the SPD.	Noted	No change to SPD
#8	Liam Robson	Environment Agency	Section 4.3: New climate change allowances were published in December 2019 on gov.uk, these will result in increases in flood level of between 1.2m and 1.6m compared to present day flood levels.	Agree. Will amend and add reference to this.	This text added as a new section - 4.9 Add this as new footnote to 6.10.4.
#9	Liam Robson	Environment Agency	Section 5.6.9: It may be better to reword this as: Existing flood defences in the Broads area offer a low standard of protection (typically up to a 1 in 7-year standard) so they may be overtopped during a flood event. However some defences are higher, with a 0.5% (1 in 200) standard or greater.	Agree. Will amend and add reference to this.	<u>5.6.9 Existing flood defences in the Broads area offer a low standard of protection (typically up to a 1 in 7-year standard) so they may be overtopped during a flood event. However some defences are higher, with a 0.5% (1 in 200) standard or greater.</u> Existing flood defences in the Broads area offer a low standard of protection (typically up to a 1 in 7-year standard), so they may be overtopped during a flood event.

Ref	Name	Organisation	Comment	BA response	How SPD changed/amended
#10	Liam Robson	Environment Agency	Line 326 and 327: The measures to take before, during and after a flood should be detailed within a Flood Response Plan for each development site.	Agree. Will amend and add reference to this.	5.6.10 Some people living and working within the Broads are historically familiar with the water environment and are unlikely to be surprised or alarmed by the possibility of floods or rising water levels or may be more prepared. That being said, others may not have had any experience of flooding. Measures will need to be in place to ensure effective communication with visitors - an issue which is already addressed on many sites locally. The measures to take before, during and after a flood should be detailed within a Flood Response Plan for each development site.
#11	Liam Robson	Environment Agency	Section 6.10.6: actual risk 1% (1 in 100) fluvial or 0.5% (1 in 200) tidal annual probability climate change flood event. Should it say the Environment Agency requires this or the NPPF Planning Practice Guidance? As the PPG allows flood resilient construction to be used for change of use/new less vulnerable but not new more vulnerable development, and therefore new more vulnerable to be dry in a flood. We also require refuge above the 0.1% (1 in 1000) climate change annual probability extreme flood for more vulnerable development.	Agree. Will amend and add reference to this.	6.10.6 It is important to note that the Environment Agency NPPG need new more vulnerable development to not flood in the actual risk 1% (1 in 100) fluvial or 0.5% (1 in 200) tidal annual probability climate change flood event through the provision of defences, raised land or raised floor levels. The Environment Agency also require refuge above the 0.1% (1 in 1000) climate change annual probability extreme flood for more vulnerable development.
#12	Liam Robson	Environment Agency	Line 702: Reword to 'if proposed less vulnerable development at actual or residual risk of flooding, or more vulnerable development at residual risk of flooding would be...'	Agree. Will amend and add reference to this.	The Authority will also consider if proposed less vulnerable development at actual or residual risk of flooding, or more vulnerable development at residual risk of flooding would be consider if proposed less vulnerable developments at risk of flooding that would be safe and sustainable and whether flood resilient measures and flood response plans are sufficient to mitigate risk.
#13	Liam Robson	Environment Agency	Line 705 and 706: And advice on Flood Response Plans can be found in Appendix D.	Agree. Will amend and add reference to this.	Advice on the flood resistance and resilience of buildings can be found at section 5.7 of this SPD and advice on Flood Response Plans can be found in Appendix D.
#14	Liam Robson	Environment Agency	Line 1019: This sentence still does not make sense. Words missing. Perhaps reword as: 'If the use of a culvert cannot be avoided then their size should be designed so they are appropriately designed for both low and high flows, are the biggest culvert that can be accommodated within the watercourse to maintain existing capacity and so have capacity for high flow conditions (and this specification might be a matter for the IDB, LLFA or Environment Agency	Agree. Will amend and add reference to this.	Replace existing wording with the proposed wording.
