

Original Responses

Personal data such as phone numbers, signatures and personal email addresses have been redacted. Organisational contact information has been retained.

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Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Stewart Patience	
Organisation / Group	Anglian Water Services Ltd	
Address line 1	Thorpewood House	
Address line 2	Thorpewood	
Town / City	Peterborough	
County		
Post Code	PE3 6WT	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM1
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes ☒

No ☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes ☐

No ☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared ☐

Justified ☒

Effective ☒

Consistent with national policy ☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Anglian Water is generally supportive of Policy PUBDM1 as drafted particularly the requirement that planning permission will only be granted where it can be demonstrated that foul water treatment or disposal already exists or can be provided in time to serve the development.

However it is noted that the final sentence of PUBDM1 states that applicants will have to demonstrate that capacity is available both within the foul sewerage network and at the Horning Knackers Wood Water Recycling Centre.

As stated in the Local Plan Horning Knackers Wood Water Recycling Centre (WRC) does not currently have capacity for additional foul flows due to surface water ingress as outlined in the relevant Position Statement.

However as emphasised in the Local Plan there is expected to be further progress on this issue following the publication of this statement.

Anglian Water is intending to undertake further technical work on this issue to investigate further the cause of the excess surface water flows and the impact of this on both the foul sewerage network and the capacity of Horning Knackers WRC. As part of which we will work with partner organisations with a responsibility for flood risk to undertake further action subject to the outcome of this work.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☒

If you have answered 'No' could you please explain why this has not been raised before:

To allow for a change of circumstances following further discussions and work by Anglian Water and/or other (flood) risk authorities.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

We would therefore suggest that Policy PUBDM1 of the Local Plan should be amended as follows to allow for a change in circumstances:

'To ensure the protection of designated sites, no new development that increases foul water flows requiring connection to the public foul drainage system within the Horning Knackers Wood Catchment will be permitted, until it is confirmed that capacity ~~is~~ **can be made** available within the foul sewerage network and at the Water Recycling Centre to serve the proposed development.'

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☒ No ☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Anglian Water would wish to reserve the right to appear at the public examination to represent our interest as a sewerage undertaker.

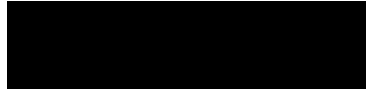
(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:

A solid black rectangular box used to redact the signature.

Date: 12th January 2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Stewart Patience	
Organisation / Group	Anglian Water Services Ltd	
Address line 1	Thorpewood House	
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Town / City	Peterborough	
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Post Code	PE3 6WT	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM3
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☒

No

☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We understand that the Environment Agency considers that the Anglian Water company area is located in an area of serious water stress as defined in the Environment Agency's map (Water Stressed Areas – final classification). Therefore we would fully support the optional water efficiency standard being applied within the Broads Authority Local Plan area.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM5
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

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Justified

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Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Anglian Water is generally supportive of Policy PUBDM5 as drafted and the overall objectives of the policy which will help to reduce the risk of surface water and sewer flooding. However we have some detailed comments relating to the wording which appears in the first and second paragraphs of this policy.

First paragraph, Point h): it is suggested that deep infiltration or borehole soakways should be considered at the same time as a combined sewer based upon advice provided by LLFA. However this appear to be inconsistent with Part H of Building Regulations and the National Planning Practice Guidance which specify that public sewers as the method of last resort for surface water disposal.

Second paragraph: In relation to the discharge of surface water we require a greenfield run off rate from the site including on brownfield sites where it is proposed to discharge surface water to the public sewerage network in accordance with Anglian Water's Surface Water Drainage Policy (<http://www.anglianwater.co.uk/assets/media/Surface-Water-Drainage-Policy-November-2017.pdf>).

Reference is made to surface water run off rates being no more than prior to development taking place. This is not consistent with Anglian Water's Surface Water Management Policy and the objective for the discharge of surface water from brownfield sites as outlined in Norfolk LLFA Statutory Consultee Guidance Document (page 13 of the document).

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

We would therefore suggest that Policy PUBDM5 of the Local Plan should be amended as follows circumstances:

- 'a) Continue natural discharge processes;
- b) Store water for later use;
- c) Adopt shallow infiltration techniques in areas of suitable porosity;
- d) Discharge direct to deep infiltration or borehole soakways**
- ~~de)~~ Store water in open water features for gradual release to a watercourse;
- ~~ef)~~ Store water in sealed water features for gradual release to a watercourse;
- ~~fg)~~ Discharge direct to a watercourse;
- gh) Discharge direct to a surface water drain (highways, Anglian water or other body or within private ownership);
- ~~h) Discharge direct to deep infiltration or borehole soakways;~~ or
- i) Discharge direct to a combined sewer '

'The surface water run-off rates that will occur as a consequence of the development are required to be no more than the greenfield rate for the equivalent event for greenfield sites or, if the site is brownfield, **discharge at a rate no greater than the equivalent greenfield rate for the site prior to development.** ~~However, applicants are encouraged to seek betterment in surface water run off as part of their proposals.~~ **Where the final discharge point is a public sewerage network the runoff rate should be agreed with the sewerage undertaker.'**

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Anglian Water would wish to reserve the right to appear at the public examination to represent our interest as a sewerage undertaker.

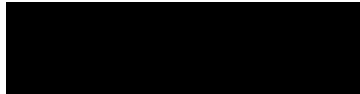
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If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDSP2
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☒

No

☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

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Effective

☐

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Anglian Water is supportive of the requirement to incorporate Sustainable Drainage Systems as part of new developments which will help to address sewer flooding and surface water flooding.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☒

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 12th January 2018

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Diana Arnott [REDACTED]
Sent: 12 February 2018 19:47
To: Planning Policy Mail
Subject: Arnott, D

Categories: Ack and Filed and on database

[REDACTED]

[REDACTED]

[REDACTED]

Dear Ms N Beal

Re: Draft Local Plan for residential moorings – Greeway Marine, Chedgrave and Loddon Marina, Loddon.

I would be against the proposed residential moorings because of the increased amount of traffic turning on to Bridge Road, at peak times this can be difficult with the 2 adjacent roads trying to turn out at the same time and difficulties have already been encountered when the traffic from Wherry Close wishes to turn right and the traffic from the marina wishes to turn left.

Yours sincerely

Diana Arnptt

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
30th January 2018

Re: Residential moorings Chedgrave and Loddon

Thank you for your letter re draft local plan. Living virtually opposite and nearby both proposed sites my wife and I find ourselves alarmed by your proposals. We have resided in Wherry Close for eleven years and we have experience of the boats likely to take advantage of your scheme and in particular we have experience of the owners of such craft.

The allocations suggested are capable of accommodating over time a considerable number of such boats (including floating hen houses and other unsightly constructions) and feel it is grossly unfair to saddle the Loddon and Chedgrave communities in this way particularly when applications for residential berths in other areas of the Broads have been rejected by your authority.

In the past we have experienced inappropriate behaviour caused by alcohol and substance abuse with townsfolk and visitors feeling threatened and intimidated.

We appreciate the problem you face but we ask you please to seek a more equitable solution.

Yours sincerely

Geoffrey Barber

Respondent: Beccles Society

Lottie Carlton

From: [REDACTED]
Sent: 15 December 2017 11:28
To: Lottie Carlton
Subject: Re: Consultation reminder: Local Plan for the Broads - Have your say!

Follow Up Flag: Follow up
Flag Status: Completed

Hello Lottie,

Thank you for consulting Beccles Society again on the latest stage of the Broads Local Plan. We discussed the details of your proposals again at our meeting on 13th December. Your detailed options for Beccles at a) the former Loaves and Fishes, b) H.E.Hippersons boatyard and c) the land surrounding Beccles Rowing Club, off Puddingmoor are all totally acceptable. We also considered all your Policy statements and as most of these had not shown significant changes since last time, we were again in full agreement with them.

So, this is a long way round of saying No Comments.

Kind regards,

Paul Fletcher
Chairman, Beccles Society

On 13 Dec 2017, 15:09 +0000, Lottie Carlton <Lottie.Carlton@broads-authority.gov.uk>, wrote:

Dear Mr Paul Fletcher Beccles Society

CONSULTATION REMINDER

Local Plan for the Broads: Have your say

Your comments are invited on the Publication version of the Broads Local Plan, which sets out the final policies we wish to use to help determine planning applications in the Broads Authority Executive Area. This is the final stage of consultation before we submit the Plan to the Planning Inspector.

To view the consultation documents, visit our website at www.broads-authority.gov.uk/broadsconsultations. The following documents are available as part of this consultation:

- Local Plan for the Broads: Publication version
- Habitats Regulation Assessment (HRA)
- Sustainability Appraisal (SA)
- Evidence that supports the Local Plan
- Policies maps



BECCLES TOWN COUNCIL

TOWN HALL, THE WALK, BECCLES, NR34 9AJ
TEL 01502 712109 ~ FAX 01502 716166
admin@beccles.info
www.beccles.info

Marie-Pierre Tighe
Director of Strategy & Sustainable
Communities
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

14 DEC 2017

11th December 2017

Dear Marie-Pierre

Beccles Town Council Response to Broads Authority Local Plan for The Broads

I am writing on behalf of Beccles Town Council to inform you that we fully endorse the Local Plan for The Broads.

Whilst reviewing the consultation document, the Planning Committee felt it was a well considered and comprehensive document and had no objections or amendments to any of the proposals therein.

Yours sincerely



Nicky Elliott
Chair of Planning

Broads Authority Local Plan**Publication version (November 2017)****Representation Form****For Office Use Only**

Consultee ID:

Received:

Processed:

This is the form for making representations on the Broads-Authority Local Plan Publication version. Once completed, please return by email to planningpolicy@broads-authority.gov.uk.

A guidance note is also available to assist you in making your response. Please go here <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The various documents that are being consulted on can be found here: <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The consultation ends 4pm on 5 January 2018. Responses received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

Hard copies of this form are available from the Broads Authority Office in Norwich and the drop-in events taking place across the Broads, details of which can be found at the website above.

Please note:

- **Separate forms should be completed for each representation.**
- **All respondents must provide their personal details.**
- **Representations should be on the basis of the soundness or legal compliance of the Plan. (Please see guidance note for more details.)**
- **It is recommended that groups who share a common view submit a single form rather than multiple copies and provide a list of each person supporting the representation.**
- **By completing this form you agree to your details being shared. Your name, address and comments (but not your other personal details) will be made available for public viewing. These representations cannot be treated as confidential.**

Please expand the boxes as necessary or attach additional sheets. Please clearly mark any additional sheets with your name and the part of the document the representation relates to.

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Beccles Town Council	
Organisation / Group	(if applicable)	
Address line 1	Town Hall	
Address line 2	The Walk	
Town / City	Beccles	
County	Suffolk	
Post Code	NR34 9AJ	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

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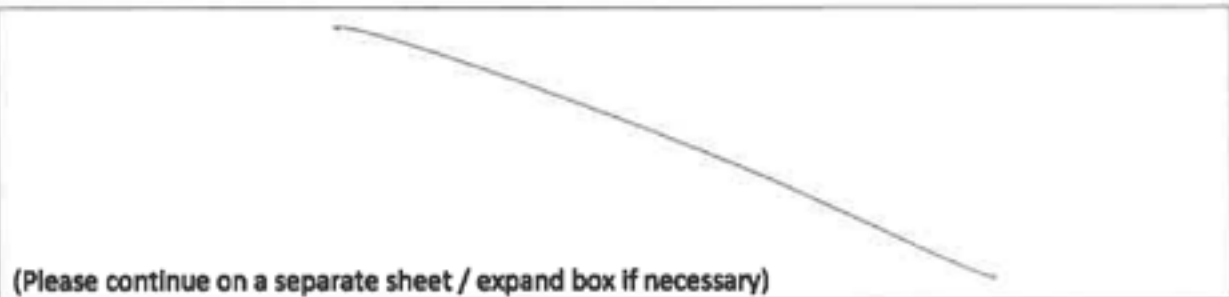
8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

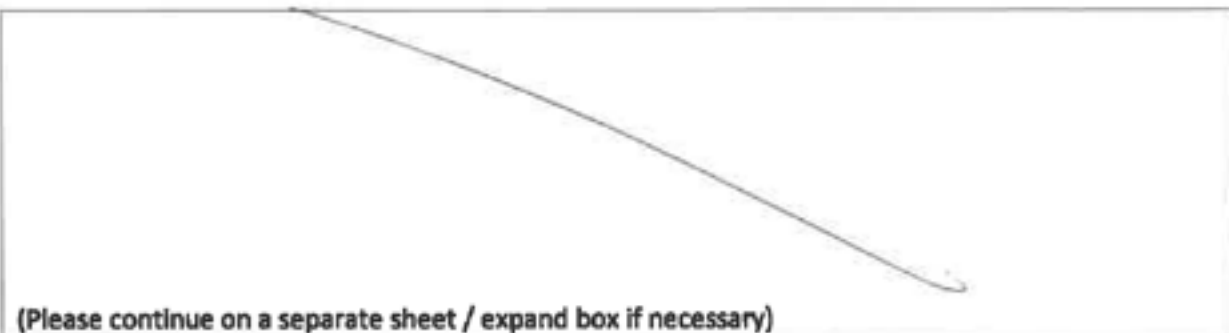
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If you have answered 'No' could you please explain why this has not been raised before:



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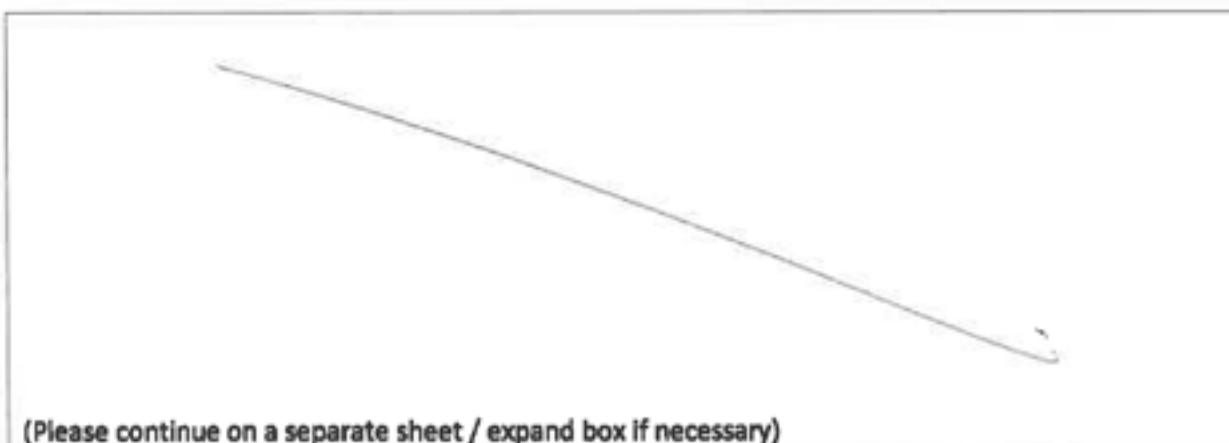
Yes

☐

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?



(Please continue on a separate sheet / expand box if necessary)

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Please sign and date this form:

Signature:

ON BEHALF OF BOACHTON TOWN COUNCIL.

Date:

9/1/18.

The closing date for responses is 4pm 5 January 2018



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A guidance note is also available to assist you in making your response. Please go here <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The various documents that are being consulted on can be found here: <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The consultation ends 4pm on 5 January 2018. Responses received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

Hard copies of this form are available from the Broads Authority Office in Norwich and the drop-in events taking place across the Broads, details of which can be found at the website above.

Please note:

- Separate forms should be completed for each representation.
- All respondents must provide their personal details.
- Representations should be on the basis of the soundness or legal compliance of the Plan. (Please see guidance note for more details.)
- It is recommended that groups who share a common view submit a single form rather than multiple copies and provide a list of each person supporting the representation.
- By completing this form you agree to your details being shared. Your name, address and comments (but not your other personal details) will be made available for public viewing. These representations cannot be treated as confidential.

Please expand the boxes as necessary or attach additional sheets. Please clearly mark any additional sheets with your name and the part of the document the representation relates to.

1.	Your contact details	Agent Details (if applicable)
Name	Richard Starling	
Organisation / Group	(if Broads Reed & Sedge Cutters Association applicable)	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		

E-mail address		
----------------	--	--

2. Group Representations

If your representation is on behalf of a group, how many people support it?

All members emailed a copy of this response for comment / agreement. All agreed.

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No X

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	Policy PUBSP2
Map reference	
Appendix	
Supporting Document	Broads Authority Flood Risk Supplementary Document March 2017

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No x

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No x

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared x

Justified

Effective x

Consistent with national policy x

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The reasoned justification of Policy PUBSP2 includes reference to "The extent and nature of flood risk, with significant areas of 'functional floodplain' mean that flood risk is a major constraint on development in the Broads" The policy includes a reference to "Particular care will be required in relation to habitats designated as being of international, national, regional and local importance in the area and beyond which are water sensitive" and that "Development proposals which would have an adverse impact on flood risk management will be refused"

On page 10 of 51 in the Broads Authority Flood Risk Supplementary Planning Document - Adopted March 2017, part 3.8. Functional Flood Plain it states "The NPPG describes the Functional Flood Plain as 'where water has to flow or be stored in times of flood' and, furthermore, "The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters". The same paragraph includes the statement "...should provide a starting point for consideration and discussions to IDENTIFY THE FUNCTIONAL FLOODPLAIN"

On page 5 of 51 of the same document, under Zone 3b it mentions "This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their

Strategic Flood Risk Assessments, areas of functional floodplain and its boundaries accordingly with the Environment Agency.

This objection is based on the fact that the Broads Authority have not clearly identified the true areas of functional floodplain and its boundaries in The Broads. It is fact that the Broads Authority have, in the past, been responsible for reducing the area of functional floodplain by sealing of sites ie preventing the natural flow of water on and off land surrounding rivers and broads. This has interfered with the natural functioning process of the floodplains. It is therefore impossible to make a true assessment of flood risk without knowing the real areas of functional floodplain. Page 24 of the Ramsar handbook for the wise use of wetlands, 4th edition, 'Land use change, biodiversity and wetlands' clearly states "Decision making should, wherever possible, give priority to safeguarding naturally functioning wetlands etc etc ". This demonstrates that the Broads Authority has an International obligation when it comes to decisions which impact upon Ramsar designated sites. Our Association is currently working with the Environment Agency to establish the real areas of floodplain by undertaking a voluntary mapping exercise with our Members to clearly identify those sites in the Broads which have been removed from the functional floodplain. It is only when this exercise is completed will we have a clear picture of how the floodplains are functioning which in turn will assist in preparing a more accurate strategic flood risk policy.

This demonstrates that Policy PUBSP2 has not been positively prepared, cannot be effective until the true functional floodplain areas are established . The NPPG description of Functional Flood Plain also states "Generally, development should be directed away from these areas using the Environment Agency's catchment flood management plans, shoreline management plans and local flood risk management strategies produced by lead local flood authorities"

Without knowing the true picture of functioning floodplains in the Broads, we cannot rely on any existing flood management plan or flood risk strategy.

We suggest that Policy PUBSP2 is put on hold until the true functional floodplain areas are established in The Broads.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

x

If you have answered 'No' could you please explain why this has not been raised before:

We did not consider the solution rested with the Broads Authority's planning department but with the actual Broads Authority itself. The issue was raised several times at the Broads Authority's Broads Forum but nothing happened. Our Association decided to raise this matter direct with the Environment Agency who have responded very well and we are now working with the Agency to establish the sites in the Broads which have been removed from the functioning floodplain.

(Please continue on a separate sheet / expand box if necessary)

To make the plan sound, the areas of functioning floodplain have first to be established and agreed by the Environment Agency. This will then provide a stronger base to form a more accurate catchment flood management plan and local flood risk management strategies. The policy and it's wording could stay in place but only if an additional reference was included which reflected the reality of the current situation. This could be;

(Please continue on a separate sheet / expand box if necessary)

Yes X No

To verify the responses to our suggestions.

(Please continue on a separate sheet / expand box if necessary)

- The adoption of the Broads Local Plan.

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Natalie Beal
Sent: 04 January 2018 12:13
To: Lottie Carlton
Cc: Planning Policy Mail
Subject: FW: Brasca - Broads Local Plan Response - 4th January 2018

[Additional comments to the original rep.](#)

From: Natalie Beal
Sent: 04 January 2018 12:03
To: 'richard starling'
Subject: RE: Brasca - Broads Local Plan Response - 4th January 2018

Ok Richard, thanks.

The only thing I would say is that from a planning point of view, we have done all we can and all we need to – we have an up to date SFRA that identifies flood zone 3b as we are required to and also we have a joint position statement with the EA on the BESL area. So I am not sure what else we can do.

If a meeting is what you want, then I can talk to Simon about this, but not sure objecting on grounds of soundness of the Local Plan is the most appropriate way to get a meeting especially as the issues you raise do not seem to relate directly to the Local Plan (see above regarding what we are required to do and what we do).

Natalie

From: richard starling [REDACTED]
Sent: 04 January 2018 12:00
To: Natalie Beal
Subject: Re: Brasca - Broads Local Plan Response - 4th January 2018

Hello Natalie,

We would not have made this response if we thought for a minute that the situation was being addressed.

Today, I can inform you that we are concentrating on the Ant valley and our members have already identified significant areas which the Broads Authority have previously restricted water flow by sealing off sites. We are still awaiting water level data from EA for Barton Broad.

Sadly, no one at the Authority has done anything about our concerns and repeated requests for action at the Broads Forum have been met with silence.

By working with the Environment Agency direct, we feel we will clearly demonstrate that the natural functioning floodplains in the Broads have been reduced and done so against the advice of National and indeed International bodies (Ramsar).

This can all change of course if the Broads Authority agreed to meet with ourselves, Natural England and the Environment Agency to talk about the situation. In the meantime, I think it best to stick with the response agreed by our membership.

Regards

Richard

From: Natalie Beal [REDACTED]
To: richard starling [REDACTED]; Planning Policy Mail <PlanningPolicy@broads-authority.gov.uk>
Sent: Thursday, 4 January 2018, 10:35
Subject: RE: Brasca - Broads Local Plan Response - 4th January 2018

Thanks Richard.

We now have a SFRA and a joint position statement with the EA about the 'BESL' model area.

The SFRA shows modelled areas of 3b and indicative areas of 3b (which is the BESL area)

SFRA here: <http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra>

(Waveney's is being finalised, but the Waveney is under the 'BESL' area).

The Joint Position Statement is here: http://www.broads-authority.gov.uk/data/assets/pdf_file/0011/958286/SFRA-Position-Statement-9-May-2017.pdf

I am not sure what else you think we need to do?

Does this address your comment?

Natalie

From: richard starling [REDACTED]
Sent: 04 January 2018 10:27
To: Planning Policy Mail
Subject: Brasca - Broads Local Plan Response - 4th January 2018

Please find attached our response to the Broads Local Plan Consultation.

Regards

Richard Starling
Brasca
Broads Authority, Yare House, 62-64 Thorpe Road. Norwich NR1 1RY
01603 610734
www.broads-authority.gov.uk



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Appendix F – Residential Moorings – call for suitable areas

Are there any areas which you think are suitable for residential moorings which meet the criteria as set out below?

If so, please fill out this form with details of areas you feel are suitable for residential moorings. A separate form for each site. Please email the completed form, maps and photos to: PlanningPolicy@broads-authority.gov.uk and title your email 'Residential Mooring Sites'.

Your name: David Broad	Your email address: [REDACTED]	Your phone number: [REDACTED]
Your address: [REDACTED]		

- What is the address of the proposed residential mooring?

28-32 Ropes Hill, Horning NR12 8JS

- We must have a map to show us the area you refer to.

Your map should show the boundary of the residential mooring (draw a line around it in a highlighter perhaps) as well as give the context to enable officers at the Broads Authority to find the site easily).

Have you included a map? ☐

- Have you included photographs of the proposed residential mooring? Yes No

Please explain how your proposed site addresses the following criteria:

1: How many residential moorings or what length of residential moorings is proposed?	Up to six from 40 to 60ft
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	Primary School, public toilets, post office, butchers, newsagents, cafes pubs, Chinese takeaway, restaurants all within walking distance. Regular bus services to nearby Wroxham, Norwich, UEA and N&N Hospital.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	Private 'marina' for 5 boats
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No, moorings would be recessed in bays
5: Is riverbank erosion an issue here? How would this be addressed?	No, off river
6: What are the adjacent buildings	Residential Properties

or land used for	Sailing Club, hotel and pub
7: What is the character or appearance of the surrounding area?	Riverside houses and boat houses
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes no public walkways nearby
9: What car parking is there for people living on boats (e.g. car park or park on road)?	Two car parking areas for up to eight vehicles and a loading/disabled access driveway
10: How can service and emergency vehicles access the area safely?	Off Lower Street Horning, Easily accessible as regular large refuse vehicle visits.
11: How would waste and sewerage be disposed of?	Mains drainage accessed by float chambers
12: Is the area on mains sewerage?	Yes
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No
14: Do you own the site? If not who does and have you told them about your proposal?	Yes
15: What is the current use of the site?	Permanent private moorings

Please note that:

- Your nomination will be assessed by the Broads Authority.
- We cannot guarantee that your nomination will be allocated for residential moorings as the nomination might not be suitable.
- Your nomination will be made public



Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name		John Walchester
Organisation / Group	Broadland District Council	
Address line 1	Thorpe Lodge 1 Yarmouth Road	
Address line 2	Thorpe St Andrew	
Town / City	Norwich	
County	Norfolk	
Post Code	NR70DU	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBTSA2
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Part (c) Western end of Thorpe Island (including the basin) of the policy is objected to.

It is not "Positively prepared" – the development and infrastructure requirements for this have not been objectively assessed, nor do they achieve sustainable development; it is not "Justified" – there is no robust and credible evidence base to support the policy; it is not "Effective" – there is no indication as to how the proposal is deliverable, particularly in terms of the infrastructure provision, nor is it actually clear what will be allowed under the policy. In terms of the National Planning Policy Framework, paragraph 14 of the NPPF suggests that there is a presumption in favour of sustainable development, and that local plans should meet objectively assessed needs and that for decision

taking development proposals that accord with the development plan should be approved. However, unless it is clear what is actually being proposed it cannot be known whether or not these tests are met. Further, paragraph 16 explains that "all plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally" (my underlining). The policy as currently worded does not meet this.

Firstly, the first paragraph states: "This part of the island will be used for low key uses". What is meant by this? Does this mean that "low key" residential uses will be permitted, or other types of development, subject to meeting the other stated criteria of removing the existing structures and making visual and biodiversity improvements? It gives no guide as to the type of development that will be allowed, other than an undefined "low key use".

Secondly, the second paragraph refers to the provision of 25 private moorings within the basin "subject to the satisfactory provision of well-designed on-site car parking, refuse storage and disposal, sewage disposal and upgrades to the bridge". There has been no assessment of how this scale of development will be achieved, or what the impacts will be from it.

In particular the current bridge is narrow and private access only, and served through a quiet residential area. It is not appropriate for this to be upgraded to accommodate the vehicular access delivery, construction and waste disposal vehicles for the moorings and other undefined "low key uses" allowed under the policy. Although the supporting text for the policy (under reasoned justification) acknowledges the shortcomings of the bridge access, that the access is "not a suitable route for significant traffic or heavy vehicles", and parking problems in the area, no assessment has been made of the impacts of the policy, for example in terms of traffic flows, noise, pollution, parking in the nearby area etc; nor from the actual upgrading of the bridge, which presumably will entail a larger structure with visual impacts.

Thirdly, the second paragraph states that "moorings shall be laid out in an informal configuration to avoid regimentation in appearance", but the following paragraph states that "moorings will only be allowed within the basin and not along the river frontage". It is difficult to see how the number of moorings in such a confined space can be anything but regimented in order to operate effectively and safely.

Fourthly, the last paragraph states "no other development shall be permitted on the western end of the island". Presumably this means in addition to the moorings and "low key uses" referred to in the earlier part of the policy; but it is a bit meaningless if it is not clear what is actually allowed on the island under the term of "low key uses".

In conclusion, it is clear that this element of the policy is seriously deficient and fails the tests of soundness. It should be deleted or replaced with a policy that has been properly thought out and assessed.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☒

No

☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

It should be deleted or replaced with a policy that has been properly thought out and assessed. If deleted this will remove the soundness issue. Similarly, a properly prepared policy should meet the soundness tests.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

In order for there to be full discussion of the issues.

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: J. Walchester on behalf of Broadland District Council
Date: 28/12/2017

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name		John Walchester
Organisation / Group	Broadland District Council	
Address line 1	Thorpe Lodge 1 Yarmouth Road	
Address line 2	Thorpe St Andrew	
Town / City	Norwich	
County	Norfolk	
Post Code	NR70DU	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSSA47
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The A47 is a trunk road of national importance and of international importance as the main road link to the port of Great Yarmouth. Consequently, the consideration of any improvements to the A47 Acle Straight should have full regard to this importance. Conversely, there are elements of the Broads area that are of national and international importance and regard should similarly be had to these. In effect, in terms of a planning application it is a matter of "balance" that the decision maker must weigh-up the benefits and disbenefits and come to a decision.

However, the policy and supporting text focuses on potential disbenefits rather than also addressing / explaining the potential benefits. In particular, in the third paragraph it is stated :

"any proposed schemes will need to : (a) Demonstrate clearly the justification for the changes, and with any benefits significantly outweighing any negative impacts ". Such a policy statement undermines the decision making process. It is for the decision-maker to determine the relative weight to apply, and at what point the balance tips in favour of one way or the other. Often the balance will be a fine one, but if the benefits outweigh the impacts even slightly it would be logical to decide in favour of the proposal. Requiring there to be a "significant" outweighing of the negative impacts is not justified.

Also, the criteria contained within the policy contain a number of requirements that could not be justified as necessary to mitigate the impacts of the development ie (vi) walking, cycling and horse-riding routes to be provided to urban areas and public rights of way; (vii) interpretation measures and viewing areas to be provided.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☒

If you have answered 'No' could you please explain why this has not been raised before:

On close inspection of a very detailed and lengthy policy some elements of the wording are found to be deficient.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

1. At the end of the first paragraph add: "The social, economic and environmental benefits of the improvements will also be important in the consideration of a scheme".
2. In the third paragraph, point (a) the word "significantly" should be deleted.
3. In the fourth paragraph, criteria (vi) and (vii) should be deleted.

These changes will make the wording justified, effective and in accordance with national policy.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☒

No ☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

In order for there to be full discussion of the issues.

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: J. Walchester on behalf of Broadland District Council
Date: 28/12/2017

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Kelvin Allen [REDACTED]
Sent: 22 January 2018 09:28
To: Lottie Carlton; Planning Policy Mail
Subject: LATE RESPONSE Broads Angling Strategy Group (Allen, K - BA Member)

Categories: Ack and Filed

Dear planning team

I'm responding in both my capacity as a BA member and director of the Broads Angling Services Group CIC. We have discussed this at length and feel given this sets planning policy for many years, angling and in some respects other recreational activities need to be recognised in the local plan.

Having read through the Broads Local Plan, it is apparent that with the exception of Navigation individual stakeholders are specifically referenced, but we believe that angling should be unidentified in the plan as having unique importance for the following reasons:

Angling has a value of between £0.5 and £0.8 million per km of tidal river.

The socio-economical value of angling in the Broads area has equal or greater value to the entire Salmon and Sea Trout Fishery in Scotland.

18% of Broads visitors went fishing during their visit.

39% of Broads boat owners go fishing.

Anglers have specific requirements that whilst overlap with many other stakeholders, the duration and requirements of the activity mean their requirements are often quite different.

At many times of the year, fish populations are focused into very small geographic locations, rather than being "spread like currents in a cake" around the Broads system. This should be taken into account when decisions on creation of angling facilities are being made.

Anglers generally like to take advantage of quite early mornings and evenings to reduce the effect of boat traffic, however the restrictions that are placed on the use of some slipways is contra to this.

At most 24-hour moorings, angling is permitted, but anglers are expected to pack up and move if a boat wishes to moor, even for a few minutes. In many cases, these moorings offer the only access to the Broads for many miles and no alternative is offered; to anglers, this suggests they are seen as 2nd class stakeholders and can lead to conflict between boaters and anglers. Acknowledgement should be given to the need for angler-only provision to access.

Regards
Kelvin

Kelvin Allen
BA Member
Director Broads Angling Services Group
Chairman Angling Trust Eastern Region Freshwater Forum.

[REDACTED]

From: Lottie Carlton [REDACTED]
Sent: 04 January 2018 16:30
To: [REDACTED]
Subject: Broads Local Plan Consultation - Extension to deadline for comments

1.	Your contact details	Agent Details (if applicable)
Name	Kelvin Allen	
Organisation / Group	Broads Angling Services Group CIC	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

5

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

Directo

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP11
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

Y

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

Y

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Y

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

I and my fellow directors believe that the UK's largest inland fishery should have some form of protection in statute and this local planning policy seems the appropriate document. The policy on waterside access would be a sound policy to reflect any demands for development with possible implications to angling access and the social economics surrounding this.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

No

If you have answered 'No' could you please explain why this has not been raised before:

We have created a new community interest company to represent the anglers who fish the Broads, incorporated 27th Dec 2017.

We have been overwhelmed by the response to a survey launched 18th Jan of 18,800 rod licence holders who fish the Broads and who feel it needs some form of protection from development.

I have attached the CIC registration with director's details.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Within policy PUBSP11

Item v) Recreational facilities; and

Is amended to read

Item v) Recreational facilities; and the retention and provision of angling access

Reasoned Justification

The addition of the following paragraph:

There remains many months of low season availability for angling tourism, extending the visitor season for the benefits of the local community. Any further loss of water front access enabling angling would greatly impact the existing limited river bankside access.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☐ **yes** if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Kelvin Allen

Date: 22nd Jan 2018

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Hayley Goldson [redacted]
Sent: 13 December 2017 10:12
To: Natalie Beal
Cc: Lottie Carlton
Subject: Re: Broads Local Plan Publication Consultation - Have your say

Hi Natalie,

No thank you. The document was reviewed and in general the content was fine with the main item of interest being the 'live aboard' licences being granted to Greenway Marine which was not considered controversial as long as live-aboards are able to be properly managed e.g. to ensure upkeep, tidy-ness etc.

Best wishes,
Hayley

Hayley Goldson
Chedgrave Parish Clerk

On 13 December 2017 at 10:07, Natalie Beal <Natalie.Beal@broads-authority.gov.uk> wrote:

Thanks for that Hayley.

Did you have any comments at all to make?

Natalie

From: Hayley Goldson [mailto:[redacted]]
Sent: 13 December 2017 09:59
To: Lottie Carlton
Cc: Natalie Beal
Subject: Re: Broads Local Plan Publication Consultation - Have your say

Dear Ms Carlton and Ms Beal,

Thank you for the consultation information which was discussed at our parish council meeting of 7th December. It was agreed that the parish council does not feel equipped to respond on the basis of legal/compliance matters.

Best wishes,

Hayley

Hayley Goldson

Chedgrave Parish Clerk

On 9 November 2017 at 13:31, Lottie Carlton [REDACTED] wrote:

Dear Parish Clerks

We would be grateful if you could pass on the following information to members of your parish council and the public in your parish. Attached is a poster advertising the consultation which we would be grateful if you could display. Also attached is the summary leaflet, the representation form for comments and a guidance sheet.

Thank you

Local Plan for the Broads: Have your say

Your comments are invited on the Publication version of the Broads Local Plan, which sets out the final policies we wish to use to help determine planning applications in the Broads Authority Executive Area. This is the final stage of consultation before we submit the Plan to the Planning Inspector.

To view the consultation documents, visit our website at www.broads-authority.gov.uk/broadsconsultations. The following documents are available as part of this consultation:

- Local Plan for the Broads: Publication version
- Habitats Regulation Assessment (HRA)
- Sustainability Appraisal (SA)
- Evidence that supports the Local Plan
- Policies maps
- Comments form and guidance
- Summary leaflet

Respondent: Eason, B

Lottie Carlton

From: Natalie Beal
Sent: 05 January 2018 13:49
To: brian.eason596
Cc: Planning Policy Mail
Subject: RE: Broads Local Plan Consultation - Extension to deadline for comments
Attachments: Broads Publication Version Local Plan rep form.docx

Follow Up Flag: Follow up
Flag Status: Completed

Thanks Brian.

Please can you fill the attached form out? Comments are below and we have your contact details, but we need to know answers to some questions please.

