

Local Plan for the Broads
Schedule of Additional Modifications
19 August 2026
Version 1

Introduction

This schedule of Additional Modifications replaces examination library document [A13 - Schedule of proposed changes \(PDF\)](#) and must be read alongside the schedule of Main Modifications (document H3) and Schedule of Policies Map Changes (document H5) which can be found here: [Examination Library](#).

The following table sets out the proposed changes to the Local Plan as well as giving the reason for the proposed change.

The table is in order of the Local Plan – see page number column.

PLEASE NOTE – a version of the Local Plan with paragraph numbers has been produced. There are no other changes to the Local Plan at the moment – just paragraph numbers. This table refers to the page numbers and paragraph numbers in this version of the Local Plan: [Regulation 19 Local Plan with Paragraph Numbers](#).

Ref: AM	Ref from Schedule of proposed changes	Page	Part of Local Plan	Proposed change	Reason	Type of change
AM1	SPC1 and 2	10	Chapter 1 Introduction	The Broads Authority is nearing the end of the review of the Local Plan for the Broads. This is the final round of consultation before we submit the Local Plan to the Planning Inspectorate and is called the Publication (regulation 19) version. There are several reasons why we are reviewing the Local Plan: • We commit in the current Local Plan for the Broads Authority to start the review around 18 months after adoption; 18 months after the May 2019 adoption is November 2020. Background work started in-house in November 2020, including project planning. • The Local Plan 2019 was produced in line with, and examined against, the 2012 National Policy Planning Framework (NPPF). At around the time the final draft of the Local Plan was being consulted on, submitted and examined, a new version of the NPPF was released. This included transition arrangements for advanced Local Plans, such as that for the Broads, which permitted examination against the ‘old’ 2012 NPPF. It is prudent to now review the Local Plan, noting that the NPPF was updated in 2024. • Given that the final drafting of the current Local Plan was at the end of 2017 (submitted early 2018, examined from mid-2018 and adopted May 2019), some of the issues that are addressed in the Local Plan, such as climate change, have moved on. Again, it is prudent to review the Local Plan to ensure it is as up to date as possible. This version of the Local Plan includes draft policies for comment. Most of the policies in this Local Plan are already included in the currently adopted Local Plan, albeit with some amendments. Some policies are new. We have incorporated comments that we received during the Preferred Options consultation (that was held from March to May 2024) where appropriate. This version is designed to be as close as possible to the final version of the Local Plan.	General update needed to reflect the stage of the Local Plan. To make Plan more succinct.	Factual update. Succinct.

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				Once adopted, this Local Plan will replace the Local Plan for the Broads that was adopted in 2019. <u>Each local planning authority must prepare a Local Plan that sets the planning policies in its local area. The Local Plan is important when deciding planning applications, as all decisions must be made in accordance with its policies, unless there are strong reasons not to do so. Local plans must be positively prepared, justified, effective, and consistent with national policy, in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework (NPPF).</u> <u>The NPPF states that every local planning authority in England should have a clear, up-to-date Local Plan that conforms to the Framework, meets local development needs, and reflects local people's views on how they wish their community to develop.</u> <u>This document is the Local Plan for the Broads, prepared by the Broads Authority as the local planning authority for the area.</u> <u>This Local Plan has been prepared in accordance with the regulations, NPPF and NPPG and has been found sound. This is the Local Plan for the Broad. It contains strategic, detailed and site-specific policies to guide development proposals in the Broads. The Local Plan has gone through numerous rounds of consultations and then has been examined by the Planning Inspectorate. It is now in place to help determine planning applications.</u> <u>This Local Plan has replaced the 2019 Local Plan for the Broads.</u> Various pieces of evidence have been used to inform this Local Plan. The evidence can be found here. and includes: • The Index of Multiple Deprivation Topic Paper (September 2021) • Settlement Study (February 2022) • Development Boundaries Topic Paper (updated August 2024) • Norfolk Study Older Person Housing (March 2022) • Gypsy and Traveller and Residential Caravans Need Assessment (Great Yarmouth Borough only) (June 2022) • Housing needs assessment (June 2022) and Local Housing Needs Assessment Addendum (March 2025) • Residential Mooring needs assessment (August 2022) and clarification letter (May 2025) • East Suffolk Cycling and Walking Strategy (November 2022) • Local Green Space Assessment (June 2023) • Housing and Economic Land Availability Assessment (HELAA) (September 2023) and HELAA part 2 (February 2025) • From HELAA to Local Plan (September 2023) and From HELAA to Local Plan part 2 (February 2025) • Replacement Quay Heading Topic Paper (2023) • Dark Skies Topic Paper (2023) • Employment and Economy Topic Paper (January 2024) • Local Infrastructure Study (Updated July 2025)		

