

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?					Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:					Open-Ended Response	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?	Date:	
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broad-roads-authority.gov.uk.	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Open-Ended Response	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:
Fiona Husband	pacific cruisers				PUBDM26				No	No	Correct - not positively prepared	Correct - not justified	Correct - not necessary	No, not consistent with National Policy		OBJECTION IT IS NOT NECESSARY TO LABEL THIS SECTION OF LAND HERE IN CHEDGRAVE AS SETTLEMENT FRINGE. WE HAVE PLENTY OF LABELS & DON'T NEED AN ADDITIONAL LABEL AS FAR AS LANDSCAPE GOES, ANY GREEN AREA HAS TREES PLANTED BY THE LANDOWNERS - MOST OF WHICH ARE NOT NATIVE SPECIES. I WOULD HAVE THOUGHT YOU SHOULD BE CONCERNED WITH THE AREAS THAT ARE NOT PART OF THE SETTLEMENT. THE DISTANCE FROM BRIDGE STREET IN LODDON IS NOT RELEVANT. OUR SITES HAVE BEEN HERE A LOT LONGER THAN MOST OF THE CLOSER SITES TO BRIDGE STREET INCLUDING LODDON QUAY. WE ARE NOT ON THE FRINGE OF CHEDGRAVE, WE ARE WELL AND TRULY CHEDGRAVE AND AGAIN BEEN HERE BEFORE LONGER THAN MUCH OF THE DEVELOPMENT IN CHEDGRAVE. The character of the land nominated does not meet with the character definition of what the policy is seeking to protect (pages attached). Much of the area designated is already fully developed and there is no formal specific site justification for the site designation. The remaining undeveloped sections are already designated as Priority Habitat: Deciduous Woodland and Lowland Fen and all lie within Flood Zones 2 and 3. Therefore, it is not necessary to have yet another designation. This is all private land and most trees have been planted over the years by the landowners. It is and has been for many years complete settlement. It is part of the settlement. The gardens and land are already have restrictions though I believe our government would be most happy for development here - in fill I believe it's called. The boatyards have always used the land for storage of boats, general storage and customer cars. These commercial businesses have been very important to the local economy. We would suggest that a site visit rather than an aerial photograph to establish landscape designation to be the way forward. This area should not be designated as Settlement Fringe and is not Settlement Fringe as outlined within the character definition of the policy. Settlement Fringe in this area should be the marshes. I strongly feel that the Broads Authority are unnecessarily adding an extra label to our land. It is not comparable to Acle Recreation Centre and such. It was purely by chance that I learned of this landscape designation which just isn't good enough. You have caused us to spend a lot of time and money on this and over the years, in particular, with the Local Green Space objection. This needs to stop. The online form is way too difficult to complete and not clear at all. This section of Chedgrave under Settlement Fringe is not necessary.	No	Because we were not made aware of this which I feel we should have been quite easily. Our private land does not need any landscape designation.	The Chedgrave area of Settlement Fringe should be removed and I recommend looking into other areas off Settlement Fringe covering private developed property	Yes	Yes	26/09/25
Dickon Povey	East Suffolk Council				Policy PUBDM1: Major Development in the Broads				Yes	No				Y		Minor change proposed to para 1 as All sites over 10 dwellings or 0.5ha will definitely be major dev. Para 1 should be amended to reflect this, in line with national policy.	No	Only noticed in this version of the plan	Amend para 1 to say: 'Major development' may include the development of sites over 10 dwellings or larger than 0.5 hectares but is not restricted to that...'	No	Yes	26/09/2025
Dickon Povey	East Suffolk Council				Policy PUBDM20: Energy demand and performance of new buildings (including extension s)				Yes	No				Y		the Written Ministerial Statement of 13 December 2023 requires energy efficiency standards to be an uplift of dwelling target emission rate (TER). Point 5 of the proposed policy uses the term "predicted energy requirements". This should be amended to reflect national policy.	Yes		That Target Emission Rates should be specified in accordance with the Written Ministerial Statement.	No	Yes	26/09/2025
Dickon Povey	East Suffolk Council				Policy PUBSP2: Strategic flood risk policy				Yes	No				Y		It is not entirely clear what is meant, in criterion 3, by 'adverse impacts on flood risk management'. Is this a reference to existing flood risk defences? This should be re-worded to remove ambiguity.	Yes		These part of the policy should be re-worded to provide clarity over the meaning of 'adverse impacts on flood risk management'.	No	Yes	26/09/2025
Dickon Povey	East Suffolk Council				Policy PUBDM17: Mitigating Recreational Impacts				Yes	No				Y		The current Suffolk Coast RAMS highlights the need to keep the strategy under regular review. To improve accuracy, the text should clarify that the requirement will apply under future iterations of the strategy.	No	Only identified in this version of the plan	The following text is added to the end of the final sentence "...which are identified within the following strategies and Zones of Influence (ZOI) (or subsequent iterations):"	No	Yes	26/09/2025
Dickon Povey	East Suffolk Council				Policy PUBDM43: Affordable housing				Yes	No				Y		Part 5 (requirement for BNG to be onsite) appears to conflict with part 6 (delivery of offsite BNG). This should be resolved to remove ambiguity.	No	Only identified in this version of the plan	The criteria 5 and/or 6 are re-worded to clarify the position on off-site provision of BNG	No	Yes	26/09/2025
Dickon Povey	East Suffolk Council				Policy PUBDM43: Affordable housing				Yes	No				Y		There does not appear to be any mention of the East Suffolk Council Affordable Housing Supplementary Planning Document. This should be referenced to improve accuracy.	Yes		Add reference to the East Suffolk Council Affordable Housing Supplementary Planning Document.	No	Yes	26/09/2025
Dickon Povey	East Suffolk Council				Policy PUBDM15: Natural Environment				Yes	No				Y		The overall approach set out in this policy is supported. However, we provide comments on some of the detailed points to improve accuracy and comply with national policy.	Yes		Reference is made to a Local Nature Recovery Network within the Local Nature Recovery Strategies. Within the strategy for Suffolk, this 'network' is not mentioned. What exactly is this policy referring to? This should be clarified. We recommend removing the text in brackets in part 7 "(which is not also subject to an international designation)", as even where a SSSI wholly overlaps a Habitats Site it can have different reasons for designation which would not be specifically picked up in a Habitats Regulations Assessment (which would specifically focus on assessing impacts on Habitats Sites features). Not all Brownfield Sites meet the criteria to be considered as 'open mosaic habitat on previously developed land'. This paragraph should be amended to clarify this.	No	Yes	26/09/2025
Dickon Povey	East Suffolk Council				Section 30.1				Yes	No				Y		East Suffolk Council confirms that the position with respect to housing need remains the same as we set out in our letter to the Broads Authority dated 20th May 2025. With respect to the plan itself, in our view, it is not sufficiently clear that the former Pegasus site (PUBOUL2) is excluded from the housing need figure. Furthermore, it is not sufficiently clear that sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers.	Yes		Add text to provide clarity that Pegasus site (PUBOUL2) is excluded from the housing need figure. Add text to clarify that sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers set out in the plan to be planned for over the plan period but will nevertheless make a contribution to housing supply. 3rd paragraph: add the site names to the reference numbers to improve the clarity of the plan.	No	Yes	26/09/2025
Dickon Povey	East Suffolk Council				Policy PUBSP5: Biodiversity				Yes	No				Y		Protected species should be referenced in criterion 2 b) for completeness and to comply with national policy	No	Only noticed in this version of the plan	Criterion 2 b) should include reference to protected species	No	Yes	26/09/2025

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?				Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:				Do 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.	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?				