#15	Gary Burckitt	Member of community	The document implies that the "hold the line" policy will run until 2055. But goes on to state that "this is dependent on the option continuing to be technically and economically deliverable". – leading to the possibility of managed realignment or a retired line of defence further inland. (Presumably at any time in the next 35 years. – Could be within a few years.) Whilst there is comfort in stating the line will be held until 2055, making it dependent on technical and economic factors surely means that it is under constant review and, in my opinion, does not reassure owners of domestic properties and business premises one little bit.	Noted. The document uses the position set out in the Shoreline Management Plan. However we will amend 5.9.	As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. This is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment, or a retired line of defence further inland. In relation to the present day, the Plan says:

Ref	Name	Organisation	Comment	BA response	How SPD changed/amended
#16	Robin Buxton	Horsey Parish Council	<p>Horsey Parish Council met on the 20th February and the Authority's Flood Risk Supplementary Planning Document Consultation was considered. Members support the purposes of the plan and indeed the contents apart from section 5.9 The Coast, in reference to the local sea defences, hold the line up to 2055, that this is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment on a retired line of defence further inland. We strongly suggest that any reference to " what may be investigated such as possible managed realignment on a retired line of defence further inland" be removed as this is totally unacceptable to us. Such reference could result in a planning blight and may present problems for some properties obtaining flood insurance as happened during a Conservation body report made in the recent past. We understand that the Broads Authority is not qualified to speculate on what may or might not be investigated on coast related matters since the Authority is not a risk management authority under the Coast Protection Act. The forthcoming Broadland Futures Initiative project would be the appropriate opportunity to discuss future coastal matters rather than a planning guidance document.</p>	Noted. The document uses the position set out in the Shoreline Management Plan. However we will amend 5.9.	<p>As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. This is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment, or a retired line of defence further inland. In relation to the present day, the Plan says:</p>
#17	David Auston	Member of community	<p>From what I have understood of the paper I think it is vital to emphasise the importance of achieving an accurate and contemporary picture of land levels between the Broads and the coast and that until such work has been thoroughly carried out and the public informed, there should be no speculation indulged in publicly and even then only informed bodies should lead the debate. On this last point I believe that only risk management authorities should be involved thus precluding the Broads Authority who I believe do not come under that description. A great deal of damage is done by loose speculation which has no real scientific base. In all the above proceedings the general public and in particular those residents of areas under discussion have to be kept informed.</p> <p>Having said the above, I will indulge a little in my own speculation. I have read that the existing line of defence is to be held until 2055 so long as it is technically and economically deliverable. I would say that of course it is technically deliverable. You only have to look at the Dutch nation to see that, or to consider the proposition by Dutch scientists and engineers to build a dam across the North Sea from Scotland to Norway and at the southern end between England and France to understand that anything is possible. It is whether there is the political will which is a far more salient point. Finally, a retired line of defence would, I imagine, carry with it an economic cost on a par with that at the coast so why not hold it there? There can be no end to the policy of retreat.</p>	Noted. The document uses the position set out in the Shoreline Management Plan. However we will amend 5.9.	<p>As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. This is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment, or a retired line of defence further inland. In relation to the present day, the Plan says:</p>
#18	Dennis Willis	Member of community	<p>The draft SPD document fails to acknowledge that Hoveton exists. There are foul water flooding issues in Hoveton that affect the river Bure. (sharing evidence!).</p>	Noted. Will amend text.	<p>Add to foul sewer column on page 22: • Anglian Water is currently preparing a position statement relating to Hoveton catchment. It is intended to set out the current position relating to this catchment including historic issues within the network and the implications for new development.</p>

Ref	Name	Organisation	Comment	BA response	How SPD changed/amended
#19	Dennis Willis	Member of community	The BA should not consider just its own area regarding planning applications. (joined-up action!) It should have concern that nearby developments, in flood zones 1, WILL have impact on the executive area. Your 4.5.2 Refers: "Existing sewers can also become overloaded as new development adds to the discharge to their catchment,(urban creep). Sewer flooding is therefore a problem that could occur in many locations" ... it does in Hoveton, yet BA as consultee makes response that fails to refer to sewage discharges into the Broads (Planning application PF/11/07620). How can SPD address this issue? I'm waiting to see BA response as consultee to present planning application PF_19_1659 regarding the same issue.	Noted. Will pass on the comments made in this representation to NNDC, with the permission of Mr Willis. This comment has also been passed on to the DM Officer at the Broads Authority who is preparing the Authority's response. Row #18 last column shows that we will add text relating to Hoveton. The answer to the comment in #21 is of relevance to this comment. We have been made aware of the issues subsequently and will take them into account when commenting on planning applications in NNDC area.	No change to SPD.