Thanks

Natalie

From: [REDACTED]
Sent: 05 January 2018 10:19
To: Natalie Beal
Subject: RE: Broads Local Plan Consultation - Extension to deadline for comments

Hi Natalie

Yes please log it unless things are done to improve affordable recreation on the water, the broads will become exclusive real estate with moorings at the bottom of the garden.

A far cry from the enterprising boat yards and cottage industries which our heritage gave us.

Still there will always be the web so no worries.

Thanks

Brian

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Natalie Beal <Natalie.Beal@broads-authority.gov.uk>

Date: 05/01/2018 09:55 (GMT+00:00)

To: [REDACTED]

Subject: RE: Broads Local Plan Consultation - Extension to deadline for comments

Dear Brian

Many thanks for this.

Sorry to hear about how you feel.

Is this a formal response to the Local Plan? Do you want me to log it?

Would you like to be taken off our contact database?

I will forward your comments to our senior management team so they are aware and they may come back to you.

Natalie

From: Lottie Carlton
Sent: 05 January 2018 09:51
To: Natalie Beal
Subject: FW: Broads Local Plan Consultation - Extension to deadline for comments

From: [REDACTED]
Sent: 04 January 2018 17:33
To: Lottie Carlton
Subject: Re: Broads Local Plan Consultation - Extension to deadline for comments

Hi Lottie

Thank you for sending me this. Unfortunately my love affair with the broads has sadly finished.

The broads has in my opinion been overwhelmed with money from London. Having owned four boats on the broads and managed them on a budget, I have finally been priced off the water and sold my last boat.

The facilities have deteriorated. Shops and moorings vanished. Public toilets disappeared, rubbish disposal facilities lost and amenities such as helpful boatyards and attractions like entertainment all but gone.

The boating community has lost its make and mend attitude and the comradeship which accompanied it. Health and safety prevents owners having facilities to work on their own boats.

Professional repair costs rip off owners.

The hire fleets price themselves above foreign holidays. Private marinas closely follow where boats rarely leave private moorings but are charged navigation fees designed to exploit a few square metres in the water.

So I leave the broads to the exclusive few.

They havnt a clue what they have missed.

A future I fear of inactivity as a national park cared for by the great and the good.

Carefully preserved in a box.

God forbid that the sound of children laughing whilst they enjoy the water should interfere with investments and the pursuits of the wealthy.

Yes the broads have changed for the worse in my opinion. I don't like the atmosphere or the unfriendly people it attracts.

An expensivr boat park where little enjoyment is tolerated unless hansomely charged for.

Happy New Year.

Regards

Brian Eason

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Lottie Carlton <Lottie.Carlton@broads-authority.gov.uk>

Date: 04/01/2018 16:21 (GMT+00:00)

To [REDACTED]

Subject: Broads Local Plan Consultation - Extension to deadline for comments

Dear Mr Brian Eason

EXTENSION TO DEADLINE FOR COMMENTS ON BROADS LOCAL PLAN

Lottie Carlton

From: Paige Harris [REDACTED]
Sent: 15 December 2017 10:18
To: Planning Policy Mail
Subject: Eat Anglian Marine Leisure (agent - Boyer)
Attachments: 171215 Draft Reps for Broads Publication Version Local Plan.pdf; 171214 Comments Form Signed.pdf

Categories: Ack and Filed

Dear Sir/Madam,

Please find attached representations to the Broads Publication Version Local Plan on behalf of East Anglian Marine Leisure. Please also find below a link to supporting documents for this representation:

<https://boyer.egnyte.com/fl/KXVfruOIYG>

I would be most grateful if you were able to confirm receipt of this email and its attachments.

Kind Regards,
Paige

Paige Harris BSc (Hons) MSc MRTPI
Planner

T [REDACTED]
W www.boyerplanning.co.uk
A 15 De Grey Square, De Grey Road, Colchester, Essex, CO4 5YQ

Boyer



Boyer's Colchester office is proud
to support Colchester Night Shelter



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To see full disclaimer that applies to this email please [click here](#).
To see our Standard Terms and Conditions of Contract please [click here](#).

Broads Authority Local Plan – Publication Version Consultation

Representations from Boyer on behalf of East Anglian Marine Leisure

Introduction

- 1.1 The Broads Authority Publication Version Local Plan will be important to set out the long-term vision and partnership actions to the benefit of the local environment, communities and visitors. This will greatly benefit the area and all of its users. The Plan combines strategies, programmes and policies that are relevant to the Broads which are reviewed regularly.
- 1.2 This Local Plan is concerned with planning and planning applications in the area as well as the issues the Local Authority faces, a vision of what the Broads area will look like in 2036 and the strategic policies and site allocations to move towards this. The Broads Plan has a focus on the strategic management of the Broads for the enjoyment of others both local and visitors.
- 1.3 The Broads Authority has several purposes including; conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads; promoting opportunities for the Broads understanding and protecting the interests of navigation. It is identified there needs to be a balance with that which affords opportunity and has regard to the needs of agriculture, forestry and the economic and social interests of those who are connected to the Broads.
- 1.4 These representations relate to land owned by East Anglian Marine Leisure at Marina Quays, Great Yarmouth (see site location plan at Appendix 1). These representations are made in response to the Broads Authority new Publication Version Local Plan (2017) and presented on behalf of East Anglian Marine Leisure.
- 1.5 Also supporting these representations are a series of documents consisting of; a Landscape Summary Statement, Engineering Visual Inspection and Report, Flood Response Evacuation Plan,

Flood Risk Assessment and Transport Statement, which are submitted alongside these representations to the Local Plan. These documents consisting of assessments and reports demonstrate that the land at Marina Quays is capable of supporting development in terms of landscape, structural engineering, flood risk and transport. Development here would greatly benefit the surrounding area as well as helping to support the economy through tourism and increased visitors to the area. Regeneration will also be a significant benefit to this underused, regularly vandalised and partly derelict site.

- 1.6 These representations have considered the draft policies relevant to the site and the general theme of regeneration.
- 1.7 We propose a revised policy for the Marina Quays area where redevelopment will ensure a continuation of water-based facilities and the provision of holiday accommodation as well as small scale residential development.
- 1.8 We support several of the publication version policies as these ensure that several types of development are allowed alongside the protection of the waterways and land in the Broads area.

Policy PUBDM4: Development and Flood Risk

- 1.9 We support Policy PUBDM4 that accepts development within flood risk zones when they show they are compatible with national and local policy. This however must not be too restrictive on development coming forward and that which does not meet all the criteria listed in this policy. Regard must be given to sites that are on previously developed land, currently not contributing to the local area and would be enhanced through development.

Policy PUBSP11: Waterside Sites

- 1.10 We support the Policy PUBSP11 that encourages the maintenance of waterside sites providing provision of visitor facilities and access to the water. The site at Marina Quays will provide visitor accommodation as well as improved access to the waterside at this site.

Policy PUBSP12 and PUBDM28: Sustainable Tourism

- 1.11 We support Policies PUBSP12 and PUBDM28 which details sustainable tourism due to the fact tourist attractions and tourism infrastructure will be supported. Particular emphasis is placed on improving the quality of visitor accommodation as well as broadening the range of accommodation provided.
- 1.12 The proposed development at Marina Quays will provide additional visitor accommodation for the area and therefore conforms to proposed Policies PUBSP12 and PUBDM28. These policies are supported.

Policy PUBDM29: Holiday Accommodation – New Provision and Retention

- 1.13 We support Policy PUBDM29 which deals with holiday accommodation. We agree with points A to D within the policy and the supporting text that accompanies it. The proposed development at Marina Quays will be in line with this policy in the Publication Version Local Plan.

Policy PUBSP14: Mooring Provision

- 1.14 Proposed Policy PUBSP14 has regard to mooring provision. We support this policy as it encourages visitor moorings where they contribute to the management of a safe and attractive waterway. Also supported is the encouragement of the Authority to provide residential moorings.

Policy PUBSP15: Residential Development

- 1.15 This policy is supported due to the fact that residential development will be supported where it is appropriately located and has high levels of accessibility. Housing on the Marina Quays site represents sustainable development and therefore is in compliance with this policy. Development here is also accessible to local facilities by public transport, cycle and foot and is appropriately located.

Policy PUBDM34: Residential Development within Defined Development Boundaries

- 1.16 We object to Policy PUBDM34 that only permits development within the development boundaries, of which there are only four within the Borough. This constrains development and does not take

into account sites that are outside or adjacent to development boundaries, that although have good access to services and facilities, as they are near to the development boundary, are not seen as appropriate for development.

- 1.17 It must be recognised that sites that are adjacent to development boundaries often benefit from the same level of services and appropriate positioning and therefore should be considered for development.

Policy PUBDM36: New Residential Moorings

- 1.18 This policy is supported as it ensures applications for permanent residential moorings will be permitted. Points A - I are also agreed with as they ensure that the new moorings will not be at the cost of other visitor moorings and will ensure the protection of the banks, waterways and the rest of the Broads area.
- 1.19 This policy supporting residential moorings should be encouraged in the Broads area as it helps to preserve the waterways as well as adding to the diverse nature of the Broads.

Policy PUBGTY1: Marina Quays (Port of Yarmouth Marina)

- 1.20 Although we support the general intent of Policy PUBGTY1 it is our submission that the policy be amended in line with a focussed policy with more relevance to the issues and condition of the site and future viable and deliverable development.

- 1.21 The following wording is proposed for this policy:

'Marina Quays (as shown on Inset Map 9) is identified as a regeneration area where redevelopment will ensure a continuation of water based facilities and provide holiday accommodation and small scale residential development.

Proposals for redevelopment shall be guided by a comprehensive Landscape Masterplan for the site and shall include:

- Retention of moorings (to include residential houseboats); and*
- Mix of holiday and residential accommodation.*

Development shall be phased to ensure the provision of moorings and holiday accommodation prior to the occupation of any permanent residential dwellings.'

- 1.22 This policy wording will help to ensure the area is regenerated in line with the abilities and scope of site owners to ensure a successful, sustainable and enjoyable place for both local people and visitors to the area. This specific wording for this policy will help to ensure the appropriate development will happen on this site as well as the knowledge that the development in the policy will be delivered to that exact detail.
- 1.23 The supporting documents that accompany these representations show that development is appropriate on this site and will not cause any adverse effects on highways, landscape, the structural soundness of the river wall and flood risk. These reports indicate that development can be supported on this site and that there will be no negative impacts on the surrounding area and safety. Design features such as stilted buildings will not increase the floorspace on the site and not cause any adverse effect on flood risk.

Inset Map 9 – Marina Quays

- 1.24 We object to Inset Map 9 which covers the area of Marina Quays.
- 1.25 Objection is raised to the northern boundary as well as the limited size of the policy area. We believe the policy area should extend northwards following the river until further into Bure Park and slightly further southwards along River Walk (see Appendix 1). This extension to the site area will ensure the regeneration of the whole site will be delivered in an efficient and timely manner. These amendments to the policy will be key to the delivery of this site and will ensure best use is made of the land.
- 1.26 This site extension reflects the existing established use rights for moorings and as an operational marina.

Conclusions

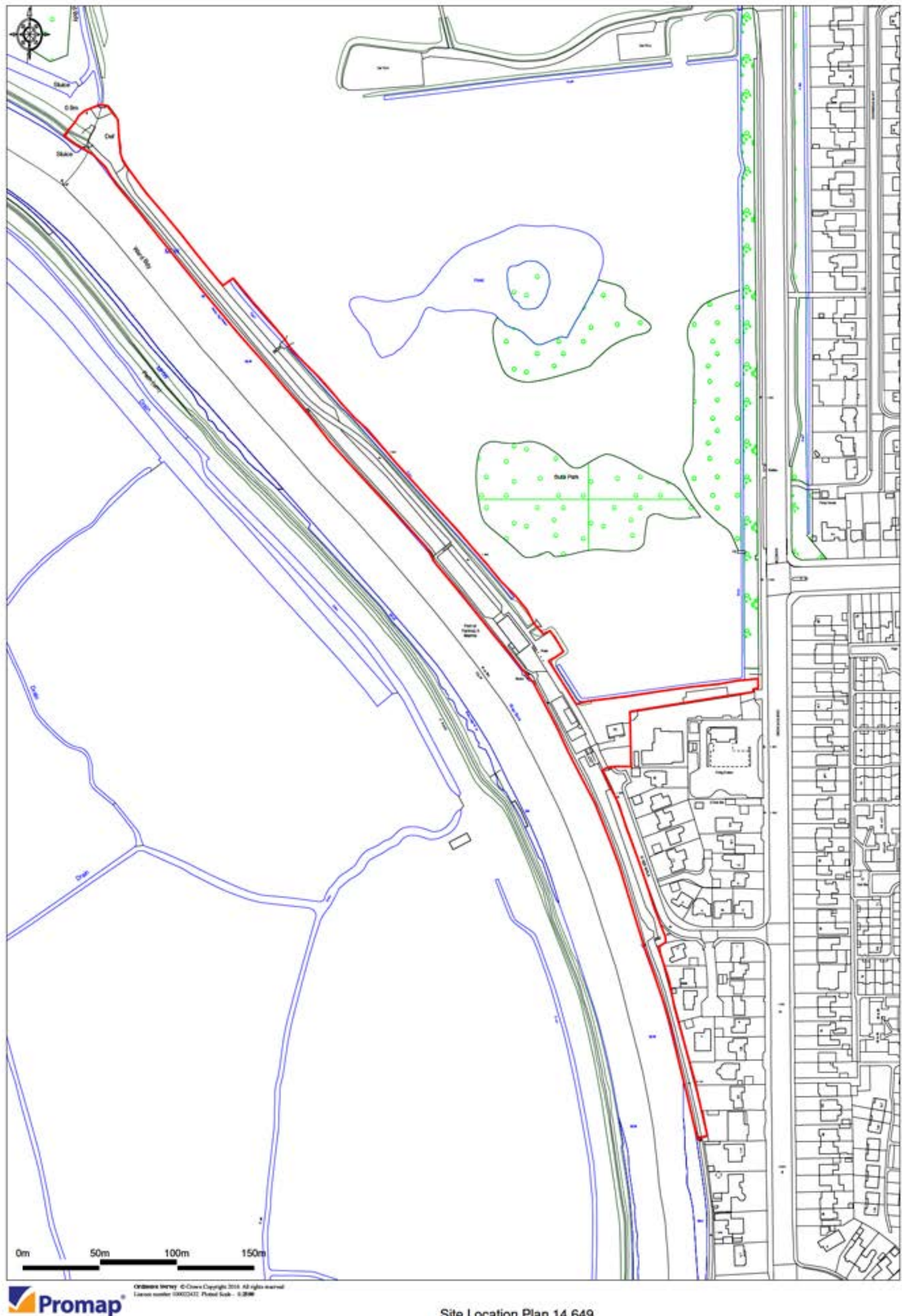
- 1.27 East Anglian Marine Leisure generally supports the Broads Authority Local Plan – Publication Version and its policies, with the exception of Policy PUBGTY1 and an objection to Inset Map 9.
- 1.28 Policy PUBGTY1 must be amended in line with the suggested text at paragraph 1.21 to ensure the proposed development can be delivered for the benefit of both local residents and visitors. Inset Map 9 should also be amended to allow for land north of the current boundary and slightly further south, following River Walk. This reflects existing moorings to be provided for the use of visitors and residents and would contribute to the vibrancy and enjoyment of the Broads for all users.

- 1.29 It is considered these modifications will benefit the site and the surrounding area as well as supporting the local tourism economy which benefits the Authority as a whole.
- 1.30 Overall, East Anglian Marine Leisure suggests amendments and object to the areas mentioned above and support the remainder of the Local Plan Publication Version.

Boyer

December 2017

APPENDIX 1 – Site Location Plan



Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name		Miss Paige Harris
Organisation / Group	East Anglian Marine Leisure	Boyer
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM4, PUBSP11, PUBSP12, PUBDM28, PUBDM29, PUBSP14, PUBSP15, PUBDM34, PUBDM36, PUBGTY1
Map reference	Insert Map 9 – Marina Quays
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐
5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☒

No

☐
6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☐
7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

 Support legal compliance and soundness.
 See attached representations on behalf of East Anglian Marine Leisure.

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Please see attached representations on behalf on East Anglian Marine Leisure.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☒

No ☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

In order to correctly represent the site, issues and redevelopment.

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature



Date: 14/12/2017

The closing date for responses is 4pm 5 January 2018

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	32.14
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We welcome the inclusion of this paragraph stating that any development that could increase the flows to the Water Recycling Centre needs to be avoided, and the link to our Joint Position Statement.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	32.14
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We welcome the inclusion of this paragraph stating that any development that could increase the flows to the Water Recycling Centre needs to be avoided, and the link to our Joint Position Statement.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM16
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We agree that proposals for land raising should consider the impacts on flood risk on the site and elsewhere, and should not be permitted if they have adverse effects which cannot be satisfactorily mitigated. To avoid any confusion, it is important to note that land raising does constitute development in itself, and as such it does require a Flood Risk Assessment. Linking to Policy PUBDM4: Development and flood risk would strengthen this policy. Land raising would not be permitted within Flood Zone 3b Functional Floodplain unless it was to reinstate previously sunken land, as otherwise it would prevent the floodplain from functioning.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

X

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box ☒ If you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM12
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and particularly welcome the requirement to maximise opportunities for restoration and enhancement of natural habitats, and the link to green infrastructure.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box ☒ If you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM36
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and the Reasoned Justification provides guidance on how moored boats can be shown to be safe with a Flood Risk Assessment.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM6
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy that ensures there will be no overall loss in the quality or quantity of open space. The Reasoned Justification correctly states the wider benefits to the community's mental and physical health that accessible open space provides. The policy and Reasoned Justification also recognise the requirement for new cemeteries to demonstrate that there will be no adverse impact on ground or surface water. We advise that this should be demonstrated within a risk assessment submitted at the planning application stage. This policy could be strengthened by linking to Policy PUBDM7: Green Infrastructure.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

X

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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12. Please tick this box ☒ If you would like to be notified of the following:

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM37
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and particularly welcome the requirement for no temporary caravans or mobile homes in Flood Zone 3.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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12. Please tick this box ☒ If you would like to be notified of the following:

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM31
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and advise that these works would require an environmental permit if within 16m of the main river. This information is provided on page 136, but could also be referenced here for clarity.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	
Map reference	
Appendix	M
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We feel the wording of paragraph M3 may be confusing and could be clarified with the following rewording: The SFRA identifies Flood Zones 2, 3a, 3b and indicative 3b as described above. The modelled 3b layer is in areas with an accurately modelled 1:20 overtopping/undefended outlines. The indicative 3b layer reflects Flood Zone 3a as a precautionary approach in areas which do not have modelled 1:20 overtopping/undefended outlines.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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Address line 2	Cobham Road	
Town / City	Ipswich	
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Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP2
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We welcome this policy, it highlights the significance of flood risk in the Broads.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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Address line 2	Cobham Road	
Town / City	Ipswich	
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E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM5
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes ☒ No ☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes ☒ No ☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared ☐ Justified ☐
Effective ☐ Consistent with national policy ☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and suggest that part i) could be strengthened by including the requirement for a 1.2m clearance between the base of infiltration SuDS and the peak seasonal groundwater levels in the body of the policy, although it is already included in the Reasoned Justification.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒ No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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Signature:



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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM3
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy to design dwellings to have a water demand equivalent to 110 litres per head per day. The Reasoned Justification correctly states that the area is under serious water stress.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM1
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support the inclusion of this policy. It recognises the requirement for development to connect to the main foul sewer, and that if a main foul sewer connection is unfeasible then alternative arrangements will only be permitted where there would be no adverse impact on the environment. However, we recommend that the fourth paragraph should be amended to clarify that waste water from septic tanks must not enter waterbodies. We welcome the inclusion of the requirement for further capacity to be provided at Knackers Wood Water Recycling Centre before any development will be permitted in Horning.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP6
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We welcome this policy, it highlights the benefits for biodiversity that can be brought through development of any scale.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box ☒ If you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM2
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy with regards to preventing the spread of invasive species and the damage they could inflict on native ecosystems and species. The policy also recognises the potential for pollution of the water environment from wash-down activities.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM4
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, it thoroughly addresses the necessary requirements to ensure development reduces the overall level of flood risk. We welcome the inclusion of part q), which requires a Flood Response Plan as part of a Flood Risk Assessment. For clarity, the following points should be addressed. On page 33, the Flood Map for Planning (Rivers and Sea) has a 27 in it, this appears to be an error. Page 33 also states that "all proposals for new development in Flood Zones 2 and 3, will be accompanied by a site specific Flood Risk Assessment (FRA), except those covered by Environment Agency standing advice." This should be clarified because while standing advice does provide guidance on what is to be included when considering flood risk for certain types of development, it is incorrect to suggest that an FRA is not required.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM27
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, as the Reasoned Justification makes a clear link to the requirements of PUBDM4: Development and flood risk. It is also important to note that works near a main river may require an environmental permit. Further information is provided in paragraph 32.3 on page 136.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	32.2
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this paragraph. It could also be added that anyone carrying out these activities without a permit where one is required is breaking the law.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM17
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, but for clarity please note that 'Environment Agency licencing requirements' ought to say 'Environment Agency permitting requirements'.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM7
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy as it recognises the many benefits that a network of connected areas of green infrastructure can provide. This policy could be strengthened by linking to Policy PUBDM6: Open space on land, play, sports fields and allotments.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM35
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, as it recognises that caravans and mobile homes are vulnerable to flooding. We recommend linking to Policy PUBDM4: Development and flood risk because any Flood Risk Assessment for such accommodation would need to show how the safety of the occupants would be managed and ensured, considering the transient nature of the site and its potential effects on the occupant's ability to receive flood warnings. Any development that would be classified as 'highly vulnerable' would be inappropriate within Flood Zone 3.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

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Town / City	Ipswich	
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Post Code	IP3 9JD	
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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM16
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We agree that proposals for land raising should consider the impacts on flood risk on the site and elsewhere, and should not be permitted if they have adverse effects which cannot be satisfactorily mitigated. To avoid any confusion, it is important to note that land raising does constitute development in itself, and as such it does require a Flood Risk Assessment. Linking to Policy PUBDM4: Development and flood risk would strengthen this policy. Land raising would not be permitted within Flood Zone 3b Functional Floodplain unless it was to reinstate previously sunken land, as otherwise it would prevent the floodplain from functioning.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

X

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM12
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and particularly welcome the requirement to maximise opportunities for restoration and enhancement of natural habitats, and the link to green infrastructure.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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Please sign and date this form:

Signature:



Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM36
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and the Reasoned Justification provides guidance on how moored boats can be shown to be safe with a Flood Risk Assessment.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box ☒ If you would like to be notified of the following:

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Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM36
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and the Reasoned Justification provides guidance on how moored boats can be shown to be safe with a Flood Risk Assessment.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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Yes

☐

No

☒

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If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM6
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy that ensures there will be no overall loss in the quality or quantity of open space. The Reasoned Justification correctly states the wider benefits to the community's mental and physical health that accessible open space provides. The policy and Reasoned Justification also recognise the requirement for new cemeteries to demonstrate that there will be no adverse impact on ground or surface water. We advise that this should be demonstrated within a risk assessment submitted at the planning application stage. This policy could be strengthened by linking to Policy PUBDM7: Green Infrastructure.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

X

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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12. Please tick this box ☒ If you would like to be notified of the following:

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM37
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and particularly welcome the requirement for no temporary caravans or mobile homes in Flood Zone 3.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM31
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and advise that these works would require an environmental permit if within 16m of the main river. This information is provided on page 136, but could also be referenced here for clarity.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	
Map reference	
Appendix	M
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We feel the wording of paragraph M3 may be confusing and could be clarified with the following rewording: The SFRA identifies Flood Zones 2, 3a, 3b and indicative 3b as described above. The modelled 3b layer is in areas with an accurately modelled 1:20 overtopping/undefended outlines. The indicative 3b layer reflects Flood Zone 3a as a precautionary approach in areas which do not have modelled 1:20 overtopping/undefended outlines.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM5
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, and suggest that part i) could be strengthened by including the requirement for a 1.2m clearance between the base of infiltration SuDS and the peak seasonal groundwater levels in the body of the policy, although it is already included in the Reasoned Justification.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM3
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy to design dwellings to have a water demand equivalent to 110 litres per head per day. The Reasoned Justification correctly states that the area is under serious water stress.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM1
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support the inclusion of this policy. It recognises the requirement for development to connect to the main foul sewer, and that if a main foul sewer connection is unfeasible then alternative arrangements will only be permitted where there would be no adverse impact on the environment. However, we recommend that the fourth paragraph should be amended to clarify that waste water from septic tanks must not enter waterbodies. We welcome the inclusion of the requirement for further capacity to be provided at Knackers Wood Water Recycling Centre before any development will be permitted in Horning.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

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10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP6
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We welcome this policy, it highlights the benefits for biodiversity that can be brought through development of any scale.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box ☒ If you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM2
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy with regards to preventing the spread of invasive species and the damage they could inflict on native ecosystems and species. The policy also recognises the potential for pollution of the water environment from wash-down activities.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM4
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, it thoroughly addresses the necessary requirements to ensure development reduces the overall level of flood risk. We welcome the inclusion of part q), which requires a Flood Response Plan as part of a Flood Risk Assessment. For clarity, the following points should be addressed. On page 33, the Flood Map for Planning (Rivers and Sea) has a 27 in it, this appears to be an error. Page 33 also states that "all proposals for new development in Flood Zones 2 and 3, will be accompanied by a site specific Flood Risk Assessment (FRA), except those covered by Environment Agency standing advice." This should be clarified because while standing advice does provide guidance on what is to be included when considering flood risk for certain types of development, it is incorrect to suggest that an FRA is not required.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box ☒ If you would like to be notified of the following:

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Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM27
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, as the Reasoned Justification makes a clear link to the requirements of PUBDM4: Development and flood risk. It is also important to note that works near a main river may require an environmental permit. Further information is provided in paragraph 32.3 on page 136.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	32.2
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this paragraph. It could also be added that anyone carrying out these activities without a permit where one is required is breaking the law.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM17
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, but for clarity please note that 'Environment Agency licencing requirements' ought to say 'Environment Agency permitting requirements'.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

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Name	Eleanor Stewart	
Organisation / Group	Environment Agency	
Address line 1	Iceni House	
Address line 2	Cobham Road	
Town / City	Ipswich	
County		
Post Code	IP3 9JD	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM7
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy as it recognises the many benefits that a network of connected areas of green infrastructure can provide. This policy could be strengthened by linking to Policy PUBDM6: Open space on land, play, sports fields and allotments.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

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Town / City	Ipswich	
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Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM35
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support this policy, as it recognises that caravans and mobile homes are vulnerable to flooding. We recommend linking to Policy PUBDM4: Development and flood risk because any Flood Risk Assessment for such accommodation would need to show how the safety of the occupants would be managed and ensured, considering the transient nature of the site and its potential effects on the occupant's ability to receive flood warnings. Any development that would be classified as 'highly vulnerable' would be inappropriate within Flood Zone 3.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

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Please sign and date this form:

Signature:



Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018



Planning Policy Dept.
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
Norfolk
NR1 1RY

Opus House
Elm Farm Park
Thurston
Bury St Edmunds
Suffolk
IP31 3SH

E374.C1.Let04
20 December 2017

Dear Sir or Madam,

LOCAL PLAN PUBLICATION CONSULTATION 2017/18

Somerleyton marina and boatyard is an economic asset to the area. From its history of pioneering research leading to the invention of the Hovercraft, through early innovation in Broads Cruiser design to the modern day where it provides a range of services and facilities to the increasing number of private boat owners on the Broads, as well as a sustainable point of access between the waterways, the railways and the tourist offer of Somerleyton and the wider area.

The boatyard and marina is owned by Somerleyton Marina Ltd which is associated with the Somerleyton Estate which purchased the marina in 2011, securing its future. The Somerleyton Estate are actively engaged in land management and other activities in the Broads area which will benefit biodiversity and public access.

There is potential to expand the private moorings at the marina in response to demand and to exploit the associated need for increased boatyard services including boat repair and servicing. This in turn would keep the additional waterside services and facilities such as the slipway and boatlift viable and operational for the benefit of all. Somerleyton Marina Ltd require a clear and positive planning policy framework in order to judge investment risk before this potential can be realised. The Broads Local Plan Review has provided a timely opportunity to engage in the plan making process and to seek the policy framework necessary for future economic development.

At the Issues and Options stage the Broads Authority put forward options for how the future planning policies would be taken forwards and we set out our client's preferred option which was to continue earlier relevant development plan policies (DP16, DP19 and DP20) into the new local plan. That is the option the Broads Authority have chosen and as such Somerleyton Marina remain supportive of the emerging plan in relation to the emerging policies set out in the enclosed proforma.

Additionally and in recognition of draft allocations for housing land in the Waveney local plan review, the Broads Authority have asked Somerleyton Marina if they would like to seek an allocations for residential moorings. A proforma and plans are enclosed with this letter as requested by the planning policy dept. We look forward to the Broads Authority officer's visiting the site again in due course and supporting the submission when it is presented to the local plan Inspector.

Yours sincerely

Steven Bainbridge MRTPI
Associate
Encl.

Evolution Town Planning Limited

Registered Office:
Opus House Elm Farm Park
Thurston Bury St Edmunds
Suffolk IP31 3SH
Registered in England Number
10636748

1.	Your contact details	Agent Details (if applicable)
Name		Steven Bainbridge
Organisation / Group	Somerleyton Marina Ltd (Somerleyton Estate)	Evolution Town Planning Ltd
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP8, PUBSP10, PUBSP11, PUBSP12, PUBSP15, PUBDM 26, PUBDM27 and PUBDM32
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We have made representations on behalf of Somerleyton Marina Ltd throughout the process of the plan preparation and have sought for the policies to be positive and effective.

Somerleyton Marina Ltd. has aspirations for improvements and potential expansion of moorings at the marina and, from the start of this process, have sought positive and flexible policies for any future planning applications to be judged against.

Our preferred option for the approach the policies would take is the one that the Council has taken.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☒ Yes

No

☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☐ No

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan, Publication version (November 2017). Representation Form

12. Please tick this box

☒ Yes

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Please sign and date this form:

Signature:



Date:

22/12/2017

The closing date for responses is 4pm 5 January 2018

Appendix F – Residential Moorings – call for suitable areas

Are there any areas which you think are suitable for residential moorings which meet the criteria as set out below?

If so, please fill out this form with details of areas you feel are suitable for residential moorings. A separate form for each site. Please email the completed form, maps and photos to: PlanningPolicy@broads-authority.gov.uk and title your email 'Residential Mooring Sites'.

Your name: Mr. Steven Bainbridge on behalf of Somerleyton Marina	Your email address: [REDACTED]	Your phone number: [REDACTED]
Your address: [REDACTED]		

- What is the address of the proposed residential mooring?

Moorings at Somerleyton Marina, Somerleyton, Suffolk NR32 5QW

- We must have a map to show us the area you refer to.

Your map should show the boundary of the residential mooring (draw a line around it in a highlighter perhaps) as well as give the context to enable officers at the Broads Authority to find the site easily).

Have you included a map? ☒

- Have you included photographs of the proposed residential mooring? Yes No

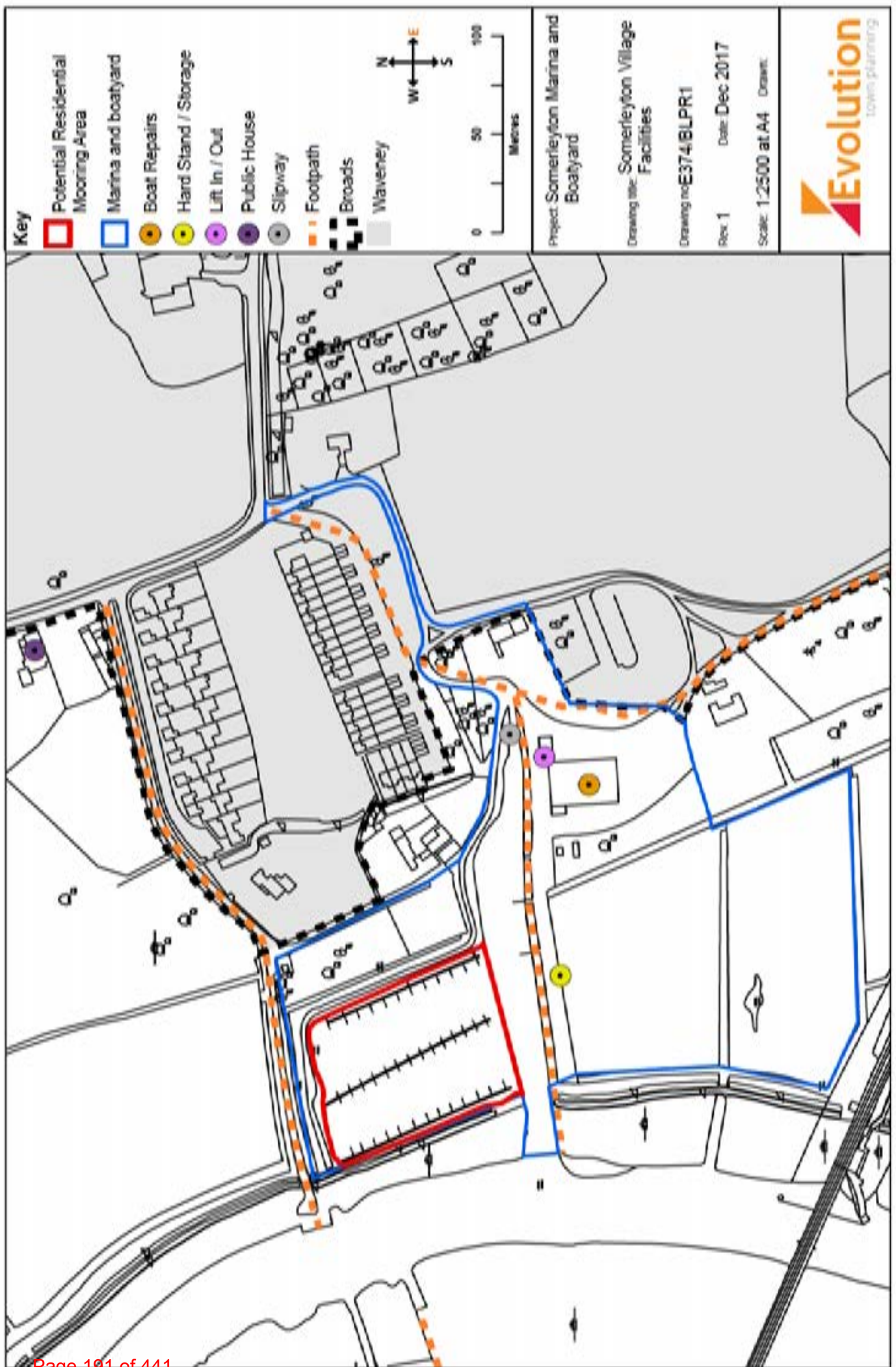
Please explain how your proposed site addresses the following criteria:

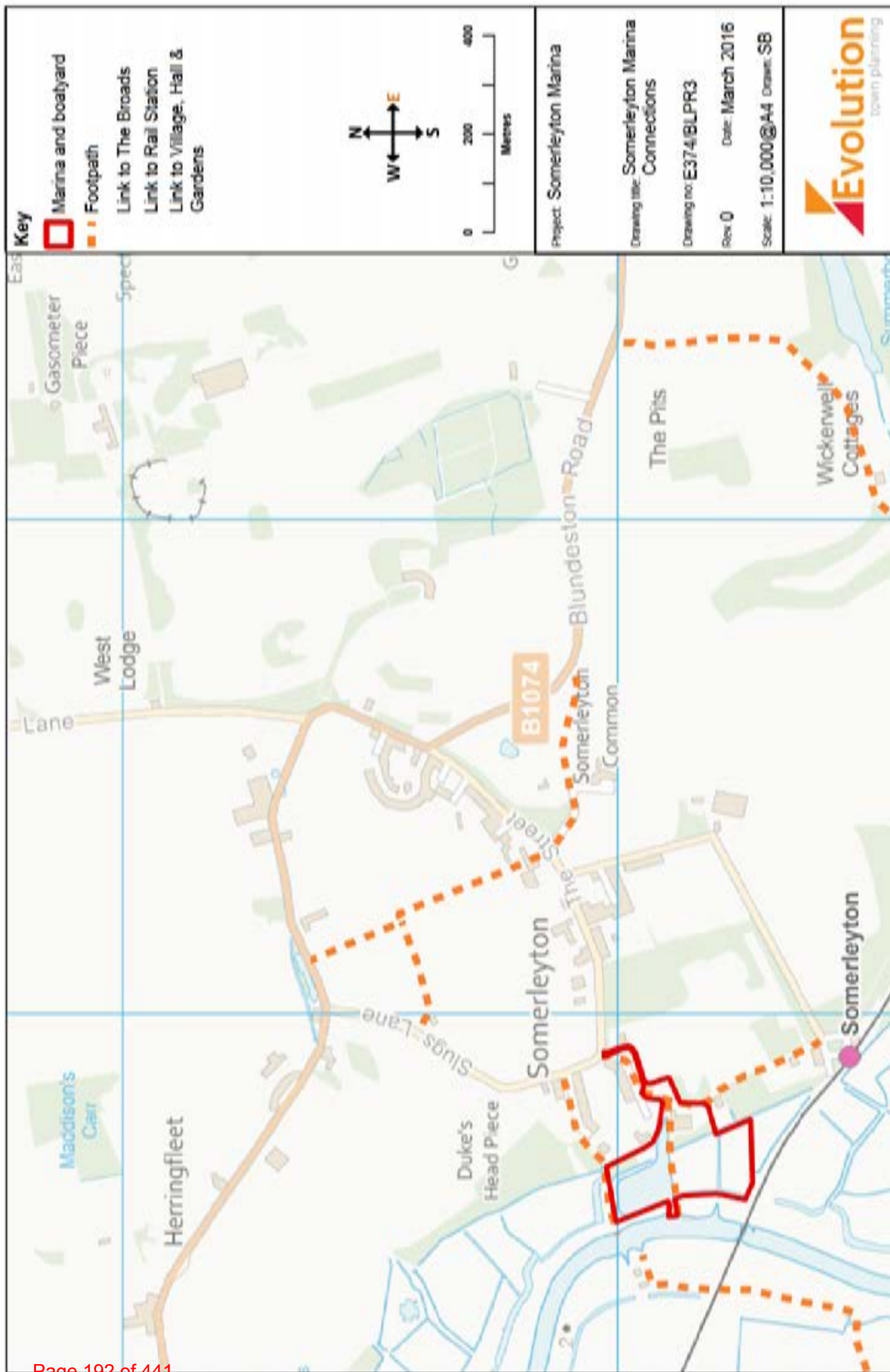
1: How many residential moorings or what length of residential moorings is proposed?	There is capacity for up to either 50 residential moorings or 170m of residential mooring headings.
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	The nearby village of Somerleyton includes a primary school, public house and a railway station as shown on the enclosed plan. There is also planning permission for a shop on the old garage site. The previous village shop having closed and the Estate is in discussions with the community about reopening it on the former garage site.
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	There are existing private marina moorings at the marina.
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No. The marina is out of the main channel.
5: Is riverbank erosion an issue here? How would this be addressed?	No. The marina is out of the main channel.
6: What are the adjacent buildings or land used for	Marina. Boat building, servicing and repairs.