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broadwaters-authority.gov.uk.	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Open-Ended Response	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:
Tessa Saunders	Anglian Water Services				Policy PUBWH11 : Whittingham Country Park plus adjacent land				Yes	Yes		Yes			N/A	Anglian Water supports the policy approach – particularly the reference to safeguarding our existing assets within the country park.	Yes		N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBTHU1 : Tourism development at Hedera House, Thurne				Yes	No		Yes			N/A	Anglian Water does not have a sewerage network in Thurne, and therefore existing properties will be served by private wastewater treatment systems such as septic tanks or package treatment plants. Clause 1.iv) would require modification to be consistent with Policy PUBDM5 with regard to wastewater disposal, where it is not feasible to connect to the mains sewer. Similarly, the constraint listed in the supporting text regarding capacity issues at Ludham-Walton Hall WRC is not relevant.	No	An oversight in reviewing the policies.	Clause 1.iv) would require modification to be consistent with Policy PUBDM5 with regard to wastewater disposal, where it is not feasible to connect to the mains sewer. Similarly, the constraint listed in the supporting text regarding capacity issues at Ludham-Walton Hall WRC is not relevant.	No	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBCAN1 : Cantley Sugar Factory				Yes	Yes					N/A	Anglian Water supports criterion 2(n) regarding water efficiency and re-use. We would recommend that this is cross referenced to Policy PUBDM31 for consistency. We also welcome reference to our existing water main within the site in criterion 2(o).	Yes		N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM5 : Non-residential development and BREEAM				Yes	Yes					N/A	Anglian Water supports this policy regarding the "Water efficiency" requirements of the BREEAM water calculators which align with our recommended approach in the Shared Standards for Water Efficiency in Local Plans (see our commentary under Policy PUBDM7). However, it might be more relevant to include these requirements in PUBDM7 or PUBDM31 for consistency. https://www.anglianwater.co.uk/sites/assets/developers/new-content/p-c/shared-standards-in-water-efficiency-for-local-plans.pdf	Yes		N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM5 2: Design				Yes	Yes					N/A	Anglian Water supports the policy aims for design particularly those that relate to safeguarding on site utilities infrastructure, sustainable design including water efficiency measures, and flood risk and resilience. This reflects our comments on similar policy themes.	Yes		N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM4 6: New residential moorings				Yes	Yes					N/A	Anglian Water agrees that proposals for residential moorings should have adequate access to pump out facilities that connect to the main sewer (and available headroom at the receiving WRC) consistent with the requirements in Policy PUBDM5 – unless there are alternative private treatment facilities in locations that are not within a reasonable distance to connect to the mains sewer.	Yes		N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBSP15: Residential development				Yes	Yes					N/A	Anglian Water agrees with the aims of the policy and the need to be consistent with other policies in the plan. We acknowledge that the statement in the supporting text that "Development within settlements will be permitted only where it meets criteria covering issues such as flood risk, satisfactory provision of infrastructure, and design", would address our key concerns around flood risk, infrastructure capacity, and resilience over the longer term.	Yes		N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM4 Or Moorings, mooring basins and marinas				Yes	Yes		Yes	Yes		N/A	Anglian Water agrees that proposals for moorings, particularly permanent moorings, should have adequate access to pump out facilities that connect to the main sewer (and available headroom at the receiving WRC) consistent with the requirements in Policy PUBDM5 – unless there are alternative private treatment facilities in locations that are not within a reasonable distance to connect to the mains sewer.	Yes		N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM3 1: New employment development				Yes	Yes		Yes	Yes		N/A	Anglian Water considers the policy sound in principle, and supports the policy requirement 1(j) in relation to non-household developments and non-domestic water requirements, which reflects our submission to the Preferred Options Local Plan consultation in 2024. However, our Non-Domestic Water Requests Position Statement has subsequently been updated (December 2024) such that any requests for non-domestic water that exceed 20m3/day will be declined, in order to protect existing supplies and the environment. Consequently, we will no longer require a Water Resources Assessment to be submitted for non-domestic water requests, as it is now a binary decision on whether the request is equal to or less than 20m3/day, or greater. Furthermore, the non-domestic water requirement may not only apply to major development, as it is rather the type of business, not necessarily the scale.	No	New emerging evidence since the last representation to the Local Plan - https://www.anglianwater.co.uk/sites/assets/developers/new-content/p-c/laws-non-domestic-demand-policy-smv2.pdf	We recommend the policy is amended to state: j) non-household developments that require significant non-domestic water use need to undertake early discussions with the relevant water company (Anglian Water or Essex & Suffolk Water) to ascertain water availability and feasibility of their scheme, and also demonstrate how they will reduce water demand;	No	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM2 5: Utilities infrastructure development				Yes	No		Yes	Yes		N/A	Whilst the reasoned justification states that the policy applies to telecommunications, electricity, gas and water infrastructure, we would suggest that the wording is more appropriately assigned to telecommunications and electricity infrastructure, which is often above ground. Anglian Water assets include underground sewers and water mains, in addition to sewage pumping stations, water recycling centres and water treatment works above ground. New infrastructure is likely to be related to new development, or provision of public sewerage networks (first time sewerage schemes) to areas currently served by septic tanks, in order to improve water quality issues. The natural beauty and biodiversity importance of The Broads is recognised, and it is considered that other policies in the Plan would be sufficient to guide new water/sewerage infrastructure, where planning permission is required. The requirement to remove any utilities equipment when it is redundant is too generic when applied to all utilities infrastructure, particularly when many of our assets are underground. However, in the context of The Broads as a designated landscape it is understandable in relation to telecommunications masts for example.	Yes		We would suggest that the purpose of the policy is either solely related to electricity and telecommunications networks or that criteria in the policy are split between those that are generic to all utility infrastructure and those specifically related to electricity and telecommunications networks.	No	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM1 8: Mitigating Nutrient Enrichment Impacts				Yes	Yes					N/A	Anglian Water recognises the need for an appropriate policy to address nutrient neutrality requirements of the designated sensitive catchment. We welcome the reference to the appropriate section of the Levelling Up and Regeneration Act with regard to nutrient removal at nutrient significant plants (our WRCs serving a population equivalent of 2,000 or more) within the catchment areas, which will be progressed during AMP8 (2025-2030).	Yes		N/A	I am not seeking changes	Yes	26/9/2025

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?					Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:					Open-Ended Response	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?		
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk .	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:	
Tessa Saunders	Anglian Water Services				Policy PUBDM1: Green and blue infrastructure and Public Rights of Way				Yes	Yes					N/A	Yes		Anglian Water welcome the policy aims to support the delivery of green and blue infrastructure and alignment with the emerging Local Nature Recovery Strategies for Norfolk and Suffolk. We also support the reference to new green and blue infrastructure incorporating SuDS as part of the multi-functional benefits that can be provided.	N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM9: Surface water run-off				Yes	Yes					N/A	No		Anglian Water supports policy to ensure all development proposals follow the drainage hierarchy for surface water. Discharge to a combined sewer will only be agreed in very exceptional circumstances, which are set out in our surface water risk management guidance which can be found here. We recommend that it might be helpful to reference our new guidance with additional sources of information in the supporting text. Anglian Water will seek to separate any surface water from any new developments to relieve the existing pressures and treatment requirements. It should be made clear in the policy or supporting text that no surface water flows will be accepted into the foul drainage network. The misconnection of surface water sources into our foul drainage network is the main contributor to hydraulic overloading, leading to spills and pollution events. See our Pollution Incident Reduction Plan 2025 for further information. Clause 2: Anglian Water agrees that betterment should be sought and encouraged particularly on brownfield sites, or on any site which could provide betterment for surface water flooding issues experienced more locally. Furthermore, we agree that run-off rates need to be agreed with Anglian Water, as the sewerage undertaker, where connections to our network are required. https://www.anglianwater.co.uk/corporate/strategies-and-plans/pollution-incident-reduction-plan/	It should be made clear in the policy or supporting text that no surface water flows will be accepted into the foul drainage network.	No	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM8: Development and flood risk				Yes	Yes					N/A	Yes		Anglian Water supports the policy approach to ensure that new development follows national policy and guidance. The Environment Agency's release of NaFRA2 provides the most up to date information to inform sustainable and resilient growth in The Broads Executive Area.	