#20	Dennis Willis	Member of community	Your amendment ref. North Norfolk includes: "At the time of writing, there are early discussions between the Environment Agency, North Norfolk District Council and the Broads Authority about particular issues of discharge and flooding from the river into the drainage systems". This should be definitive and refer "sewage drainage systems".	Agree. Will amend text.	Change to: sewage drainage systems
#21	Dennis Willis	Member of community	Early discussions? EA were aware of sewage system issues in Hoveton in 2017 and referred to it in January 2018 (AE/2017/122281/02-L01 to NNDC Planning)... And nothing has been done about addressing the issues. What can be included in SPD to address them?	We will send you the contact we have at EA and Anglian Water Services. Also see row #18.	No change to SPD.
#22	Dennis Willis	Member of community	Be reminded that Anglian Water has a legal requirement under the Water Act 1991"to provide, improve and extend such a system of public sewers ... and so to cleanse and maintain those sewersas to ensure that that area is and continues to be effectually drained"! This means NOT drained into the Broads. (enhance the catchment!)	Noted.	No change to SPD.
#23	Dennis Willis	Member of community	Your amendment ref. North Norfolk, includes: "To summarise, due to capacity issues, development that increases foul drainage output is not likely to be permitted." How can SBD/BA influence development in NNDC areas abutting the BA executive area that has the capacity to increase foul drainage output?	The Authority tends to be consulted on neighbouring applications that are near to our boundary. This is an issue we can raise in our response, if appropriate and relevant, noting your comment in row #19.	No change to SPD.
#24	Dennis Willis	Member of community	You refer North Norfolk, Groundwater: "No concerns specific to North Norfolk". Developments in upper Hoveton (Brook Park Phases 1 and 2) create surface water discharge into areas of ground that WILL raise the water table at times of significant rainfall. This does affect those properties in areas of upper Hoveton – so there should be concerns.	Noted however this issue, as worded, seems more to do with surface water. Note that we are also seeking advice from EA on this query, but consider this more of a surface water issue and surface water is adequately addressed in the SPD and other documents - see #25 below.	No change to SPD.
#25	Dennis Willis	Member of community	The plan supports the use of SuDS. You should as planning authority ensure that approved SuDS are built as such by developers. Evidence exists that SuDS are not built as approved in Hoveton and in other areas of Norfolk. (carrying out joined-up actions that address agreed issues).	Noted. We have a strong Surface Water Run-off policy in our recently adopted Local Plan - DM6. As Mr Willis points out, the SPD also addresses SuDS. So there is the policy framework to address the need for SuDS. If Mr Willis would like to tell us of specific examples in the Broads Authority where SuDS are not being built as approved, the Authority will look into this.	No change to SPD.
#26	Dennis Willis	Member of community	Line 905 & 906 ..."deep infiltration is unlikely to work in the Broads Authority area due to high ground water levels". Should read BA and abutting authority/council areas.	Noted. The SPD cannot guide development in neighbouring Local Planning Authority areas. With Mr Willis' permission, we will send this comment on to NNDC.	No change to SPD.