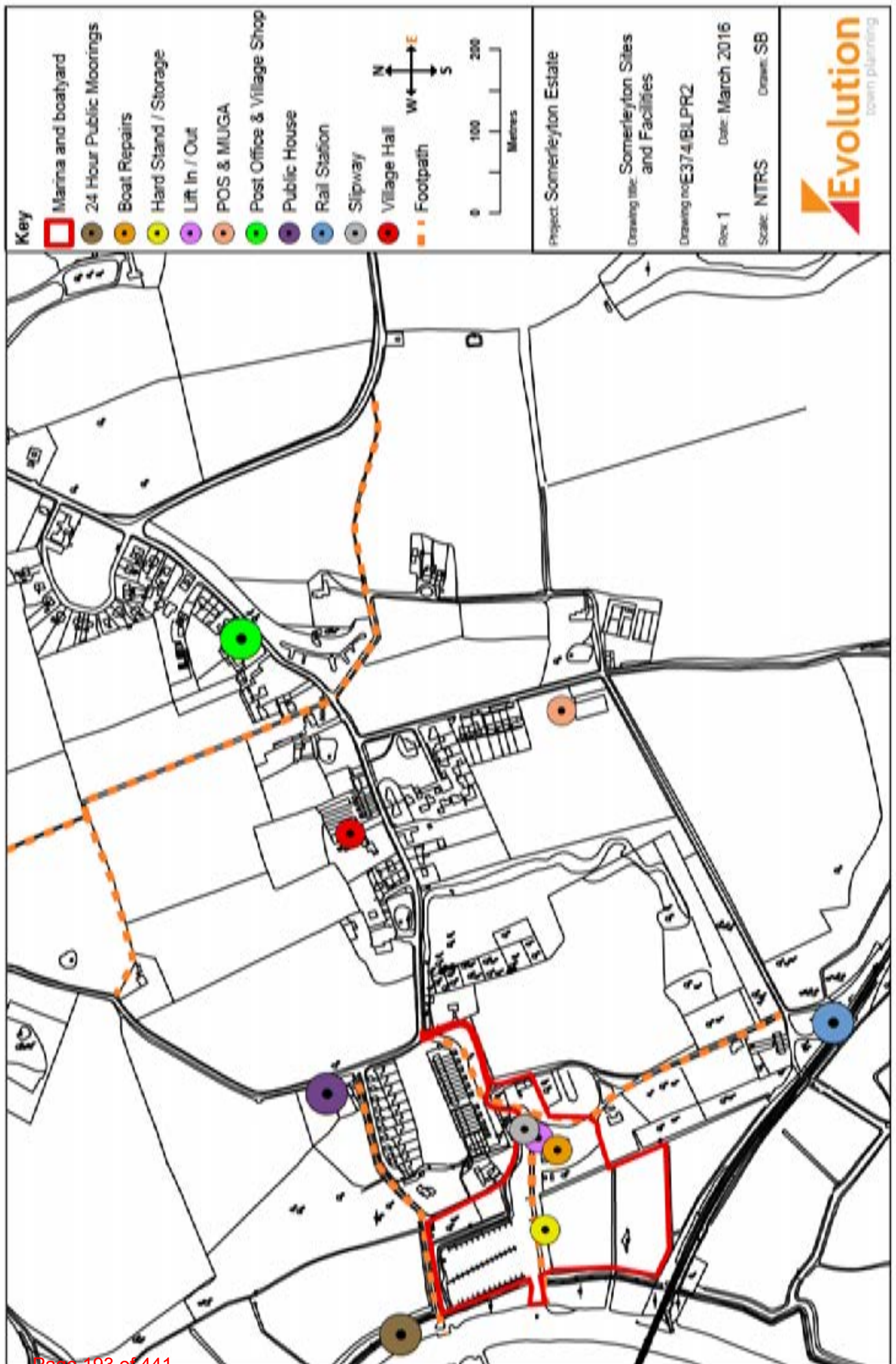
7: What is the character or appearance of the surrounding area?	The new residential moorings would be sited in an existing marina and adjacent to existing boat sheds. To the east of the site is the village of Somerleyton which currently features draft allocations for housing and a new settlement boundary in the emerging Waveney local plan review.
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Yes. The existing marina walkways have functioned adequately in the past and this would not be expected to change.
9: What car parking is there for people living on boats (e.g. car park or park on road)?	There is existing space for car parking which could be formalised, improved and resurfaced as required to support new residential moorings.
10: How can service and emergency vehicles access the area safely?	Access via public highway as they would do presently.
11: How would waste and sewerage be disposed of?	Mains sewerage.
12: Is the area on mains sewerage?	Yes.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No. The marina is approximately 140m from the boatsheds. There are other residential properties much nearer to the boat sheds and there have been no noise complaints as a result of that relationship.
14: Do you own the site? If not who does and have you told them about your proposal?	Yes. The Somerleyton Estate own the marina and boatyard.
15: What is the current use of the site?	Marina and boatyard.

Please note that:

- Your nomination will be assessed by the Broads Authority.
- We cannot guarantee that your nomination will be allocated for residential moorings as the nomination might not be suitable.
- Your nomination will be made public







Respondent: Fiddy, I

Lottie Carlton

From: Isobel Fiddy [REDACTED]
Sent: 25 January 2018 18:05
To: Planning Policy Mail
Subject: Draft plan for residential moorings - Greenway Marine Chedgrave and Loddon Marina

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Natalie,

With regard to the above I live at Wherry Close practically opposite and beside the proposed residential moorings and unfortunately, I am concerned, as in the past there has been problems especially with unsocial behaviour and the police being involved on several occasions. I'm sure this would not be a problem with everyone but it only takes one bad apple to spoil life for all.

Regards
Isobel Fiddy

Sent from my iPad

Sent from my iPad

Respondent: Flack, J (MEP Eastern Region)

Lottie Carlton

From: Natalie Beal
Sent: 14 December 2017 16:20
To: Planning Policy Mail
Subject: FW: Consultation reminder: Local Plan for the Broads - Have your say!

From: Lottie Carlton
Sent: 14 December 2017 16:18
To: Natalie Beal
Subject: FW: Consultation reminder: Local Plan for the Broads - Have your say!

From: FLACK John [REDACTED]
Sent: 14 December 2017 08:54
To: Lottie Carlton
Subject: RE: Consultation reminder: Local Plan for the Broads - Have your say!

Dear Ms. Beal,

Thank you for sending me the details of your emerging local Plan. I do not feel the need to comment on any specifically, but appreciate being included in the wide consultation.

Have a good Christmas,

Yours sincerely,

John F.

John Flack MEP
Member for the East of England

Tel: [REDACTED]
European Parliament, Bât. Willy Brandt
60 Rue Wiertz, 1047 Brussels
Email: [REDACTED]
Web: www.JohnFlack.uk

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Peter Flowerdew	
Organisation / Group	(if applicable)	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	15 Heritage and Historic Assets
Policy number	PUBDM11 Reuse of historic buildings
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

N/K

No

N/K

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

X

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

This part of the Plan gives a preference to tourism over residential use which can be detrimental to small communities. Some of these buildings lie within a small group of dwellings which have evolved into specific close knit communities, if this policy is adopted and an owner wants to convert a building, tourists would be forced upon the group upsetting the rhythm of the community and adding very little to it. In fact their presence is more likely to be an upsetting influence whereas a residential conversion would likely add to it.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☒

If you have answered 'No' could you please explain why this has not been raised before:

I was unaware of the content earlier; this should not be surprising as the method of making the public aware seems inadequate. Talking to many people within the Broads Authority area I have yet to speak to one who was aware of this process. As your figures suggest there are about 6300 inhabitants within the area I would have thought a letter to each household would have been more appropriate as the circulation of the local press seems to have fallen dramatically over the last decade.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Having talked to the Broads Authority I understand it would be difficult to write a policy that takes into account the specific wishes of small groups of people therefore I suggest removing the wording on page 54 Policy PUBDM11: 'conversion to residential uses, where the building would be used as a second home or for the main residence of the occupiers, will only be permitted where employment, recreation or tourism uses of the building are proved to be unviable'. This would leave adequate control by the Broads Authority and still give local people a say in their community growth. There is no such wording in the current plan and I see no benefit it adding it to the new plan.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: P J Flowerdew

Date: 15th December 2017

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Peter Flowerdew	
Organisation / Group	(if applicable)	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	31 Other development management policies
Policy number	PUBDM47 Conversion of buildings
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

This part of the Plan gives a preference to tourism over residential use which can be detrimental to small communities. Some of these buildings lie within a small group of dwellings which have evolved into specific close knit communities, if this policy is adopted and an owner wants to convert a building, tourists would be forced upon the group upsetting the rhythm of the community and adding very little to it. In fact their presence is more likely to be an upsetting influence whereas a residential conversion would likely add to it.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

I was unaware of the content earlier; this should not be surprising as the method of making the public aware seems inadequate. Talking to many people within the Broads Authority area I have yet to speak to one who was aware of this process. As your figures suggest there are about 6300 inhabitants within the area I would have thought a letter to each household would have been more appropriate as the circulation of the local press seems to have fallen dramatically over the last decade.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Having talked to the Broads Authority I understand it would be difficult to write a policy that takes into account the specific wishes of small groups of people therefore I suggest removing the wording on page 132 Policy PUBDM47: '... and when it is clearly demonstrated' to '...would be unviable'. This would leave adequate control by the BA and still give local people a say in their community growth. There is no such wording in the current plan and I see no benefit it adding it to the new plan.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: P J Flowerdew

Date: 15th December 2017

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Gabi Roesch [REDACTED]
Sent: 03 January 2018 15:38
To: Lottie Carlton
Cc: Margaret Johnson
Subject: RE: Consultation reminder: Local Plan for the Broads - Have your say!

Happy New Year Lottie

One of our councillors has attended one of your information meetings on behalf of Fritton with St Olaves Parish Council and found this very helpful. Thank you very much.

We would like to inform you that after discussion Fritton with St Olaves Parish Council has no concerns or comments.

With kind regards

Gabi

Gabi Roesch

Parish Clerk

Fritton with St Olaves Parish Council

<http://frittonwithstolavesparishcouncil.norfolkparishes.gov.uk>

Respondent: Gowing, S

Lottie Carlton

From: Sharon Gowing [REDACTED]
Sent: 27 January 2018 14:59
To: Planning Policy Mail
Subject: Residential Moorings Greenway Marina Chedgrave and Loddon Marina Loddon

Follow Up Flag: Follow up
Flag Status: Flagged

As a resident adjacent to and opposite the proposed sites I would like to make the following comments and concerns re the draft plan:

There are already a few boats at Loddon Marina that are being used as permanent dwellings. During the summer we experienced a number of problems from the owners of these boats with holiday makers being harassed and intimidated by anti-social behaviour, mainly caused by alcohol and often loud music was played into the early hours! Not only was this a nuisance to our visitors but also to the local people living around the marina.

More pollution could be added into the river if no additional facilities are planned or are inadequate for laundry,toilets,showers,pump out etc.

Where would additional parking facilities be sited?

Would the residents pay council tax?

Will there be site rules issued re condition of boats,storage,pets,noise,washing lines,fires etc?

I look forwards to hearing the outcome from the Planning Inspector.

Kind regards
Sharon Gowing

Lottie Carlton

From: Lesley Grahame [REDACTED]
Sent: 01 January 2018 21:05
To: Planning Mail
Cc: Lottie Carlton
Subject: Re: Local Plan for the Broads Consultation -

Dear colleagues

I would like to flag up the need for residential moorings, which appear to be missing. I feel that this lack is missed opportunity. An inhabited urban river bank is potentially safer, more vibrant and more attractive than an empty one.

Nurturing a river-based community could bring social and economic benefits to the area. Boat residents could support local businesses, take care of the banks and (very slightly) reduce housing need.

Here's wishing you a happy, hopeful and peaceful 2018

Lesley Grahame

Green Party Councillor,
Thorpe Hamlet Ward
Norwich

Tel [REDACTED]
Mob [REDACTED]
[REDACTED]

<http://www.norwichgreenparty.org/>

On Thursday, 30 November 2017, 11:22:56 GMT, Lottie Carlton [REDACTED] wrote:

Dear Mr Lesley Grahame Norwich City Councillor - Thorpe Hamlet

Local Plan for the Broads: Have your say

Public drop-in sessions

A reminder that there are two more public drop-in sessions when you can come and talk to members of Broads Authority staff about the Local Plan for the Broads consultation:

Lottie Carlton

From: Lottie Carlton
Sent: 12 January 2018 15:22
To: Lesley Grahame
Subject: Grahame, L

Categories: Ack and Filed

Thank you Lesley. We now have all the information we need. Thank you for taking the time to submit a response. We will keep you informed of progress of the consultation and inspection process.

Kind regards

Lottie Carlton
Administrative Officer
01603 756044

From: Lesley Grahame [REDACTED]
Sent: 12 January 2018 15:18
To: Lottie Carlton
Subject: Re: RE: RE: Broads Local Plan Consultation - Extension to deadline for comments

Dear Lottie

Thank you for your patience, sorry for the IT failures

Lesley Grahame

Green Party Councillor,
Thorpe Hamlet Ward
Norwich

Tel [REDACTED]
Mob [REDACTED]
[REDACTED]

<http://www.norwichgreenparty.org/>

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[Send SMS](#)

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You'll need Skype Credit

On Friday, 12 January 2018, 13:22:47 GMT, Lottie Carlton <[REDACTED]> wrote:

Hello again Lesley

Unfortunately the form is still looking a bit odd (see screen shot of page one) below.

Perhaps you could let me know the answers to the questions in the form via return email instead (the ones in bold below):

1. We already have your contact details.
2. This is not a group representation so n/a.
3. **Which part of the plan does your response relate to? PUBS15, PUBDM36**
4. **Do you consider that this part of the Plan meets the legal and procedural requirements (yes or no)? Probably. I don't have the expertise to answer this more fully**
5. **Do you consider this part of the Plan has met the tests of soundness (yes or no)?**
I don't have the expertise to answer this more fully
6. **Do you consider this part of the Plan to be unsound because it is not Positively prepared (PP), Justified (J), Effective (E), Consistent with national policy (CP)?** **E** There is scope for further Conflict between the Broads Authority and residential boat dwellers. Transparent, flexible and fair policies would help avoid this
J The absence of residential moorings within the City does not meet the aspirations of local people
7. We already have your response.
8. **Have you raised this issue during previous consultations on the Local Plan (yes or no)? If no, please explain why this has not been raised before. No, workload issues**
9. We already have your response.
10. **If your representation is seeking a change, do you consider it necessary to participate in the public examination (yes or no)?**
11. If you wish to participate in the public examination, please outline why you consider it to be necessary? I can see from part of your form that you responded 'I would want to be present if there were nobody else putting the case for residential moorings, especially if the case against were represented' That's all I wrote, thanks
12. Please tick this box if you would like to be notified of the listed items. I can see you have responded 'yes please'.

Hopefully this will work better rather than trying to sort out the document problems.

Thank you and kind regards

Lottie Carlton



Authority Local Plan
Publication version (November 2017)
Consultation Form

For Office Use Only
Consultee ID:
Received:
Processed:

This is the form for making representations on the Broads Authority Local Plan Publication version. Once completed, please return by email to planningpolicy@broads-authority.gov.uk.

A guidance note is also available to assist you in making your response. Please go here <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The various documents that are being consulted on can be found here: <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The consultation ends 4pm on 5 January 2018. Responses received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

Hard copies of this form are available from the Broads Authority Office in Norwich and the drop-in events taking place across the Broads, details of which can be found at the website above.

One form should be completed for each representation. Consultants must provide their personal details. Representations should be on the basis of the soundness or legal compliance of the Plan. (See guidance note for more details.) It is recommended that groups who share a common view submit a single form rather than multiple copies and provide a list of each person supporting the representation. By completing this form you agree to your details being shared. Your name, address and details (but not your other personal details) will be made available for public viewing. Representations cannot be treated as confidential.

Please expand the boxes as necessary or attach additional sheets. Please clearly mark any additional sheets with your name and the part of the document the representation relates to.

Your contact details		Agent Details (if applicable)
Name: Lesley Grahame		
Group	(if applicable)	
[Redacted]		
Other		

Representations
If representation is on behalf of a group, how many people support it? No
Name of person in your group that supports the representation attached with this form -

From: Lesley Grahame
Sent: 12 January 2018 12:35
To: Lottie Carlton
Subject: Re: RE: Broads Local Plan Consultation - Extension to deadline for comments

Dear Lottie

Does this work?

Lesley Grahame

Green Party Councillor,
Thorpe Hamlet Ward
Norwich

Tel [REDACTED]
Mob [REDACTED]

<http://www.norwichgreenparty.org/>

[Call](#)

[Send SMS](#)

[Add to Skype](#)

You'll need Skype Credit

On Friday, 12 January 2018, 12:19:46 GMT, Lottie Carlton [REDACTED] wrote:

Dear Lesley

Unfortunately we are unable to open the document without all the sections being 'corrupted'. Is it possible to convert the document to a pdf before resending please? That should help to ensure we are able to open it.

Kind regards

Lottie Carlton

Administrative Officer

01603 756044

From: Lesley Grahame [REDACTED]
Sent: 12 January 2018 11:31
To: Planning Mail
Cc: Lottie Carlton
Subject: Re: Broads Local Plan Consultation - Extension to deadline for comments

Dear Lottie, Natalie

Thank you for the extension.

Here are my comments

Lesley Grahame

Green Party Councillor,
Thorpe Hamlet Ward
Norwich

Tel [REDACTED]
Mob [REDACTED]

<http://www.norwichgreenparty.org/>

[Call](#)

[Send SMS](#)

[Add to Skype](#)

You'll need Skype Credit

On Thursday, 4 January 2018, 16:22:15 GMT, Lottie Carlton [REDACTED] wrote:

Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Lesley Grahame	
Organisation / Group	(if applicable)	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

--

2. Group Representations

If your representation is on behalf of a group, how many people support it? n/a

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes No

Yes No

Representation Form

2. Group Representations

If your representation is on behalf of a group, how many people support it? n/a

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	PUBS15 and PUBDM36
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (*see guidance note for assistance with this question*)

Yes

No

Probably, I don't have the expertise to answer this more fully.

5. Do you consider this part of the Plan has met the tests of soundness? (*see guidance note for assistance with this question*)

Yes

No

I don't have the expertise to answer this more fully.

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

E: There is scope for further conflict between the Broads Authority and residential boat dwellers. Transparent, flexible and fair policies would help avoid this.

J: The absence of residential moorings within the City does not meet the aspirations of local people.

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

PUBS15 Housing on Utilities site -I question the wisdom of building on flood plain unless very high standards of flood resilience and sustainability can be provided. This is an excellent site for renewable energy such as solar, water/ground source heat and any or all of these uses would need to be combined sensitively with existing and possibly improving biodiversity

Policy PUBDM36 on residential moorings

I welcome provision for residential moorings and look forward to seeing waterborn communities being supported by the Broads authority. The default position should be to allow residential moorings unless there is a strong evidence-based reason to refuse.

Some of these new moorings should be within Norwich, where services are easiest to provide.

The restrictions on Thorpe Island, Bungalow Lane and Griffin Marine are excessive and should be reviewed to encourage the growth of river-based communities.

A well populated river bank is a safer, more inviting place than an empty one

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

Excessive workload

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

The default interpretation of the conditions should be to allow residential moorings unless there is a strong evidence-based reason to refuse.

Some of these new moorings should be within Norwich, where services are easiest to provide.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

No

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

I would want to be present if there were nobody else putting the case for residential moorings, especially if the case against were represented

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Yes please

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: John Clements [REDACTED]
Sent: 12 January 2018 14:45
To: Planning Policy Mail
Cc: Natalie Beal
Subject: Broads Local Plan - Publication version - GYBC Response

Dear Sir or Madam,

Great Yarmouth Borough Council – Response to Publication of Proposed Broads Local Plan

General

Great Yarmouth Borough Council commends the Broads Authority on the generality of its proposed Local Plan.

Policy PUBSSA47: Changes to the Acle Straight (A47T)

The Borough Council strongly supports and promotes improvements to the Acle Straight, including dualling of its entire length and various other improvements within the Broads area. This is in the interests of the long term growth of the local and national economy, as well as of road safety and reducing congestion.

The Council recognises the generality of the issues raised in the policy and supporting text, and the importance of maintaining the landscape and special qualities of the Broads to the national interest, and to quality of life in Great Yarmouth Borough and the wider local area.

That said, it considers that the issues are presented in an overly negative and defensive way. That there are potential advantages and improvements to Broads interests and special qualities (including delivery of aspects of other policies Plan) is given only very limited recognition and attention.

This Plan could be an opportunity to positively identify such improvements and how they could be achieved, and influence the detailed design and measures associated with the dualling of the road when this is taken forward.

For example, the road and its traffic currently has a significant adverse effect on tranquillity in the Broads over a very extensive area, through road noise and the visibility (day and night) of fast moving traffic. (The line and movement of headlights along the road at night is in some ways more intrusive than the more general light pollution mentioned in the policy.) There may be potential for improvements in these respects if, for instance, dualling also resulted in a low noise road surface and provision of natural screening to the road. (There are now only very limited remnants of the willows which apparently originally lined both sides of the road.)

Similarly, specific ambitions could be identified in terms of access for cyclists (including safe provision along the Straight itself) and walkers. The policy and supporting text refers to these issues only in generalities, and do not identify practical ambitions.

In the Borough Council's view, the Plan's potential for enabling a more sustainable future for the Acle Straight is not fully realised by this policy.

Duty to Cooperate

Great Yarmouth Borough Council values the cooperation it has with the Broads Authority, both formal and informal, and over a variety of geographies. The Borough Council is satisfied that, from its perspective, the Broads Authority has met the 'duty to cooperate'.

Should you have any queries regarding the above, please do not hesitate to contact me.

Yours faithfully,

John Clements
Principal Strategic Planner
Great Yarmouth Borough Council

Direct Dial [REDACTED]
[REDACTED]

www.great-yarmouth.gov.uk

2nd Floor, Town Hall, Hall Plain, Great Yarmouth, Norfolk, NR30 2QF

Lottie Carlton

From: Stephen G. Shepherd [REDACTED]
Sent: 22 December 2017 13:24
To: Planning Policy Mail
Subject: Local Plan for the Broads - Have your say!

Dear Sirs

Broads Local Plan Publication Version (November 2017)

Thank you for the opportunity to comment on the Broads Authority Local Plan Publication Version.

Unfortunately, the Great Yarmouth Cycle Forum was not consulted at the earlier stages of the Broads Local Plan and, therefore, it has never been formally discussed at meetings. Rather than comment on the legal compliance and soundness of the Plan, I would like to pass on the views of members received following an email advising them of the current consultation.

The Great Yarmouth Cycle Forum supports the Broads Local Plan. We are pleased to see that sustainable transport, including cycling, is mentioned in the transport related and site specific policies. Cycle Forum members suggested that once provided, any cycling facilities should be maintained to a high standard.

We note that the importance of cycle tourism in the Broads is recognised and we welcome the policies that promote sustainable tourism.

We also welcome the proposal to protect the former railway track beds from development owing to their potential to encourage walking, cycling or horse-riding. The ambition of creating a route from Great Yarmouth to Beccles utilising these track beds is fully supported.

We are also pleased that the policy relating to changes to the Acle Straight identifies the need for a walking, cycling and horse-riding route along the length of the road, in line with an aim in the Broads Integrated Access Strategy to provide a new link to enable non-car journeys between Acle and Great Yarmouth.

Yours faithfully

Stephen Shepherd

Vice Chair
Great Yarmouth Cycle Forum

c/o Strategic Planning
Great Yarmouth Borough Council

Telephone: [REDACTED]
[REDACTED]

Website: www.great-yarmouth.gov.uk

Correspondence Address: Town Hall, Hall Plain, Great Yarmouth, Norfolk NR30 2QF

Great Yarmouth Borough Council - Customer Focused, Performance Driven

It takes 24 trees to produce 1 ton of office paper! Think... is it really necessary to print this email?

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Stephen Shepherd	
Organisation / Group	Great Yarmouth Cycle Forum	
Address line 1	Strategic Planning	
Address line 2	Town Hall, Hall Plain	
Town / City	Great Yarmouth	
County	Norfolk	
Post Code	NR30 2QF	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

16

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP8; PUBSP9; PUBDM22; PUBDM23; PUBDM42; PUBSP12; PUBDM28; PUBSSTRACKS; PUBSSA47
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☒

No

☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Please see the attached email.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

The Great Yarmouth Cycle Forum has not been consulted previously.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:

A solid black rectangular box used to redact the signature.

Date: 11 January 2018

The closing date for responses is 4pm 5 January 2018

Respondent: Harrison, E

Lottie Carlton

From: Lottie Carlton
Sent: 15 February 2018 11:10
To: Elizabeth Harrison
Subject: Harrison, E

Categories: Ack and Filed and on database

Dear Elizabeth Harrison

Thank you for your response. Please treat this email as acknowledgement of receipt.

Kind regards

Lottie Carlton
Administrative Officer
[REDACTED]

From: Elizabeth Harrison [REDACTED]
Sent: 13 February 2018 16:17
To: Lottie Carlton
Subject: Re: Draft Local Plan Loddon and Chedgrave

Re: Draft Local Plan Loddon and Chedgrave

I would like to express my strong disapproval of the proposed residential moorings. We, in Wherry Close have first hand experience of people living in boats at the proposed sights. There appear to be no restrictions or monitoring regarding the type of boat, noise levels or antisocial behaviour of people residing there. There has been intimidation and abuse to both visitors and residents. Making things more permanent and increasing the numbers can only make the situation worse.

Is it envisaged that there will be facilities provided - showers, toilets, washing, waste disposal and rubbish collection?

Will there be adequate road access, at present there is just a dirt track, and parking space?

Yours sincerely

Elizabeth Harrison

From: Lottie Carlton [REDACTED]
Sent: 31 January 2018 09:28
To: Elizabeth Harrison
Subject: RE: Draft Local Plan Loddon and Chedgrave

Dear Elizabeth

Thank you for the clarification. I'll make sure this is noted on the response entered on our consultation database.

Kind regards

Lottie Carlton
Administrative Officer
[REDACTED]

From: Elizabeth Harrison [REDACTED]
Sent: 30 January 2018 17:19
To: Lottie Carlton
Subject: RE: Draft Local Plan Loddon and Chedgrave

Dear Lottie

I feel I must point out that the response I submitted was as Company Secretary of Loddon Quay Ltd on behalf of the residents of all 10 properties. My own response is yet to be submitted.

Elizabeth Harrison

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From: Lottie Carlton [REDACTED]
Sent: Tuesday, January 30, 2018 12:47:19 PM
To: Elizabeth Harrison
Subject: RE: Draft Local Plan Loddon and Chedgrave

Dear Elizabeth Harrison

Thank you for submitting your own response and for forwarding the attached from Mr Geoffry Barber. Please treat this email as acknowledgement of receipt.

Kind regards

Lottie Carlton
Administrative Officer
[REDACTED]

From: Elizabeth Harrison [REDACTED]
Sent: 30 January 2018 12:25
To: Planning Policy Mail
Subject: Draft Local Plan Loddon and Chedgrave

Dear Natalie

Please find attached a letter from a resident of Wherry Close who doesn't have access to the internet.

Regards

Elizabeth Harrison

Broads Authority, Yare House, 62-64 Thorpe Road. Norwich NR1 1RY

01603 610734

www.broads-authority.gov.uk



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As email is not a 100% secure communications medium we advise you to check that messages and attachments are virus-free before opening them. We cannot accept liability for any damage that you sustain as a result of software viruses. We reserve the right to read and monitor any email or attachment entering or leaving our systems without prior notice. Opinions expressed in this email are not necessarily endorsed by the Broads Authority unless otherwise specifically stated.

Respondent: Hayes, G

Lottie Carlton

From: Gary | Willow Builders [REDACTED]
Sent: 12 February 2018 20:14
To: Planning Policy Mail
Subject: Hayes, G

Categories: Ack and Filed and on database

Miss Beal,

Further to our conversation last week I formally comment on the proposals contained within your letter 5th January 2018 as follows.

We are property owners at the entrance to both of the above sites and during the construction of our properties on the corner of the access track to Loddon Marina, and many months following we experienced considerable anti-social behaviour, vandalism and theft originating from the casual tenants at Loddon Marina.

You can therefore understand our concern at your current proposal for residential moorings at the above sites as we see this as nothing more than a potential travellers site filled with low quality accommodation and attracting transient residents with limited social responsibility.

In real terms you will be allowing a person to stay at a river mooring on a boat of potentially low value and of questionable condition with no control or regulation other than that of a landlord who has no serious financial risk.

Unless these sites can be regulated and controlled in a proper manner you will be inflicting visual and social degradation to the Town of Loddon.

We strongly object to these proposals.

Yours sincerely

GARY HAYES

www.willowbuilders.co.uk



Mill Works, Loddon Road
Ditchingham, Norfolk NR35 2RA
T: 01986 891414
F: 01986 891415
E: enquiries@willowbuilders.co.uk
willowbuilders.co.uk

Pre-Submission Consultation Draft of the Publication version of the Local Plan for The Broads – Highways England's Response

1. The A47 Acle Straight – Policy PUBSSA47

- 1.1. The whole of the A47 Acle Straight lies within the area covered by the Local Plan. The Local Plan contains a substantial, detailed policy relating to the Acle Straight. It sets out a number of criteria which will need to be addressed in the development of any improvements or changes to the Acle Straight and sets out a commitment to work proactively with the promoters and designers of any such schemes.
- 1.2. The Local Plan makes it clear that this policy applies to *any* changes to the Acle Straight, including road safety improvements up to and including possible future dualling schemes. It makes reference to a Defra policy document '**English National Parks and the Broads – UK Government Vision and Circular 2010**'. Paragraph 85 of that document includes the following: *'there is a strong presumption against any significant road widening or the building of new roads through a Park, unless it can be shown there are compelling reasons for the new or enhanced capacity and with any benefits outweighing the costs very significantly. Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks'*. There is therefore a fundamental conflict between the status of the Broads as a National Park and the needs of the A47 Acle Straight as a key link in the Strategic Road Network (SRN). However, this conflict derives from central government policy on National Parks: the Local Plan merely reflects this. It is commendable, therefore, that the Local Plan does not rule out future improvements to the Acle Straight, up to and including dualling. However, it does reflect the general thrust of central government policy on this issue.
- 1.3. There is a concern that this policy could prevent Highways England from bringing forward capacity or safety improvements that may be required on the Acle Straight. If these improvements are not provided then the ability of the road to accommodate strategic traffic could be diminished and could restrict economic growth in areas such as Great Yarmouth that have limited alternative connections to the Strategic Road Network

The Local Plan makes it clear that any improvement schemes for the Acle Straight must:

- be clearly justified, with benefits significantly outweighing negative impacts;
- scope out environmental and conservation related constraints as early as possible in the process;
- clearly demonstrate that there is no realistic alternative that would have avoided or had a lesser impact on the Broads Authority area;

- set out clearly any resultant impacts; and
 - demonstrate how any negative impacts would be mitigated.
- 1.4. Policy PUBSSA47 includes a list of criteria to be addressed and a list of constraints which must be acknowledged in the design of any scheme. The criteria include, amongst the expected environmental and conservation related items, the following:
- Surface water run-off and pollution risk from spills to be addressed;
 - Lighting to be kept to a minimum, thoroughly justified and carefully designed to avoid light pollution; and
 - Walking, cycling and horse-riding routes to be provided.
- 1.5. The supporting text acknowledges that any major improvement (such as dualling) would be a Nationally Significant Infrastructure Project (NSIP) and would therefore not be determined by the Broads Authority. It also acknowledges that improvements to the Acle Straight could deliver benefits in terms of road safety, the management of surface water and pollutants, and the economy of the local area and wider region.
- 1.6. Amongst other more detailed considerations are:
- Reference to the Broads Integrated Access Strategy, which aims to create a shared-use path for walkers, cyclists and horse riders along the whole of the Acle Straight facilitating non-car journeys between Acle and Great Yarmouth;
 - The provision of laybys, to allow users of the A47 to appreciate the iconic landscape of the Broads;
 - The fact that the whole route lies within a conservation area and that the Stracey Arms Drainage Mill (adjacent to the A47 approximately 4km east of Acle) is a listed building; and
 - An acknowledgement that constraints imposed by the railway, the river, farm accesses and the side road to Halvergate may rule out an 'on-line' improvement and that a wider corridor may need to be considered within which to identify a potential route for a future improved A47.
- 1.7. It is clear that the Policy (PUBSSA47) is intended not to rule out any possible future improvements but to ensure that the designers of any such schemes take into account important considerations which would not apply outside of the Broads and therefore to provide the justification to overcome the strong presumption against any such schemes contained in central government policy. The Policy therefore appears to be a practical attempt to balance the competing needs of the A47 as a key link in the SRN with those of the Broads as a National Park status area and is welcomed by Highways England.

Highways England supports PUBSSA47. However, if plans are put forward to modify this policy to give more emphasis to the presumption against road schemes through the Broads and to make it more restrictive to the development of schemes then Highways England would resist any such modifications in order to retain the flexibility that the current policy provides to the development of necessary improvements to the A47.

2. **Policy PUBDM22 – Transport, highways and access** sets out the criteria to be adopted for assessing development proposals that need to be accessed by land. This requires that they should:

- Be assessed in terms of their impact upon the highway network in respect of traffic capacity, highway safety and the environmental impact of generated traffic;
- Where appropriate, mitigation will be required, including off-site works;
- Incorporate access by sustainable modes of travel; and
- Where appropriate, a Travel Plan will be required.