N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBSP2: Strategic flood risk policy				Yes	Yes					N/A	No		Anglian Water supports the approach of this strategic policy and welcome the inclusion of climate change allowances, when taking account of flood risk in new development proposals. We agree that SuDS should be the principal method of mitigating surface run-off in accordance with the drainage hierarchy. NOTE: Clause 4 lists the risk management authorities that would be consulted in relation to managing flooding risks. Anglian Water is also a Risk Management Authority, as identified in the Flood and Water Management Act 2010, in respect of managing the risk of flooding to water supply and sewerage facilities, and flood risks from the failure of infrastructure. We work with developers to assess the risk of new development connecting to our networks and provide guidance to assist with managing surface water flood risk. https://www.anglianwater.co.uk/sitesassets/developers/development-services/aws-surface-water-guide-sm.pdf	N/A	I am not seeking changes	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM7: Water efficiency and re-use				Yes	Yes					N/A	Yes		Anglian Water considers the policy is SOUND in principle, however, with the publication of the Shared Standards for Water Efficiency in Local Plans, we are now advising local planning authorities to introduce tighter water efficiency standards using the evidenced approach. Given The Broads Local Plan is at an advanced stage, we are mindful that the Shared Standards represents a step change, but the Shared Standards would provide the evidence required to support the policy specification "any higher standards established ... locally". The Shared Standards for Water Efficiency in Local Plans was published in June 2025. These Shared Standards set out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. We recommend that LPAs include Local Plan Policies that: <ul style="list-style-type: none"> Require new homes to be built to more stringent standards for water efficiency than the optional Building Regulations (part G) standard of 110 litres per person per day (l/p/d). Evidence indicates that a design standard of up to 85 litres/person/day (l/p/d) for residential developments is feasible. Require new, extended or redeveloped non-domestic development to aim to achieve full credits in the BREEAM water calculator. Require new major non-domestic developments to include water saving measures and water reuse in their design. These standards provide guidance and local evidence to help LPAs make a case that more stringent water efficiency policies are justified, feasible and viable as part of Water Cycle Studies and Integrated Water Management Plans that effectively manage a range of challenges across the water environment and aid nature recovery. Local Plans have a significant role in helping to deliver the sustainable use of water resources and address shorter-term water scarcity issues. LPAs can help ensure the risk of harm to habitats and deterioration to water bodies due to water scarcity is minimised by setting more ambitious, tighter water efficiency standards for new residential and non-domestic developments in local planning policy. It is considered that a modification to Policy PUBDM7 can help make development in The Broads more water efficient and allow sustainable growth, whilst longer term water supply solutions are being developed/implemented. As well as managing risks to the environment, tighter water efficiency measures may also reduce the need for water companies to restrict supply for non-domestic growth, alongside other initiatives. It is recognised that the Broads Local Plan is at an advanced stage in its preparation, but this consultation provides an opportunity to include a tighter water efficiency standard that can be justified by evidence set out in the annex supporting Shared Standards. The evidence is extensive and demonstrates, inter alia, that:	Policy PUBDM7: Water efficiency and re-use 1. All new/replacement/converted dwellings (including holiday/visitor accommodation and residential ancillary accommodation) will be designed to have a water demand equivalent to 90 litres per head per day of mains supplied potable water, or any tighter water efficiency standard subsequently established nationally through Building Regulations Part G. Measures to reduce water demand further will be encouraged and supported. 2. All new/replacement/converted or extended buildings are required to incorporate greywater recycling and rainwater harvesting unless it is not feasible to do so. 3. Washing up provision and toilets and showers associated with camping, caravanning and glamping sites are required to be designed to include water efficient fittings. 4. All new/replacement/converted non-domestic buildings are required to be designed to be water efficient and should aim to achieve full credits within the 4 water categories (WAT01, WAT02, WAT03, and WAT04) under the BREAAM standard, with a minimum score of 3 credits within WAT01 Water Consumption. 5. Planning applications need to include sufficient detail as to the intended standard and set out the measures to be incorporated to enable compliance.	No	Yes	26/9/2025
Tessa Saunders	Anglian Water Services				Policy PUBDM7: Water efficiency and re-use				Yes	Yes					N/A	Yes		*The Water Resource Management Plans (WRMPs), prepared by water companies, in the Shared Standards area demonstrate that there are significant challenges in meeting predicted domestic and non-domestic growth in water demand whilst also meeting statutory environmental obligations. There are non-domestic water restrictions in both Anglian Water and Essex & Suffolk Water areas which are referenced in the supporting text to Policy PUBDM7. *Water efficiency is needed for protected sites and wider nature recovery. Of the 239 SS5s in the Shared Standards area, 96 at time of writing, have water abstraction identified as an active pressure. Many have measures in place to address these pressures linked in many cases to the plan-led approach. The Shared Standards complement or support the delivery of those measures. The Norwich and the Broads water resource zone (WRZ) is identified as one of the WRZs with deterioration risk as a result of abstraction pressures. *It present it is feasible to achieve a total consumption of 85 l/p/d by taking a fittings-based approach using product types outlined in the Shared Standards Annex C - Section C2, which can be achieved at relatively low cost. In addition, water companies offer incentives to developers to build water efficient homes. These are tied into water company Business Plans that are published every five years, with the latest being published in 2025 alongside WRMPs. For example, Anglian Water offer a £500 incentive for residential properties that achieve a water efficiency standard of 90 l/p/d which would be within the shared standards water efficiency parameters of 85-95 l/p/d suggested for Local Plan policies. These incentives can support the viability of delivering water efficiency measures. Based on the Shared Standards introducing a 'locally established water efficiency standard', Policy PUBDM7 could be modified to reflect the recommendations in the Shared Standards. Whilst the overall level of development in The Broads is low, it is considered the evidence set out in the Shared Standards is clear that tighter water efficiency standards are necessary for sustainable growth and nature recovery, which supports the National Park purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the Parks, and the long term vision and fundamental principles for the Broads National Park in the Broads Plan 2022-2027.	See above	No	Yes	26/9/2025

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?					Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:					Do 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.	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?		
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk .	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Open-Ended Response	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:
Tessa Saunders	Anglian Water Services				Policy PUBDM5: Water quality and foul drainage				Yes	Yes					N/A	Anglian Water supports the policy approach in terms of the need to demonstrate adequate foul drainage and adequate sewage provision is available to accommodate wastewater flows from new development, including residential moorings with associated pump-out facilities. This approach aligns with similar policies in other Local Plans across our region. Anglian Water advises developers to seek early engagement on their proposals for wastewater connections. For example, we may require a sustainable point of connection to our network, particularly where a site may trigger a number of risks - such as pollution risks and CSO spills, surcharges of our network, existing flood potential and excess surface water flooding. We welcome the supporting text which encourages developers to undertake pre-planning engagement. We endorse the policy requirement regarding Horning Knackers Wood water recycling centre (WRC) and the explanation in the supporting text. Work has been completed to bring the WRC into permit compliance for dry weather flow. However, this will require monitoring to assess whether the specific constraints and challenges in the WRC catchment have been successfully mitigated by this investment. Anglian Water has provided The Broads Authority with details of capacity at our WRCs for the residential allocations within the Local Plan. Our investment during successive 5-year asset management periods (AMPs) must remain within the limits as approved in our final determination from Ofwat. We are currently in the process of preparing our next Drainage and Wastewater Management Plan (DWMP) which will assess numerous factors, including forecasted growth in all 1,100 of our WRC catchments and review our risk of compliance performance against the discharge permit (as issued by the Environment Agency). We work with the Environment Agency to prioritise those catchments where investment in additional treatment capacity is required and to secure funding for this from Ofwat via the Price Review process.	No		N/A	I am not seeking changes	Yes	26/09/2025