Ref	Name	Organisation	Comment	BA response	How SPD changed/amended
#27	Ray Holloway	Member of community	<p>The following comments are a combination of most comments made by Mr Holloway during an email conversation to ascertain the changes he would like to propose.</p> <p>I believe the Broads Authority should urgently remove a reference in its latest flood risk planning document to managed coastal retreat. A sentence could trigger a repeat of the problems that followed Natural England's report seven years ago. It caused panic when leaked to the press because it called for sea defences between Winterton and Horsey to be done away with and for there to be a managed retreat that could go as far inland as Potter Heigham. They withdrew it, funding came from the Government to maintain sea defences and the shoreline management plan is to hold the line until 2055. There is concern at the Broads Authority's statement that "...other options may be investigated such as managed re-alignment on a retired line of defence further inland." The Environment Agency has confirmed the Broads Authority is not a flood risk management authority under the Coastal Protection Act. Please note that my comments paraphrases a report from a local Parish Council meeting, but do reflect my personal opinion. The SMP was adopted in 2012, I consider quoting it by the BA to be irresponsible partly because the situation regarding erosion and climate change has moved on a long way in 8 years, and shoreline management is not part of your responsibility. My understanding is that the BA makes reference to managed retreat, possibly the reference is not the exactly correct wording from the SPD as I picked up the information from a Parish Council meeting. You'll appreciate that these consultation documents are rarely accessible to general public understanding, given their nature. As to how I wish to proceed, I would simply like to register that "any" reference to managed retreat however obliquely worded has no place in any plan or consultation and that to do so is irresponsible and beyond BA's responsibility. I hope this is possible as I believe it is very important and is relevant to all planning considerations along and adjacent to Norfolk's coast. My suggestion is that the following text is taken out of the document, struck through. 'This is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment, or a retired line of defence further inland. In relation to the present day'</p>	Noted. The document uses the position set out in the Shoreline Management Plan. However we will amend 5.9.	<p>As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. This is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment, or a retired line of defence further inland. In relation to the present day, the Plan says:</p>
#28	Richard Starling	Somerton Parish Council	The Parish Council supports the main purposes of the plan to increase awareness, advice to developers and to maintain high standards of design.	Support noted.	No change to SPD
#29	Richard Starling	Somerton Parish Council	The plan should state that not all areas of the Broads have detailed hydraulic information and the Environment Agency acknowledges these limitations. The Broadland Futures Initiative minutes of their 21 October 2019 meeting (Note 6 A.O.B.) state "The need to establish the true picture regarding the functional floodplain" and, furthermore, "The need for up to date and accurate land levels especially between the Broads and the Coast". The planning document should include these references to reflect the current position especially section 5.8. Functional Flood Plain. The Environment Agency recognise the need for more detailed surveys and they intent to publish an online public consultation regarding Broadland flood modelling in coming months. Until these surveys are completed the document should state that "the extent and efficiency of the Functional Flood Plain has yet to be established" This would be in line with current Environment Agency information.	<p>Noted. The Local Plan sets this out on page 35.</p> <p>The Authority has a joint position statement with the EA on this very topic: http://www.broads-authority.gov.uk/__data/assets/pdf_file/0011/958286/SFRA-Position-Statement-June-2018.pdf</p> <p>The SPD talks about this in section 5.5.4</p> <p>The issue is therefore adequately addressed.</p>	No change to SPD

Ref	Name	Organisation	Comment	BA response	How SPD changed/amended
#30	Richard Starling	Somerton Parish Council	The Coast (5.9) You mention, in relation to the local sea defences, hold the line up to 2055, that this is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment on a retired line of defence further inland. The Broads Authority is not, according to the Environment Agency, a risk management authority under the Coast Protection Act and therefore Somerton Parish Council considers that the document should not include speculations on what might or may be investigated since the Authority is not qualified to make such statements. These references should therefore be removed or attributed to a body which is qualified.	Noted. The document uses the position set out in the Shoreline Management Plan. However we will amend 5.9.	As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line up to 2055. This is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment, or a retired line of defence further inland. In relation to the present day, the Plan says:
#31	Lorraine Houseago	Norfolk County Council	Thank you for consulting us on this amended planning document. We have no comments to make.	Noted.	No change to SPD
#32	Simon Marjoram	Broadland and South Norfolk Councils	References to the impacts of 'climate change', such as the suggested increase in river flows that have been added to para 4.4.1, should be cross-referenced to source material. It would also make the SPD more useful if, where possible, it could be quantified as to what taking into account climate change means in terms of what is required of applicants to demonstrate the acceptability of proposals.	Agreed. EA said the same.	See Row #18. And reference added to 4.4.1.