2.1 The supporting text states that: 'where a development proposal could have an impact on a trunk road, it will be assessed by Highways England in accordance with policies of the relevant Department for Transport Circular (i.e. Circular 02/2013). This statement is to be welcomed, however Highways England would ask that this text should be included in the wording of the actual Policy itself and not just in the supporting text.

3. **Policy PUBSP15 - Residential Development**

There appears to be a discrepancy in the numbers of dwellings referred to in different places within the documentation, with a lack of clarity as to how the precise numbers of dwellings to be allocated have been derived. Highways England requests that this should be clarified.

4. Highways England welcomes has noted and welcome the following policies:

PUBSP16 and PUBDM43 (Community Facilities)

PUBDM46 (Planning Obligations and Developer Contributions)

5. Highways England has no comments to make on any other policies contained in the Broadlands Local Plan.

Davina Galloway
10 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Davina Galloway	
Organisation / Group	Highways England	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	Policy PUBSSA47 Policy PUBDM22 Policy PUBSP15
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: B D Galloway

Date: 12.1.2018

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Natalie Beal
Sent: 12 January 2018 08:59
To: Galloway, Davina; Lottie Carlton
Cc: Planning Policy Mail
Subject: Highways England

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Ack and Filed and on database

Thanks for that Davina.

Natalie

From: Galloway, Davina [mailto: [REDACTED]]
Sent: 12 January 2018 08:58
To: Natalie Beal; Lottie Carlton
Cc: Planning Policy Mail
Subject: RE: Broads Local Plan - Highways England Comments

Hi Natalie

As requested, I have sent you a word copy of my comments. I have also completed the form as requested – I have just put in the policies that I have referred to as the main ones relating to Highways England and I'm happy for you to add the relevant page numbers, etc, if necessary. I'm in a meeting all morning and then not in this afternoon so wanted to get this back asap.

Highways England has queried clarification on PUBSP15 but other than that, Highways England believes the Local Plan (from the Highways England perspective of the A47) to be sound.

Regards.

Davina

Davina Galloway
Asset Manager
Operations 'East'
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
Tel: [REDACTED]
Web: <http://www.highways.gov.uk>

From: Natalie Beal [mailto: [REDACTED]]
Sent: 10 January 2018 16:41
To: Galloway, Davina; Lottie Carlton
Cc: Planning Policy Mail
Subject: RE: Broads Local Plan - Highways England Comments

Thanks Davina.

Please can you fill out the attached? Just once.

Also, to help us out, please can you send a word version so we can copy over text to our database?

To be clear, you are not objecting to any policies?

Natalie

From: Galloway, Davina [REDACTED]
Sent: 10 January 2018 16:37
To: Lottie Carlton; Natalie Beal
Subject: Broads Local Plan - Highways England Comments
Importance: High

Natalie/Lottie

Thank you for the extra time allowed for us to comment on the Local Plan (pre submission document). I have attached our comments in the above document

Regards.

Davina

Davina Galloway
Asset Manager
Operations 'East'
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
Tel: [REDACTED]
Web: <http://www.highways.gov.uk>

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Broads Authority, Yare House, 62-64 Thorpe Road. Norwich NR1 1RY
01603 610734
www.broads-authority.gov.uk

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Katie Parsons	
Organisation / Group	Historic England	
Address line 1	[REDACTED]	
Address line 2	[REDACTED]	
Town / City	[REDACTED]	
County	[REDACTED]	
Post Code	[REDACTED]	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

n/a

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	Our comments relate to the entire Plan as a positive strategy for the historic environment must be integrated throughout the Plan (please see letter dated 5 th Jan 2018 for full comments).
Policy number	<p>In summary we have the following comments –</p> <p>Policy PUBSP5: Historic Environment</p> <p>We very much welcome a strategic level policy which seeks to protect and enhance the historic environment. We are pleased to see reference within the policy itself to setting, archaeology, waterlogged heritage, and heritage at risk. We are also pleased to see that the term <i>historic environment</i> being used. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage, and both designated and non-designated heritage assets.</p> <p>It would be helpful if the supporting text outlined the Conservation Areas at Risk on the National Register.</p>

	<p>Policy PUBDM13: Energy demand and performance</p> <p>In developing policy covering this area you may find the Historic England guidance <i>Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings</i> https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/ to be helpful in understanding these special considerations.</p>
	<p>Policy PUBDM19: Utilities Infrastructure Development</p> <p>Where point (c) requires infrastructure development to have regard to character of the locality, landscape and amenity we request that the additional point of character and significance of the historic environment is also included.</p>
	<p>Policy PUBSP12: Sustainable Tourism</p> <p>This policy would be strengthened by referencing the role that the historic environment has to play to in sustainable tourism at the strategic level.</p>
	<p>Policy PUBBEC1: Former Loaves and Fishes</p> <p>It may be helpful to make reference to <i>character</i> as well as appearance.</p>
	<p>Policy PUBBEC2: Beccles Residential Moorings (H.E. Hipperson's Boatyard)</p> <p>We welcome reference to the Beccles Conservation Area across the river and the text which requires proposals to take the conservation area into consideration. This policy could be strengthened by making explicit reference to the need to have regard for the <i>setting</i> of the conservation area.</p>

	<p>Policy PUBCAN1: Cantley Sugar Factory</p> <p>We welcome the reference to the nearby Langley Conservation Area, and the two Grade II* Churches of St Botolph at Limpenhoe and St Margaret at Cantley. We would recommend that the policy is strengthened to make explicit reference to the need for development to have regard for the setting of these designated heritage assets. Due to the open landscape around the factory, development should be particularly careful to respond to these assets and the historic environment more generally.</p>
	<p>Policy PUBGTY1: Marina Quays (Port of Yarmouth Marina)</p> <p>The supporting text makes reference to the presence of the Halvergate Marshes Conservation Area and identifies two World War Two sites which may have archaeological potential. Whilst these inclusions are welcomed, the policy itself contains no mechanism to ensure that these heritage assets and their settings are considered. As above, we request that the policy requires any redevelopment to make explicit reference to the setting of the Halvergate Marshes Conservation Area across the river and to specify whether or not an application will be expected to be accompanied by an archaeological assessment.</p>
	<p>Policy PUBHOR1: Car Parking</p> <p>We welcome the reference to the Horning Conservation Area and the policy requirement to improve the character and appearance of the conservation area. It is recommended that the wording is slightly amended to read <i>character or appearance</i> as this better reflects the statutory obligations of the Planning (Listed</p>

	Building and Conservation Area) Act 1990.
	<p>Policy PUBHOV3: Brownfield land off Station Road, Hoveton</p> <p>The supporting text for this policy makes reference to the nearby scheduled monument of Wroxham Bridge. However the policy itself does not mention it. It is recommended that the policy itself be amended to include a criterion which requires development to take account of the monuments' setting.</p>
	<p>Policy PUBNOR1: Utilities Site</p> <p>This site is in close proximity to a number of designated heritage assets including the Grade II listed of Ruins of Trowse Newton Hall, the Thorpe Ridge Conservation Area and the Grade II listed Registered Park and Garden (RPAG) of Crown Point. The supporting text of the policy also identifies the site as having archaeological potential and therefore there may be un-designated heritage assets within the site. The presence of these heritage assets is not reflected within the policy and it is recommended that point b) refers to the historic environment and setting of heritage assets as well as natural assets.</p>
	<p>Policy POTHU1: Tourism development at Hedera House, Thurne</p> <p>We are pleased to see the inclusion of point ii) but request that this amended to require specific consideration of the <u>setting and significance</u> of the nearby Grade II* listed windpumps: Thurne Dyke Windpump and St Benets Level Windpump. As they are Grade II* listed Historic England will a statutory consultee for any subsequent application.</p> <p>We welcome recognition for undiscovered archaeological potential</p>

	in the supporting text on page 188 but this is not reflected in the policy itself.
Map reference	-
Appendix	-
Supporting Document	-

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes ☒ No ☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes ☒ No ☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared ☐ Justified ☐
Effective ☐ Consistent with national policy ☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

I have recommended some minor alterations within my letter dated 5th Jan 2017 (see attached) but these do not compromise the integral soundness of the Plan.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒ No ☐

If you have answered 'No' could you please explain why this has not been raised before:

These points follow on from our previous letter dated 1st February 2017 in response to the Preferred Options draft.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Please see attached letter, it makes minor suggestions but no major changes are required to make it legally compliant.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐ No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Our views can be dealt with adequately through our written representations

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Katie Parsons

Date: 5th January 2018

The closing date for responses is 4pm 5 January 2018



Historic England

Our ref: PL00015056

Your ref:

Date: 05 Jan 2018

Direct Dial: [REDACTED]

By email only to: planningpolicy@broads-authority.gov.uk

Dear Natalie

Ref: Broads Authority Local Plan pre-submission consultation (reg. 19)

Thank you for consulting Historic England on the Broads Authority Local Plan pre-submission stage (reg. 19). As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the pre-submission document. We have now had the opportunity to review the documents and can provide the following substantive comments.

The following comments offer some guidance regarding the development of your Local Plan and things to consider with respect to the Historic Environment.

We have produced a number of detailed Good Practice Advice and Advice Note documents. We recommend that you review the following as part of your plan preparation process:

The Historic Environment in Local Plan - Good Practice Advice in Planning 1
<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

The Setting of Heritage Assets - Good Practice Advice in Planning 3
<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

The Historic Environment and Site Allocations and Local Plans - Advice Note 3
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

All Historic England advice should be read alongside our Conservation Principles, which underpin our work. Conservation Principles can be found here:
<https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>



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A positive strategy for the historic environment

Paragraph 126 of the NPPF requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. Ideally the strategy should offer a strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.

A good strategy will offer a positive holistic approach throughout the whole plan whereby the historic environment is considered not just as a stand-alone topic but as an integral part of every aspect of the plan, being interwoven within the entire document. So policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands. Site allocations may need to refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also be able to positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development due to the impact they would have on the historic environment.

A good strategy will also be spatially specific, unique to the area, describing the local characteristics of the borough and responding accordingly with policies that address the local situation. We would expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment through the plan relating to the unique characteristics of the area.

The draft Plan successfully outlines the unique attributes which contribute to the high quality historic environment of the Broads and outlines well the relationship between local cultural heritage, local economy, the built environment and landscapes.

Chapter 4: About the Broad – Spatial Portrait

The supporting text in paragraphs 4.1 – 4.9 describe in helpful detail, the unique nature of the Broads as a result of human activity and makes clear that the landscape forms a defining element of the historic environment in the area.

The Spatial Portrait is locally specific to the Broads and describes the pattern settlements and changing local vernacular. Paragraph 4.8 in particular outlines the numbers of different types of designated heritage assets within the Broads as well as addressing non-designated heritage assets. Reference to the presence of waterlogged heritage is particularly welcome and including this in the Spatial Portrait helps outline its importance as a heritage asset. We particularly welcome acknowledge of heritage assets being a finite resource.



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Chapter 5: Policy Context

This section describes the links between the draft Local Plan and the other relevant policy documents such as the East Inshore and Offshore Marine Plans (2014) and the Broads National Park Broads Plan (2017).

Chapter 8: Vision, objectives and existing policies

We welcome reference to more intangible but equally important aspects of cultural heritage within the Vision. We also welcome reference to the distinctive local character and historic significance of the Broads.

Objective 8 specifically addresses address the need to protect, maintain and enhance the historic environment, and is very much welcomed. This strong objective will help positively shape the Plan's strategic policies. Overall the objectives demonstrate an integrated approach to the conservation of the historic environment which sees the interrelationship between conservation and other spatial planning goals recognised within several different policies rather than in isolation. For example objectives 3 and 14 embody a wider understanding of the historic environment has helped inform these objectives which will also help deliver the conservation and enhancement of the historic environment.

We welcome the inclusion of paragraph 8.4 which clearly outlines the special qualities of the Broads and the different aspect of cultural heritage that make an integral contribution.

Chapter 9: Sustainable development in the Broads

Policy PUBSP1: DCLG/PINS Model Policy

We welcome the direct reference to the NPPF in this policy and support the wording of the policy. It is recommended that the supporting text could be strengthened to elaborate the policy and refer to the three strands of sustainable development outlined within paragraph 7 of the NPPF which includes the conservation and enhancement of the historic environment.

Chapter 12: Green Infrastructure

Policy PUBDM7: Green Infrastructure (GI)

Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of



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green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.

We are pleased to see the inclusion of points a) and c) in this policy, these will ensure that GI networks will consider the impact upon the historic environment. This policy should be a benefit to the historic environment.

Chapter 13: Climate Change

Policy PUBSP3: Climate Change

We welcome the inclusion of point iv) within this strategic policy.

Chapter 14: Soils

Policy PUBDM9: Peat soils

We welcome the wording of this policy, particularly the requirement for evaluation to be carried out to assess the impact of proposals upon paleoenvironments and archaeology. We also welcome the need to make provision for the recording and interpretation of peat environments before the commencement of development. The supporting text strengthens the justification for these policy provisions, particularly the reference to waterlogged heritage and archaeology on page 48. We are also very pleased to see reference to Historic England's *Wetland and Waterlogged Heritage Survey NHPP Activity 3A5* listed in the evidence list. This again demonstrates the importance of this important heritage asset and points prospective applicants and decision makers directly to the on-going research.

Chapter 15: Heritage and Historic Assets

Policy PUBSP5: Historic Environment

We very much welcome a strategic level policy which seeks to protect and enhance the historic environment. We are pleased to see reference within the policy itself to setting, archaeology, waterlogged heritage, and heritage at risk. We are also pleased to see that the term *historic environment* being used. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage, and both designated and non-designated heritage assets.

It would be helpful if the supporting text outlined the Conservation Areas at Risk on the National Register.



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Policy PUBDM10: Heritage Assets

We welcome this policy which seeks to protect, preserve or enhance the significance and setting of the heritage assets and that of the wider historic environment. We are pleased to see reference within the policy, to non-designated heritage assets, archaeology and undiscovered heritage assets. The supporting text provides good justification for the policy provisions and explains the reasoning clearly which should help direct decision makers and prospective applicants.

Policy PUBDM11: Re-use of historic buildings

We welcome the inclusion of this policy and the proposed wording.

Chapter 17: Renewable Energy

Policy PUBDM13: Energy demand and performance

We welcome reference to heritage assets within this policy and the need for developments to comply with points d) – g) as well as other relevant legislation. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment.

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building 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.

In developing policy covering this area you may find the Historic England guidance *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/> to be helpful in understanding these special considerations.

Chapter 18: Landscape Character

Policy PUBSP7: Landscape Character

We welcome the inclusion of this strategic level policy. The policy recognises that historic features and overall perception of landscape character form a part of the historic environment typifying the Broads.



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Policy PUBDM16: Land Rising

We welcome the inclusion of point e) which requires proposals to consider archaeology and the significance of heritage assets and their settings.

Policy PUBDM19: Utilities Infrastructure Development

Where point (c) requires infrastructure development to have regard to character of the locality, landscape and amenity we request that the additional point of character and significance of the historic environment is also included.

We are encouraged that the authority has included a specific policy that relates to this form of development which can be well integrated into the landscape where it fully considered good design.

Telecommunications

Advanced, high quality telecommunications infrastructure is essential for sustainable growth. The development of high speed broadband technology and other communications networks also play a vital role in enhancing provision of local community facilities and services. However, the siting and location of telecommunications equipment can affect the appearance of the public realm, streetscene, the historic environment and wider landscapes. The consideration of their positioning is therefore important, particularly in conservation areas and sensitive landscapes. We suggest that you refer to the following guidance which you may find helpful:

Cabinet Siting and Pole Siting Code of Practice:
[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final Cabinet and Pole Siting COP Issue 1 2 .pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf)

We welcome the policy provision which requires redundant equipment to be removed.

Policy PUBDM19: Protection and enhancement of settlement fringe landscape character

We are pleased to see that this well-written and important policy has been included in the regulation 19 draft of the Plan.

Chapter 21: Transport

Policy PUBSP8: Getting to and around the Broads

We welcome the inclusion of point ii) of the policy which promotes access to the built, historic and natural landscape. We recommend that the policy is amended to ensure



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that improvements to transportation and access arrangements have regard to the conservation and enhancement of the historic environment.

Chapter 23: Sustainable Tourism

Policy PUBSP12: Sustainable Tourism

This policy would be strengthened by referencing the role that the historic environment has to play to in sustainable tourism at the strategic level. We welcome the inclusion of point v) of the policy which addresses heritage assets. However, the policy and text could better recognise that the historic environment provides direct opportunities for tourism and the local economy as part of the attraction and character of the Broads landscape. There is an opportunity within this policy to emphasise and promote heritage assets and the wider historic landscape as a positive contribution to sustainable tourism.

Policy PUBDM28: Sustainable tourism and recreational development

We welcome the reference to the historic environment in part a vi) and part b x) of this policy.

Policy PUBDM29: Holiday accommodation – new provision and retention

We welcome the need for development to have regard to the Landscape Character Assessment in point f) and to consider the visual implication in point g). This will benefit the wider historic environment and landscape character of the Broads.

Site Specific Policies

We are very pleased to see that the site specific policies accurately identify and describe the presence of both designated and non-designated heritage assets, and includes specific provision for the conservation of and enhancement of the Broads locally distinctive historic environment.

Only some minor amendments have been suggested (see below) and if these are incorporated it will strengthen the plan, and the conservation of the historic environment that it proposes.

Policy PUBACL1: Acle Cemetery and Extension & Policy PUBACL2: Acle Playing Field Extension

There are no known designated heritage assets within the boundaries of these sites or within their immediate vicinity. We welcome the policy requirement (point a) for a prior archaeological assessment to be carried out. The reasoned justification supports this policy provision and outlines the nature of the site's archaeological interest.



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Policy PUBBEC1: Former Loaves and Fishes

This site is located within the Beccles Conservation Area. The policy to resume the use of the Public House is welcome as it should ensure the continued vitality and vibrancy of this part of the conservation area in terms of use and character. We welcome the policy provision at point (ii) which seeks proposals which will enhance the appearance of the area. It may be helpful to make reference to *character* as well.

Policy PUBBEC2: Beccles Residential Moorings (H.E. Hipperson's Boatyard)

We welcome reference to the Beccles Conservation Area across the river and the text which requires proposals to take the conservation area into consideration. This policy could be strengthened by making explicit reference to the need to have regard for the *setting* of the conservation area.

Policy PUBCAN1: Cantley Sugar Factory

We welcome the reference to the nearby Langley Conservation Area, and the two Grade II* Churches of St Botolph at Limpenhoe and St Margaret at Cantley. We would recommend that the policy is strengthened to make explicit reference to the need for development to have regard for the setting of these designated heritage assets. Due to the open landscape around the factory, development should be particularly careful to respond to these assets and the historic environment more generally.

Policy PUBGTY1: Marina Quays (Port of Yarmouth Marina)

The supporting text makes reference to the presence of the Halvergate Marshes Conservation Area and identifies two World War Two sites which may have archaeological potential. Whilst these inclusions are welcomed, the policy itself contains no mechanism to ensure that these heritage assets and their settings are considered. As above, we request that the policy requires any redevelopment to make explicit reference to the setting of the Halvergate Marshes Conservation Area across the river and to specify whether or not an application will be expected to be accompanied by an archaeological assessment.

Policy PUBHOR1: Car Parking

We welcome the reference to the Horning Conservation Area and the policy requirement to improve the character and appearance of the conservation area. It is recommended that the wording is slightly amended to read *character or appearance* as this better reflects the statutory obligations of the Planning (Listed Building and Conservation Area) Act 1990.

Policy POUBHOR7: Horning - Boatyards, etc at Ferry Road. & Ferry View Road

We welcome the policy require for development of this site to pay particular regard to the setting of the nearby Grade II* Listed Hobbs Mill and Grade II Listed Horning



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Ferry Mill.

Policy PUBHOV3: Brownfield land off Station Road, Hoveton

The supporting text for this policy makes reference to the nearby scheduled monument of Wroxham Bridge. However the policy itself does not mention it. It is recommended that the policy itself be amended to include a criterion which requires development to take account of the monuments' setting.

Policy PUBNOR1: Utilities Site

This site is in close proximity to a number of designated heritage assets including the Grade II listed of Ruins of Trowse Newton Hall, the Thorpe Ridge Conservation Area and the Grade II listed Registered Park and Garden (RPAG) of Crown Point. The supporting text of the policy also identifies the site as having archaeological potential and therefore there may be un-designated heritage assets within the site. The presence of these heritage assets is not reflected within the policy and it is recommended that point b) refers to the historic environment and setting of heritage assets as well as natural assets.

Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site

This site is located within the Oulton Broad Conservation Area. We welcome the inclusion of point vii) which requires development of this site consider its location within the conservation area. It would be stronger if this point required development to preserve or enhance the character or appearance of the Oulton Broad Conservation Area. We welcome the need to provide an archaeological assessment in light of the archaeological potential of the site.

Policy PUBPOT1: Bridge Area

We welcome the policy criterion which requires new development to have regard to Potter Heigham Bridge, a scheduled monument and Grade II * listed building, and its setting.

Policy POTHU1: Tourism development at Hedera House, Thurne

We are pleased to see the inclusion of point ii) but request that this amended to require specific consideration of the setting and significance of the nearby Grade II* listed windpumps: Thurne Dyke Windpump and St Benets Level Windpump. As they are Grade II* listed Historic England will a statutory consultee for any subsequent application.

We welcome recognition for undiscovered archaeological potential in the supporting text on page 188 but this is not reflected in the policy itself.

Policy POXNS5: Drainage Mills

We are very pleased to see that the plan includes specific provision for the



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conservation of these characteristic and locally distinctive Broad structures. We welcome specific reference in the policy to their setting and we are pleased to see that the supporting text outlines the intrinsic importance of these mills to the historic landscape and character of the Broad.

Policy PUBSSSTAITHES: Staithe

We welcome the inclusion of point iv) which seeks to resist development that detrimentally impacts upon the historic character and setting of staithe.

Policy PUBSSA47: Changes to the Acle Straight (A47T)

We are pleased to see specific policy provision which requires constraint scoping which considers the historic environment and which requires any improvements to consider visual impact and the setting of the Broad. We are pleased to see that point ix) considers both designated and non-designated heritage assets and their settings as well as waterlogged archaeology. We are also pleased to see reference to specific heritage assets within the supporting text.

Historic England will closely monitor any proposal for development of the Acle Straight that impacts the historic character of this landscape and the setting and significance of listed structures along its route.

Glossary

Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. We recommend that the Plan includes a glossary which defines:

Listed Buildings

Scheduled Monuments

Conservation Areas

Registered Parks and Gardens

Registered Battlefields

Protected Wrecks

Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings

Summary

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.



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Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made then please do get back to me. In the meantime, we look forward to continuing to work with you and your colleagues in the preparation of the Local Plan documents.


Yours sincerely



pp

Ms Katie Parsons

Historic Environment Planning Adviser

e-mail: 



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Sent by email to: planningpolicy@broads-authority.gov.uk

12/01/2018

Dear Sir/ Madam

Response by the House Builders Federation to the Local Plan for the Broads

Thank you for consulting the Home Builders Federation (HBF) on the Local Plan for the Broads. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

We recognise that as a National Park there are significant policy constraints that will limit the level of development. However, in recognising these constraints it is still important that the plan being proposed is supported by an appropriate evidence base, is an effective plan that is deliverable over its period and is consistent with national policy. Whilst we are pleased to see changes to the plan addressing some our concerns there are still elements of the Plan what we do not consider to be sound. Set out below are the areas of the Plan that we consider to be unsound against the tests outlined in paragraph 178 of the National Planning Policy Framework.

We would like to submit the following representations on the Local Plan and we would welcome, in due course, participating in hearings of the Examination in Public.

Duty to Co-operate

Whilst the Broads National Park is highly constrained and will play a limited role in meeting the needs of the Housing Market Area (HMA) within which they are located it is still essential that the Broads Authority establishes that needs across the HMA are being met. We are pleased to see that the Norfolk LPAs along with the County Council have all agreed to meet their own housing needs and signed up to the Norfolk Strategic Framework. This should provide a reasonable basis for co-operation moving forward and clearly identifies housing as a key cross border issue. Our one concern regarding the duty is the reliance on Great Yarmouth to meet a proportion of the Broads housing needs. The duty to co-operate statement outlines on page 23 that delivery in the Great Yarmouth HMA is 69% less than current requirements. In the first three years of their current plan period Great Yarmouth have failed to meet their housing requirement and have a delivery shortfall of 343 homes. This is a significant shortfall and whilst there may be a Memorandum of Understanding outlining that Great Yarmouth will

accommodate these homes it may be prudent to identify further sites to meet these needs.

PUBDM13: Energy demand and performance

This policy is unsound as it is ineffective

The HBF does not generally object to local plans encouraging developers to include renewable energy as part of a scheme and to minimising resource use in general it is important that this is not interpreted as a mandatory requirement. This would be contrary to the Government's intentions, as set out in ministerial statement of March 2015¹, the Treasury's 2015 report 'Fixing the Foundations'² and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards. The Deregulation Act 2015 was the legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. Transitional arrangements were set out in a Written Ministerial Statement in March 2015.

As written the policy could be considered to require applicants to comply with an energy efficiency standard that exceeds that required by Building Regulations. We would suggest that the policy be amended to encourage the adoption of energy efficiency measures and the use of renewable and low carbon energy sources. This would more accurately reflect the intention of Government is to improve energy efficiency through Building Regulations not through planning policy. It is also unclear as to how the Authority intend to monitor and enforce the delivery of this policy.

PUBSP15: Residential development

Unlike other national parks the boundary of the Broads Authority is very tightly drawn to the valleys and rivers within the area and we appreciate the difficulties in assessing needs within the national park. Given the relatively small population we would not disagree with the housing needs assessment for the national park of 286. As the Broads Authority have stated they intend to meet this level of need they should set out in text of the policy as the housing requirement for the national park. It would also be helpful if this was broken down by HMA to allow for monitoring against specific requirements, in particular the requirement in relation to the Great Yarmouth HMA. At present the policy does not establish the Authority's requirement and this should be rectified to ensure clarity as to the objective of this policy.

PUBDM33: Affordable Housing

This policy is unsound as it has not consistent with national policy.

¹ www.gov.uk/government/speeches/planning-update-march-2015

² <https://www.gov.uk/government/speeches/fixing-the-foundations-boosting-britains-productivity>

It is essential that policies in Local Plan provide a clear statement on the intentions of the Authority with regard to what it is expecting from applicants. The need for such clarity is established in paragraphs 17 and 154 of the NPPF. In particular paragraph 154 states:

“Only policies that provide a clear indication as to how a decision maker should react to a development proposal should be included in the plan.”

This policy fails to achieve the necessary level of clarity with regard to the requirement that developments of between 6 and 10 units will contribute a commuted sum to support affordable housing delivery. There is no detail as to how much a developer will be expected to contribute and will lead to uncertainty in bringing sites forward. Policies need to be clear and unambiguous in order to allow policy compliant schemes to come forward and for decisions on those schemes to be considered efficiently, and most importantly, predictably. At present this policy lacks the necessary detail to allow for efficient and predictable decision making – one of the core planning principles set out in paragraph 17 of the NPPF.

PUBDM42: Design

Part k of this policy is unsound as it is unjustified

Part K of policy PUBDM24 requires 5% of all dwellings over 20 units to be built to part M4(2). The Council are required by paragraph 56-007 of PPG to justify the imposition of the higher standard having regard to needs, the accessibility and adaptability of existing stock and the overall impact on viability. Whilst the Council have established that in general the Broads has an ageing population there is no evidence in relation to the existing stock, the type of tenure where needs are most likely to occur or the impact on viability. Without this evidence it is not possible for the Council to justify the inclusion of adoption of the optional technical standard. Part k of the policy should therefore be deleted as it is unjustified.

PUBDM44: Designing places for healthy lives

Policy is unsound as it is ineffective

We recognise the importance of ensuring new development supports the wider aims of local authorities and their partners to improve the health and well-being of their residents and workforce. However, the requirement for all new development to explain how their development facilitates Health and well-being is unnecessary and an additional burden on applicants. Planning Practice Guidance (PPG) sets out that HIAs “*may be a useful tool to use where there is expected to be significant impacts*” but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Where a development is in line with policies in the local plan it should not be necessary to provide additional information on health and well-being. Only where there is a departure from relevant

policies in the plan should the Broads Authority consider requiring an assessment as to the contribution a development makes towards health and well-being.

PUBDM46: Planning obligations/ Developer contributions

The policy is unsound as it is unjustified and ineffective.

The Council's evidence on infrastructure is limited and fails to set out the type of infrastructure required in the Broads and the cost of that infrastructure. There is no evidence to show what the impact of the new housing being proposed for the area will have on the local infrastructure and its capacity to absorb any increase in its use. Given the level of housing development being proposed the impact on infrastructure is likely to be minimal over the course of the plan period. The Authority's own evidence sets out that for many of the infrastructure items listed in this policy that there is no additional impact. For example, on both education and police services the Local Infrastructure Study establishes that there are no additional needs, and there is no evidence presented with regard to waste and recycling facilities. Yet these are all included within the policy even though there is no need identified from the levels of development being proposed.

We would also suggest that the inclusion of administrative fees as part of a planning obligation is also inappropriate and unlawful. The case of *Oxfordshire v Secretary of State for Communities and Local Government* [2015] EWHC 186 established that Local Planning Authorities have no right to demand an administrative payment in relation to S106 contributions as they fall outside of the scope of Regulation 122 of the CIL regulations and paragraph 204 of the NPPF. This paragraph sets out that planning obligations should only be sought where they meet all of the following tests:

- They are necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonable related in scale and kind to the development

We do not consider that the Authority has sufficient evidence to include all of the items listed in PUBDM24 as being required to make development acceptable in planning terms. There may well be a desire to make improvements to certain public facilities and to raise funds from development to support these. However, if there is no evidence to support the need for such contributions then the Council should not include these within the policy. It is also unlikely that the Authority would be able to pool contributions to infrastructure outside of the Broads National Park due to pooling restrictions on financial contributions. This will further limit the effectiveness of the approach to developer contributions set out in this policy and in particular the support of infrastructure beyond the boundaries or control of the Authority.

Given that there is no evidence on either the likely scale of contributions there are real concerns as to the deliverability of this policy. Without a more detailed assessment of infrastructure needs this policy cannot be considered to be effective or justified.

Conclusions


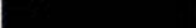
For the Local Plan for the Broads to be found sound it must pass the four tests set out in paragraph 182 of the NPPF. At present we consider the Publication Local Plan to be unsound due to:

- The affordable housing policy is not justified by the evidence base and is inconsistent with national policy
- Lack of evidence to support adoption of optional accessibility standards
- Planning obligation policy is unjustified and ineffective

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. I have also attached at appendix 1 responses to the Authority's additional questions regarding previous consultations, participation at the EIP and notifications. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



Mark Behrendt
Planning Manager – Local Plans
Home Builders Federation
Email: 
Tel: 

Appendix 1

Have you raised these issue during previous consultations on the Local Plan?

Yes

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

If you wish to participate in the public examination, please outline why you consider it to be necessary?

To ensure that the interests of the housebuilding industry are effectively represented at the EIP

(Please continue on a separate sheet / expand box if necessary)

Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan



Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	James Knight	
Organisation / Group	(if applicable)	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBTSA2
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

This policy was introduced very late in the process, due to planning enforcement issues at the western end of the island, resulting in extremely limited consultation. Information provided to support the proposed policy was materially incorrect and misleading (as summarised below), resulting in a policy which seeks to extinguish historic mooring rights on the river without any objective justification. Planning committee members could reasonably be expected to have arrived at a different conclusion had they been in possession of these material facts and considerations, which are:

1. An assertion that there had never been any mooring on the river at the western end of the island, when, in fact, this stretch of river was intensively used for mooring boats throughout most of the 20th century.
2. The misrepresenting of a planning appeal decision relating to the adjacent mooring basin. It was claimed that the river bank moorings had been “proven” abandoned and that the inspector allegedly raised concerns over river width and the amenity of residents which should preclude any such mooring. In fact, the decision did not relate to the river moorings and, instead, the inspector stated that any reasonable person would expect to see boats moored on this section of river.
3. An assertion that there was no means of accessing the mainland from the island other than by boat, which ignored the existence of a vehicular and pedestrian bridge in the same ownership as the island.
4. A claim that the Broads Authority had no choice but to create a policy in respect of the western end of the island which exactly mirrored an appeal decision. In fact, the Authority should base its planning policies on all material factors, which may include any relevant inspector’s decisions but not to the exclusion of other considerations.
5. It was also stated that there would be no point in making planning policy which conflicts with the wishes of the current landowner - when in fact planning policy should be aspirational and in the public interest, even if that sometimes involves taking a longer term view.

The proposed policy also ignores the clear suitability of the marina at the western end of the island as a location for residential moorings in accordance with the objectives of policy PUBDM36. The Accommodation Needs Assessment for houseboats identifies an objectively assessed need for 63 residential moorings over the plan period. The Local Plan proposes 25 residential moorings across 4 locations, and 10 residential moorings have recently been approved at appeal, leaving a shortfall of 28. Additionally, the Authority’s own research suggests that up to 100 households already live on boats in the Broads executive area. The inclusion of this marina could allow the objectively assessed need to be fulfilled in a sustainable location with excellent facilities and transport links, close to the city of Norwich.

In summary:

1. The policy is not positively prepared, because it ignores the objectively assessed development need for residential moorings and the obvious suitability of this location.
2. The policy is not justified because it is not founded on a robust or credible information base - indeed the information base is factually incorrect. In particular, there is no objective basis on which to claim that the amenity of residents would be affected by boats moored on the river.
3. The policy is not effective because it is not sufficiently flexible to deal with changing circumstances - such as a change in land ownership.
4. The policy does not meet the legal or procedural requirements because it did not go through the full consultation process and members of the planning committee (and others) were misled as to the salient facts underpinning the policy.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

This policy needs to be comprehensively reviewed in the light of the available evidence.

The policy should accept the marina's inherent suitability as a site for residential moorings, and should not seek to limit riverside moorings other than those which would create a genuine hazard to navigation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

In order to consider this policy objectively, it will be necessary for the Inspector to ask questions, and to seek evidence and clarification, on the points which I have made. I will need to participate in the public examination in order to provide the knowledge and evidence which will be required.

(Please continue on a separate sheet / expand box if necessary)

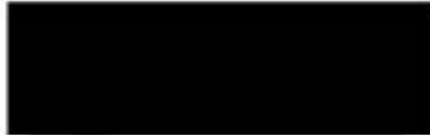
Broads Authority Local Plan. Publication version (November 2017). Representation Form

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- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 11 Jan 2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	James Knight	
Organisation / Group	(if applicable)	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

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Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

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3. The policy is not effective because it is not sufficiently flexible to deal with changing circumstances - such as a change in land ownership.
4. The policy does not meet the legal or procedural requirements because it did not go through the full consultation process and members of the planning committee (and others) were misled as to the salient facts underpinning the policy.

(Please continue on a separate sheet / expand box if necessary)

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Yes ☒

No ☐

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(Please continue on a separate sheet / expand box if necessary)

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Yes

☒

No

☐

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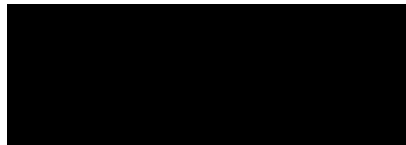
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- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 11 Jan 2018

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: David Johnso [REDACTED]
Sent: 24 January 2018 10:53
To: Lottie Carlton
Subject: RE: LDBA - comments on the Proposed Local Plan

Dear Lottie

Thanks for your email. I'm sorry about the anomalies. I was asked to complete a further form and perhaps matters or views have changed between the two submissions. Please use the second (later) form. I referred to PUDM36 as this is the overriding policy in respect to Residential Moorings but you are right in that my comments refer specifically to Loddon and Chedgrave.

I hope that this clarifies matters and thanks for raising these issues.

Best regards

David Johnson
Community Support
Loddon & District Business Association
[REDACTED]



From: Lottie Carlton [REDACTED]
Sent: 22 January 2018 13:18
To: [REDACTED]
Subject: FW: LDBA - comments on the Proposed Local Plan

Dear David

Thank you for completing and submitting the form as requested.

We now have two forms from you that include PUBL0D1 Loddon Marina Residential Moorings, unfortunately with conflicting data. One states you are representing a group of 70 people and the other 25. Additionally one states the reasons you consider this policy to be unsound as not Justified and not Effective whereas the other form also includes with these two, not Positively Prepared. Could you please clarify these anomalies?