Mr Michael Priaux	Swifts Local Network: Swifts & Planning Group		Mr Michael Priaux (Chair)		PUBDM15				Yes	No			Not effective		Supportive of this policy especially the requirement for "...at least one integral bird box..." clause on page 116 which implements the NPPG guidance, but to ensure fully sound and effective please add "(e.g. swift brick)" as this is how NPPG Natural Environment 2025 paragraph 017 refers to them. Swift bricks are a universal nest brick for small bird species as set out in the NPPG, and the only type that meets BS 42021, so there is no need for other types of integral boxes. Please add "with reference to best-practice guidance such as BS 42021 or equivalent" after "case-by-case basis" to ensure fully sound and effective and ensure suitable numbers and locations specified and installed. https://www.gov.uk/guidance/natural-environment	Yes	Has only become relevant following addition of this clause (which is broadly positive text but could be improved).	Supportive of this policy especially the requirement for "...at least one integral bird box..." clause on page 116 which implements the NPPG guidance, but to ensure fully sound and effective please add "(e.g. swift brick)" as this is how NPPG Natural Environment 2025 paragraph 017 refers to them. Swift bricks are a universal nest brick for small bird species as set out in the NPPG, and the only type that meets BS 42021, so there is no need for other types of integral boxes. Please add "with reference to best-practice guidance such as BS 42021 or equivalent" after "case-by-case basis" to ensure fully sound and effective and ensure suitable numbers and locations specified and installed. https://www.gov.uk/guidance/natural-environment	No	Yes	26/09/2025	
Tessa Saunders	Anglian Water Services				PUBDM3: Pollution and Hazards in development and protection of environmental quality				Yes	Yes					N/A	Anglian Water is supportive of the policy requirements, specifically clause 3(c) which should ensure that new development is not sited close to any existing hazards or existing sensitive development. Anglian Water provides guidance on asset encroachment for our water recycling centres (WRCs) and sewage pumping stations to ensure developments provide a suitable buffer between sensitive receptors and our assets to avoid adverse impacts due to odour or noise - so the 'agent of change' principle is appropriately addressed. https://www.anglianwater.co.uk/developing/planning-capacity/asset-encroachment/	No	N/A	N/A	I am not seeking changes	Yes	26/09/2025
Mark Behrendt	Home Builders Federation				Policy PUBDM5 7: Fibre to the Premises (FTTP)				Yes	No				Not consistent with national policy		Firstly, it is not for the developer to ensure that there is FTTP available for the development. This is for the provider of those services to schedule and deliver and development should not be delayed where this is not available. With regard to connections within the development the Council are no doubt aware of the new part 8 of the Building Regulations: Physical Infrastructure and network connections to new dwellings was published in 2022. These improved regulations require all new build dwellings to be installed with the gigabit-ready physical infrastructure connections subject to a cost cap of £2,000 per dwelling. As such it is unnecessary for the Council to include DM57 in the local plan and it should be deleted.	No	Missed consultation	Delete policy	Yes	Yes	26/09/2025
Mark Behrendt	Home Builders Federation				Policy PUBDM4 3: Affordable housing				Yes	No				Not justified		This policy requires new development to meet the requirements for affordable housing policy as set out in the local plan for the relevant district - between 25% and 33%. However, it is notable that the viability assessment on the local plan notes at paragraph 5.11 that 33% affordable housing was only viable for older people's accommodation to provide at waterfront locations. No evidence is provided as to what an appropriate level of affordable housing might be in such locations for this typology and as such HBF would recommend that specialist housing for older people in non waterfront locations is not required to make a contribution for affordable housing. This could be set out in DM43 or DM48.	No	Missed consultation	See above	Yes	Yes	26/09/2025
Mark Behrendt	Home Builders Federation				Policy PUBSP15: Residential development				Yes	Yes					Not justified	The housing requirement of 1,077 homes over the plan period 2021 to 2042 has been calculated using a different methodology to that required by national policy for areas outside of the Broads Authority and other national parks. HBF recognise that the BA can use an alternative locally derived method as set out in paragraph 2a-014 of PPG. However, it also states that in taking these considerations such authorities must take into account the best available evidence on housing stock as well as local house prices, earnings and housing affordability. Given the latest standard method is a stock based approach housing needs HBF would have expected some consideration given to the housing stock in Broads Authority and whether the proposed requirement provides a sufficient boost to housing supply.	No	Missed consultation		Yes	Yes	26/09/2025
Mark Behrendt	Home Builders Federation				Policy PUBDM2 0: Energy demand and performance of new buildings (including extension)				Yes	No				Not consistent with national policy		HBF recognises that the Planning and Energy Act 2008 allows local authorities to set policies in their local plans that require development to achieve higher standards than those set out in building regulations. However, it must be noted that written ministerial statement (WMS) on local energy efficiency standards published on the 13th of December 2023 states that "Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes" and that local standards can "add further costs to building new homes by adding complexity and undermining economies of scale". After noting these concerns, the 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures: "that development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. "The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). Given that the FHS will be introduced in the very near future and will require all new homes to be Zero carbon ready HBF do not consider it necessary for policies to be included in local plans that go beyond current standards. The Council state that there is no guarantee that this will be implemented however Ministers have confirmed that the Future Homes Standard will be published this autumn (https://www.gov.uk/government/news/rooftop-solar-for-new-builds-to-save-people-money). However, we recognise the concern created by the delay and as such recommend that the 10% improvement in energy be applied to those homes built under part L of the 2021 building regulations to allow improvement in energy efficiency ahead of the introduction of the FHS.	No	Missed consultation	See above	Yes	Yes	26/09/2025
Mark Behrendt	Home Builders Federation				Policy PUBDM1 6: Biodiversity Net Gain				Yes	No				Not consistent with national policy		Part 1a of this policy states it will seek to secure nature recovery and biodiversity net gain by "Applying the principles related to the biodiversity hierarchy, Sites of Special Scientific Interests (SSSI) and Irreplaceable habitats set out in national planning policy. In Castle Point, ancient woodlands are considered to constitute irreplaceable habitats". HBF are concerned that in putting consideration of the biodiversity hierarchy alongside the consideration of irreplaceable habitats the will create confusion in the application of this policy. The delivery of BNG is a separate and different consideration to those related to protected species and habitats and should be kept separate within policies. HBF would therefore recommend that mention of the biodiversity hierarchy is removed from part 1a. HBF does not consider the requirement in 2d for development on greenfield sites to deliver 20% BNG to be sound. Guidance in paragraph 74-006-20240214 of PPG states that: "...plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented". As such the starting point is that local plan should not seek a higher requirement. This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified, and the HBF would argue that it should be considered a high bar with regard to the evidence required to justify such a policy. There must be very robust evidence that the area is significantly worse than the country as a whole with regard to the negative impacts on biodiversity from development.	No	Missed previous consultation	The requirement to provide a 20% increase in BNG should be reduced to the statutory minimum of 10%	Yes	Yes	26/09/2025

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?					Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:					Open-Ended Response	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?	
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk.	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:
Mark Behrendt	Home Builders Federation				Policy PUBDM16: Biodiversity Net Gain				Yes	No		Not justified		Not consistent with national policy		No	Missed previous consultation	The requirement to provide a 20% increase in BNG should be reduced to the statutory minimum of 10%	Yes	Yes	26/09/2025
Kim Balls	Great Yarmouth Borough Council				PUBSSA47				Yes	Yes					Yes. No issues.	No		N/A	I am not seeking changes	Yes	26/09/2025
Kim Balls	Great Yarmouth Borough Council				PUBSSTRACKS				Yes	Yes					Yes. No issues.	No		N/A	I am not seeking changes	Yes	26/09/2025
Kim Balls	Great Yarmouth Borough Council				PUBTHU1				Yes	Yes					Yes. No issues.	No		N/A	I am not seeking changes	Yes	26/09/2025
Kim Balls	Great Yarmouth Borough Council				PUBORM1				Yes	Yes					Yes. No issues.	No		N/A	I am not seeking changes	Yes	26/09/2025
Kim Balls	Great Yarmouth Borough Council				PUBGY1				Yes	Yes					Yes. No issues.	No		N/A	I am not seeking changes	Yes	26/09/2025
Kim Balls	Great Yarmouth Borough Council				PUBFLE1				Yes	Yes					Yes. No issues.	No		N/A	I am not seeking changes	Yes	26/09/2025
Kim Balls	Great Yarmouth Borough Council				PUSP15				Yes	Yes					Yes. No issues.	No		N/A	I am not seeking changes	Yes	26/09/2025
Kim Balls	Great Yarmouth Borough Council			8.1 - 8.2					Yes	Yes					Yes - no issues	No		N/A	I am not seeking changes	Yes	26/09/2025
Nicola Ledain	Somerton Parish Council	7		all					Yes	Yes					The plan is sound.	Yes	n/a	not seeking changes	I am not seeking changes	Yes	25/09/2025
Steven Gray	None				PUBDM26		17		No	No	Yes - not positively prepared	Yes - not justified	Yes - not effective, not necessary	Not consistent		No	Only now aware of this, should this not be more public?	Given the existing protections, the developed nature of the area, and its economic and community value, the designation as Settlement Fringe is unjustified. I respectfully request that this site be excluded from the proposed designation.	No	Yes	25/09/2025
Mrs Lynda Cressy	Gale Cruisers				PUBDM26		17		No	No	Correct	Correct	Correct	No		No	We have not been consulted as usual it seems a lot of the time decisions are made about our properties with out our knowledge. I only found out by my neighbour	Not seeking changes to property in question as a added suggestion this form is not that easy to understand it needs to be more informative in plain English	No	Yes	25/09/2025

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?							Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:					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.	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?	