#33	Simon Marjoram	Broadland and South Norfolk Councils	The SPD would benefit from being more consistent in its reference to Neighbourhood Plans, e.g. para 7.1.3 refers to taking into account other policies in the Broads Local Plan and adjoining authorities' Local Plans, but should refer to Neighbourhood Plans too, as they also form part of the Development Plan; and	Agreed. Will amend 7.1.3	7.1.3 It should be noted that all aspects of the development need to comply with policies of the Local Plan (adopted 2019) as well as adopted Neighbourhood Plans and that conformity with policies SP2 and DM5 does not override applicability of other policies (of the Broads Authority and other relevant Local Planning Authority).
#34	Simon Marjoram	Broadland and South Norfolk Councils	The document numbering also goes awry in places (see sections 5.7 to 5.9).	Noted.	Check all formatting and numbering on adoption of the SPD. Also read through to check for any grammatical or typographical errors.
#35	Andrew Parnell	Great Yarmouth Borough Council	Great Yarmouth Borough Council welcomes the SPD and supports the approach of the Broads Authority to add further detail to Planning Policies around this important issue	Support noted.	No change to SPD.
#36	Andrew Parnell	Great Yarmouth Borough Council	Beginning at point 6.4 the tests to apply the sequential test may require more thought particularly in regards to area of search (6.5.8.)	Noted.	Add this as a bullet point to 6.5.8: Or a wider/another area as appropriate and subject to agreement with the Broads Authority
#37	Andrew Parnell	Great Yarmouth Borough Council	Our own draft policy available here (Policy E1, page 147) seeks to address the application of the sequential test. As an alternative for the broads would the relevant housing market area be an more appropriate area for applying the test for housing proposals?	Part of our area is in the Central Norfolk Housing Market Area which is the area of 5 districts. This approach might not work.	See response to #36 which may address this comment as well.
#38	Andrew Parnell	Great Yarmouth Borough Council	It is also unclear how a developer has to justify its area of search and what appropriate justification would constitute (6.5.11)	This depends in the site and the location. It will be for the applicant to address using this section as a guide.	No change to SPD.
#39	Paul Fletcher	Beccles Society	It is a very comprehensive document and is based on a lot of common sense in conjunction with planning policies. As such we have no further comments to make.	Support noted.	No change to SPD.
#40	Lisa Weller	Hoveton Parish Council	Hoveton Parish Council reviewed the draft Broads Flood Risk Supplementary Planning Document at its meeting of Monday 2nd March, and the Council noted that the draft document doesn't recognise the particular problems that exist in Hoveton regarding surface water and foul water flooding. Hoveton Parish Council would like to request that text is added within the table provided on page 21 of the draft document (sources of flood risk, North Norfolk), as follows:	Noted.	See next rows.

Ref	Name	Organisation	Comment	BA response	How SPD changed/amended
#41	Lisa Weller	Hoveton Parish Council	Under 'surface water' column: There are foul water flooding issues in Hoveton and Wroxham alongside the River Bure, from water running down and across Norwich Road in both these settlements and also in areas of Hoveton which experience serious surface water flooding at times of significant rainfall.	Agree and will amend table.	<ul style="list-style-type: none"> • Hoveton Parish Council, in response to the second consultation on the SPD, stated that there are foul water flooding issues in Hoveton and Wroxham alongside the River Bure, from water running down and across Norwich Road in both these settlements and also in areas of Hoveton which experience serious surface water flooding at times of significant rainfall.
#42	Lisa Weller	Hoveton Parish Council	Under 'foul sewer' column: Within Hoveton, the existing sewers have become overloaded, especially as new developments have added their discharge to the catchment. Sewer flooding is therefore now a problem in parts of Hoveton, with discharges into residential properties, which will need to be resolved by Anglian Water.	Agree to some extent and will amend table. Also see row #18.	<ul style="list-style-type: none"> • Hoveton Parish Council, in response to the second consultation on the SPD, stated that the existing sewers have become overloaded and sewer flooding is now a problem in parts of Hoveton.
#43	Hayley Goldson	Chedgrave Parish Council	Thank you for granting an extension on this matter. It was considered by Chedgrave Parish Council at its meeting on 5th March. Councillors have no comments.	Noted.	No changes to SPD