It is also not clear which section of your response relates specifically to PUBDM36 New Residential Moorings (one of the policies listed on the form). Your response seems to relate more to PUBLOD1 Loddon Marina Residential Moorings. We obviously would not wish to misrepresent the intentions of your response so could you please clarify which comment is attached specifically to the PUBDM36 policy?

Thank you and kind regards

Lottie Carlton
Administrative Officer
[REDACTED]

From: Natalie Beal
Sent: 22 January 2018 08:03
To: Lottie Carlton; Planning Policy Mail
Subject: FW: LDBA - comments on the Proposed Local Plan

From: David Johnson [REDACTED]
Sent: 20 January 2018 10:02
To: Natalie Beal
Subject: RE: LDBA - comments on the Proposed Local Plan

Dear Natalie

Thanks for this.

Herewith the Representation Form.

Regards

David Johnson
Community Support
Loddon & District Business Association
[REDACTED]



From: Natalie Beal [REDACTED]
Sent: 09 January 2018 11:19
To: David Johnson [REDACTED]
Cc: Planning Policy Mail [REDACTED]
Subject: RE: LDBA - comments on the Proposed Local Plan

Hello

Not singled out. All boatyards in sustainable locations were asked if they wanted to put their sites forward for residential moorings. A few came forward and I assessed them accordingly. Isolated locations were discounted. Also we allocate at Beccles. Brundall, Stalham and other places with development boundaries could have residential moorings too. Also through this consultation, some more have come forward for consideration at Somerleyton, Horning and St Olaves.

Please fill out the attached form, other than your representation as that is below.

Thanks

Natalie

From: David Johnson [REDACTED]
Sent: 09 January 2018 10:05
To: Natalie Beal
Subject: RE: LDBA - comments on the Proposed Local Plan

Dear Natalie

Thanks for your response.

Our concern is about the likely effect of having these residential moorings in what are small communities on the local economy. On the one hand, one might say that additional people will add to the purchasing power of the locality. On the other hand, our existing experience of having liveaboards in the locality leads us to believe that this drives away visitors. There seems to be little control that the authorities can bring to bear on those who misuse the system. In answer to your question therefore, the LDBA would not support any residential moorings in Loddon/Chedgrave. You say that you need to provide 63 moorings around the system but it seems that Loddon/Chedgrave has been singled out for allocation. There is nothing in the draft to suggest how the balance is to be provided. As I understand from the draft, the precise need is anecdotal rather than precise although the figure seems to suggest some degree of accuracy.

I hope that this explains our position.

Kind regards

David Johnson
Community Support
Loddon & District Business Association



From: Natalie Beal [REDACTED]
Sent: 04 January 2018 15:43
To: David Johnson [REDACTED] Planning Policy Mail [REDACTED]
Subject: RE: LDBA - comments on the Proposed Local Plan

Dear Mr Johnson

Thank you for the comment.

To help me understand, is your particular area of concern that leads you to say the Local Plan is not sound, that we draft allocate some moorings at Loddon and Chedgrave for residential moorings? What is the actual issue please? The number? Or do you not support any? The Authority is bound by law to assess need for those living on boats and we have done that and we need to provide 63 around the system.

Please can you clarify your soundness objection?

Yours sincerely

Natalie Beal

From: David Johnson [REDACTED]
Sent: 04 January 2018 13:48
To: Planning Policy Mail
Subject: RE: LDBA - comments on the Proposed Local Plan

I now attach the Representation Form in connection with my email as below.

From: David Johnson [REDACTED]
Sent: 04 January 2018 13:33
To: [REDACTED]
Subject: LDBA - comments on the Proposed Local Plan

Ms Natalie Beal
Planning Policy Officer

Dear Madam

Proposed Broads Local Plan

I am writing on behalf of the LDBA which is grateful for the opportunity to make comments on the proposed plan.

The Loddon and District Business Association exists to promote and protect business and commercial activity in the town of Loddon, the village of Chedgrave and surrounding areas. It is particularly concerned with tourism as this is seen as a means to enhance retail and service provision in its area of referral. As most of the business communities of Loddon and Chedgrave lie outside the scope of activity of the Broads authority, there is little comment for us to make. However, the existence and significance of the Broads as a national park does have a material impact upon business in the area as does the level of tourism.

The Association is pleased to note the provisions for protecting and enhancing the tourism industry in its area. It is important to realise that many tourists reaching Loddon/Chedgrave arrive by boat along the river Chet and whatever can be done to protect and enhance this channel and the facilities available at its head will be of benefit to the wider community.

We are concerned about Policies PUBLOD1 and PUBCHE1 which propose to reduce the number of recreational moorings in boatyards by replacing these with residential moorings.

It is interesting to note that the total of residential moorings proposed equates to a significant proportion of the total number of permanent moorings in Loddon & Chedgrave and of further interest is the fact that only a very limited number of boatyards on the Broads network have applied for this facility.

Our experience of residential moorings which have illegally sprung up in the vicinity in the last few years is not a happy one. It has led to anti-social behaviour and has discouraged some in the boating fraternity to come to this location and use the boat hire facilities on offer. There is also a level of discouragement amongst those who visit Loddon/Chedgrave and stay on a short term mooring overnight.

It is noted from the document that several comments have been made concerning the displacement of occasional use boats and what will happen to these. To my knowledge, there is a high demand for moorings which far outweighs their availability. One has only to ask any boatyard to discover that there are long waiting lists for moorings. We might suggest from this

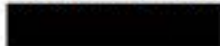
fact that as the purpose of the Broads area is to provide recreational facilities, it should not be used as a provider of permanent floating housing sites.

The Association is pleased to note the proposed policies set out in Chapter 22, particularly with regard to recreational access. It is hoped that these policies will further enhance the progression of plans to improve the bank of the river Chet allowing the re-opening of the Wherryman's Way. The closure of part of this footpath has made a material difference to the aspirations of longer distance walkers as well as occasional walkers, and their use of the commercial facilities in Loddon/Chedgrave.

I hope that you will take into account these views in the further consideration of the Plan and would be most grateful for an acknowledgment of receipt of this email.

Yours faithfully

David Johnson
Community Support
Loddon & District Business Association



Broads Authority, Yare House, 62-64 Thorpe Road. Norwich NR1 1RY
01603 610734
www.broads-authority.gov.uk



If you have received this email in error, please delete it immediately and notify the sender. This email may contain confidential information and may be legally privileged or prohibited from disclosure and unauthorised use. If you are not the intended recipient, you must not copy, distribute or rely on it.

As email is not a 100% secure communications medium we advise you to check that messages and attachments are virus-free before opening them. We cannot accept liability for any damage that you sustain as a result of software viruses. We reserve the right to read and monitor any email or attachment entering or leaving our systems without prior notice. Opinions expressed in this email are not necessarily endorsed by the Broads Authority unless otherwise specifically stated.

Lottie Carlton

From: Elizabeth Harrison [REDACTED]
Sent: 20 January 2018 16:54
To: Planning Policy Mail
Subject: Harrison, E

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Ack and Filed

----- Original Message -----

Subject: Draft Local Plan for Residential moorings - Greenway Marine and Loddon Marina

From: Elizabeth Harrison [REDACTED]

Sent: 14:55, Saturday, 20 January 2018

To: planningpolicy@broads-authority.org.uk

CC:

Dear Natalie

As residents of Loddon Quay, adjacent to and opposite the proposed sites we feel we must strongly object to the draft plan.

As some boats at Loddon Marina are already being used as permanent dwellings we have some experience of the problems this is causing local residents. the town and the Broads Authority. An increase in the number of residential boats can only increase the problem.

Some of these boats are unsightly eg. rough wooden sheds built on top of boats and extra paraphernalia on the quay headings.

More pollution of the river must also be of concern.

There have been many occasions when there has been excessive anti-social behavior with alcohol, possible substance abuse and loud noise. Visitors have been intimidated and even threatened. Consequently the town of Loddon is suffering from a bad reputation.

We wondered if the residential moorings would be subject to Council Tax by the owner or the user? Are the current owners up to date with their obligations?

We were also concerned about extra traffic coming out from the boatyards on to Bridge road which is already difficult. Is their proposed to be parking provision for all the extra possibly 30+ vehicles?

Kind Regards
Elizabeth Harrison

Company Secretary Loddon Quay Ltd

Respondent: Mautby Parish Council

Lottie Carlton

From: Lottie Carlton
Sent: 05 January 2018 09:52
To: Shirley Weymouth
Subject: RE: Broads Local Plan Consultation - Extension to deadline for comments

Dear Shirley

Thank you for letting us know that Mautby Parish Council's response to the consultation is that it has no comments. Please treat this email as acknowledgment of receipt.

Kind regards

Lottie Carlton
Administrative Officer
[REDACTED]

From: Shirley Weymouth [REDACTED]
Sent: 04 January 2018 16:59
To: Lottie Carlton
Cc: [REDACTED]
Subject: Broads Local Plan Consultation - Extension to deadline for comments

Lottie

Mautby Parish Council had no comments

Shirley

Parish Clerk

From: Lottie Carlton [REDACTED]
Sent: 04 January 2018 16:24
To: [REDACTED]
Subject: Broads Local Plan Consultation - Extension to deadline for comments

Dear Mrs S A Weymouth Parish Clerk Mautby & Runham Parish Council

EXTENSION TO DEADLINE FOR COMMENTS ON BROADS LOCAL PLAN

As a result of some organisations requesting a week's extension to the deadline for comments to the Local Plan for the Broads, we have extended the deadline to 4pm on 12 January 2018.

Many thanks to those who have commented to date.

Yours sincerely

Natalie Beal
Planning Policy Officer
planningpolicy@broads-authority.gov.uk

Respondent: Natural England

Date: 5 January 2018

Our ref: 231370

Your ref: n/a



Natalie Beal
Planning Policy Officer
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

planningpolicy@broads-authority.gov.uk

BY EMAIL ONLY

Dear Natalie

**Local Plan for the Broads – Publication Version Pre-submission Consultation
Plan Period 2012-2036**

Thank you for your consultation regarding the above, dated 11 November 2017, which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Local Plan for the Broads – Pre-submission Consultation

Natural England welcomes the inclusion of the majority of our comments made previously at the Preferred Options stage (in our letters of response dated 3 February 2017 (our ref: 203094) and 14 July 2017 (our ref: 219615) respectively).

In respect to Natural England's interests, we consider the Local Plan **to meet the legal and procedural requirements and to be sound**, and in particular the following specific policies and supporting documents:

Policies

PUBSP4: Soils
PUBDM9: Peat Soils
PUBDM12: Natural Environment
PUBSSA47: Changes to the Acle Straight (A47T)
PUBSP15: Residential development
PUBNOR1: Utilities Site
PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site; and
PUBTHU1: Tourism development at Hedera House, Thurne
Habitats Regulations Assessment
Sustainability Appraisal

Other comments on the Local Plan for the Broads – Habitats Regulations Assessment

We fully support the findings of the exemplary Habitats Regulations Assessment (HRA) of the Local Plan. The report *Habitats Regulations Assessment of the Local Plan for the Broads at Publication*

stage, dated August 2017, and prepared by Footprint Ecology, has assessed the emerging plan at Preferred Options stage and then at Publication stage. It is thorough, clear and evidence base, and Natural England is satisfied that the HRA provides a comprehensive assessment of the likely significant effects of the Local Plan on European sites and meets the requirements of the Conservation (Habitats & Species) Regulations 2017* ('the Habitats Regulations 2017'). We concur with its conclusions that the Local Plan is unlikely to have a significant effect on European sites and that an Appropriate Assessment is not be required, as all the modifications, identified in the HRA report, have been made to the relevant Local Plan policies.

* Please note the various legislative amendments that have been made to the Habitats Regulations since 2010 were tidied up and consolidated into new regulations. On 30 November 2017, the current 2010 Regulations were replaced with the Conservation of Habitats and Species Regulations 2017 (or the 'Habitats Regulations 2017'). The 2017 Regulations do not introduce any material changes to the regulations or change how they should be interpreted and applied. However, the Local Plan should reflect this change in the wording by the time it is adopted.

Examination in Public

We do not consider it necessary to participate in person in the public examination, unless requested to do so by the Planning Inspector.

For any queries relating to the specific advice in this letter only please contact me on 020802 64893. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Louise Oliver
Norfolk and Suffolk Team

NFU Consultation Response

By email:

planningpolicy@broads-authority.gov.uk

Date: 12 January 2018

Contact: Rob Wise

Tel: [REDACTED]

NFU East Anglia response to Broads Authority Local Plan consultation

The NFU represents around 47,000 farm businesses in England and Wales. In addition we have 40,000 countryside members with an interest in farming and the countryside. The NFU represents over 900 farm businesses in the wider Broadland catchment areas of Norfolk and Suffolk. We are pleased to have this opportunity to comment on the final draft of the Broads Authority Local Plan.

The draft Local Plan taken in the round appears to adhere to the underlying philosophy of the presumption in favour of sustainable development contained in the National Planning Policy Framework. This is well articulated in the Plan's first policy, specifically on sustainable development.

However the experience of our members in dealing with the currently existing Local Plan is that the cumulative effect of the interpretation of individual policies within the plan can lead to recommendations for refusal of permissions. When looked at in isolation each individual policy would seem sound in relation to a presumption in favour of development, but when taken together act to restrict development that might indeed be viewed as sustainable development.

In looking at the draft Plan there are three individual policies that we wish to comment on in this regard.

Policy PUBDM9: Peat soils

We accept the presumption in favour of preserving peat soils, but feel the policy wording that development can only occur where it is demonstrated that "enhancement of biodiversity outweighs the carbon loss" is an absolute measure that is unsound in plan making terms. There is no absolute way to measure this objectively, and even if there were, it would be inappropriate to set such an absolute criteria. We believe that the draft policy be amended to take account of biodiversity enhancement but not attempt to place a definitive yardstick against it.

Policy PUBDM14: Renewable energy

We believe that the policy's reasoned justification statement needs to make it more explicit that certain wind turbines will potentially be permitted, especially smaller ones for the purpose of generating electricity for own - residential or business - consumption.

Policy PUBDM21: Light pollution and dark skies

We believe that the first part of this policy - "a) There is no permanent external lighting within Dark Sky Zone category 1 as identified on the policies maps" - is unsound. It is clearly possible to design external lighting systems that have a minimal impact on the night sky, so it is unsound to have an absolute ban on introducing any new external lighting into any given zone. Existing policies have already placed severe restrictions on our members who have, *inter alia*, vital animal welfare reasons for needing at times to use external lights. The new policy must recognise these needs in all areas.

Yours faithfully

[REDACTED]
Rob Wise
Regional Environment Adviser
NFU East Anglia

Broads Authority Local Plan
Publication version (November 2017)
Representation Form

For Office Use Only
Consultee ID:
Received:
Processed:

This is the form for making representations on the Broads-Authority Local Plan Publication version. Once completed, please return by email to planningpolicy@broads-authority.gov.uk.

A guidance note is also available to assist you in making your response. Please go here <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The various documents that are being consulted on can be found here: <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The consultation ends 4pm on 5 January 2018. Responses received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

Hard copies of this form are available from the Broads Authority Office in Norwich and the drop-in events taking place across the Broads, details of which can be found at the website above.

Please note:

- Separate forms should be completed for each representation.
- All respondents must provide their personal details.
- Representations should be on the basis of the soundness or legal compliance of the Plan. (Please see guidance note for more details.)
- It is recommended that groups who share a common view submit a single form rather than multiple copies and provide a list of each person supporting the representation.
- By completing this form you agree to your details being shared. Your name, address and comments (but not your other personal details) will be made available for public viewing. These representations cannot be treated as confidential.

Please expand the boxes as necessary or attach additional sheets. Please clearly mark any additional sheets with your name and the part of the document the representation relates to.

1.	Your contact details	Agent Details (if applicable)
Name	Rob Wise	
Organisation / Group	NFU East Anglia	
Address line 1	Agriculture House	
Address line 2	Willie Snaith Road	
Town / City	Newmarket	
County	Suffolk	
Post Code	CB8 7SN	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

900

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	See submitted consultation response
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☒

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

See submitted consultation response

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

The issues have only been previously raised in informal officer discussions.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

See submitted consultation response

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Should the suggested changes not be made prior to submission, it will be necessary to illustrate to the Planning Inspector the negative impacts these unsound policies will have on the farming community.

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 12 January 2018

The closing date for responses is 4pm 5 January 2018

Your Ref:
Our Ref: Broadland LPA Jan 18
02 March 2018



Beccles House
1 Common Lane North
Beccles
Suffolk
NR34 9BN

Web: www.greatyarmouthandwaveneyccg.nhs.uk

Dear Sirs,

Further to your invitation to respond to the consultation on the Local Plan for the Broads, Great Yarmouth and Waveney CCG wishes to provide the feedback set out below;

- The CCG welcomes the early reference to Health on the Local Plan fundamental objectives (OB11).
- The CCG supports the rationale set out in Section 11 and the provision of open space, play and allotments and the benefit this provides for generic health and mental well-being.
- In Section 25 of the document the CCG has an expectation that CIL contributions for the housing development proposals set out in the section will be forthcoming and considered to enable corresponding health infrastructure development to be planned and implemented; particularly around the Gt Yarmouth and Waveney areas.
- The CCG would welcome acknowledgement of the need for a discussion regarding the LPA plans for delivering further older people's accommodation; to ensure there is corresponding commissioning of relevant primary care services, and that this matches the forecast 13% increase in the number of over 75s by 2036.
- The CCG supports the rationale set out in Section 28 and would further wish to explore with the LPA how health and well-being infrastructure development will be a core part of their future planning and decision making.

- The CCG was highly disappointed to note that the development of health infrastructure is not specifically recognised in the LPA's Planning Policy PUBDM46 as an integral part of the planning obligations and developer contributions. The CCG will be seeking an early discussion about how this issue can be rectified.

Should our position change in relation to any of the above applications, representation will be made ahead of the deadline.

Yours sincerely

Sadie Parker
Director of Primary Care

1.	Your contact details	Agent Details (if applicable)
Name	Sadie Parker	
Organisation / Group	Great Yarmouth & Waveney CCG	
Address line 1	Beccles House	
Address line 2	1, Common Lane North	
Town / City	Beccles	
County	Suffolk	
Post Code	NR34 9BN	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM46
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The CCG notes that the development of Health infrastructure is not specifically recognised in the LPA's Planning Policy PUBDM46 as an integral part of the planning obligations and developer contributions. The CCG will be seeking an early discussion about how this issue can be rectified.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

The CCG has only recently established a primary care directorate with particular expertise for Estates planning across the health and social care system and therefore, would have been unable to comment in previous consultations

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

The CCG would be keen to engage with formal discussions as to how the plan will acknowledge the need to developing health infrastructure and older peoples' accommodation to support anticipated growth.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Not applicable

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:

Date:

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Natalie Beal
Sent: 26 January 2018 13:31
To: Lottie Carlton
Subject: FW: Consultation Response

I have added to the comment. Please can you save.

Ta.

From: Martin Royal [REDACTED]
Sent: 26 January 2018 12:01
To: Natalie Beal
Cc: SMITH, Alison (NHS GREAT YARMOUTH AND WAVENEY CCG)
Subject: Consultation Response

Natalie

Good morning

On behalf of the Great Yarmouth & Waveney CCG I am responding to your queries

So the purpose of the comment was to make a statement that the NHS per se do not seem to be considered when planning how contributions for CIL/S106 arising from housing developments will be apportioned and used. I m sorry I assume you had adopted CIL as Waveney has done. Clearly not, so Im further assuming for Broadland you agree S106 contributions from developers to contribute to infrastructure developments.

From the documentation it is not clear whether your policy documentation acknowledges health as part of this consideration. So whilst no changes to the local plan are needed from our perspective we are simply making the case for inclusion of health alongside, education, police, highways etc for consideration of S106.

Hope this is clear, Im ore the happy to ring if clarification is required

Martin Royal

Hello

We are just going through your comments on the Local Plan for the Broads.

I have queries on some comments...

‘In Section 25 of the document the CCG has an expectation that CIL contributions for the housing development proposals set out in the section will be forthcoming and considered to enable corresponding health infrastructure development to be planned and implemented; particularly around the Gt Yarmouth and Waveney areas.

The CCG would welcome acknowledgement of the need for a discussion regarding the LPA plans for delivering further older people’s accommodation; to ensure there is corresponding commissioning of relevant primary care services, and that this matches the forecast 13% increase in the number of over 75s by 2036.’

We do not have CIL. Also I am not sure what your point is and whether any changes to the Local Plan are needed. Please clarify.

Thanks

Natalie

Natalie Beal
Planning Policy Officer


Respondent: Nice, S and S

Lottie Carlton

From: Lottie Carlton
Sent: 12 January 2018 10:03
To: Stephen Nice
Subject: Nice, S and S

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Ack and Filed and on database

Dear Steve and Sarah Nice

Thank you for letting us know you have no further comments on the Broads Local Plan.

Kind regards

Lottie Carlton
Administrative Officer
01603 756044

From: Stephen Nice [REDACTED]
Sent: 12 January 2018 09:20
To: Lottie Carlton
Subject: Re: Broads Local Plan Consultation - Extension to deadline for comments

Hi
No further comments from us
Regards
Steve and Sarah nice

On 4 Jan 2018 16:22, Lottie Carlton [REDACTED] wrote:

Dear Steve and Sarah Nice

EXTENSION TO DEADLINE FOR COMMENTS ON BROADS LOCAL PLAN

As a result of some organisations requesting a week's extension to the deadline for comments to the Local Plan for the Broads, we have extended the deadline to 4pm on 12 January 2018.

Many thanks to those who have commented to date.

Yours sincerely

Natalie Beal
Planning Policy Officer
planningpolicy@broads-authority.gov.uk
01603 610734

Local Plan for the Broads: Have your say

Lottie Carlton

From: Natalie Beal
Sent: 14 December 2017 16:20
To: Planning Policy Mail
Subject: Norfolk Constabulary

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Checked, Ack and Filed and on database

From: Lottie Carlton
Sent: 14 December 2017 16:19
To: Natalie Beal
Subject: FW: Consultation reminder: Local Plan for the Broads - Have your say!

From: Wolsey, Richard [REDACTED]
Sent: 14 December 2017 12:37
To: Lottie Carlton
Cc: Cawdron, Caroline J
Subject: RE: Consultation reminder: Local Plan for the Broads - Have your say!

Lottie...many thanks for the update. There are no Architectural Liaison Officer comments from us at this time.

Kind regards

Mr Dick Wolsey
Architectural Liaison Officer/CPO
Norfolk Constabulary
GT Yarmouth & South Norfolk Areas
Police Station
3, London Road
Beccles
Suffolk
NR34 9TZ

[REDACTED]
Or
[REDACTED]

From: Lottie Carlton [REDACTED]
Sent: 13 December 2017 15:09
To: Wolsey, Richard
Subject: Consultation reminder: Local Plan for the Broads - Have your say!

Lottie Carlton

From: Waters, Laura [REDACTED]
Sent: 18 December 2017 11:18
To: Planning Policy Mail
Subject: Norfolk County Council
Attachments: Schedule_Comments_December 2017.docx; Representation form_Policy PUBSSA47.docx

Categories: Ack and Filed

FAO Local Plan Team

Re: Broads Authority Local Plan - Reg 19 Consultation

Thank you for consulting Norfolk County Council on the above Local Plan.

Please find attached a Schedule of the County Council's formal comments on the emerging Local Plan.

I have also attached completed Representation Form where the County Council's comments are deemed to raise a "soundness objection".

In addition to the formal soundness objection (1 form attached), the County Council has some detailed comments contained in the attached Schedule, which the Broads Authority is asked to take into account in preparing the next stages of the Local Plan.

Should you have any queries with any of the comments attached please contact either myself or the named officer set out in the attached Schedule.

Kind regards

Laura

Laura Waters
Senior Infrastructure Development Planner
Community and Environmental Services
Telephone: [REDACTED]
Email: [REDACTED]

--

To see our email disclaimer click here <http://www.norfolk.gov.uk/emaildisclaimer>

Norfolk County Council Comments on:

Broads Authority Local Plan – Publication version Pre-submission consultation (November 2017) - December 2017

1. Introduction

- 1.1. The schedule of comments and accompanying Representation Forms have been agreed with the Chair and Vice Chair of the County Council's Environment, Development and Transport Committee.
- 1.2. The County Council welcomes the opportunity to comment on the above Local Plan and supports all those amendments to the Plan, which overcome the County Council's previous concerns/objections raised at the Regulation 18 Stage in respect of the:
 - The environmental issues; and
 - Developer contributions.
2. There remains Transport issues specifically relating to the Acle Straight which are set out below in relation to the County Council's position in support of the dualling of the A47.
- 2.1. The remainder of this schedule sets out further comments the County Council wishes to make on the emerging Local Plan:

3. Spatial Portrait (Section 4)

- 3.1 Public Health welcome the positive impact on health and well-being of the natural environment for residents and visitors alike and the recognition this is particularly important to those within deprived communities (both residents and visitors).
- 3.2 Should you have any queries with the above comments please call or email Phil Shreeve (Advanced Public Health Officer) on [REDACTED] or [REDACTED]

4. Water and Flooding (Section 10)

- 4.1 **Policy PUBDM4 – Development and Flood Risk:** The LLFA have requested previously that policy PUBDM4 specifically include reference to all sources of flooding, however as the Broads Authority area is mostly at risk of fluvial and tidal flooding, the policy indicates when a flood risk assessment (FRA) is to be done based on these risks. We note that the justification text (paragraph 5) indicates that an FRA when undertaken should consider all sources of flooding and include SuDS (sustainable drainage). We also note that developers are signposted to review the appropriate Strategic Flood Risk Assessment (SFRA).

4.2 **Policy PUBDM5 – Surface Water run-off**

We would still request an amendment to the second paragraph of Policy PUBDM5 with regard to surface water runoff. This has changed since the previous consultation in June. This paragraph currently reads as:

“The surface water run-off rates that will occur as a consequence of the development are required to be no more than the greenfield rate for the equivalent event for greenfield sites or, if the site is brownfield, then no more than the rates prior to development. However, applicants are encouraged to seek betterment in surface water run off as part of their proposals”.

4.3 The LLFA would request this is changed to;

The surface water runoff rates that will occur as a consequence of the development are required to be no more than the pre development greenfield runoff rates. Brownfield sites should reduce runoff to as close as greenfield rates as possible but should be no more than the rates prior to development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals.

This change is requested to reflect the national standards ([here](#)), the LLFA guidance ([here](#)) and current Anglian Water policy ([here](#)).

4.4 The Flood and Water Management team has discussed the allocated sites with Broads Authority and the Environment Agency but are unsure if a formal consultation has begun.

4.5 Should you have any queries with the above comments please call or email Elaine Simpson (Senior Flood Risk Officer) on [REDACTED] or [REDACTED]

5. **Open space (land and water), play and allotments (Section 11)**

5.1 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.

5.2 Should you have any queries with the above comments please call or email Phil Shreeve (Advanced Public Health Officer) on [REDACTED] or [REDACTED]

6. **Green Infrastructure (Section 13)**

6.1 **HRA document supporting the Local Plan:**

The HRA refers to the Candidate Marine SAC Haisborough, Hammond and Winterton SAC. The European Commission approved the SAC designation of Haisborough, Hammond and Winterton marine SAC in Sept 2017 see <http://jncc.defra.gov.uk/page-6534>

Paragraph 1.46 of the HRA states that Footprint Ecology undertook visitor surveys from European sites across Norfolk, as part of a joint commission by the Norfolk local planning authorities over 2016/17. The surveys were actually completed in 2015/16. The document referred to is not included in the references.

- 6.2 Should you have any queries with the above comments please call or email David White (Senior Green Infrastructure Officer) on [REDACTED] or [REDACTED]

7.0 **Heritage and historic assets (Section 15)**

- 7.1 The Historic Environment Service are really pleased to see the historic environment considered throughout this document. The inclusion of the historic environment in the spatial portrait (section 4.8), challenges and opportunities (section 7), objectives (OBJ8), special qualities (section 8.4) and policies (PUBSP5, PUBDM9 and PUBDM10) is really welcome. Earlier in the year (July-August 2017) the Broads Authority asked us to comment on a selection of the site allocations and it is good to see many of our comments on archaeological issues included.
- 7.2 PUBDM10, point viii. It would be really useful if point viii could include dissemination and archiving, as well as evaluation, excavation, recording and interpretation of the remains. This would help ensure it is in accordance with paragraph 141 of the National Planning Policy Framework.
- 7.3 Page 56, sources. The Norfolk and Suffolk Historic Environment Records are available online through county specific websites, both of which could be mentioned here (in addition to the Heritage Gateway): www.norfolk.heritage.gov.uk and <https://heritage.suffolk.gov.uk/> (although it should be noted that neither of these websites is suitable for use in the preparation of planning applications).
- 7.4 PUBCAN1 Cantley Sugar Factory. The discovery of artefacts and the sites of two drainage mills within the area of the sugar factory, plus the recovery of Iron Age to medieval objects in the wider area, suggests some areas of the sugar factory have potential to contain undisturbed archaeological remains. We recommend including the potential for this site to have archaeological interest in the constraints and features section. This site allocation was not included in those the Broads Authority consulted us on earlier in the year (presumably as it is rolling forward from the Site Specific Policies Local Plan and the level/nature of past and existing development on the site).
- 7.5 Should you have any queries with the above comments please call or email David Robertson (Acting Senior Historic Environment Officer) on [REDACTED] or [REDACTED]

8.0 **Amenity (Section 19)**

- 8.1 Public Health note given the equality impact assessment notes that some areas are inaccessible to some people with disabilities is there scope to strengthen the consideration of new amenities where they have regard to enabling access for all?

- 8.2 Should you have any queries with the above comments please call or email Phil Shreeve (Advanced Public Health Officer) on [REDACTED] or [REDACTED]

9.0 **Transport (Section 23)**

- 9.1 Policy PUBSSA47 sets out a number of aspects that the Broads Authority considers should be assessed in relation to improvements on the Acle Straight. However, the derivation of this set of criteria is not clear to the Highways Authority; it appears to be an arbitrary, non- defined list of selective criteria. Highways England, who will make recommendations about whether to bring forward improvements, state (in their Route Strategies Approach, which details how they will do this) that government's vision for transforming the strategic road network is described in the Road Investment Strategy post 2020: Planning Ahead. This sets out that evidence will be assessed relating to five broad aims published in the Road Investment Strategy for 2015-2020: economy, network capability, integration, safety and the environment. Detailed assessment and appraisal is described in a number of technical documents and manuals published by the Department for Transport. Decisions about whether to take forward an improvement, and assessment of any impacts arising from any such proposals, will be taken in accordance with these documents. On the whole the criteria listed in the policy are requirements of the design manuals and appraisal guidance. However, these manuals provide a comprehensive list of criteria. Whilst it is recognised that the Broads Authority might have some special considerations they would like taken into account the rationale for the list set out in the policy is not clear.

- 9.2 The Highways Authority note that Policy PUBSSA47 and the supporting information are on the whole focused on the presumption that the much needed road improvements on the Acle straight will have a presumptive negative impact on the local environment. The Highways Authority feel the policy and supporting text should be re written to bring a more balanced view, i.e. to consider the likely and many positive impacts a new high quality road improvement could have on the local environment. We would expect to see the positive benefits included in the policy and supporting text such as the wider socio-economic benefits.

On the point of the snail relocation trial this study is ongoing and no presumption on its success or otherwise can be made at this stage.

The Highways Authority would like clarity on the policy and the planning references stipulating the scheme requirements and criteria that need to be addressed through the design and delivery of the scheme. We also urge the Broads Authority to consult Highways England on the plan and the policies as the A47 is a trunk road.

In summary, whilst environmentally very challenging it is not unexpected given the location. A very thorough environmental assessment and provision for future monitoring should cover all the issues raised and the local plan actually helps scope what is required. If the Broads Authority are not minded to amend Policy PODM24 as suggested above this could mean the plan is found unsound.

- 9.3 Should you have any queries with the above comments please call or email David Cumming (Interim Team Leader Transport) on [REDACTED] or [REDACTED]

10. **Housing (Section 25)**

- 10.1 Availability of affordable and good quality housing is a key determinant of health so there is some concern, as noted, that small scale development on small plots may preclude the need for provision of affordable homes, even though taken in totality across the area there would usually be a requirement to provide this. However proposals in PUBDM33 and commuted sums for 6 to 10 new dwellings may go some way to mitigating this risk and is welcomed.
- 10.2 Should you have any queries with the above comments please call or email Phil Shreeve (Advanced Public Health Officer) on [REDACTED] or [REDACTED]

11. **Member Comments**

- 11.1 Please see below comments from Cllr Caste, the member for Yarmouth North and Central:
- 11.2 Any new Broads Plan should embrace the improved river defences being delivered over the coming period on Yare and Bure (via Environment Agency capital works) such that new developments on the edge of Yarmouth built-up area will become more sustainable - and recognition that such developments may lever in additional resources to assist with the funding of such defences.
- 11.3 Yare Barrier - the current initiative by Broads Authority to build a consensus about what will follow the current Broads Flood Alleviation bank strengthening programme. A refreshed Yare Barrier scheme - fashioned to increase flood protection for Yarmouth residents along the Yare riversides alongside the original aspiration to protect the Broads system from inundation - should be reflected positively in the Broads Plan for the next quarter century.
- 11.4 Acle Straight - there is now a recognition by the Broads Authority that the A47 between Acle and Yarmouth will indeed be dualled. This should be incorporated in more positive wording in the text - with aspiration for provision of improved vehicular access to the Damgate Marshes SSSI site and Stracey Arms Windmill/ Indian Temple complexes as part of the overall design process near the Halvergate junction and an optimum alignment with the existing dualled roadway at the Acle end.

1.	Your contact details	Agent Details (if applicable)
Name	Laura Waters	
Organisation / Group	Norfolk County Council	
Address line 1	County Hall	
Address line 2	Martineau Lane	
Town / City	Norwich	
County	Norfolk	
Post Code	NR1 2DH	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	32.27
Policy number	PUBSSA47
Map reference	Acle Straight and considerations/constraints
Appendix	I
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The plan has not been positively prepared as it does not meet all the infrastructure requirements in relation to the A47 improvements. It is not effective as it does not sufficiently align with the County Councils policy on dualling the A47. It is not consistent with national policy as set out in the Road Improvement Strategy in terms of the criteria/evidence used to assess such schemes and it is not justified with insufficient evidence provided on why the particular criteria set out in the policy has been used.

The policy as currently worded would undermine the County Council's aspiration of dualling the A47.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☒

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Policy PUBSSA47 should be reduced to the first two paragraphs and phrased more positively. The remaining policy text should be moved to the supporting text and the words "must be addressed" replaced with "need to consider".

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☒

No ☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Due to the strategic significance of the delivery of the A47 improvements.

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form: Laura Waters

Signature: Laura Waters

Date: 18/12/2017

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Natalie Beal
Sent: 20 December 2017 13:27
To: Planning Policy Mail
Subject: Norfolk County Council
Attachments: Public Health.docx

Categories: Ack and Filed

From: Shreeve, Phil [REDACTED]
Sent: 20 December 2017 13:23
To: Natalie Beal
Cc: Waters, Laura
Subject: FW: Broads Local Plan Publication Consultation

Natalie

CC Laura

Apologies, this was my fault for misreading the scope of the amenity parts of Section 19. Please disregard

As you will see the rest of the comments are positive

Thanks

Phil Shreeve
Advanced Public Health Officer – Healthy Places

Public Health, Norfolk County Council, 3rd Floor, County Hall, Martineau Lane, Norwich, NR1 2DH

Email: [REDACTED]
Phone: [REDACTED]
Mobile: [REDACTED]

From: Waters, Laura
Sent: 20 December 2017 11:28
To: Shreeve, Phil [REDACTED]
Subject: RE: Broads Local Plan Publication Consultation

Hi Phil

I have just sent our response across to the Broads Authority and their officer Natalie Beale [REDACTED] had a question about one of your comments (attached), could you get back to Natalie please and cc me into the response.

She has asked if possible if we could get something to her by the second week of January.