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk.	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Open-Ended Response	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:	
Tom Wignall	Avison Young on behalf of National Gas Transmission				PUBDMS 2			24-09 National Gas (emailed separately to planning policy)	Yes	Yes	Yes	Yes	Yes	Yes		N/A	Yes		N/A		I am not seeking changes	Yes	24/09/2025
Trustees 1971 Settlement	Somerleyton Estate	N/A - Not a group	N/A		Policy PUBSOM 1 - Somerleyton Marina Residential Moorings				Yes	Yes					We did not answer no	Broads Authority Local Plan Representations Policy PUBSOM1 Somerleyton Marina Residential Moorings Client: The Somerleyton Estate Content Amendment Record This report has been issued and amended as follows: IssueRevisionDescriptionDateSigned 100raft13.09.2508 100reviewed13.09.2508M Reference: E374.C1.Marina.2025.Rep01 Disclaimer The copyright in this report prepared by Evolution Town Planning Ltd is owned by them and no such report, plan or document may be reproduced, published or adapted without their written consent. Complete copies of this report may however be made and distributed by the Client in dealing with matters related to the brief. The information given in this report is solely for the use of the Client noted above. Evolution Town Planning Ltd can accept no responsibility or liability to any third party. The benefit of this report is not transferable to any third party except with the written agreement of the original Client and of Evolution Town Planning Ltd. An extra fee will be payable for such a transfer. 1.0Introduction 1.1These representations have been made on behalf of the Somerleyton Estate and support the allocation of 15 residential moorings at the Somerleyton Marina set out in Policy PUBSOM1 of the new Broads Local Plan. 1.2The Estate is a significant local business employing a large number of local people and is centred on Somerleyton village. Its activities cover agriculture, residential property, tourism, and commercial property. The Estate owns the Marina and its aim is to improve the boatyard and Marina, and to support a range of different types of moorings in the Marina. New income from residential moorings will help the Marina boatyard, which is an important local business, to flourish. 1.3The background is that the Marina came up for sale in 2012 and was bought by the Estate. The Estate has a longstanding policy of supporting traditional local businesses in the area. The Marina has long been an active part of Somerleyton village, providing a boatyard, serving local boats and moorings. For thirteen years, the Estate has run a successful boatyard and around 100 moorings at the Marina. The Estate has been paying off the borrowings needed to purchase the Marina and, now the borrowing have been paid it is able to invest in and improve the Marina, starting with introducing residential moorings. 2.0Planning History 2.1The Marina is already allocated for 10 residential moorings in the current Broads Local Plan, and the Estate has submitted a planning application for residential moorings reference BA/2024/0454/FUL. This application is close to being approved. Final comments from the Environment Agency have been addressed informally, and the Council is waiting for their formal comments before approving the application. 2.2It was discussed with the Local Planning Authority (LPA) whether to apply for 15 moorings in the current planning application, however the advice received was to wait for the new Local Plan to be adopted before applying for more than 10 moorings. 2.3The current application is for 9 residential moorings as this number limits the Section 106 (S106) contributions required which start at 10 moorings. The residential moorings will require investment in new pontoons before they can be installed which has to be done at the outset. Delaying S106 contributions until after this work has been completed helps the viability of the project. It is proposed to apply for a further 6 moorings when the Local Plan is adopted.	Yes		Not seeking changes		I am not seeking changes	Yes	24/09/2025
Trustees 1971 Settlement	Somerleyton Estate	N/A - Not a group	N/A		Policy PUBSOM 1 - Somerleyton Marina Residential Moorings				Yes	Yes					We did not answer no	3.0Site Description 3.1The Somerleyton Marina and boatyard are located between Somerleyton village and the River Waveney. The Lowestoft railway line runs to the south and west. The site is accessed via a roadway that leads from the village at the junction of Slugs Lane and The Street. 3.2The vehicular access leads down a slope to the edge of the Marina and boatyard and enters the marina at a car parking area. To the south of the marina is a building of around 775 square metres, and a smaller building of around 90 square metres which are the base for the boatyard. Around these buildings are outside storage areas for boats. 3.3A channel containing moorings and a slipway runs from the buildings in a westerly direction to where it opens out to the north to a basin where the residential moorings would be located. Further west from this channel, is the entrance to the River Waveney. A vehicular access runs alongside the southern part of the channel, and along the northern part of the channel, before running around the north of the mooring basin. Figure 3.1 - Somerleyton Marina 3.4The west of the marina is the River Waveney. The river is around 40 metres wide at the entrance to the marina. To the north along the river there are moorings alongside the river. To the south, the river goes under the swing bridge for the Lowestoft Railway Line. 3.5To the north and east of the marina is the village of Somerleyton with homes and the Dukes Head Pub. To the south, is a single house and woodland, and to the west is woodland and farmland. 4.0Somerleyton Estate 4.1There are a diverse range of activities on the Somerleyton Estate. The Marina and boatyard were bought by the Estate in 2012 after it was put up for sale by its previous owners who were the holiday company TUI. The Estate bought the business because it wanted to ensure that it remained viable, and remained an important amenity for the local area. The Estate has a long history of investing in local businesses including the Dukes Head Pub in Somerleyton. The Pub has been run by the Estate to ensure that it continued as a village amenity. The residential moorings would provide welcome custom for the pub. The Estate owns and runs the Fritton Lake Resort and Fritton Arms Pub which are a high-quality holiday resort. The Estate has a large farming business, and a portfolio of properties that are let to local people. The Grade II* Listed Somerleyton Hall and Gardens are owned and maintained by the Estate and are open to visitors. 4.2Somerleyton village has a primary school, employment opportunities and a rail and bus service. 4.3The various businesses on the Estate provide an income that maintains the Gade II* Listed Somerleyton Hall and gardens; they provide local employment, and to keep local skills alive such as those needed in livestock farming and boat building. The businesses are run with a strong environmental focus.	Yes		Not seeking changes		I am not seeking changes	Yes	24/09/2025
Trustees 1971 Settlement	Somerleyton Estate	N/A - Not a group	N/A		Policy PUBSOM 1 - Somerleyton Marina Residential Moorings				Yes	Yes					We did not answer no	5.0Residential Moorings 5.1The Residential Moorings would meet the demand for this type of home, in a sustainable location within a long-established Marina and boatyard. The Estate bought the Marina and boatyard to maintain the facility for the area. Now that the borrowings are paid off, the Estate will invest in the Marina and boatyard to ensure that these longstanding local businesses can thrive. This will support local boat building and local jobs and support the tourist industry. 5.2The Marina and boatyard already contain the facilities which are needed to support residential moorings. Several of the boats on land around the buildings are not used by their owners, and are not being maintained. The owners are being encouraged to remove them to free up space. There are more parking and outside areas than are required by the existing operations. Buildings are in place to provide storage. 5.3There are numerous employment opportunities nearby, in the boatyard itself on site, in the Dukes Head pub, and local farms some 400 metres away at Somerleyton Hall and Estate which are in Somerleyton village. The primary school is 950 metres away. There are bus stops throughout the village, the nearest being at the Dukes Head. The train station is 550 metres to the south access via a public right of way. 5.4The site has access by roadside, footpaths or PROW to facilities and services in Somerleyton village. There are facilities in the boatyard that will be adapted to provide showers, toilets, and other necessary facilities. 5.5There is an existing highways access to the boatyard/marina. This has operated effectively for many years. 5.6The site is near to the Somerleyton Conservation Area and is already used as a marina and boatyard. Reusing part of the marina basin for residential moorings will not have a detrimental impact on the Conservation Area. 5.7The pontoons and moorings in the Marina have not been replaced for many years. As part of the introduction of residential moorings the existing pontoons will be replaced. This will provide a more efficient use of the Marina basin meaning that there will not be an adverse impact on the existing moorings. 5.8Many of the existing boats in the Marina are used infrequently so provide little work for the boatyard or other local businesses. Residential moorings will provide more activity in the Marina and will better support local businesses. 6.0National Planning Policy	Yes		Not seeking changes		I am not seeking changes	Yes	24/09/2025
Trustees 1971 Settlement	Somerleyton Estate	N/A - Not a group	N/A		Policy PUBSOM 1 - Somerleyton Marina Residential Moorings				Yes	Yes					We did not answer no	6.1National planning policy in the National Planning Policy Framework 2024 (NPPF) is relevant. An important part of the NPPF are the policies which seek to secure economic growth. Paragraph 85 of the NPPF states 'significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development'. 6.2Paragraph 88 states 'Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; b) the development and diversification of agricultural and other land-based rural businesses'. 6.3Paragraph 88 gives strong support to the growth and expansion of all types of businesses in rural areas. The economic policies in the NPPF provide strong support for the development which will create employment and secure economic growth. Particularly important is Paragraph 85 which states that 'significant weight' should be placed on the need to support economic growth. 7.0Conclusion 7.1The Somerleyton Estate's ambition for the Marina and boatyard is to support local boat building and local tourism industries. Residential moorings would support the boatyard and Marina by providing better and consistent income and more work for the boatyard and nearby businesses. 7.2The Marina is sustainably located with services and facilities nearby so is suitable for an additional 5 residential moorings. All the facilities needed to serve the moorings are nearby or can be upgraded. 7.3The Estate supports the allocation of 15 residential moorings in the new Broads Local Plan and looks forward to the adoption of the Local Plan so that a planning application can be made for additional residential moorings. 7.4An important part of The Framework are the policies which seek to secure economic growth. Paragraph 80 of The Framework states 'significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development'. 7.5Paragraph 83 states 'Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; b) the development and diversification of agricultural and other land-based rural businesses'. 7.6Paragraph 83 of The Framework gives strong support to the growth and expansion of all types of businesses in rural areas. The Framework's economic policies provide strong support for the development which will create employment and secure economic growth. Particularly important is Paragraph 80 which states that 'significant weight' should be placed on the need to support economic growth.	Yes		Not seeking changes		I am not seeking changes	Yes	24/09/2025

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?				Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:				Open-Ended Response	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?				
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk .	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Open-Ended Response	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:
Planning Policy Team	North Norfolk District Council				PUBDM5 - Electric Vehicle Charging Points				Yes	No					Not effective - the policy lacks clarity on the requirement for EV provision compared to NNDC's emerging Policy CC8	NNDC welcomes the inclusion of a dedicated policy on EV charging points, including the associated design, safety and location considerations. However, the policy lacks clarity on the fundamental requirement for provision. By contrast NNDC's emerging Local Plan Policy CC8 requires all new residential development (including changes of use) to provide EV charging points. As NNDC is the local housing authority, a consistent approach would provide greater clarity and benefit for applicants, residents and decision makers across the district.	No	The lack of clarity in PUBDM56 compared with NNDC's emerging Policy CC8 only became apparent on review of the Publication draft.	Amend PUBDM56 to align more closely with NNDC's Policy CC8 by requiring new residential development (including changes of use) to provide EV charging points, with clear thresholds and criteria. This would ensure the policy is effective and consistent across the district.	No	No	22/09/25
Planning Policy Team	North Norfolk District Council				PUBDM5 - water quality and foul drainage				Yes	Yes					Sound but could be clarified	NNDC supports PUBDM5, and in particular clause 6, and recognises the importance of managing foul drainage capacity. NNDC are signatories to the joint position statement mentioned in relation to Horning Knackers Wood Water Recycling Centre. However, the Plan would benefit from acknowledging that Horning is split with NNDC and is identified as a Small Growth Village in NNDC's emerging Local Plan, even if the village is constrained and no residential requirement is expected in the Plan period.	No	The opportunity to support PUBDM5 and add clarification about Horning's cross boundary status as only arisen at the Reg 19 stage.	Retain Policy PUBDM5 as drafted, but add recognition of Horning's cross-boundary status and NNDC's joint role with Anglian Water, to aid clarity and ensure effective delivery.	No	Yes	22/09/25
Planning Policy Team	North Norfolk District Council				Section 8 - Duty to Cooperate (p30)				Yes	Yes					Sound but could be reinforced	NNDC supports the recognition of cross-boundary issues in Section 8 and the ongoing work under the Duty to Cooperate. Given the importance of cross-boundary coordination at Hoveton/Wroxham, NNDC wishes to emphasise that retail and town centre planning must remain a key focus of future joint working.	No	This has not been raised previously, as the need to emphasise retail/town centre coordination at Hoveton/Wroxham has only become apparent on review of the publication draft. This representation is therefore new at the Reg 19 stage.	Strengthen Section 8 by acknowledging retail/town centre coordination at Hoveton/Wroxham as an example of cross-boundary issues that require ongoing joint working.	Yes	No	22/09/25
Planning Policy Team	North Norfolk District Council				Section 6.10 Neighbourhood Plans (p20)				Yes	No			Needs factual correction			The list of Neighbourhood Plans omits Hoveton Neighbourhood Plan. This is a factual error. Stalham NP is correctly included.	No	The omission has only become apparent at Reg 19.	Update Section 6.10 to add Hoveton Neighbourhood Plan to the list of Neighbourhood Plans in preparation.	No	Yes	22/09/25
Planning Policy Team	North Norfolk District Council				PUBHOV5 Hoveton Village Centre and areas adjacent to the Village Centre				Yes	Yes					Yes, sound but could be strengthened	NNDC welcomes the recognition in PUBHOV5 that Hoveton Town Centre should be considered as a whole, across local authority boundaries, and in coordination with NNDC's Development Plan. This reflects the established joint approach. NNDC wishes to ensure that the wording remains fully consistent with its emerging Local Plan and that monitoring continues to maintain alignment.	No	NNDC wishes to confirm support and alignment at the Reg 19 stage.	Ensure that PUBHOV5 wording is aligned with NNDC's emerging Local Plan retail/town centre policy for Hoveton/Wroxham and consider minor amendments to reinforce the shared approach. This will ensure the plan is effective in addressing cross-boundary retail issues and consistent with the agreed joint approach already in place.	Yes	Yes	22/09/25
Planning Policy Team	North Norfolk District Council				PUBDM35 Retail development in the Broads				Yes	No					Not effective - does not reference cross-boundary retail matters at Hoveton/Wroxham	NNDC notes that PUBDM35 sets criteria for retail development in the Broads but does not reference the cross-boundary issues at Hoveton/Wroxham. This omission weakens the effectiveness of the policy, as it risks decisions being made without recognition of the joint town centre approach that has been consistently agreed between the Broads Authority and NNDC and is included in our Local Plan and Duty to Cooperate documents.	No	This omission only became clear at the Reg 19 stage.	Insert an explicit reference in PUBDM35 to the need to consider cross-boundary retail issues at Hoveton/Wroxham, to align with NNDC's emerging Local Plan and ensure the shared approach is clear across both generic and site-specific policies.	Yes	Yes	22/09/25
Clare Howe	Sport England				Policy PUBDM10				Yes	No					Sport England considers Policy PUBDM10 to be inconsistent with national planning policy.	While the aim of enhancing amenity and biodiversity value is supported in principle, the wording as currently drafted is problematic because it lacks safeguards that ensure playing fields are protected. There is a risk that proposals introducing biodiversity enhancements (e.g., tree planting, wildflower meadows, or wetland features) could be supported under this policy, even if they compromise the usability of existing playing fields.	No	Sport England have not been consulted on this addition prior to this consultation.	To address this concern and ensure consistency with the NPPF, Sport England recommend the following amendment to criteria (b): Amended criteria (b): 'Proposals that meet the requirements of 1a above and improve the amenity or biodiversity value of the open space in an appropriate way, provided they do not result in the loss, or prejudice the use of playing fields, will be supported'. This amendment would ensure that biodiversity and amenity enhancements are supported without undermining the use of the playing field; provide clarity for applicants and decision-makers; and bring the policy into consistency with national planning policy. Sport England support the objective of this policy, however, this should not come at the cost of losing or prejudice playing fields. Sport England advises the Council to amend Policy PUBDM10(b) as suggested above, or similar, to ensure consistency with the NPPF to ensure the proposal protects playing fields. Within the supporting text of the policy, Sport England recommends reference is made to Sport England's Biodiversity Net Gain (BNG) guidance - Biodiversity Net Gain guidance Sport England https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/our-planning-role-guidance-and-tools/BNG it shows how biodiversity measures can be incorporated into playing fields without compromising their intended sporting use or long-term protection. The resource gives advice on good design principles for BNG, information about the maintenance of different BNG features and information about when to consider BNG as part of the planning application process.	No	Yes	22/09/2025

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?							Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:					Open-Ended Response	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?	Date:
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk .	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Response	Date:	
LLFA	Norfolk County Council				PUBDM9: Surface Water Runoff				No	No	yes	yes	yes	yes		No	No, Changes have been made since regulation 18 and this text has been updated but not subsequently discussed with the LLFA. Previously, the LLFA has raised concerns about the BA's divergence from national policy, guidance and LLFA's Developer Guidance and policy.	1. and 2. Update Policy PUBDM9 and the supporting Reasoned Justification text to be aligned with the national and LLFA policies and guidance. 3. Update the policy to reflect the national policy in NPPF. 4. Update text to reference the new National Standard for SuDS.	No	Yes	19/09/2025		
LLFA	Norfolk County Council				Policy PUBDM8: Development and flood risk				No	No	yes	yes	yes	yes		No	No, Changes have been made since regulation 18 and this text has been updated but not subsequently discussed with the LLFA. Previously, the LLFA has raised concerns about the BA's divergence from national policy, guidance and LLFA's Developer Guidance and policy.	T1. The LLFA suggested the addition of "agreed" to the existing text in 1.c so as to read as follows: "An agreed flood response plan, where required, has been produced that is appropriate and deliverable." 2. Remove the text in point 2.b in Policy PUBDM8 3, 4 and 6. Review the text and update to more consistent with principles of national policy and resolve potential difficult planning interactions with other areas of the proposed policy. 5. Amend text in the policy and the reasoned justification to include all sources of flood risk in the sequential test. 6. Amend the guidance to remove the indication that only existing flood risk should be considered. 7. Update the text to include reference to the LLFA's Developer Guidance that is freely available on the Norfolk County Council website. 8. Further information of when the updated SFRA could be expected should be included. 9. An update to the text of PUBDM8 and the supporting Reasoned Justification to suitably include appropriate references to climate change.	No	Yes	19/09/2025		