Thanks, Laura

From: Shreeve, Phil
Sent: 20 November 2017 11:39
To: Waters, Laura [REDACTED]
Cc: Christie, Sean [REDACTED]
Subject: RE: Broads Local Plan Publication Consultation

Laura

I don't see anything of significant to what was considered back in February, but make the following comments if they are of use:

- 4.13 Welcome the positive impact on health and well being of the natural environment for residents and visitors alike and the recognition this is particularly important to those within deprived communities (both residents and visitors)
- This is reflected as a core part of Section 11 on open space and play and is welcomed
- Section 19 – given the equality impact assessment notes that some areas are inaccessible to some people with disabilities is there scope to strengthen the consideration of new amenities where they have regard to enabling access for all?
- Section 21 – welcome links to existing or new active or public transport networks wherever possible
- PUBSP9 vii – welcome incorporating the needs of people with a disability to access recreational offer
- Availability of affordable and good quality housing is a key determinant of health so there is some concern, as noted, that small scale development on small plots may preclude the need for provision of affordable homes, even though taken in totality across the area there would usually be a requirement to provide this. However proposals in PUBDM33 and committed sums for 6 to 10 new dwellings may go some way to mitigating this risk and is welcomed
- Welcome PUBDM44 and active support for the promotion of healthy lives

Thanks

Phil

From: Waters, Laura
Sent: 13 November 2017 11:47
To: Historic Environment Planning ; Dukes, David ; Doleman, Richard ; Grimes, Hannah ; Lead Local Flood Authority ; Allen, Dominic ; White, David - ETD ; Wright, Keren ; Jeffery, Caroline ; Tupper, Nick ; Libs Planning Obligations ; Hey, Chris ; Blackwell, Jane ; Holland, Steve ; Cameron, Sara ; Scales, Andy ; [REDACTED] Shreeve, Phil ; Natural Environment Team ; McCann, Ian
Subject: Broads Local Plan Publication Consultation

Dear All

The Broads Authority has now formally published their Reg 19 Pre-submission Local Plan.

The Plan can be found on their website at www.broads-authority.gov.uk/broadsconsultations.

Please could I have any comments on the Local Plan by Monday 27 November. Please find attached the County Council's previous comments made to the Plan (February 2017).

In the meantime if you have any queries please call or email me.

Kind regards

Laura

Laura Waters
Senior Infrastructure and Economic Growth Planner
Community and Environmental Services
Telephone: [REDACTED]
Email: [REDACTED]

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8.0 **Amenity (Section 19)**

8.1 Public Health note given the equality impact assessment notes that some areas are inaccessible to some people with disabilities is there scope to strengthen the consideration of new amenities where they have regard to enabling access for all?

8.2 Should you have any queries with the above comments please call or email Phil Shreeve (Advanced Public Health Officer) or [REDACTED] or [REDACTED]

Comment [N81]: I think this has been raised before. This policy is about people nearby are affected by a development such as odors and noise pollutions. There are other policies in the local plan that promote access and these are shown on the EQIA (positive against disability). Do those need improving?

Lottie Carlton

From: Natalie Beal
Sent: 22 December 2017 08:22
To: Planning Policy Mail
Subject: Norfolk County Council
Attachments: Green Infrastructure.docx

Categories: Ack and Filed

From: White, David - ETD [REDACTED]
Sent: 20 December 2017 14:13
To: Natalie Beal
Cc: Waters, Laura
Subject: FW: Broads Local Plan Publication Consultation

Hello Natalie,

Laura asked me to respond to your question on my comments.

For the record, I noted the incorrect date for when the surveys associated with the recreational study were completed. I then stated that the report from that survey was not included in the references. However you appear to be saying that the recreational pressure report citation was included as a footnote. If that is the case, I apologise because I missed that.

LP looks very strong.

Happy Christmas

Dave

From: Waters, Laura
Sent: 20 December 2017 11:30
To: White, David - ETD <[REDACTED]>
Subject: RE: Broads Local Plan Publication Consultation

Hi Dave

I have just sent our response across to the Broads Authority and their officer Natalie Beale [REDACTED] had a question about one of your comments (attached), could you get back to Natalie please and cc me into the response.

She has asked if possible if we could get something to her by the second week of January.

Thanks, Laura

From: White, David - ETD
Sent: 15 November 2017 16:18

To: Waters, Laura [REDACTED]
Subject: FW: Broads Local Plan Publication Consultation

Hi Laura

Minimal response from us; they have addressed our previous comments. So we only add the following, both points relating to the HRA:

The HRA refers to the Candidate Marine SAC Haisborough, Hammond and Winterton SAC. The European Commission approved the SAC designation of Haisborough, Hammond and Winterton marine SAC in Sept 2017 see <http://jncc.defra.gov.uk/page-6534>.

Paragraph 1.46 of the HRA states that Footprint Ecology undertook visitor surveys from European sites across Norfolk, as part of a joint commission by the Norfolk local planning authorities over 2016/17. The surveys were actually completed in 2015/16. The document referred to is not included in the references.

Ta

Dave

From: Waters, Laura
Sent: 13 November 2017 11:47
To: >
Subject: Broads Local Plan Publication Consultation

Dear All

The Broads Authority has now formally published their Reg 19 Pre-submission Local Plan.

The Plan can be found on their website at www.broads-authority.gov.uk/broadsconsultations.

Please could I have any comments on the Local Plan by Monday 27 November. Please find attached the County Council's previous comments made to the Plan (February 2017).

In the meantime if you have any queries please call or email me.

Kind regards

Laura

Laura Waters
Senior Infrastructure and Economic Growth Planner
Community and Environmental Services
Telephone: [REDACTED]
Email: [REDACTED]

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To see our email disclaimer click here <http://www.norfolk.gov.uk/emaildisclaimer>

Green Infrastructure (Section 13)

HRA document supporting the Local Plan:

The HRA refers to the Candidate Marine SAC Haisborough, Hammond and Winterton SAC. The European Commission approved the SAC designation of Haisborough, Hammond and Winterton marine SAC in Sept 2017 see <http://jncc.defra.gov.uk/page-6534>

Paragraph 1.46 of the HRA states that Footprint Ecology undertook visitor surveys from European sites across Norfolk, as part of a joint commission by the Norfolk local planning authorities over 2016/17. The surveys were actually completed in 2015/16. The document referred to is not included in the references.

Should you have any queries with the above comments please call or email David White (Senior Green Infrastructure Officer) on [REDACTED] or [REDACTED]

Comment [NB1]: What does this mean? There is a footnote to the webpage with the document on. I intent to improve this link on adoption, but what does the comment mean?

Lottie Carlton

From: Natalie Beal
Sent: 11 January 2018 16:51
To: Lottie Carlton; Planning Policy Mail
Subject: FW: * FAO HU* RE: FW: Broads Local Plan Publication Consultation

FYI –to add to LLFA comment...

From: Waters, Laura [REDACTED]
Sent: 10 January 2018 13:21
To: Natalie Beal
Subject: FW: * FAO HU* RE: FW: Broads Local Plan Publication Consultation

Hi Natalie

Please see below the LLFAs response to your queries on their comments and they are happy to discuss further if required

Thanks, Laura

From: Lead Local Flood Authority
Sent: 10 January 2018 10:05
To: Waters, Laura [REDACTED]
Subject: RE: * FAO HU* RE: FW: Broads Local Plan Publication Consultation

Hi Laura,

Please tell Natalie

- a) We have requested previously that policy PUBDM4 be amended. Our comments are intended to read that we note that our request has not been actioned, but we note that 'all sources of flooding' are referred to elsewhere. Sorry if this was not more clear.
- b) Our approach to brownfield development is evolving and our comments reflect this.

Please also tell Natalie that I'm in the office all week, if she wants to give me a call. My direct dial is 01603 223127

Helen Underwood
Flood Risk Officer
Lead Local Flood Authority

Email: llfa@norfolk.gov.uk for any planning enquiries or statutory planning consultations
Email: water.management@norfolk.gov.uk for any reports of flooding, watercourse regulation or general enquiries.
Web: www.norfolk.gov.uk

Norfolk County Council
General enquiries: 0344 800 8020 or information@norfolk.gov.uk



Think..... is it really necessary to print this email

From: Waters, Laura
Sent: 20 December 2017 11:32
To: Lead Local Flood Authority <llfa@norfolk.gov.uk>
Subject: FW: FW: Broads Local Plan Publication Consultation

I have just sent our response across to the Broads Authority and their officer Natalie Beale (Natalie.Beal@broads-authority.gov.uk) had a couple of questions about the flood and water comments (attached), could you get back to Natalie please and cc me into the response.

She has asked if possible if we could get something to her by the second week of January.

Thanks, Laura

Laura Waters
Senior Infrastructure Development Planner
Community and Environmental Services
Telephone: [REDACTED]
Email: [REDACTED]

From: Lead Local Flood Authority
Sent: 08 December 2017 09:28
To: Waters, Laura
Subject: RE: FW: Broads Local Plan Publication Consultation

Dear Laura

In Helens absence, I have reviewed our files on the progress made on the policy wording since January 2017. I note that our official previous comments were in January and we have had direct contact with the Broads Authority since to work on **Policy PUBDM4: Development and flood risk** and **Policy PUBDM5: Surface water run-off**.

- 1) We have requested previously that policy PUBDM4 specifically include reference to all sources of flooding, however as the Broads Authority area is mostly at risk of fluvial and tidal flooding, the policy indicates when an flood risk assessment (FRA) is to be done based on these risks. We note that the justification text (paragraph 5) indicates that an FRA when undertaken should consider all sources of flooding and include SuDS (sustainable drainage). We also note that developers are signposted to review the appropriate Strategic Flood Risk Assessment (SFRA).
- 2) We would still request an amendment to the second paragraph of Policy PUBDM5 with regard to surface water runoff. This has changed since the previous consultation in June. This paragraph currently reads as:

The surface water run-off rates that will occur as a consequence of the development are required to be no more than the greenfield rate for the equivalent event for greenfield sites or, if the site is brownfield, then no more than the rates prior to development. However, applicants are encouraged to seek betterment in surface water run off as part of their proposals.

We would request this is changed to;

The surface water runoff rates that will occur as a consequence of the development are required to be no more than the pre development greenfield runoff rates. Brownfield sites should reduce runoff to as close as greenfield rates as possible but should be no more than the rates prior to development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals.

This change is requested to reflect the national standards ([here](#)), the LLFA guidance ([here](#)) and current Anglian Water policy ([here](#)).

3) I note that Helen has discussed the allocated sites with Broads Authority and the Environment Agency but I am unsure if there is a formal consultation on these.

Kind Regards
Elaine

Elaine Simpson (BSc MSc CWEM CEnv CSci)
Senior Flood Risk Officer
Lead Local Flood Authority
(I do not work on Wednesdays or Friday after 2pm)

Email: llfa@norfolk.gov.uk for any planning enquiries or statutory planning consultations
Email: water.management@norfolk.gov.uk for any reports of flooding, watercourse regulation or general enquiries.
Web: www.norfolk.gov.uk

Norfolk County Council

General enquiries: 0344 800 8020 or information@norfolk.gov.uk



Think..... is it really necessary to print this email

From: Waters, Laura
Sent: 29 November 2017 09:43
To: Ogden, Mark
Subject: FW: Broads Local Plan Publication Consultation
Importance: High

Hi Mark

Would you be able to take a look at our previous response on water and flooding and the latest version of that section in the local plan (both attached) and confirm you are happy the previous comments have been addressed. If you don't think the relevant points have been addressed then we can make an objection to the plan.

If I could have this by the end of the week it would really be appreciated, as I'm aiming to get a draft response to Tom next Wednesday.

Thanks, Laura

Laura Waters
Senior Infrastructure Development Planner
Community and Environmental Services
Telephone: [REDACTED]
Email: [REDACTED]

From: Waters, Laura
Sent: 13 November 2017 11:47
To: [REDACTED]

Subject: Broads Local Plan Publication Consultation

Dear All

The Broads Authority has now formally published their Reg 19 Pre-submission Local Plan.

The Plan can be found on their website at www.broads-authority.gov.uk/broadsconsultations.

Please could I have any comments on the Local Plan by Monday 27 November. Please find attached the County Council's previous comments made to the Plan (February 2017).

In the meantime if you have any queries please call or email me.

Kind regards

Laura

Laura Waters
Senior Infrastructure and Economic Growth Planner
Community and Environmental Services
Telephone: [REDACTED]
Email: [REDACTED]

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Lottie Carlton

From: Tim Holt-Wilson [REDACTED]
Sent: 11 January 2018 10:22
To: Lottie Carlton
Subject: RE: Broads Local Plan Consultation - Extension to deadline for comments

Dear Lottie / Natalie,

Thank you once again for an opportunity to make further comments.

We are disappointed that our earlier comments (June 2016) do not seem to have taken on board the geodiversity issue in the progressive way that we had hoped.

Section 4 does not include mention of the geodiversity dimension of the Broads area.

Section 8.1 (Vision) does not recognise the contribution of geodiversity (the natural, physical aspects of the environment) to the Broads. Landscape includes physical as well as cultural and biological features.

Section 8.2 (Objectives 2015-2036) does not recognise that protecting and enhancing geodiversity is a worthwhile objective in the Broads.

Section 8.4 (Special qualities). We note with approval your inclusion of 'geo-heritage' among the special qualities, but prefer 'Earth heritage' or 'geodiversity' as terms to use. We wonder why you give the word a capital 'G', and also why it is placed under a 'History' heading here. Geodiversity is considered under 'Natural Environment' in the NPPF (section 11) and not under 'Historic Environment'. This is surely a logical inconsistency that needs rectifying before submission. In support of our contention we note you have not later dealt with geodiversity under section 15 (Heritage and Historic Assets) but rather section 16 (Biodiversity).

Section 15 (Heritage and Historic Assets). As per our foregoing comments, 'geo-heritage' is not included here despite being categorised with these assets in section 8.4.

Section 16 (Biodiversity). We note that geodiversity is referred to here several times, presumably following the guidance of the NPPF.

- **Policy PUBDM12** - <Development that would have an adverse impact on a Local Nature Reserve, County Wildlife Site, a section 41 priority habitat identified under the Natural Environment and Rural Communities (NERC) Act 2006, or a local site of geodiversity, including peat soils, will only be permitted in exceptional circumstances> We approve the inclusion of 'local site of geodiversity' but you could have better said 'County Geodiversity Site'. NB the Norfolk Geodiversity Partnership is the body that manages CGS and the Geodiversity Action Plan (GAP) process.
- **Reasoned justification – Geodiversity subsection**. <There is no designated Regionally Important Geological or Geomorphological Sites (RIGS) in the Broads> The term 'RIGS' has been replaced with 'County Geodiversity Site' in Norfolk since 2010. Please amend.
- **Ditto**. <Local geodiversity interest is: '*Holocene peatland and marine alluvium giving rise to open water, fen and carr habitats; broads developed in former early Mediaeval peat diggings; rivers including lower reaches of Bure, Waveney and Yare and their tributaries including Ant, Chet and Thurne*'⁵³.>
You have taken this sentence from 'Norfolk's Earth Heritage – valuing our geodiversity' (Norfolk Geodiversity Partnership, 2009). We suggest replacing the introductory bit with one that makes more sense. Thus perhaps: "The geodiversity of the Broads area may be summarised as '*Holocene peatland...* [etc]'".
- **Ditto**. Thank you for recognising the value of enhancing and valuing the asset.

- Planning conditions. Need to mention geodiversity here for reasons of logical policy consistency. Are you saying that the Broads Authority would not implement 'appropriate mitigation and enhancement measures' if a proposed development had an adverse impact on geodiversity??
- Evidence used to inform this section. As you have quoted directly from 'Norfolk's Earth Heritage' we think it would be appropriate for you to cite this document here.

Appendix F. List of Policies in the Local Plan.

- Policy PUBDM12. The Norfolk Geodiversity Partnership should be included among the organisations to be involved, as we would advise on enhancement or mitigation of impact on non-statutorily protected features of geodiversity interest.

Yours sincerely,

Tim Holt-Wilson

TD Holt-Wilson
For Norfolk Geodiversity Partnership



UK

Tel: [REDACTED]

Website: <https://sites.google.com/site/norfolkgeodiversity/>

From: Lottie Carlton [REDACTED]
Sent: 04 January 2018 16:22
To: [REDACTED]
Subject: Broads Local Plan Consultation - Extension to deadline for comments

Dear Mr T Holt-Wilson Suffolk Geodiversity Partnership

EXTENSION TO DEADLINE FOR COMMENTS ON BROADS LOCAL PLAN

As a result of some organisations requesting a week's extension to the deadline for comments to the Local Plan for the Broads, we have extended the deadline to 4pm on 12 January 2018.

Many thanks to those who have commented to date.

Yours sincerely

Natalie Beal
Planning Policy Officer



Local Plan for the Broads: Have your say

Reminder: How to respond to the consultation

1.	Your contact details	Agent Details (if applicable)
Name	Tim Holt-Wilson	
Organisation / Group	Norfolk Geodiversity Partnership	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

15+

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	Appendix F
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Re. subsection Policy PUBDM12. The Norfolk Geodiversity Partnership and GeoSuffolk should be included among the organisations listed here to be involved. They are the bodies recognised by Natural England for the designation of Local Sites of geodiversity interest, and would advise the BA on enhancement or mitigation of impact on non-statutorily protected features of geodiversity interest. These include Norfolk County Geodiversity Sites, Suffolk County Geosites and any candidate sites already in the designation process.

Broads Authority Local Plan. Publication version (November 2017). Representation Form

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

Because this is the first time we have seen this section in draft form.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Suggested replacement text.

Natural England, Suffolk and Norfolk Wildlife Trust, RSPB, Norfolk Geodiversity Partnership, GeoSuffolk.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

12. Please tick this box ☒ **if you would like to be notified of the following:**

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:



Signature

11th January 2018
Date

1.	Your contact details	Agent Details (if applicable)
Name	Tim Holt-Wilson	
Organisation / Group	Norfolk Geodiversity Partnership	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

15

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	Section 4.
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Section 4 does not include mention of the geodiversity dimension of the Broads area. If it has not been adequately characterised then development proposals affecting its character cannot properly be judged, as per NPPF sections 113 and 117.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☒

No

☐

If you have answered 'No' could you please explain why this has not been raised before:

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Geodiversity should have been scoped as part of the area's spatial portrait and given a separate subsection after section 4.7 Biodiversity.

Suggested text:

<The geodiversity of the Broads is an understated aspect of its natural heritage. There are five nationally-designated sites (SSSIs covering Pleistocene geology and active coastal processes), but many other local sites of interest have been identified in the Norfolk Geodiversity Audit. Ongoing issues for the area's geodiversity include drying out of wetland and oxidation of peat, leading to loss of finite environmental and archaeological archives as well as release of stored carbon, and coastal protection work, which alters the dynamics of marine erosion and sediment transport. It is important to improve public awareness of environmental history and Earth-shaping processes as they hamper efforts to tackle the ongoing impacts of sea-level rise and climate change.>

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Because we have made representations in the past and geodiversity has not been adequately scoped in the preparation of planning policy documents. We may need to argue our case again.

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box ☒ If you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:



Signature:

11th January 2018

Date:

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Tim Holt-Wilson	
Organisation / Group	Norfolk Geodiversity Partnership	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

15+

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	Section 8.1.
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Section 8.1 (Vision) does not recognise the contribution of geodiversity (the natural, physical aspects of the environment) to the Broads. Landscape includes physical as well as cultural and biological features, and this must be reflected in the area's Vision Statement. See NPPF section 117.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☒

No

☐

Broads Authority Local Plan. Publication version (November 2017). Representation Form

If you have answered 'No' could you please explain why this has not been raised before:

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Geodiversity should have been scoped as part of the area's spatial portrait and then characterised in the Vision Statement.

Suggested text to include:

<The Earth heritage features of the Broads are recognised and protected, and people understand the contribution of geodiversity to landscape and the dynamic role of natural processes in shaping it.>

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Because we have made representations in the past and geodiversity has not been adequately scoped in the preparation of planning policy documents. We may need to argue our case again.

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:



Signature

11th January 2018

Date

1.	Your contact details	Agent Details (if applicable)
Name	Tim Holt-Wilson	
Organisation / Group	Norfolk Geodiversity Partnership	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

15

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	Section 8.2.
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

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☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Section 8.2 (Objectives 2015-2036) does not recognise that protecting and enhancing geological features is a worthwhile objective in the Broads. See NPPF sections 113 and 117.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

Broads Authority Local Plan. Publication version (November 2017). Representation Form

If you have answered 'No' could you please explain why this has not been raised before:

Because this is the first time we have seen this section in draft form.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Geodiversity needs including in OBJ4 as part of dealing with the Natural Environment.

Suggested text.

<The area's rich and varied habitats, wildlife and geological features are conserved, maintained, enhanced and sustainably managed.>

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Because we have made representations in the past and geodiversity has not been adequately scoped in the preparation of planning policy documents. We may need to argue our case again.

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:



Signature

11th January 2018

Date

1.	Your contact details	Agent Details (if applicable)
Name	Tim Holt-Wilson	
Organisation / Group	Norfolk Geodiversity Partnership	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

15+

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	Section 16. Planning Conditions.
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

There is a need to mention geodiversity here for reasons of logical policy consistency. The omission in this section implies that 'appropriate mitigation and enhancement measures' would not be implemented for geoconservation interests. The omission needs rectifying, to make in congruent with NPPF section 109.

8. Have you raised this issue during previous consultations on the Local Plan?

☐

X

☒

Broads Authority Local Plan. Publication version (November 2017). Representation Form

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

Because this is the first time we have seen this section in draft form.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Suggested replacement text.

Wherever a proposed development may have an adverse impact on biodiversity or geodiversity, conditions and/or planning obligations will be used to ensure that appropriate mitigation and enhancement measures are implemented. See policy PUBDM46.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Because we have made representations in the past and geodiversity has not been adequately scoped in the preparation of planning policy documents. We may need to argue the case again.

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:



Signature:

11th January 2018

Date:

1.	Your contact details	Agent Details (if applicable)
Name	Tim Holt-Wilson	
Organisation / Group	Norfolk Geodiversity Partnership	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

15+

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	Section 16. Reasoned justification – Geodiversity subsection (on page 60).
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

This geodiversity subsection is inaccurate, as the BA area boundary includes part of Winterton & Horsey Dunes SSSI whose designation document specifies geodiversity features (dune systems; ness landform).

Also, since 2010 the term 'RIGS' has been replaced with 'County Geodiversity Site' in Norfolk and 'County Geosite' in Suffolk.

Also, there is no reference to significant exposures of early and middle Pleistocene marine and glacial sediments. These should be included as part of this portrait of the area's geodiversity. This is because Bramerton Pits is a geological SSSI of this type.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

Because this is the first time we have seen this section in draft form.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Suggested replacement text.

Geodiversity is the variety of rocks, fossils, minerals, landforms and soils, along with the natural processes that shape the landscape that forms the Earth heritage resource. There are no designated Local Sites of geodiversity interest (RIGS, County Geodiversity Sites, County Geosites) in the Broads area. There are however two SSSIs designated for their geodiversity features: Bramerton Pits for their Norwich Crag exposures and Winterton-Horsey Dunes for their coastal dunes. The geodiversity of the Broads area may be summarised as 'Holocene peatland and marine alluvium giving rise to open water, fen and carr habitats; broads developed in former early Mediaeval peat diggings; rivers including lower reaches of Bure, Waveney and Yare and their tributaries including Ant, Chet and Thurn. There are also significant exposures of early and middle Pleistocene marine and glacial sediments'.⁵³ New development has the potential to result in the loss of local geodiversity, including the valuable biodiversity and carbon stores supported by peat soils (see Policy PUBDM 9), through operations such as landfill, destruction of geomorphology (landform) and mineral extraction. However, there is also potential to enhance geodiversity by recording sediments exposed during development and by the retention of geological sections. The Authority will make sure development is managed to protect this important asset.

*53. National Parks and NNRs. Norfolk Geodiversity Partnership, online
<https://sites.google.com/site/norfolkgeodiversity/action-ngap/3-protecting/protected/parks-nnrs/>
[accessed December 2017]*

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

Broads Authority Local Plan. Publication version (November 2017). Representation Form

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Because we have made representations in the past and geodiversity has not been adequately scoped in the preparation of planning policy documents. We may need to argue the case again.

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:



Signature

11th January 2018

Date

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Tim Holt-Wilson	
Organisation / Group	Norfolk Geodiversity Partnership	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

15+

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	Section 16.
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Geodiversity is not a subset of biodiversity, so the title of Section 16 should be 'Biodiversity and Geodiversity' or 'Natural Environment', as per NPPF section 11.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

Broads Authority Local Plan. Publication version (November 2017). Representation Form

If you have answered 'No' could you please explain why this has not been raised before:

Because this is the first time we have seen this section in draft form.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Alter the title of section 16 to:

Either '*Biodiversity and Geodiversity*'
Or '*Natural Environment*'.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Because we have made representations in the past and geodiversity has not been adequately scoped in the preparation of planning policy documents. We may need to argue the case again.

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:



Signature

11th January 2018

Date

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Tim Holt-Wilson	
Organisation / Group	Norfolk Geodiversity Partnership	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

15

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	Section 8.4.
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Section 8.4 (Special qualities). We note with approval the inclusion of 'geo-heritage' among the special qualities, but suggest 'Earth heritage' or 'geodiversity' would be better terms to use. We wonder why the word is given a capital 'G', and also why it is placed under a 'History' heading here.

Geodiversity is covered under 'Natural Environment' in the NPPF (section 11) and not under 'Historic Environment'. This is surely a logical inconsistency that needs rectifying before submission. In support of our contention we note that geodiversity has later been dealt with under section 16 (Biodiversity).

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

Yes

☐

If you have answered 'No' could you please explain why this has not been raised before:

Because this is the first time we have seen this section in draft form.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Delete mention of geodiversity from section 8.4J and give it a separate lettered heading.

Suggested Text

Either *Earth heritage*

Or *Geodiversity*.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

X

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

Because we have made representations in the past and geodiversity has not been adequately scoped in the preparation of planning policy documents. We may need to argue our case again.

12. Please tick this box

X

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

11th January 2018

Date

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Planning Policy	
Organisation / Group	North Norfolk District Council	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

n/a

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	Whole plan
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☐

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We welcome the opportunity to comment on this pre-submission publication version of the Local plan for the Broads. The following comments are offered at officer level only.

The Broads Authority (BA) area lies within the administrative area of North Norfolk District Council and as such there is a need to work closely together in order to ensure that cross boundary matters are coordinated. It is considered that the Local Plan for the Broads has been produced in accordance with the Duty to Cooperate and that this is demonstrated in part by the undertaking of the Norfolk Strategic Framework (NSF). At the time of the start of this consultation the NSF was in draft form but

is now approaching Local Planning Authority (LPA) endorsement stage by LPA's, though the intention is that the document remains iterative. The NSF contains a number of agreements as to how cross boundary matters will be dealt with and the BA are a signatory to this Duty to Cooperate.

Outside of the strategic issues there are a number of localised issues that North Norfolk has worked with the BA on to agree a combined approach e.g. to joint areas of retail planning. We consider that the proposed retail policies largely reflect that agreed approach where the boundaries meet in Hoveton.

We also welcome the proposed policies relating to water efficiency as Norfolk is recognised as an area of water stress that will benefit from a coordinated approach.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☐

If you have answered 'No' could you please explain why this has not been raised before:

n/a

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

n/a

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: S Tudhope (Planning Officer) Date: 10/01/18

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Natalie Beal
Sent: 11 January 2018 13:32
To: Davison, Judith [REDACTED]
Cc: Planning Policy Mail
Subject: FW: Broads Local Plan consultation
Attachments: NCC rep PUBSP13.docx; NCC rep PUBDM36.docx

Many thanks for the representation Judith.

From: Davison, Judith [REDACTED]
Sent: 11 January 2018 13:27
To: Natalie Beal; Planning Policy Mail
Cc: Cllr Stonard, Mike; Cllr Harris, Gail
Subject: Broads Local Plan consultation

Dear Natalie

Thank you for the opportunity to comment on the Publication version of the Broads Local Plan and for extending the consultation time period to 11th January.

The city council is generally very supportive of the policies and proposals in the Broads Local Plan.

I am pleased to note that a reference to water source heat pumps has been added into the reasoned justification for PUBDM14 (Renewable Energy) in line with the city council's previous comments on the Preferred Options plan last year.

I have made two representations which are on the attached forms (both of which were raised in my comments on the previous consultation). As discussed with you, one of these is technically a soundness objection as we would like a change to be made to the policy for residential moorings.

Please let me know if you wish to discuss these representations further.

Kind regards,

Judith

Judith Davison
Planning policy team leader
Norwich City Council
[REDACTED]

Please note my normal working days are Mondays to Thursdays

Telephone number for all enquiries [REDACTED]

Norwich City Council Legal Disclaimer:

"This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any

1.	Your contact details	Agent Details (if applicable)
Name	Judith Davison	
Organisation / Group	Norwich City Council	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP13
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

General support for the policy however it would be helpful to provide a cross-reference to the published Broads Authority Navigation Advice Note prepared as part of the work to develop the River Wensum Strategy. This could be referred to in paragraphs 2 or 3 of the reasoned justification and would assist implementation of the policy by providing a better understanding of issues around navigation.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Page 33 of 44

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Judith Davison

Date: 11 January 2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Judith Davison	
Organisation / Group	Norwich City Council	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM36
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The plan promotes the provision of residential moorings in mooring basins, marinas or boatyards, which effectively excludes any such provision in Norwich (or on sections of other Main Rivers within / adjacent to development boundaries, without basins, marinas and boatyards). The emerging River Wensum Strategy (anticipated to be adopted in 2018) seeks to encourage residential moorings where appropriate on the Wensum. Provision of permanent houseboat sites with proper on-site facilities could have a number of benefits by contributing to housing need, providing affordable housing in a pleasant environment, and supporting the local economy.
(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Page 334 of 441

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Policy PUBDM36 should be revised by amending criterion (a) to state "Is in a mooring basin, marina or boatyard, or in the case of a Main River where the impact on navigation is considered acceptable, within or adjacent to a defined development boundary...". This could also be reflected in the explanatory text.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Judith Davison

Date: 11 January 2018

The closing date for responses is 4pm 5 January 2018

O. A. Chapman & Son
Chartered Surveyors

08 DEC 2017



Your reference:

Our reference:

Date

JDF/SH/

4th December 2017

NORWICH

Natalie Beal
Planning Policy Officer
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

Dear Ms Beal

Re: The Old Station Yard, Geldeston Road, Ellingham, NR34 – Local Plan for the Broads Consultation

Thank you for your email of 30th November 2017. Unfortunately I shall not be able to attend either of the public drop-in sessions and although we are no longer agents for the owner of the above site Mr Albert Loines, we would like to comment that objection to development of this site for residential purposes seems entirely at odds with stated Government policy.

As you will be aware the site has been identified by South Norfolk District Council as suitable for residential redevelopment but that in discussions with your goodselfs you have previously stated that residential development would be entirely unacceptable as the site overlooks the Waveney Valley.

However we would draw attention to the fact that the site is presently used for purposes which detract from views into and from Waveney Valley and that residential development particularly if sympathetically landscaped, would greatly enhance the aspects in the immediate and general locality.

Furthermore development of this brownfield site would be entirely in keeping with Government Planning Policy and would also help to alleviate the critical shortage of housing that the nation faces. Development of

(Cont/d ...)

this site for residential purposes would also have the additional benefit of reducing heavy goods vehicle movements within the immediate locality and surrounding villages and we would also comment that that property is virtually within touching distance of other development. There are also good local bus services and the property is readily accessible to the A143 and the A146 providing access to the regional road network.

Accordingly we would trust that you would agree that this site would be well suited to residential development subject to appropriate safeguards in terms of landscaping and the environment and trust that the new Broads Authority Local Plan will allocate it accordingly.

Yours sincerely



J D FULLER MRICS
O A Chapman & Son Ltd

Lottie Carlton

From: Pacific Cruisers [REDACTED]
Sent: 22 December 2017 12:04
To: Planning Policy Mail
Subject: Local Plan Response

I feel it would be more helpful and kinder if each Parish Council was sent an outline of which policies will affect their area with an explanation in layman's terms of what this would mean in the future for them and their residents.

The policy regarding additional residential moorings is and should be a huge concern for the areas involved. Residents will not be aware of these proposed additions and it will certainly have a big impact on local communities whereby permission is given for residential moorings located in a village. Parish Council should have had the opportunity to alert their residents to this policy. There has not been enough time for this proposed policy to be reviewed since designated locations were only just added to this document and were not mentioned in draft consultation.

Obviously, there is great concern regarding residential moorings sadly due to the fact that "liveaboards" often do not keep a tidy ship and it has recently been found that there has been an increase in crime and drugs when "liveaboards" are present. It seems that local authorities are providing boat accommodation for otherwise unfit skippers as this is a cheaper option than housing. Therefore, it is imperative that conditions are added to each individual person & their boat as well as the management offering the residential mooring. If the Broads Authority are recommending these sights, they must be responsible for managing the visual impact & the suitability of the person using the residential mooring.

I am very concerned that there are other policies being put forward in this document that residents should be made aware of. However, it seems impossible to decipher the impact on residents due to the technical speak used. Unfortunately, most people that these policies affect do not have a degree in planning.

I have been advised that Policy PUBDM21: Light pollution and dark skies could have an effect at our location. However, I am unable to understand what this would mean.

Many thanks and kind regards

Fiona Husband
Pacific Cruisers (Loddon) Ltd
www.pacificcruisers.co.uk
[REDACTED]



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Lottie Carlton

From: Natalie Beal
Sent: 03 January 2018 14:24
To: Pacific Cruisers
Cc: Planning Policy Mail
Subject: RE: Local Plan Response

Hello

If businesses propose new schemes then the light pollution policy will come into play and the Development Management Officers who deal with planning applications will talk to the business about the policy. It is not about turning off lights, but the right amount of light doing what is needed, pointing at the thing that needs to be lit up.

If we go for dark skies status then the Authority will need to work with the community to improve poor lighting schemes.

Basically, external lights need to be pointed down and all is ok.

Noted regarding residential moorings and it is something we are going to talk about.

I will add the below to your comments. I may be back in touch.

Thanks

Natalie

From: Pacific Cruisers [REDACTED]
Sent: 03 January 2018 14:21
To: Natalie Beal
Subject: RE: Local Plan Response

Thank you for your email.

I am very concerned regarding the live aboard situation and the ability of those skippers. Also, that residential moorings could become shanty towns. However, the Broads Plan probably isn't concerned with these aspects.

Light pollution – Will this policy have an effect on waterside businesses?

Many thanks and kind regards
Fiona Husband

From: Natalie [REDACTED]
Sent: 29 December 2017 08:51
To: Pacific Cruisers; Planning Policy Mail
Subject: RE: Local Plan Response

Dear Fiona

There is a one line summary document that accompanies this consultation. It was talked about in the email/letter you and other got. Here it is again for your convenience: http://www.broads-authority.gov.uk/data/assets/pdf_file/0008/1041866/Publication-summary-leaflet.pdf

The consultation period has been around 8 weeks. The consultation has been widely advertised – a few times in numerous papers, emails out to groups and individuals, social media and Parish Councils.

When you say 'local authorities are providing boat accommodation for otherwise unfit skippers' I am not sure what you mean. I am not aware of the Broads Authority or any of our districts buying a boat, applying for permission from us for residential moorings and then giving that to people to live on. Can you provide details please?

If you have any questions about a policy, you can pick up the phone and call me or ask them in an email. For example, what are your concerns about addressing light pollution?

Yours sincerely

Natalie

From: Pacific Cruisers [REDACTED]
Sent: 22 December 2017 12:04
To: Planning Policy Mail
Subject: Local Plan Response

I feel it would be more helpful and kinder if each Parish Council was sent an outline of which policies will affect their area with an explanation in layman's terms of what this would mean in the future for them and their residents.

The policy regarding additional residential moorings is and should be a huge concern for the areas involved. Residents will not be aware of these proposed additions and it will certainly have a big impact on local communities whereby permission is given for residential moorings located in a village. Parish Council should have had the opportunity to alert their residents to this policy. There has not been enough time for this proposed policy to be reviewed since designated locations were only just added to this document and were not mentioned in draft consultation.

Obviously, there is great concern regarding residential moorings sadly due to the fact that "liveaboards" often do not keep a tidy ship and it has recently been found that there has been an increase in crime and drugs when "liveaboards" are present. It seems that local authorities are providing boat accommodation for otherwise unfit skippers as this is a cheaper option than housing. Therefore, it is imperative that conditions are added to each individual person & their boat as well as the management offering the residential mooring. If the Broads Authority are recommending these sights, they must be responsible for managing the visual impact & the suitability of the person using the residential mooring.

I am very concerned that there are other policies being put forward in this document that residents should be made aware of. However, it seems impossible to decipher the impact on residents due to the technical speak used. Unfortunately, most people that these policies affect do not have a degree in planning.

I have been advised that Policy PUBDM21: Light pollution and dark skies could have an effect at our location. However, I am unable to understand what this would mean.

Many thanks and kind regards

Fiona Husband
Pacific Cruisers (Loddon) Ltd
www.pacificcruisers.co.uk
[REDACTED]



Lottie Carlton

From: Clare Mackne [REDACTED]
Sent: 28 December 2017 13:15
To: Planning Policy Mail
Cc: Keith Lead
Subject: River Waveney Trust, representations on Broads Local Plan

Dear Ms Beal,

River Waveney Trust
Representations on the Broads Local Plan, publication Version, November 2017

The River Waveney Trust was formed in order to enhance and protect the River Waveney corridor, tributaries and catchment, its ecology, water quality and environment. It also has an educational role and promotes public access to the river.

The Trust would like to record its support for the overall approach and priorities of the Broads Local Plan.

Improving water quality and maintaining biodiversity are high on the Trust's agenda and it therefore applauds the emphasis given in the Plan's Vision (Chapter 8) to recognition of 'clear, fresh water as a fundamental resource.' Likewise, it welcomes Objective 6 (water quality), and the principles of Development Management policies PUBDM1-5 and Strategic policy SUBSP2.

The Trust supports the principle reflected in Objective 4, PUBDM7 and PUBSP6 that development should bring positive benefits in terms of green infrastructure, habitat, wildlife and diversity, and it also welcomes the provisions of PUBSP9 and 12, relating to recreation and tourism.

Clare Mackney

On behalf of
Keith Lead,
Chairman of Trustees,
River Waveney Trust,
c/o

[REDACTED]

Clare Mackney

[REDACTED]

Broads Authority Local Plan
Publication version (November 2017)
Representation Form

For Office Use Only
Consultee ID:
Received:
Processed:

This is the form for making representations on the Broads-Authority Local Plan Publication version. Once completed, please return by email to planningpolicy@broads-authority.gov.uk.

A guidance note is also available to assist you in making your response. Please go here <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The various documents that are being consulted on can be found here: <http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

The consultation ends **4pm on 5 January 2018**. Responses received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

Hard copies of this form are available from the Broads Authority Office in Norwich and the drop-in events taking place across the Broads, details of which can be found at the website above.

Please note:

- **Separate forms should be completed for each representation.**
- All respondents **must** provide their personal details.
- Representations should be on the basis of the **soundness or legal compliance** of the Plan. (Please see guidance note for more details.)
- It is recommended that groups who share a common view submit a **single form rather than multiple copies** and provide a list of each person supporting the representation.
- By completing this form you agree to your details being shared. Your name, address and comments (but not your other personal details) will be made available for public viewing. **These representations cannot be treated as confidential.**

Please expand the boxes as necessary or attach additional sheets. Please clearly mark any additional sheets with your name and the part of the document the representation relates to.

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	KEITH LEAD (CHAIRMAN)	A. CLARE MACKNEY
Organisation / Group	RIVERWAVERNEY TRUST	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate? PLEASE SEE EMAIL DATED 28/12/17 SETTING OUT THE RWT'S SUPPORT FOR THE PRINCIPLES BEHIND THESE OBJECTIVES + POLICIES.

Paragraph number	OBJECTIVES 4+6
Policy number	PUBOM 1-5; SUBSP2
Map reference	PUBOM 7; PUBSP 6, 9
Appendix	+ 12.
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

N/A

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

N/A

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

N/A

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

N/A

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

N/A

No

Broads Authority Local Plan. Publication version (November 2017). Representation Form

If you have answered 'No' could you please explain why this has not been raised before:

N/A

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

N/A

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

N/A

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

N/A

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 04/07/2018

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Pearson, Philip [REDACTED]
Sent: 12 January 2018 13:53
To: Planning Policy Mail
Cc: Lottie Carlton
Subject: RSPB submissions on the Broads Local Plan
Attachments: Broads-Publication-Version-Local-Plan HRA.docx; Broads-Publication-Version-Local-Plan Para 33.3.docx; Broads-Publication-Version-Local-Plan PUBDM2.docx; Broads-Publication-Version-Local-Plan PUBDM4.docx; Broads-Publication-Version-Local-Plan PUBDM12 Brownfield sites FINAL.docx; Broads-Publication-Version-Local-Plan PUBDM24.docx; Broads-Publication-Version-Local-Plan PUBSSA47.docx

Dear Cally and Natalie,

The RSPB is supportive many of the policies within the Local Plan and considers they provide strong protection the Broads habitats and wildlife. The Local Plan has developed a much stronger approach to protecting and enhancing the important habitats and wildlife of the Broads and the RSPB is pleased to note that many of our recommendations at the preferred option stage have been included in the submission document. Some small amendments are required to strengthen a few policies and ensure that the information of protected areas, notably the Outer Thames Estuary SPA, reflects recent updates to features and boundaries. The RSPB is pleased to see a strong peat policy included within the plan which we consider both important and a useful precedent to engage with other Local Authorities that have significant amounts of peat soils. We look forward to hearing more about how you plan to work with ourselves and other partners around the monitoring of the plan.

The RSPB currently reserves its opportunity to attend any examination sessions that will cover biodiversity, water quality, climate change, brownfield sites, A47 and HRA.

If you have any queries, please get in touch.

Regards,
Phil.

Philip Pearson
Senior Conservation Officer

Eastern England Regional Office 65 Thorpe Road, Norwich, Norfolk, NR1 1UD

Tel [REDACTED]

Mobile [REDACTED]

rspb.org.uk

Let's give nature a home



The RSPB is the UK's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

1.	Your contact details	Agent Details (if applicable)
Name	Philip Pearson	
Organisation / Group	RSPB	
Address line 1	65 Thorpe Road	
Address line 2		
Town / City	Norwich	
County	Norfolk	
Post Code	NR5 9EA	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

N/A

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

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No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	
Map reference	
Appendix	
Supporting Document	HRA

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

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No

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5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

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No

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6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☒

Consistent with national policy

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7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Whilst the RSPB does not disagree with the conclusions of the HRA for most of the protected areas within the Broads it does not accurately reflect the Outer Thames Estuary Special Protection Area. The RSPB has made the previous comments at the Preferred Options stage on ensuring the information on the Outer Thames Estuary SPA is accurate:

"The map of selected SPAs should be updated to include the proposed extended boundary of the Outer Thames Estuary pSPA. This is pertinent to the Broads as the boundary extension covers the lower reaches of the River Bure. The extension is proposed to protect areas used by foraging common tern."

"Paragraphs 7.30-7.35 and Table 5 need to be updated to reflect the proposed extended Outer Thames Estuary pSPA boundary and features changes. This would see the boundary extended up the lower reaches of the River Bure and foraging little tern and common tern added as features. Red-throated diver remains as a wintering feature. This is necessary for accuracy and to ensure the full effects of any policies have been assessed. This approach reflects the requirements of paragraph 118 of the National Planning Policy Framework, as set out in paragraph 6.6 (p.50) of the HRA of the Local Plan."

No change has been made. The changes were formally registered in December 2017. Irrespective of this change, the site has been classified as a pSPA since 2015 and should have been identified for consideration in the Local Plan policies and supporting documents.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

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No

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If you have answered 'No' could you please explain why this has not been raised before:

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

The RSPB recommends that the HRA text is updated to reflect the revised Outer Thames Estuary SPA boundary and features and the impact of the Local Plan policies are reassessed against this site to ensure no additional mitigation is required.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

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No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

It is important to ensure that this marine protected area is dealt with appropriately and that the Local Plan affords it appropriate protection. Hopefully the issue can be dealt with through minor modifications, but the RSPB reserves its opportunity to attend examination sessions on biodiversity, the environment and the HRA.

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box

☒

If you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 4th January 2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Philip Pearson	
Organisation / Group	RSPB	
Address line 1	65 Thorpe Road	
Address line 2		
Town / City	Norwich	
County	Norfolk	
Post Code	NR5 9EA	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

N/A

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	33.3 Monitoring the Local Plan (p.208)
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

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No

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5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

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Effective

☒

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The RSPB is supportive of the approach set out in the Local Plan. However, it is unclear how the annual monitoring review will be reported. Given that there are a range of organisations identified that will have involvement in reporting against monitoring indicators clarity on how the information will be evaluated will be important to demonstrate transparency in the review process. There are a range of groups supporting the function of the Broads Authority and it would be helpful to understand the role that such groups could play in reviewing the Local Plan progress. We are not aware of any discussion regarding how the RSPB's data might be used to monitor progress of the Local Plan. Any monitoring plan needs to demonstrate buy-in from all partners to demonstrate that it will be effective in achieving the aim to evaluate progress.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

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No

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If you have answered 'No' could you please explain why this has not been raised before:

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

There must be agreement reached with the different stakeholders about data they collect and how these data will be used by the authority. The monitoring plan should set out more clearly what stakeholder groups will be used to collate data and monitor progress or what groups will be established to ensure wider partner involvement in the monitoring process. Demonstrating transparency in decision-making and securing strong partnership working will be important, especially where partners' data is required.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

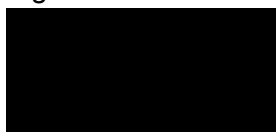
To ensure transparency in decision-making and that buy-in from all partners mentioned has been secured to ensure the proposed approach will be effective.

12. Please tick this box ☒ if you would like to be notified of the following:

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- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:

A solid black rectangular box used to redact the signature.

Date: 4th January 2018

The closing date for responses is 4pm 5 January 2018

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Name	Philip Pearson	
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Address line 2		
Town / City	Norwich	
County	Norfolk	
Post Code	NR5 9EA	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

N/A

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	Policy PUBDM2: Boat wash-down facilities (final paragraph of supporting text, p.30)
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

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Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The RSPB is supportive of this policy and the principles that it sets out. However, it is unclear from the final sentence in the concluding paragraph of the supporting text if situations could arise that would be deemed acceptable for contaminated water to enter watercourses should a boat yard provide evidence that the implementation of an appropriate filtration system was not viable:

"If this requirement could affect the viability of an operation, evidence is required that proves installing a wash down facility could make an operation unviable. This statement will then be independently reviewed, entirely at the applicant's expense."

This appears to undermine the policy and the RSPB recommends that this needs to be clarified to ensure it is consistent with both Water Framework Directive targets and the Habitats Regulations. The policy needs to set out how it will address such a situation should it arise to ensure that a consistent approach is taken to all applicants and that the aims of the policy, namely to limit contaminants entering watercourses, is not undermined. If no alternatives are available for recommending within the policy, then it would seem appropriate that such applications are refused and this should be stated in the policy or supporting text in order to manage expectations.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

This had not been noted in previous iterations of the Local Plan. The final sentence has been included since the Preferred Options consultation and has highlighted the significance of this paragraph and the need to ensure that the objective of this policy can be effectively delivered.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

There are two options that could be used to address the concern:

- 1 The policy is amended to state that applications that do not provide wash down facilities will be refused to ensure compliance with limiting contaminated water inputs to watercourses.
- 2 The Broads Authority identify a suite of options that would need to be put in place to ensure contaminated water is not able to enter watercourses.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

This could have serious consequences for water quality in the Broads and the management of water dependent habitats and wildlife. The RSPB currently requests involvement on any discussions relating to this topic to ensure that the issue is adequately resolved.

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:

A solid black rectangular box used to redact the signature.

Date: 4th January 2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Philip Pearson	
Organisation / Group	RSPB	
Address line 1	65 Thorpe Road	
Address line 2		
Town / City	Norwich	
County	Norfolk	
Post Code	NR5 9EA	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

N/A

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	Policy PUBDM4: Development and flood risk (supporting text, p.33)
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

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No

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5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

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No

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6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The RSPB recommends that the supporting text be strengthened to highlight that inappropriate flooding can harm the important habitats and species for which the Broads are important. For example, extreme winter flooding can effect drier habitats and prolonged standing water can affect vegetation growth and impact species that do not tolerate inundation, flooding during the spring and summer can affect breeding success, and inputs of saline water can have serious consequences for freshwater habitats. Water quality and quantity on the best sites for wildlife must be carefully managed to within appropriate targets defined within management plans to ensure overall condition of protected sites do not deteriorate. Increased flood risk from new development must

therefore consider impacts often at significant distance to ensure that it will not adversely affect the integrity of protected areas.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

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No

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If you have answered 'No' could you please explain why this has not been raised before:

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

An additional sentence could be added at the end of the third paragraph of the supporting text (p.33; after "Risks relate not just to property..."), for example:

"Inappropriate flooding can also harm the important habitats and species for which the Broads are important, which can have long term consequences for site maintenance and the achievement of conservation objectives."

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

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No

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11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

To ensure that the issue of biodiversity impacts from adverse flooding are recognised fully with this policy and will be adequately addressed through any assessments of increased flood risk from new development.

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:

A solid black rectangular box used to redact the signature.

Date: 4th January 2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Philip Pearson	
Organisation / Group	RSPB	
Address line 1	65 Thorpe Road	
Address line 2		
Town / City	Norwich	
County	Norfolk	
Post Code	NR5 9EA	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

N/A

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	Policy PUBDM12: Natural environment (brownfield sites, p.60)
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

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No

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5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The RSPB is supportive of this policy and the principles that it sets out. However, a very broad definition of brownfield sites is used ("...any piece of land that has been altered by human intervention"). Much of the Broads has been altered by human activity from peat digging to agriculture. Based on this loose definition nearly the entire Broads executive area could be considered 'brownfield', which clearly is not the case. The NPPF definition highlights that this is land that has previously been developed and is either still functioning or has become disused. Annex 2 of the NPPF defines previously developed land as:

"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time."

The RSPB recommends that if a definition is to be retained that this is amended to:

"Brownfield sites – **defined as land which has previously been developed...**"

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

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No

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If you have answered 'No' could you please explain why this has not been raised before:

Having reviewed the preferred options document, the RSPB recognises that this definition was provided, but it was not identified at that stage for comment. However, it is essential that the submission version ensures that a more appropriate definition is applied.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

The RSPB recommends that if a definition is to be retained that this is amended to:

"Brownfield sites – **defined as land which has previously been developed...**"

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

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No

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11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

To ensure that brownfield sites are appropriately defined. We hope that this could be resolved prior to examination with agreement regarding an appropriate minor amendment.

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box

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If you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:



Date: 4th January 2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Philip Pearson	
Organisation / Group	RSPB	
Address line 1	65 Thorpe Road	
Address line 2		
Town / City	Norwich	
County	Norfolk	
Post Code	NR5 9EA	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

N/A

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	Policy PUBDM24: New employment development (policy text, p.80)
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

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No

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5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

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Justified

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Effective

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Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

New employment development has the potential to impact on wildlife and the wider Broads environment. New development of all forms could adversely affect protected sites through direct and indirect effects (e.g. land take, disturbance, water quality). This policy needs to ensure that all factors that new employment development will need to consider are captured within this policy. In order to ensure all potential impacts are considered we recommend that bullet point (ii) has designated habitats and protected species added to it. This would be consistent with wording in other policies:

"ii) Proposals do not have an adverse impact on landscape character, protected areas, biodiversity and the wider environment;"

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

This had not been noted in previous iterations of the Local Plan.

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

In order to ensure all potential impacts are considered we recommend that bullet point (ii) has designated habitats and protected species added to it. This would be consistent with wording in other policies:

"ii) Proposals do not have an adverse impact on landscape character, protected areas, biodiversity and the wider environment;"

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

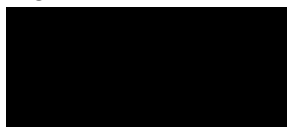
N/A

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

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Signature:

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Date: 4th January 2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Philip Pearson	
Organisation / Group	RSPB	
Address line 1	65 Thorpe Road	
Address line 2		
Town / City	Norwich	
County	Norfolk	
Post Code	NR5 9EA	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

N/A

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☐

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	Policy PUBSSA47: Changes to the Acle Straight (A47T) (Constraints and features, p.202)
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

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No

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5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

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No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☒

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The RSPB is supportive of this policy and the principles that it sets out. However, bullet point three of the constraints and features should include the Outer Thames Estuary SPA alongside the Breydon Water designations. The Outer Thames Estuary SPA has been re-classified to include foraging common tern and little tern and extends up the lower reaches of the River Bure. The changes were formally registered in December 2017. Irrespective of this change, the site has been classified as a pSPA since 2015 and should have been identified for consideration in the Local Plan policies.

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

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No

☐

If you have answered 'No' could you please explain why this has not been raised before:

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

The Outer Thames Estuary SPA must be added as a constraint and included as appropriate within the rest of the policy of supporting text. This policy should then be reassessed in the Habitats Regulations Assessment to confirm that the policy remains appropriate.

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

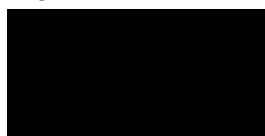
This is an important site and it is essential that the key features and sites that policies could affect are properly identified and appropriate measures identified to ensure adverse effects will be avoided and that the Policy approach is appropriate.

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:

A solid black rectangular box used to redact the signature.

Date: 4th January 2018

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Irina Scales [REDACTED]
Sent: 14 February 2018 11:45
To: Planning Policy Mail
Subject: Scales, I

Categories: Ack and Filed and on database

Subject: Re: Draft Local Plan for Residential Moorings – Greenway Marine, Chedgrave and Loddon Marina, Loddon

Dear Natalie

Re: Draft Local Plan for Residential Moorings – Greenway Marine, Chedgrave and Loddon Marina, Loddon

I would like to reject the proposal on the following grounds.

- 1.The existing marinas are kept in squalid conditions and I cannot imagine the residential permission will improve it. At least one of the illegal permanently lived on boats has had its owner arrested for stealing from genuine boat users.
- 2.Loddon/Chedgrave is an ideal boating destination for tourists, which provide an extra income for the local shops. The anti-social behaviour, poorly maintained boats and threatening attitude from many of the residential boats is putting visitors off coming to the area. This will have a detrimental effect of local businesses.
- 3.Additionally Residential Moorings come with more air pollution from boats burning non-smokeless type materials. Air pollution from antiquated diesel generators. noise pollution from antiquated diesel generators. Additional issue of domestic waste and ecological impact to river and surrounded bio system.
4. Permanent moorings will also remove space for people who stay casual period of time.

Best Regards

Irina Scales
[REDACTED]

Lottie Carlton

From: Stephen Scales [REDACTED]
Sent: 31 January 2018 21:53
To: Planning Policy Mail
Subject: Draft Local Plan for Residential Moorings – Greenway Marine, Chedgrave and Loddon Marina, Loddon [Scanned]

FAO Natalie Beal

Dear Natalie

Re: Draft Local Plan for Residential Moorings – Greenway Marine, Chedgrave and Loddon Marina, Loddon

Many thanks for your letter dated 5th January 2018 regarding the above residential moorings.

I would like to register my strong objection to the proposal on the following grounds.

- 1, The existing marinas are kept in very poor good condition and I am sure that with the addition of residential moorings this would get worse.
- 2, We have, as the Broads Authority is aware, had many problems over several seasons with people living on the staithe illegally. This is very disturbing to proper users who must put up with considerable anti-social behaviour.
- 3, At least one of the illegal permanently lived on boats has had its owner arrested for stealing from genuine boat users.
- 4, The standard of repair of the residential boats that have been on the staithe has been exceptionally poor, many are no more than floating sheds, this in turn is putting off visitors to the town and reducing tourism.
- 5, The illegal residential boats are often the cause of anti-social behaviour with drinking and loud music.

Overall the staithe is an ideal boating destination for tourists and genuine boaters. The anti-social behaviour, poorly maintained boats and threatening attitude from many of the residential boats is putting visitors off coming to the area. This will have a detrimental effect of local businesses.

Best Regards

Stephen Scales

[REDACTED]

Lottie Carlton

From: Lottie Carlton
Sent: 30 January 2018 09:05
To: Planning Policy Mail
Subject: Somerton Parish Council

Categories: Ack and Filed

From: Shirley Weymouth [REDACTED]
Sent: 14 January 2018 11:33
To: Lottie Carlton
Cc: Natalie Beal; 'Thirtle, Haydn'; 'James Bensly'; Jacquie Burgess; 'richard starling'
Subject: SOMERTON BROADS LOCAL PLAN RESPONSE

Hi Lottie

It was agreed at the Parish Council meeting on the 9 January that the response would be as follows and not completing the questionnaire. Included is Jacque Burgess but I have taken a guess on her email address, is it possible for you to forward this email onto her please:

'Somerton Parish Council met on the 9th January and decided not to make any formal response to the Broads Local Plan consultation. The Parish Council does, however, wish to make the following comments for the record;

- 1. The Parish Council thank the Broads Authority for agreeing to the extension to the consultation period for the Local Plan.*
- 2. It is very much appreciated that the Broads Authority decided to hold consultation events for the Local Plan in the actual Broads instead of hosting meetings in the City of Norwich. The meeting at Potter Heigham was well attended and gave local people the opportunity to participate in the process. The Parish Council do hope that future consultation / engagement events are also undertaken in The Broads.*
- 3. The Parish Council are relieved that the evidence base for the Authority's Staithe's Policy no longer includes any reference to the inaccurate report submitted by the UEA (T. Williamson).*
- 4. The Parish Council note that the Broads Climate Change meetings are still held in secret with the public not being able to attend. Furthermore, no proper minutes of these meetings are made other than 'notes' displayed on the Authority's website. The Parish Council suggests these procedures should comply with the spirit of localism and openness.*
- 5. With regard to future flood risk related matters, we ask that local people are able to participate in any review and that it is conducted in an open and democratic manner including the participation of our elected representatives.*
- 6. Finally, the Parish Council hope that the Broads Authority will take the opportunity to implement some changes in 2018 to engage properly and effectively with those of us who reside in The Broads and to do so in The Broads'.*

Shirley Weymouth
Parish Council

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Philip Raiswell	
Organisation / Group	Sport England	
Address line 1	Sport Park	
Address line 2	Oakwood Drive	
Town / City	Loughborough	
County	Leics	
Post Code	LE11 3QF	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM44
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Sport England supports this policy because it requires new development to plan for active lifestyles and physical activity. In this way it is compliant with Sport England's strategy to reduce inactivity and increase levels of physical activity, as well as being compliant with the NPPF, which seeks to increase opportunities for people to take part in sport and physical activity. We also support the promotion of Sport England's 'Active Design' guidance as a tool to help achieve this.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Philip Raiswell

Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Philip Raiswell	
Organisation / Group	Sport England	
Address line 1	Sport Park	
Address line 2	Oakwood Drive	
Town / City	Loughborough	
County	Leics	
Post Code	LE11 3QF	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM6
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Sport England is fully supportive of this policy as it has been widened to include protecting existing sports facilities from inappropriate development, as well as making provision for new facilities. It is therefore considered to be compliant with Sport England's planning policies and objectives, as well as the NPPF.

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☐

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

Broads Authority Local Plan. Publication version (November 2017). Representation Form

12. Please tick this box

☒

if you would like to be notified of the following:

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- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Philip Raiswell

Date: 11/1/2018

The closing date for responses is 4pm 5 January 2018

Appendix F – Residential Moorings – call for suitable areas

Are there any areas which you think are suitable for residential moorings which meet the criteria as set out below?

If so, please fill out this form with details of areas you feel are suitable for residential moorings. A separate form for each site. Please email the completed form, maps and photos to: PlanningPolicy@broads-authority.gov.uk and title your email 'Residential Mooring Sites'.

Your name: St Olaves Marina Ltd	Your email address: [REDACTED]	Your phone number: [REDACTED]
Your address: [REDACTED]		

- What is the address of the proposed residential mooring?

St Olaves Marina Ltd Beccles Road St Olaves Great Yarmouth Norfolk, NR31 9HX
--

- We must have a map to show us the area you refer to.

Your map should show the boundary of the residential mooring (draw a line around it in a highlighter perhaps) as well as give the context to enable officers at the Broads Authority to find the site easily).

Have you included a map? ☒

- Have you included photographs of the proposed residential mooring? Yes

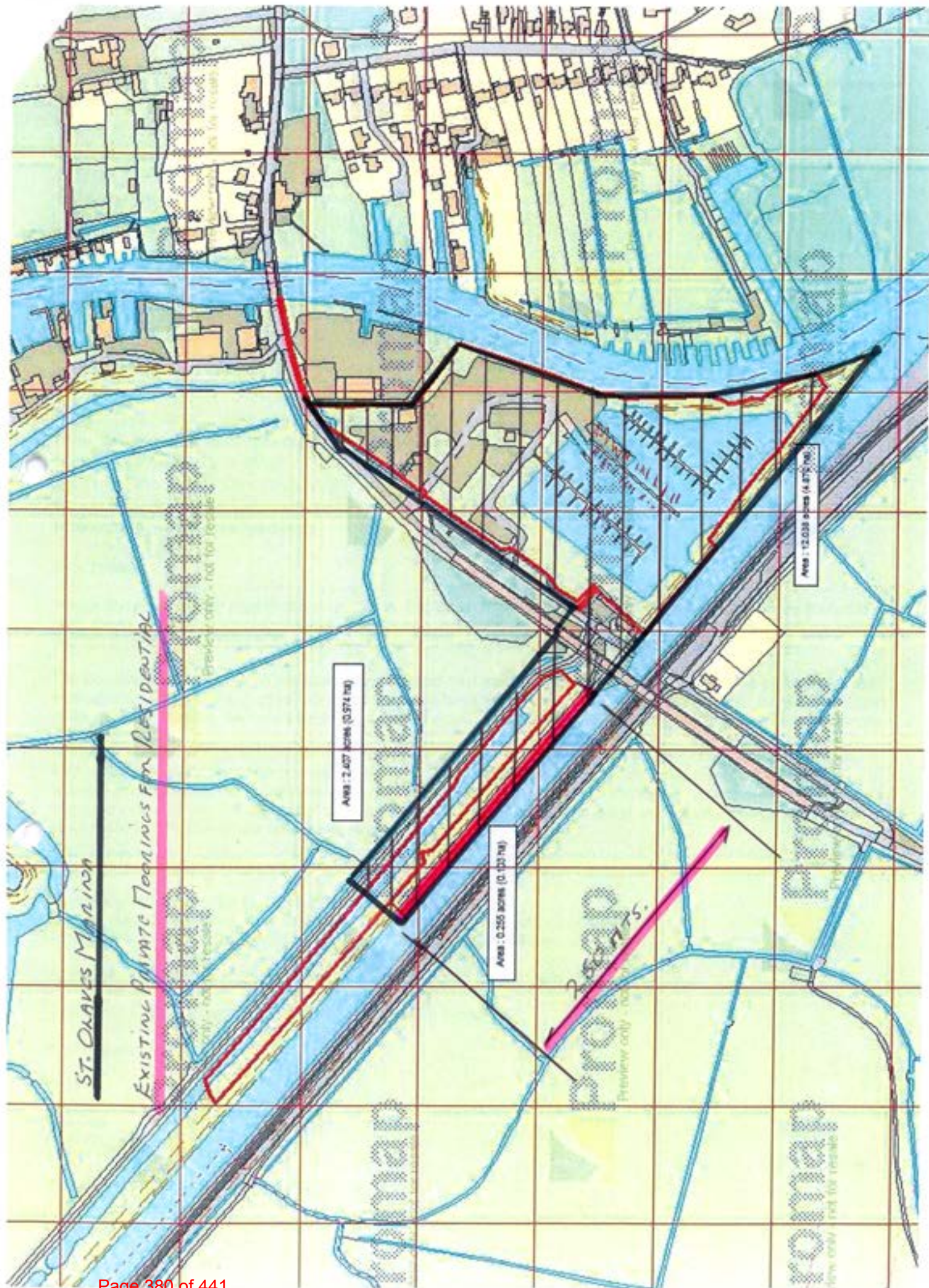
Please explain how your proposed site addresses the following criteria:

1: How many residential moorings or what length of residential moorings is proposed?	250mts (approx. 12 boats subject to boat lengths)
2: What services and facilities are nearby for people living on boats to use (for example pharmacy, GP, school or shop)? Where are these facilities and how far are they?	St Olaves – Restaurant and Public House – Garage Services – Taxi Services Bus service – Beccles/Great Yarmouth/Norwich Local shop at Friton – 2 miles Nearest supermarket by car/bus/train 6 miles Haddiscoe Train station. Lowestoft – Norwich (10 minutes walking distance)
3: Are there moorings already? If so, what is the current use of the moorings (e.g. public, private, marina etc.)?	Private Marina Moorings
4: Would residential moorings here reduce the width of the navigation channel and impact on the ability of boats to pass?	No – Already existing moorings
5: Is riverbank erosion an issue here? How would this be addressed?	No – Piled bank

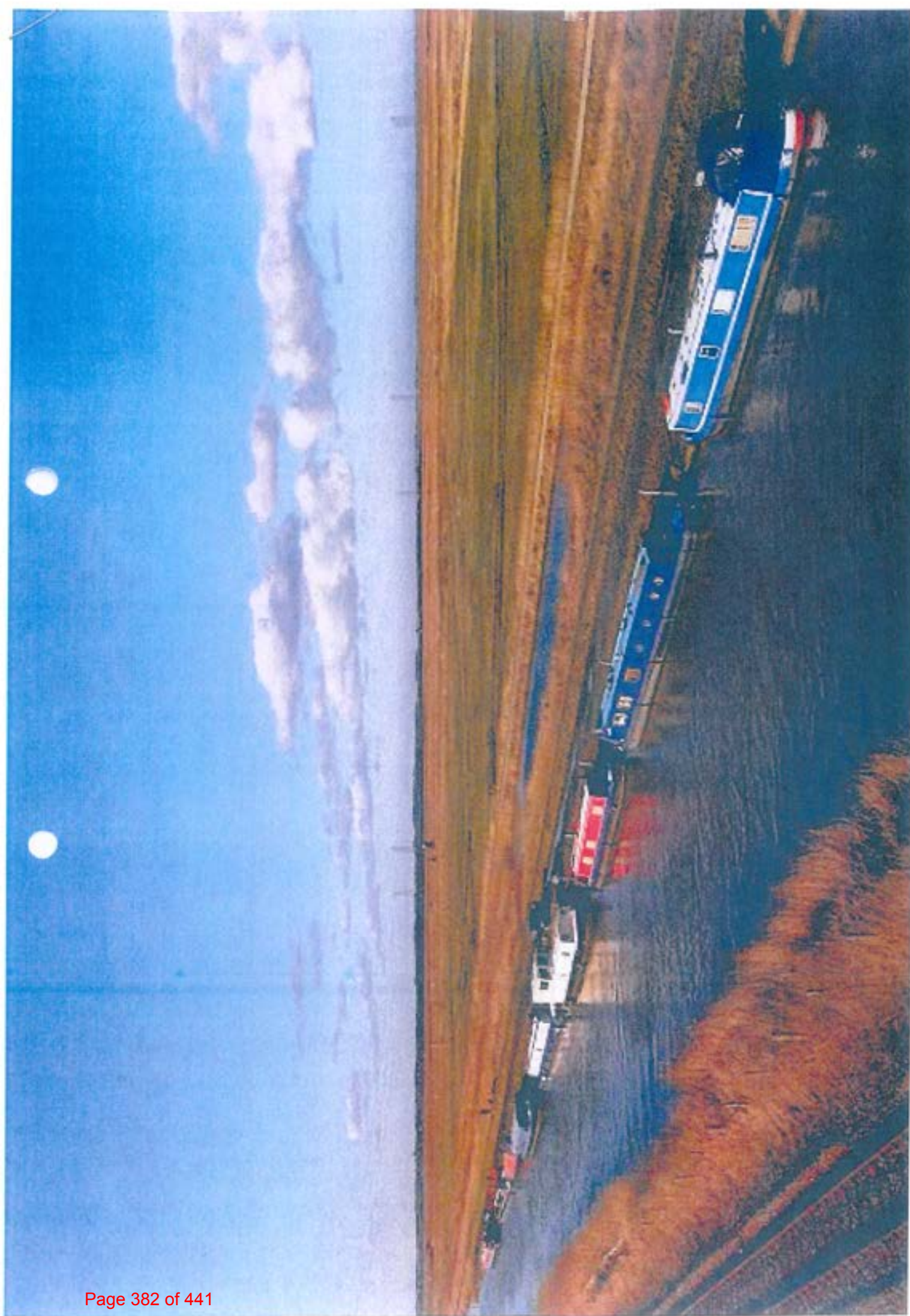
6: What are the adjacent buildings or land used for	St Olaves Marina - Full marina services – Workshops, moorings, storage, fuel, pump out and boat sales. Facilities include – Toilets, showers, emergency services by marina staff.
7: What is the character or appearance of the surrounding area?	1. St Olaves Marina Moorings – Storage/workshop/office 2. Haddiscoe large high road bridge 3. River wall, railway line, marshes
8: Is there safe access between vessels and the land without interfering with or endangering those using walkways?	Private roadway alongside moorings and car park
9: What car parking is there for people living on boats (e.g. car park or park on road)?	As question 8. Private and secure
10: How can service and emergency vehicles access the area safely?	Private roadway
11: How would waste and sewerage be disposed of?	Within the existing marina
12: Is the area on mains sewerage?	Private sewage system – Fresh mains water and electricity will be provided to each moored boat.
13: Would a residential mooring in this location prejudice the current or future use of adjoining land or buildings?	No
14: Do you own the site? If not who does and have you told them about your proposal?	Yes
15: What is the current use of the site?	Marina and moorings

Please note that:

- Your nomination will be assessed by the Broads Authority.
- We cannot guarantee that your nomination will be allocated for residential moorings as the nomination might not be suitable.
- Your nomination will be made public









Date: 12th January 2018
Enquiries to: Cameron Clow
Tel: [REDACTED]
Email: [REDACTED]

Natalie Beal
The Broads Authority
Yare House
62 – 64 Thorpe Road
Norwich
Norfolk
NR1 1RY

Dear Miss Beal,

Local Plan for the Broads Pre Submission Consultation

Thank you for consulting with Suffolk County Council on the pre-submission version of the Local Plan for the Broads.

As this is the pre-submission version of the plan the County Council will be commenting on the plan regarding its soundness in relation to our service areas as well as some minor issues that may still be present.

Archaeology

Aspirations to protect and enhance heritage feature in the plan and the site specific policies are fit for purpose, triggering consultation at the appropriate times. Policy PUBDM10 sets out an approach to preservation by record of heritage assets.

Surface Water Management and Flooding

The Broads Local plan acknowledges water, flooding and surface run-off as a major consideration for development throughout the plan and is sound in this regard. The County Council would like to suggest a minor amendment to the explanatory text in this section to add some missing details.

The Plan provides some detail on other relevant consenting procedures related to watercourses. Section 23 of The Land Drainage Act 1991 requires applicants who wish to affect the flow of an ordinary watercourse, for instance to culvert, dam, weir or install a headwall into a watercourse, to attain consent from the drainage board concerned. For Suffolk this will either be the LLFA, Suffolk County Council, or the Waveney, Lower Yare & Lothingland Internal Drainage Board. Given the detail set out in respect of Environmental Permits, it may be helpful to refer to the Land Drainage Act within explanatory text on page 35 or paragraph 32.3. However, this is not a soundness issue.

Transport

Evidence

The Plan does not appear to be underpinned by a specific study examining the cumulative impacts of development on the highway network. Whilst paragraph 162 of the National Planning Policy Framework sets out the need for local planning authorities to assess the quality and capacity of

infrastructure for transport, paragraph 182 (the soundness tests) also states that evidence should be proportionate.

The scale of growth coming forward in this plan is such that it would be disproportionate to require a new assessment (at local plan level) of cumulative transport impacts in order to ensure soundness as it will be assessed at the planning application stage. Suffolk County Council highways officers have carried out a high level assessment of the sites allocated in Suffolk and believe the sites to be deliverable subject to mitigation, the need for which would be determined through transport assessments or statements considered during the planning application process, in accordance with Policy PUBDM22 and the NPPF.

Policy PUBDM22

The plan acknowledges the challenges of delivering sustainable transport in an area of a rural and remote nature, but takes positive steps to encourage sustainable and active transport amongst residents and visitors.

Policy PUBDM22 part c requires development to “Provide parking in accordance with the relevant adopted standards.” In Suffolk these standards are Suffolk Guidance for Parking (2015) and the County Council welcomes the weight the Plan gives to these standards.

The requirements to protect and enhance the Public Rights of Way network are welcomed.