LLFA	Norfolk County Council				Policy PUBDM8: Development and flood risk				No	No	yes	yes	yes	yes		No	See above	See above	No	Yes	19/09/2025		
LLFA	Norfolk County Council				PUBSP1				No	No				yes		Yes	Yes - A similar issue was previously raised.	Add as an additional sub-point in point 5 of Policy PUBSP1. Avoiding development in areas at risk of future flooding due to the impacts of climate change.	No	Yes	19/09/2025		
Lead Local Flood Authority (LLFA)	Norfolk County Council			9.2 and 9.3					No	No	yes	yes				No	No, Not specifically on this text however, previous comment was made on the lack of Smart objectives.	The LLFA suggests that Flood risk should be considered as both a strength and a weakness. An additional text into the section 9.2 text which could be altered as follows with the underlined text: h.) A unique wetland and low-lying area prone to flooding and status equivalent to a National Park. g.) Attractive environment prone to flooding, providing the basis for most of the Broads' economy and recreation for residents and visitors. l.) An area providing many ecosystem services and natural resources, as evidenced in the Norfolk and Suffolk natural capital assets compendium.	No	Yes	19/09/2025		

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?				Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:				Open-Ended Response	Have you raised this issue during previous consultations on the Local Plan?	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?	Date:			
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk.	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Open-Ended Response	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:
Caroline Jeffery (Principal Planner)	Planning Services (Minerals and Waste Planning Authority)				Policy PUBDIT1: Maltings Meadow Sports Ground, Ditchingham				Yes	No			Not Effective			Point 5 of the Policy refers to Norfolk County Council's Core Strategy Policy CS16. However, all the policies in Norfolk County Council's Minerals and Waste Core Strategy were superseded by the policies in the Norfolk Minerals and Waste Local Plan in May 2025. Therefore the policy text needs to be updated to refer to the relevant current local plan policy.	Yes		The wording of Point 5 of the policy needs to be amended as follows: "The site lies on a safeguarded mineral resource (sand and gravel) and any development proposals will need to address this (see Norfolk County Council's Minerals and Waste Local Plan Policy MP11 – mineral safeguarding areas and mineral consultation areas)."	No	Yes	19/09/2025
Andrew Marsh	Historic England				Policy PUBDM13: Heritage Assets				Yes	No						The current policy wording conflates the NPPF's approach to designate d and non designate d heritage assets, particularly in relation to the tests of substantial harm and less than substantial harm.	No		Amend Policy PUBDM13: Heritage Assets to read: 3. Identified and unidentified non-designated heritage assets Development proposals that would result in harm to the significance of a non-designated heritage asset (identified or unidentified) will be considered in the context of national policy. A balanced judgement will be made having regard to: •the significance of the heritage asset, •the scale of any harm or loss, and •the public benefits of the proposal. Applicants should consult the Historic Environment Record and provide an appropriate assessment of the asset's significance and the potential impact of the development. Proposals should demonstrate how harm has been avoided or minimised, and where appropriate, how the asset's significance will be preserved or enhanced. 4. Archaeology c) There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets that are demonstrably of equivalent significance. d) Development proposals that will result in unavoidable harm to, or loss of, an archaeological heritage asset's significance will be considered in the context of national policy, having regard to the significance of the asset. In the case of substantial harm/loss of a Scheduled Monument and other archaeological heritage assets that are demonstrably of equivalent significance, proposals must also meet the following requirements: i. There is no less harmful viable option; ii. The amount of harm has been reduced to the minimum possible; and iii. Satisfactory provision is made for the evaluation, excavation, recording interpretation, dissemination and archiving of the remains and then interpretation, dissemination and archiving before the commencement of development.	No	Yes	18/09/2025
Julie Reynolds	None			Chapter 53, paragraph 10 (Delivery and Implementation)	PUBSOM 1	Policy map 16			No	No						You state that access to the site should provide adequate visibility splays (in line with DMRB standards) and access width should be adequate to allow two vehicles to pass and accommodate large service vehicles. The present access road will not meet this requirement. Furthermore the point where this current track meets The Street and Slugs Lane within the village (Map ref: TM 479970) has extremely poor visibility and is currently a danger point. More residential and service traffic at this point will exacerbate this situation. Due consideration has not been given to road safety issues.	No	As a nearby resident I was invited only to comment following your letter of 25 July 2025	Rejection of the application on road safety grounds.	Yes	Yes	17 September 2025
Judy Clift, vice chair Somerton PC	Somerton parish Council		Richard starling, Kevin king, David Shuker, Peter Young, Diane Crane	The whole plan					Yes	Yes					N/a	No	Have no issue with the plan	Somerton PC supports this plan, and does not seek any changes	I am not seeking changes	Yes	12th September 2025	
Sarah Eglington	Norfolk Wildlife Trust				Policy PUBDM5 3: Source of heating				Yes	Yes				yes		We support this policy, in particular the statement that oil heating of new builds and replacement dwellings will not be supported. This will help meet our commitments to reducing carbon emissions.	Yes		not seeking changes	I am not seeking changes	Yes	10/09/25
Sarah Eglington	Norfolk Wildlife Trust				Policy PUBDM2 1: Renewable and low carbon energy				Yes	No				yes		Whilst we support the development of renewables to help meet our Net Zero requirements, it must be ensured that proposals for renewable infrastructure are nature positive in line with the Biodiversity Duty.	Yes	The sections we are commenting on are new text	We recommend including the following text in relation to solar farms, as well as wind farms "The potential for impacts on birds and bats, and other wildlife, must be fully assessed and avoided and mitigated". We also recommend including the clause below for solar farms (currently applied to wind farms only) "Information relating to the vehicle routing associated with construction activities for solar farms must be provided. The proposed site access arrangements and access routes will be suitable for the construction phase, including the delivery of turbine components and construction materials, the operational phase, and the decommissioning of the proposed solar farm" We suggest that the text in 10 is strengthened to state that proposals for turbines or access routes located on peat soils Will Not be supported.	No	Yes	10/09/25
Sarah Eglington	Norfolk Wildlife Trust				Policy PUBDM2 0: Energy demand and performance of new buildings (including extension s)				Yes	Yes				yes		We support general intention of this policy to reduce the energy demand of buildings, in line with the weight afforded to the measures in the updated NPPF (Paragraph 164): In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).	Yes		not seeking changes	I am not seeking changes	Yes	10/09/25
Sarah Eglington	Norfolk Wildlife Trust				Policy PUBDM1 9: Trees, woodland s, hedges, scrub and shrubs and developm ent				Yes	Yes				yes		We support this policy.	No		We suggest adding words requiring after care/management of new trees to ensure that they survive and replacement planting for any that die.	No	Yes	10/09/25

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?				Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:				Open-Ended Response	Have you raised this issue during previous consultations on the Local Plan?	Response	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. If you are not seeking changes then please write 'not seeking changes'.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?	Date:				
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk.	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:			
Sarah Eglington	Norfolk Wildlife Trust			-	Policy PUBDM16: Biodiversity Net Gain	-	-	-	Yes	Yes					yes	Yes		See here for comment - comment was very long so placed into a separate document. https://www.broads-authority.gov.uk/_data/assets/pdf_file/0023/217742/APPENDIX-H-Norfolk-Wildlife-Trust-comments-on-BNG.pdf	Yes	not seeking changes	I am not seeking changes	No	10/09/25	
Sarah Eglington	Norfolk Wildlife Trust			-	Policy PUBDM15: Natural Environment	-	-	-	Yes	Yes					yes	Yes	-	We support this policy which aims to protect, restore and enhance biodiversity and habitats and welcome the additional text around compliance with the mitigation hierarchy.	Yes	-	Not seeking changes	I am not seeking changes	No	10/09/25
Sarah Eglington	Norfolk Wildlife Trust			-	Policy PUBSP5: Biodiversity	-	-	-	Yes	Yes					yes	Yes	-	We support this policy which aims to prevent development having an adverse impact on internationally, nationally, and locally designated sites and are pleased to see that County Wildlife Sites and Section 41 Priority Habitats are referred to in this policy. However, we recommend that additional text is added to cover the functionally linked habitats of these sites. We also recommend additional policy text regarding a requirement for developments to submit full Ecological Impact Assessments in order that the potential impacts on biodiversity can be reviewed. We support the addition of a clause stating that new development will include beneficial features biodiversity. This will help comply with the Council's duty to have regard to the conservation and enhancement of biodiversity under the 2006 NERC Act and its amendment under the 2021 Environment Act.	Yes	-	No	Yes	10/09/25	
Andrew Marsh	Historic England				Policy PUBDM13: Heritage Assets				Yes	No				The current policy wording conflates the NPPF's approach to designated and non-designated heritage assets, particularly in relation to the tests of substantial harm and less than substantial harm.		No	We support the overall direction of Policy PUBDM13. However, we recommend that the Authority reviews point 3 (Identified and unidentified non-designated heritage assets) and 4 (Archaeology) to ensure consistency with the National Planning Policy Framework (NPPF). As currently drafted, the policy wording does not fully reflect national policy and is therefore not sound. Nonetheless, we believe this can be readily addressed through minor modifications. Distinction between designated and non-designated heritage assets. It is particularly important that the policy distinguishes clearly between the tests of harm applicable to designated and non-designated heritage assets. Paragraph 214 of the NPPF sets a high bar for substantial harm or total loss of designated heritage assets, requiring clear and convincing justification and demonstration of substantial public benefits. In contrast, paragraph 216 requires a balanced judgement for non-designated heritage assets, having regard to the scale of harm and the asset's significance. These distinct approaches should be reflected accurately in the policy wording to avoid conflation. 4: Archaeology With specific reference to 4: Archaeology, we recommend that criterion (d) be reviewed. It currently appears to address harm to both designated and non-designated heritage assets. However, as discussed above the thresholds set out in paragraphs 214 and 216 of the NPPF differ considerably. If the intention is to apply this policy only to non-designated archaeological remains of equivalent significance to scheduled monuments (as referenced in paragraph 213b), footnote 75 of the NPPF, this should be made explicit. The policy also omits a key element of the test in paragraph 214, namely that the harm or loss is necessary. It is not enough for substantial public benefits to outweigh the substantial harm, the harm itself needs to be necessary to achieve the public benefits. We recommend that paragraph (d) be amended to ensure consistency with the Framework.	No	In earlier consultations, we focused on the new and proposed amendments to adopted policy. Our current comments address specific wording carried over from the original Local Plan.	To ensure consistency with the National Planning Policy Framework (NPPF), we consider it necessary to amend the policy wording. The revised text should more closely reflect the language and intent of the NPPF. We would welcome the opportunity to meet and discuss this further.	No	Yes	09/09/2025	
Rosemary Spooner	xx			Filby Development Boundary					No	Yes	Not justified					Yes	Raised this during mini consultation on Filby development boundary proposals.	An extension of the Filby Development Boundary along Howes Loke, off Thrigby Road to include part of land of Mallard's Reach.	Yes	Yes	Yes	6 September 2025		
Sarah Eglington	Norfolk Wildlife Trust			-	Policy PUBDM9: Surface water run-off	-	-	-	Yes	Yes					yes	Yes		We support this policy, and the Reasoned Justification, particularly the text around the use of SUDS and their potential to reduce phosphorous in surface water run-off.	Yes		not seeking changes	I am not seeking changes	Yes	05/09/25
Sarah Eglington	Norfolk Wildlife Trust			-	Policy PUBSP2: Strategic flood risk policy	-	-	-	Yes	Yes					yes	Yes		We support this policy and the requirement for new development to incorporate Sustainable Urban Drainage SUDS measures. This is in line with paragraph 164 of the NPPF which states that "New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems."	Yes		not seeking changes	I am not seeking changes	Yes	05/09/25
Sarah Eglington	Norfolk Wildlife Trust			-	Policy PUBDM7: Water efficiency and re-use	-	-	-	Yes	Yes					yes	Yes	-	We support this policy which requires new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. The design of new developments should optimise the inclusion of water efficiency and consumption measures, such as rainwater/ or greywater recycling, low flow taps and showers, low flush toilets, rain gardens and water butts and Sustainable Urban Drainage Systems (SUDS) in the construction of new buildings. We recommend that all major non-residential development should incorporate water conservation measures to achieve full credits for category Wat 01 of BREEAM and recommend that non-domestic buildings referred to in section 4 of the policy are given an appropriate efficiency target for clarity for developers and monitoring policy delivery. We support the reasons given in the Reasoned Justification text	Yes	-	not seeking changes	No	Yes	05/09/25
Sarah Eglington	Norfolk Wildlife Trust			-	Policy PUBDM2 Embodied Carbon	-	-	-	Yes	Yes					yes	Yes		We support the inclusion of additional text around the issue of embodied carbon. Embodied carbon makes up a significant portion of the built environment's total emissions, therefore to meet the UK's net-zero by 2050 target, a holistic approach that includes addressing embodied carbon is crucial.	Yes		not seeking changes	I am not seeking changes	Yes	05/09/25
Adele Powell	Norfolk Coast Partnership (NCP)				Policy PUBSP7: Tranquillity in the Broads				Yes	Yes					n/a	No		Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBSP7: Tranquillity in the Broads. The Policy seeks to conserve the tranquillity of the area and states all development proposals will need to protect the dark skies and nocturnal character of the Broads in accordance with the dark skies policy. NCP supports this policy but suggests that a reference to the Norfolk Coast National Landscape is added to the policy to ensure that its significance is recognised in this context.	No		NCP believe the Plan is legally compliant and sound. Minor amendments to include reference to the Norfolk Coast National Landscape would be welcome.	No	Yes	20/08/2025

Your Contact Details:		Group Representations:		To which part of the Plan does your representation relate?					Do you consider that this part of the Plan meets the legal and procedural requirements? (see guidance note for assistance with this question)	Do you consider this part of the Plan has met the tests of soundness? (see guidance note for assistance with this question)	If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:					Open-Ended Response	Have you raised this issue during previous consultations on the Local Plan?	Open-Ended Response	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of progress of the Local Plan?	Date:	
Name:	Organisation/Group:	If your representation is on behalf of a group, how many people support it?	Please send a list of each person in your group that supports the representation to planningpolicy@broroads-authority.gov.uk.	Paragraph Number:	Policy Number:	Map Reference:	Appendix:	Supporting Document:	Response	Response	Positively Prepared:	Justified:	Effective:	Consistent with National Policy:	(Select this option if you did not answer no)	Open-Ended Response	Response	If you have answered 'No' could you please explain why this has not been raised before:	Open-Ended Response	Response	Response	Date:
Adele Powell	Norfolk Coast Partnership (NCP)				Policy PUBDM28: Light Pollution, Dark Skies and Nocturnal Character				Yes	Yes					n/a	Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBDM28: Light pollution, dark skies and nocturnal character. This Policy looks to conserve and enhance the tranquillity, nocturnal character and dark sky experience of the Broads. The Policy designates two Dark Sky Zones of which the Norfolk Coast National Landscape falls within Dark Sky Zone category 1 which is protected from permanent illumination. NCP supports this policy but suggests that a reference to the Norfolk Coast National Landscape is added to the policy to ensure that its significance is recognised in this context.	No		NCP believe the Plan is legally compliant and sound. Minor amendments to include reference to the Norfolk Coast National Landscape would be welcome.	Yes	Yes	20/08/2025
Adele Powell	Norfolk Coast Partnership (NCP)				PUBSSCOAST: The Coast				Yes	Yes					n/a	Norfolk Coast Partnership (NCP) welcomes the inclusion of Policy PUBSSCOAST: The Coast. Specifically, we support how the policy highlights the special nature, character and tranquillity of the area of coast defined on the Adopted Policies Map and seeks to conserve the area for low-key quiet recreation and as a wild bird and seal refuge. NCP also supports the policy's promotion of appropriate small-scale development, such as footpath bridges, bird-watching hides and seal viewing platforms, which facilitates low level recreation and the policy's ban on other forms of operational development in the Coastal Area.	No		NCP believe the Plan is legally compliant and sound.	No	Yes	20/08/2025
Mrs Madeleine Sillitoe	n/a		Madeleine Sillitoe; Anna Sillitoe; Will Sillitoe	POINT 48 ON P.298	PUBBRU2 ZA	n/a	n/a		No	Yes	n/a				THE DOCUMENT SAYS: '...the policy seeks greater public access to appreciate the river scene. It also seeks more public moorings and more slipways to access the water.' Since anyone residing at the new mooring site will have access to village resources and to private road access leading to Brundall (e.g. Laurel Drive) it would be right and fair for villagers to have access to the river so they can enjoy the Broads. This is consistent with a need for residents of Brundall, as noted as one of the aims of Brundall Parish Council, to expand villagers' access to riverside areas. At present the village has almost no common access to the Broads/river despite the fact that Brundall is a village located by the River Yare itself. So, given that access to village resources are to be shared with new residents at the mooring site, a reciprocal benefit for the village should be included within these plans too. Thank you.	No	FIRST TIME VIEWING THE DETAILS	More consideration for access and roaming rights for local residents need to be considered.	No	Yes	7/8/2025	