Policy PUBSSA47

Suffolk County Council is aware of Norfolk County Council’s position in respect of this policy and its criteria for assessing impacts of improvements to the Acle Straight. Suffolk County Council would welcome a positive approach to improvement of the A47, given the importance of this route to Lowestoft.

Minerals and Waste

The plan has noted that Suffolk County Council is the Minerals and Waste planning authority for Suffolk and acknowledged the Minerals Core Strategy and Waste Core Strategy.

For consistency, the constraints, and features section beneath policy PUBOUL1 should acknowledge that the site is within Suffolk’s minerals consultation area for sand and gravel. However, the site is heavily constrained by flood risk, heritage and nature designations, dark sky areas, access and amenity, so is likely not economically viable as a mineral extraction site.

Accessible and Adaptable Housing

The plan makes several references to the “Lifetime Homes” as part of addressing the areas aging population and the potential of changing family circumstances. Improving independent life for older people and disabled people is one of the four outcomes of the Joint Health and Wellbeing Strategy for Suffolk so the County Council welcomes the provision of adaptable homes within the plan. However, the Lifetime Homes standards have been absorbed by optional requirement M4(2) of The Building Regulations.

The references to Lifetime Homes should be deleted in order to ensure clarity. Furthermore, it is not clear how the Authority has determined that 5% of new homes should meet the M4(2) standard. The County Council would be pleased to work with the Broads Authority to better understand how this requirement has been set, and to consider requiring that a greater proportion of homes meet the standard.

Planning Obligations/Developer Contributions

Policy PUBDM46 underpins efforts to secure planning obligations and developer contributions. However, in order to be effective (and, as such, sound), the policy should identify that the list of infrastructure types is not prescriptive, i.e.

‘Contributions may be sought towards, or commitments to provide, infrastructure types including,’

Furthermore, the County Council welcomes the reference to following the approach set out in County Council guidance on infrastructure contributions on page 131. However, the list of infrastructure types in that sentence are not wholly consistent with those in the policy. For the sake of clarity, the Broads Authority should either delete the types of infrastructure required or expand the list to match the policy.

It should also be noted that it is not standard practice for the planning authority to hold all contributions. The County Council is usually a party to Section 106 agreements insofar as is relevant to County Council functions. This supporting text on page 131 should also be amended to be consistent with practice.

I hope that these comments are helpful.
Yours sincerely

Cameron Clow
Planning Officer
Suffolk County Council

1.	Your contact details	Agent Details (if applicable)
Name	Cameron Clow	
Organisation / Group	Suffolk County Council	
Address line 1	Endeavour House	
Address line 2	8 Russell Road	
Town / City	Ipswich	
County	Suffolk	
Post Code	IP1 2BX	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM46 and PUBDM42h
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☒

Consistent with national policy

☒

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Concerned that PUBDM46 is not effective.

Mentions of Lifetime Homes in PUBDM42h not consistent with national policy.

Full details in letter.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

We did not pick up these points during previous consultations

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

We don't feel it is necessary, however if the inspector feels otherwise we can attend.

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box

☒

if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Cameron Clow

Date: 12/01/2018

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Natalie Beal
Sent: 02 February 2018 16:18
To: Lottie Carlton
Subject: FW: I do not understand this comment....

Follow Up Flag: Follow up
Flag Status: Flagged

From: Cameron Clow [REDACTED]
Sent: 16 January 2018 13:30
To: Natalie Beal
Subject: RE: I do not understand this comment....

Hi Natalie,

Sorry for the delay.

What is meant here is in addition to the Environmental Permitting Regulations 2010 section at the bottom of page 34/page 35 it might be helpful to add the information about applicants having to gain consent from the appropriate drainage board, if they wish to change the flow of an ordinary water course, as per the Land Drainage Act 1991.

As stated it is not necessarily a soundness issue, just a suggestion to make the consent information for applicants in the plan regarding flood risk more complete.

I hope that helps. Sorry for any confusion.

Kind regards,
Cameron

Cameron Clow
Planning Officer
Suffolk County Council

From: Natalie Beal [REDACTED]
Sent: 16 January 2018 12:06
To: Cameron Clow [REDACTED]
Subject: RE: I do not understand this comment....

Hello Cameron

Any progress with this please?

Thanks

Natalie

From: Natalie Beal
Sent: 12 January 2018 15:37
To: Cameron Clow [REDACTED]
Subject: I do not understand this comment....

Hello Cameron

What does this mean and what changes are requested?

The Broads Local plan acknowledges water, flooding and surface run-off as a major consideration for development throughout the plan and is sound in this regard. The County Council would like to suggest a minor amendment to the explanatory text in this section to add some missing details.

Surface Water Management and Flooding: The Plan provides some detail on other relevant consenting procedures related to watercourses. Section 23 of The Land Drainage Act 1991 requires applicants who wish to affect the flow of an ordinary watercourse, for instance to culvert, dam, weir or install a headwall into a watercourse, to attain consent from the drainage board concerned. For Suffolk this will either be the LLFA, Suffolk County Council, or the Waveney, Lower Yare & Lothingland Internal Drainage Board. Given the detail set out in respect of Environmental Permits, it may be helpful to refer to the Land Drainage Act within explanatory text on page 35 or paragraph 32.3. However, this is not a soundness issue.

Thanks

Natalie

Natalie Beal
Planning Policy Officer
[REDACTED]

Broads Authority, Yare House, 62-64 Thorpe Road. Norwich NR1 1RY
01603 610734
www.broads-authority.gov.uk



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Scanned by iCritical.

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	James Meyer	
Organisation / Group	Suffolk Wildlife Trust	
Address line 1	Brooke House	
Address line 2	The Green	
Town / City	Ashbocking	
County	Suffolk	
Post Code	IP6 9JY	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	8.2
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support the objectives set out in section 8.2 of the preferred options document, in particular OBJ2, OBJ3, OBJ4, OBJ5, OBJ6, OBJ7, OBJ10, OBJ11, OBJ14 and OBJ16.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

N/A

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

N/A

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

N/A

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: James Meyer

Date: 05/01/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	James Meyer	
Organisation / Group	Suffolk Wildlife Trust	
Address line 1	Brooke House	
Address line 2	The Green	
Town / City	Ashbocking	
County	Suffolk	
Post Code	IP6 9JY	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBDM7
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We note these amendments made to this chapter following the Preferred Options consultation draft. We consider that these address the comments we made at the Preferred Options stage and we therefore support Policy PUBDM7 (Green Infrastructure), in particular criterion (a) and the reference to protecting and enhancing natural environments.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☒

If you have answered 'No' could you please explain why this has not been raised before:

N/A

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

N/A

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

N/A

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

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Signature: James Meyer

Date: 05/01/2018

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Address line 1	Brooke House	
Address line 2	The Green	
Town / City	Ashbocking	
County	Suffolk	
Post Code	IP6 9JY	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP4 and PUBDM9
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support both the inclusion of a Soils policy (PUBSP4) and the amendments made to the Peat Soils policy (PUBDM9) following the Preferred Options consultation.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

N/A

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

N/A

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

N/A

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

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- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: James Meyer

Date: 05/01/2018

The closing date for responses is 4pm 5 January 2018

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Address line 1	Brooke House	
Address line 2	The Green	
Town / City	Ashbocking	
County	Suffolk	
Post Code	IP6 9JY	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP4 and PUBDM9
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support both the inclusion of a Soils policy (PUBSP4) and the amendments made to the Peat Soils policy (PUBDM9) following the Preferred Options consultation.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

N/A

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

N/A

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

N/A

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: James Meyer

Date: 05/01/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	James Meyer	
Organisation / Group	Suffolk Wildlife Trust	
Address line 1	Brooke House	
Address line 2	The Green	
Town / City	Ashbocking	
County	Suffolk	
Post Code	IP6 9JY	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBSP13
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

We support the requirement in Policy PUBSP13 (Navigable Water Space) for the beneficial use of dredgings where they will help deliver ecological gain, as identified in the Reasoned Justification.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

N/A

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

N/A

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

N/A

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: James Meyer

Date: 05/01/2018

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	James Meyer	
Organisation / Group	Suffolk Wildlife Trust	
Address line 1	Brooke House	
Address line 2	The Green	
Town / City	Ashbocking	
County	Suffolk	
Post Code	IP6 9JY	
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	
Map reference	
Appendix	
Supporting Document	Habitats Regulations Assessment

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

With regard to the Habitats Regulations Assessment (HRA) Report, it should be noted that amendments have been made to the Outer Thames Estuary Special Protection Area (SPA) area and qualifying species, this includes the addition of breeding Little Tern and Common Tern to the designation. The information and assessment relating to the Outer Thames Estuary SPA should therefore be updated to reflect the amendments.

For future reference it should also be noted that the Conservation of Habitats and Species Regulations (2010) (as amended) were amended to the Conservation of Habitats and Species Regulations (2017) on the 30th November 2017.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☒

No

☐

If you have answered 'No' could you please explain why this has not been raised before:

N/A

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Amend HRA include amended designation of the Outer Thames Estuary SPA. Update references to the Conservation of Habitats and Species Regulations to the 2017 regulations.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

N/A

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: James Meyer

Date: 05/01/2018

The closing date for responses is 4pm 5 January 2018

Lottie Carlton

From: Natalie Beal
Sent: 03 January 2018 08:59
To: Planning Policy Mail
Subject: FW: Broads Local Plan

Asked them for one form to be filled in.

From: Thomas Foreman [REDACTED]
Sent: 30 December 2017 13:29
To: Natalie Beal
Subject: Broads Local Plan

Dear Natalie,

The Town Council has considered the Broads Local Plan. These are the following comments it wishes to make:

Careys Meadow – page no: 182 - support

Thorpe Island: page no 183

- Paragraph 1) - support
- Paragraph 2) – support with the exception of
 - o viii) in so far as it relates to the central part of the island as this will allow for welcome expansion of recreational/club activities.
 - o (x) in so far as water pollution was a matter for the environment agency and need not be included.
- Eastern End – do not support the statement that “well designed upgrades or renewals to existing buildings is appropriate or should be encouraged” – suggest wording amended to “no amendment to existing buildings other than maintenance of the fabric of existing buildings”. With regard to landscaping - tree maintenance needed to be in line with the tree management plan due to its location in a conservation area. Support be given to the retention of private moorings but avoiding double birth moorings, and support the need to ensure planning permission is sought for any permanent moorings accepting that there are currently no rights for permanent moorings and any such use would require a planning application to be submitted.
- Central – support
- Western End – noted that this policy had largely been framed by the Planning Inspector
- Reasoned justification page 184 – clarity needed regarding what is deemed as “occupation”

Griffin Lane – page no: 185 - policy endorsed but there was a need for a more flexible approach when considering any applications for industrial development on the site – seek to promote existing uses to protect and enhance existing and potential uses associated with broads and maritime functions.

Bungalow Lane – page 186 – support

River Green open space – page 187 – support

Housing Policies:

Page 98 – Policy PUBSP15 - comment be made that the Broads Authority should be exempt from this policy relating to residential development. Most land was at risk of flooding and there was little real likelihood of meeting the requirements for new dwellings or affordable housing. The Broads Authority is specifically exempt from housing targets.

Page 105/6 – Policy PUBDM34 – Query the necessity of including Thorpe St Andrew, given the statement than only a small area of the Town falls within the Broads Authority Planning Area. Given the likelihood of

flooding and the conservation area, the Town Council feels it is an un-necessary addition as any construction within the Broads Authority area will have a larger negative impact on the town.

Page 108 - Policy PUBDM35 – support

Page 110 – Policy PUBDM36 – welcome the policy on new moorings noting that the moorings on the Island do not appear to comply with this policy.

I understand that there is a comments form, but due to time constraints it is not possible to complete this for each individual component.

Best wishes

Thomas

Lottie Carlton

From: Natalie Beal
Sent: 08 January 2018 12:58
To: [REDACTED]
Cc: [REDACTED]
Subject: Tompkinson, T

Hello

According to my records, we wrote to 1-10 Wherry Close.

I think they would be able to be occupied all year round. The boats may go away from the mooring and cruise and then come back.

I will pass on what you say about the pontoon to check that is all ok from our end.

Would you like me to note these comments as part of the consultation?

Natalie

-----Original Message-----

From: [REDACTED]
Sent: 06 January 2018 11:59
To: Planning Policy Mail
Cc: [REDACTED]
Subject: Residential moorings at Loddon Marina

Dear Sirs,

Thank you for sending out details of your proposals, however, there has been a recent change at Loddon Marina with the addition of an extra pontoon which you do not show. On this pontoon there is a boat which is regularly being used as a residential home.

In general we do not have objections, provided the Dark Sky is enforced and there are restrictions regarding noise levels. The moorings at Loddon have been the subject of residential moorings which have been abused in the past, with noise and anti-social behaviour etc coming from the boats.

Can you please let us know what regulations will be in force regarding the use of residential moorings, re length of stay etc?

Has this letter been sent to the other residents of Wherry Close, that is numbers 1 to 9?

Yours faithfully

Tony Tomkinson

[REDACTED]

Lottie Carlton

From: Natalie Beal
Sent: 05 February 2018 07:44
To: Planning Policy Mail; Lottie Carlton
Subject: FW: Residential Moorings, Chedgrave and Loddon

-----Original Message-----

From: [REDACTED]
Sent: 03 February 2018 11:05
To: Natalie Beal
Cc: [REDACTED]
Subject: Residential Moorings, Chedgrave and Loddon

Dear Natalie,

Further to your earlier correspondence, please find below my consider response to these proposals.

1.) Greenway's.

I understand that the proposal would be for about 50% of the moorings, currently at the yard, to be available for residential use. Are these proposals subject to Planning Permission and approval by the Broads and District Council Authorities, or just The Broads?

Should they be accepted, then we should expect additional road vehicular transport to and from the boatyard, currently there is no metalled road. Access from the Norwich Rd, Chedgrave would have to be improved because the house next to the current drive creates a blind spot which is very dangerous. On the other side is a private road with a large tree obstructing any improvement in the visual splay. Secondly, I understand that there is no suitable washing or toilet facilities at the boatyard.

2) Regarding the Loddon Marina, it may be possible to get 10 or more residential moorings; during the last year we have experienced the results of residential moorings, all-be-it unofficial ones; with one resident now being held at Her Majesty's pleasure.

We should expect an increase in substance misuse, noise and other similar problems to the ones which resulted in moving boats from the Norwich moorings.

There is no road access to the marina, currently vehicular traffic must enter the site from Bridge Street, Loddon via a field/caravan site.

The pontoons at the Marina are quite unsuitable and dangerous for regular use (or any use). Washing and toilet facilities would have to be built.

It is quite possible if not probable, that the current problems regarding residential moorings on the Yare in Trowse and Norwich would be transferred to Loddon.

Tony Tomkinson

Broads Authority Local Plan. Publication version (November 2017). Representation Form

1.	Your contact details	Agent Details (if applicable)
Name	Lee Walker	
Organisation / Group	NNDC)	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	Entire
Policy number	
Map reference	
Appendix	
Supporting Document	

ME701310

4. Do you consider that this part of the Plan meets the procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Page 414 of 441

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

I am happy with the proposals.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

N/a

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

X

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☐ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: leee walker

Date:5/1/2018

The closing date for responses is 4pm 5 January 2018

Respondent: Warren, T

Lottie Carlton

From: Trevor Warren [REDACTED]
Sent: 05 January 2018 11:43
To: Planning Policy Mail
Subject: Broads Local Plan

Thank you for the notice of the deadline extension for this consultation, which acted as a timely reminder!

The newly published Plan has been studied with particular reference to the Thorpe Conservation Area and has received general support. However, the following comments should be noted. Although previous policy TSA2 produced in 1997 appears not to be listed as now superseded, the new proposals seem to embrace its spirit as (regrettably) amended by the Planning Inspectors at recent inquiries. Statements that planning applications leading to a “tidying-up” of a given area would be supported are to be welcomed. Is there scope for interpreting the Plan in a more proactive way by actually requiring such visual improvement? This could apply to sites within the Conservation Area as well as adjacent places such as Carey’s Meadow and the river bank opposite Whitlingham Country Park.

Trevor Warren, Thorpe Conservation Group.

Lottie Carlton

From: Trevor Warren [REDACTED]
Sent: 08 January 2018 14:19
To: Lottie Carlton
Subject: Re: Broads Local Plan

Dear Lottie Carlton,

Thank you for your reply, but

I responded using the Thorpe Conservation Group banner simply so that you could identify me as one of the people to whom you originally sent details. It will be much simpler if you treat my comments as being from an individual (see below). The relevant details are:

[REDACTED]

As to the rest of your attached form:

2. Thorpe Conservation Group was set up by the late Margaret Langley in order to campaign against an application made on 23 Oct 1975 by Anchor Enterprises and Pentagon Securities for 235 residential units on the old Jenner boatyard site, involving the conversion of Thorpe Hall and the Town House Hotel into dwellings, and including a new bridge to the island at the Town House site. Mrs Langley, who lived next to the Town House at Walpole House, was anxious to preserve the historic nature of the area with its listed buildings, and received much local support. Hence the establishment of this ad hoc group. (In this case, I understand that the planning application was passed but the project foundered financially. It probably would not have got so far today!) Mrs Langley kept her initiative alive for other planning issues as they arose, with similar groups set up by those affected, and eventually passed the duty of "keeping an eye on things" to me. The last major exercise was in 2008 when a planning application for mooring use on Thorpe Island resulted in the formation of another ad hoc group and the submission of some 40 letters of protest. There is thus no formal list of members.

3. This one at least is simple. The paragraph in question is 32.24 Thorpe St Andrew. The Policy numbers are TSA2 Thorpe Island and TSA1 Carey's Meadow.

4 - 7. I am not qualified to judge compliance with legal and procedural requirements, but am happy to assume the Authority has got it right!

8. I probably have not commented on this issue before because, as I recall, policy TSA2 was omitted from the early draft Local Plan pending legal judgement.

9 - 11. Not proposing a change, just commenting.

In any case, I haven't got the faintest idea of how to fill in your emailed form and return it on-line!

Finally, my reference in my earlier email to policy TSA2 not being listed as superseded refers to Appendix G on page 228. TSA1 and 3 are listed but not 2, yet it has been substantially changed from the 1997 version.

Please give me a call if this has merely muddled the waters even more. Sincerely, Trevor Warren.

On 5 Jan 2018, at 14:08, Lottie Carlton wrote:

> Dear Trevor Warren

>

> Thank you for submitting a response to the Broads Local Plan consultation on behalf of the Thorpe Conservation Group. Please treat this email as acknowledgement of receipt.

>

> Please could you fill in the attached form that provides information required by the formal consultation process? You don't need to add the response itself as we have this from your email below.

>

> Thank you and kind regards

>

> Lottie Carlton

> Administrative Officer



Your ref n/a

Our ref n/a

Date 05/01/2018

Please ask for Samuel Hubbard

Direct dial

Email

Ms Natalie Beal
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

Dear Ms Beal

Broads Local Plan – Publication Version

Thank you for consulting Waveney District Council on the Broads Local Plan Pre-submission version. The Broads Authority has a good working relationship with Waveney District Council and the Council supports the ongoing approach to joint working on the preparation of Local Plans.

Cross-Border Strategic Matters (Duty to Co-operate)

Policy PUBSP15: Residential Development

Waveney District Council supports the policy approach and the approach to housing numbers. The Council supports the position that the Broads sits within three housing market areas of which one is Waveney.

The Council considers that the Waveney element of the Broad's Objectively Assessed Need also forms part of Waveney's Housing Market Area objectively assessed need. The Council considers that housing completions in the Broads Authority area count towards Waveney District Council's objectively assessed need as agreed in the Memorandum of Understanding from 2012. This matter could be made more explicit in the supporting text. With respect to the Memorandum of Understanding (MoU) from 2012, it may be worthwhile considering whether to update this with a revised Statement of Common Ground, as the MoU was drafted before the Broads Authority had an identified objectively assessed need. If so further changes to the supporting text would need to be made to reflect this.

Policy PUBSSA47: Changes to the Acle Straight (A47T)

Waveney District Council strongly supports proposals to improve and specifically dual the Acle Straight and believe that there are compelling reasons in the interests of safety and economic growth for improvements to be made to this stretch of the trunk road network.

It is considered that the supporting text to the Policy could set a more positive tone with respect to improvements and dualling. Specifically, the second paragraph should emphasise the strategic importance of the road and the fact it connects Lowestoft to Great Yarmouth, Norwich and beyond to the midlands. The paragraph should also reference the strategic importance given to the route by the New Anglia Local Enterprise Partnership's Economic Strategy. Paragraph 7 of the supporting text could also be expanded to explain in more detail the benefits changes to the route could make, particularly those associated with economic growth of the sub-region of Great Yarmouth and Lowestoft, improvements to recreation such as walking, cycling and horse riding and landscape improvements.

Other Matters

Policy PUBSP12: Sustainable Tourism

Tourism is of significant importance to the Waveney economy and the Council support this policy which promotes sustainable tourism growth of the Broads area. Lowestoft and Beccles provide sustainable access points to the Broads, with good public transport links including regional bus links and train lines. It is considered that these locations could usefully be identified in the supporting text, along with others such as Great Yarmouth and Wroxham/Hoveton where sustainable access to the Broads can be achieved.

Policy PUBDM34: Residential Development within Defined Development Boundaries

The Council supports this approach and the proposed development boundary for Oulton Broad. The Council also supports not having development boundaries in the Broads part of Beccles and Bungay for the reasons relating to character and flood risk as set out in the Broads Authority Development Boundary Topic Paper. It should be noted that the Waveney First Draft Local Plan includes a Settlement Boundary for Somerleyton. The draft Settlement boundary extends all the way to the Broad's boundary.

Policy PUBDM36: New Residential Moorings

The Council support this policy approach. However, linked to the above, Somerleyton, which has a range of services and facilities, with rail access to Lowestoft and Norwich, should be considered as a suitable area for a modest number residential moorings subject to the other criteria of the Policy.

Policy PUBDM42: Design

The part of the Policy with respect to accessibility which requires 5% of new homes on sites above 20 dwellings to meet M4(2) standards is consistent with Policy WLP8.1 of the First Draft Waveney Local Plan. In response to concerns raised by Suffolk County Council, the Council is considering whether to adjust this requirement upwards (subject to viability). It is not currently clear from the supporting text as to why 5% is an appropriate requirement. The Council would encourage the Broads Authority to liaise with Suffolk County Council in determining whether this is an appropriate requirement. The Policy also seems to confuse the M4(2) standard with the Lifetime Homes standard. The Lifetime Homes standards have been absorbed by optional requirement M4(2).

Policy PUBOUL3 – Oulton Broad District Shopping Centre

The Policy as drafted is identical to the draft policy for Oulton Broad District Centre in the Waveney First Draft Local Plan. The Council supports this proposed consistent policy approach to the District Centre in Oulton Broad. However, it should be noted that Waveney District Council may need to make changes to the policy in its Publication version of the Local Plan to take into account comments raised during the consultation on the First Draft. The Council will endeavour to keep the Broad's Authority up to date with any proposed changes, and would encourage the Broad's Authority to support minor modifications to this policy post publication to ensure continued consistency.

The Council hopes that the above comments are helpful. If there are any questions regarding the comments above please contact Sam Hubbard in the Planning Policy and Delivery Team

[Redacted]

Yours sincerely,

[Redacted]

Cllr David Ritchie
Cabinet Member for Planning and Coastal Management

1.	Your contact details	Agent Details (if applicable)
Name	Sam Hubbard	
Organisation / Group	Waveney District Council	
Address line 1	Riverside	
Address line 2	4 Canning Road	
Town / City	Lowestoft	
County	Suffolk	
Post Code	NR33 0EQ	
Telephone number	[REDACTED]	
E-mail address	[REDACTED]	

2. Group Representations

If your representation is on behalf of a group, how many people support it?

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

No

3. To which part of the Plan does your representation relate?

Paragraph number	See attached letter
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

No

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

No

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

See attached letter. Waveney District Council supports the policies of the Broads Local Plan but suggests changes to help improve the effectiveness and clarity of the Plan. It is not considered that these suggested changes are fundamental to the soundness of the plan.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

See attached letter.

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

See above

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

The Council does not consider it necessary to participate in the public examination. However, the Council will attend if requested to do so by the Broads Authority or the Independent Examiner.

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature:

Cllr David Ritchie – Cabinet Member for Planning and Coastal Management

Date: 5th January 2018

The closing date for responses is 4pm 5 January 2018

From: Natalie Beal
Sent: 02 February 2018 09:38
To: Lottie Carlton
Subject: Oulton Broad District Centre changes

The Draft Waveney Local Plan Policy:

Policy WLP2.10 - Oulton Broad District Shopping Centre

Oulton Broad District Shopping Centre is identified on the Policies Map.

New Town Centre Use Development (falling within use classes A1, A2, A3, A4, A5, C1, D2 and B1a) will be permitted within the Oulton Broad District Centre where the scale and function of the development is consistent with the role of the District Centre and would not impact on the vitality and viability of Lowestoft Town Centre.

Within the Oulton Broad District Shopping Centre proposals for changes of use of ground floor premises from use classes A1 (retail) and A2 (financial and professional services) to other non-retail uses including A4 (drinking establishments) and A5 (hot food takeaways) will not be permitted.

The following changes of use will only be permitted where either cumulatively or individually they have no significant adverse impact on the character, retail function and vitality and viability of the centre, residential amenity including noise, fumes, smell and litter, highway safety, parking and community safety:

- From use classes A1 (retail) and A2 (financial and professional services) to A3 (restaurants and cafes).
- Other premises in the Oulton Broad District Shopping Centre to use classes A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food takeaways).

Respondent: Whitlingham Charitable Trust

Lottie Carlton

From: Lottie Carlton
Sent: 03 January 2018 11:37
To: Martin Shaw
Cc: ROB BENNETT
Subject: Whitlingham Charitable Trust

Categories: Ack and Filed

Dear Martin

Thank you for your response to the consultation on behalf of Whitlingham Charitable Trust. Please treat this email as acknowledgement of receipt.

Kind regards

Lottie Carlton
Administrative Officer
[REDACTED]

From: Martin Shaw [REDACTED]
Sent: 02 January 2018 20:31
To: Lottie Carlton
Cc: ROB BENNETT
Subject: Re: Broads Local Plan Publication Consultation - Have your say

Dear Lottie

Having perused the pre-submission Broads Local Plan (and having commented on earlier drafts) I have no comments to make on the latest version on behalf of Whitlingham Charitable Trust. In my view the Plan meets the various Tests of Soundness.

Regards

Martin

J Martin Shaw
Chair, Whitlingham Charitable Trust

On 9 Nov 2017, at 13:43, Lottie Carlton [REDACTED] wrote:

Dear Mr J M Shaw Whitlingham Charitable Trust

Local Plan for the Broads: Have your say

Your comments are invited on the Publication version of the Broads Local Plan, which sets out the final policies we wish to use to help determine planning applications in the Broads Authority Executive Area. This is the final stage of consultation before we submit the Plan to the Planning Inspector.

To **view the consultation documents**, visit our website at www.broads-authority.gov.uk/broadsconsultations. The following documents are available as part of this consultation:

Lottie Carlton

From: Natalie Beal
Sent: 18 January 2018 11:36
To: Lottie Carlton; Planning Policy Mail
Subject: FW: Local Plan re submission - Wroxham Parish Council
Attachments: Broads-Publication-Version-Local-Plan-rep-form Wroxham Parish Council 1 rev 1.docx; Broads-Publication-Version-Local-Plan-rep-form Wroxham Parish Council 3 rev 1.docx; Broads-Publication-Version-Local-Plan-rep-form Wroxham Parish Council 4 rev 1.docx; Wroxham proposed green infrastructure map.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Replacement comments and removal of one comment from Wroxham.

From: Wroxham Parish Council Clerk [REDACTED]
Sent: 18 January 2018 11:12
To: Planning Policy Mail
Subject: Local Plan re submission - Wroxham Parish Council

Dear Natalie,

Following your comments WPC have reviewed the submission, amended responses 1, 3 and 4 and withdrawn no 2 on the basis that the A3 map of the development area you supplied is satisfactory to councillors. I attach a scan to accompany submission no 3 which shows the Council's proposal for further green infrastructure areas. I hope this clarifies the Council's views.

Many thanks for the opportunity to make a refined submission,

--
Clare Male, Clerk and RFO
Wroxham Parish Council
[REDACTED]

1.	Your contact details	Agent Details (if applicable)
Name	Clare Male	
Organisation / Group	Wroxham Parish Council	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

11

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	All
Policy number	
Map reference	
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☐

No

☒

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☐

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

General comment - Whilst the Parish Council applauds the depth and detail of the report it finds it impenetrable for the layperson and as such a challenging consultation document. In particular the approach of asking respondents to complete a separate form for each representation is both onerous and unnecessary. The process places all the onus on the public to challenge the Authority and not vice versa. For example, asking is the documents meet "the tests of soundness". The Council challenges the accessibility of this document to the public.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

N/A

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

The consultation should be compliant with Cabinet Office Consultation Principles 2016 – particularly sections A and G.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☐

No

☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Clare Male

Date: 12/01/18

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Clare Male	
Organisation / Group	Wroxham Parish Council	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

11

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBHOV1
Map reference	11
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☐

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☒

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

The areas included as green infrastructure have been carried over from a previous policy. The Parish council asks that additional areas of the southern part of Bridge Broad and Broads Authority owned site in Bure Close be added. Map attached.

Bridge Broad: Wroxham Parish Council wish to see the solid fencing between the road and Bridge Broad removed and this area opened up more to the public. The Parish Council is in discussions with the new owner as to how this could be implemented to suit both their business needs and yet make this area an attractive community area.

Bure Close: The Parish Council would like to see this Broads Authority owned parcel of land developed and maintained as a quiet seating area to the southern side of the Bure. This would complement the green spaces on the opposite northern bank.

(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes ☐

No ☒

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation.

Add in the areas stated above to green infrastructure area.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes ☐

No ☒

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

12. Please tick this box ☒ if you would like to be notified of the following:

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Clare Male

Date: 12/01/18

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Clare Male	
Organisation / Group	Wroxham Parish Council	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

2. Group Representations

If your representation is on behalf of a group, how many people support it?

11

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBHOV5
Map reference	11
Appendix	
Supporting Document	

4. Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)

Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

☐

No

☒

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

☐

Justified

☐

Effective

☒

Consistent with national policy

☐

7. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Hoveton Town Centre and areas adjacent to the Town Centre. The Parish Council feels that the "areas adjacent to the town centre" area in Wroxham considers Wroxham only in the context of the boundary of the Broads Authority and perpetrates the dominance of Hoveton town centre. Point v says it will consider proposals that contribute to the "vitality and viability of the Town Centre" – that Town centre being Hoveton not Wroxham. Wroxham becomes a conduit for traffic into Hoveton and a provider of car parking.
(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

If you have answered 'No' could you please explain why this has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

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This section needs to be reviewed more thoroughly with local residents and appropriate bodies.

(Please continue on a separate sheet / expand box if necessary)

10. If your representation is seeking a change, do you consider it necessary to participate in the public examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

More detailed consultation is required to review this area as a whole.

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

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- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Clare Male

Date: 12/01/18

The closing date for responses is 4pm 5 January 2018

1.	Your contact details	Agent Details (if applicable)
Name	Clare Male	
Organisation / Group	Wroxham Parish Council	
Address line 1		
Address line 2		
Town / City		
County		
Post Code		
Telephone number		
E-mail address		

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If your representation is on behalf of a group, how many people support it?

11

Is a list of each person in your group that supports the representation attached with this form - including name, postal address, email or telephone number and signature?

Yes

☐

No

☒

3. To which part of the Plan does your representation relate?

Paragraph number	
Policy number	PUBHOV5
Map reference	11
Appendix	
Supporting Document	

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Yes

☒

No

☐

5. Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)

Yes

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(Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultations on the Local Plan?

Yes

☐

No

☒

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(Please continue on a separate sheet / expand box if necessary)

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Yes

☒

No

☐

11. If you wish to participate in the public examination, please outline why you consider it to be necessary?

More detailed consultation is required to review this area as a whole.

(Please continue on a separate sheet / expand box if necessary)

12. Please tick this box ☒ if you would like to be notified of the following:

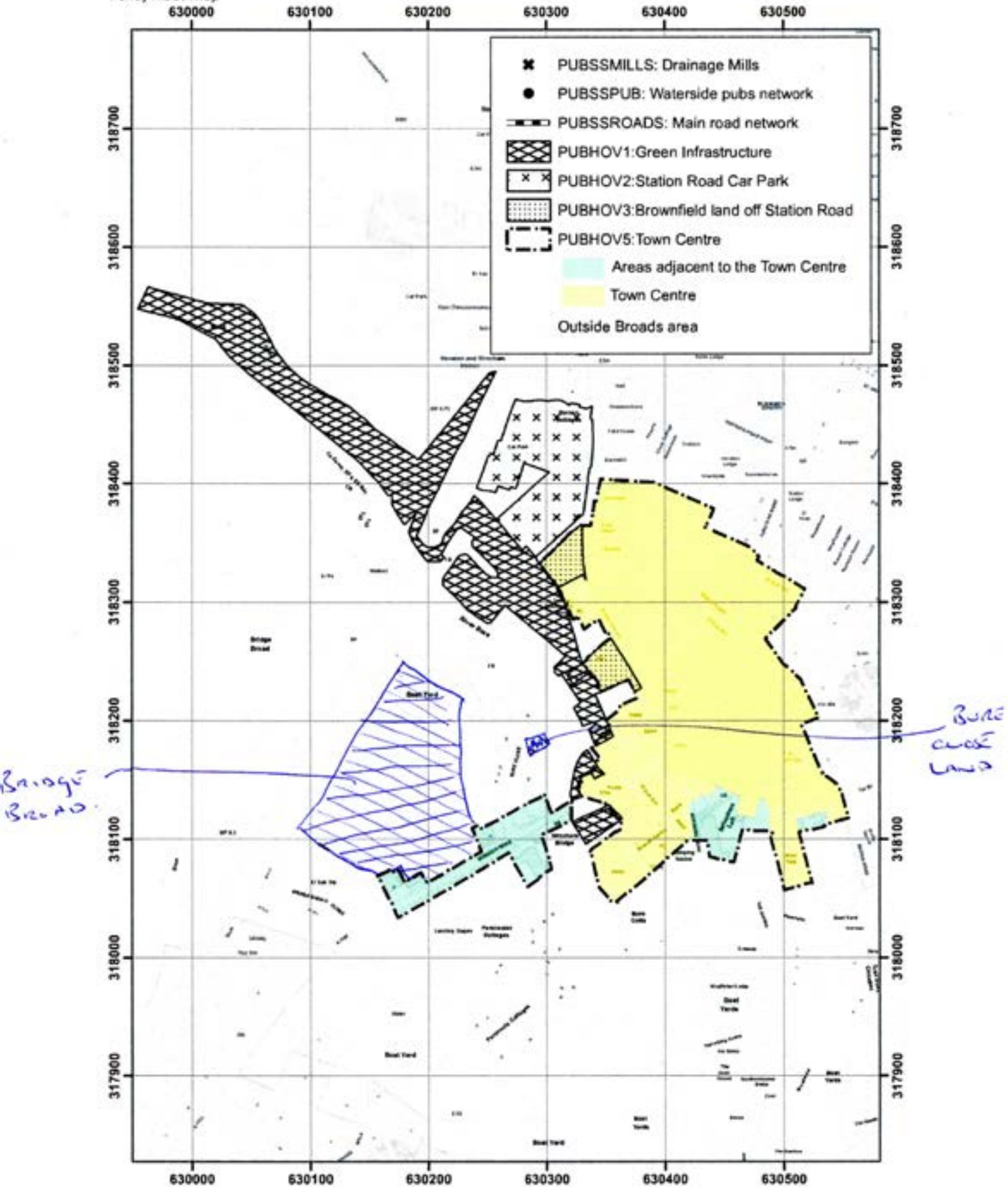
- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Please sign and date this form:

Signature: Clare Male

Date: 12/01/18

The closing date for responses is 4pm 5 January 2018



Respondent: Yallop, L

Lottie Carlton

From: Louisa Yallop [REDACTED]
Sent: 07 January 2018 12:00
To: Planning Policy Mail
Subject: Yallop, L

Categories: Waiting information, Ack and Filed

Dear Natalie Beal

Thank you for your letter of 5th January. I live at [REDACTED]

I would generally support the application for residential moorings because I feel it is a sustainable and low impact way to live.

There were some problems last year with anti-social behaviour from un-offical live-aboards so obviously it would be a concern if the application was connected to those individuals.

Best wishes
Louisa Yallop