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				Renewable Energy Topic Paper (February 2024) Technical Health and Wellbeing Paper (January 2024) An investigation into the technical issues related to 'do float' and 'can float' homes (May 2024) Energy Performance in Local Plans, Written Ministerial Statement and the Local Plan for the Broads (July 2024) Local Plan Sequential Test (July 2024) 'More than 10% Biodiversity Net Gain for the Local Plan for the Broads' Topic Paper (Updated February 2025) Great Yarmouth Gypsy and Traveller Accommodation Assessment (GTAA) Update (September 2024) and Addendum (May 2025) Broads Authority Local Plan Viability Assessment Final Report (October 2024) Broads Authority Local Plan Viability Assessment Technical Appendices (October 2024) PM2.5 Topic Paper (November 2024) Development Boundary Topic Paper (December 2024) Broads Authority GTAA Review (December 2024) Peat topic paper (February 2025) Affordable Housing Topic Paper (March 2025)		
AM2	SPC3	11	Chapter 2 About this consultation	Remove this chapter.	Not needed in final version of Local Plan.	Factual update
AM3	SPC4	13	Chapter 4 Sustainability Appraisal and Habitats Regulation Assessment	The SA that is out for consultation (November 2025 to January 2026) is slightly different to the one that was out for consultation from July 2025 to September 2025. A summary of the changes are set out in the orange box in the amended SA. We have produced a Sustainability Appraisal (SA) Scoping Report and asked key stakeholders for their views — see SA Scoping Report and comments. We are aware that the Government is considering changing the approach to assessing local plans. The requirement to produce a SA and a Habitats Regulation Assessment (HRA) may be removed, and another assessment may take their place. This was proposed in the 2020 Planning White Paper and further discussed in Nature Recovery Green Paper: Protected Sites and Species. However, at the time of writing no such changes are in place and so, unless told otherwise, we will produce SAs and HRAs as appropriate. Similarly, the UK has left the European Union (EU). The need to undertake SA and HRA originates from EU directives. EU law was transposed into UK law when we left the EU and so the requirement to undertake these assessments still exists. That being said, the Levelling Up and Regeneration Act proposes replacing Environmental Impact and Strategic Environmental Assessments (Sustainability Appraisals) with a new set of Environmental Outcome Reports, with “a clearer and simpler process where relevant plans and projects are assessed against tangible environmental outcomes set by government.” We will ensure the local plan meets all requirements that are in place as it is produced.	To make Plan up to date and more succinct.	Succinct

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				The Sustainability Appraisal that accompanies this Publication <u>final</u> version of the Local Plan can be found here . The Habitats Regulations Assessment that accompanies this Publication <u>final</u> version of the Local Plan can be found here .		
AM4	SPC5	14	Chapter 5 Timeline and stages for the production of the Local Plan for the Broads	Remove this chapter.	Not needed in final version of Local Plan.	Factual update
AM5	SPC8	19	Section 6.7 Current Broads Planning Policy Documents	Remove reference to Flood Risk SPD	Would no longer be in place on adoption of the Local Plan. And most of SPD within Local Plan.	Factual update
AM6	SPC10	20	Section 6.10 Neighbourhood Plans	Update list and date the list reflects.	To ensure the Local Plan is up to date.	Factual update
AM7	SPC11	20	Section 6.8 Neighbouring Local Planning Authority Planning Policy Documents	Make past tense	To reflect the Local Plan has been produced.	Factual update
AM8	SPC12	20	Section 6.9 Norfolk Strategic Planning Framework (NSPF) (2021)	Refer to most recent version and amend hyperlink.	Most recent version endorsed August/September 2025.	Factual update
AM9	SPC13	20	Section 6.10 Neighbourhood Plans (p20)	Update the list of Neighbourhood Plans at the time of the adoption of the Local Plan.	To address comment BLP227	REG19 representation
AM10	SPC9	20	First bullet point	Amend 6.7 f) 'East Suffolk Affordable Healthy Environments Supplementary Planning Document (SPD)'	To address comment BLP45	REG19 representation
AM11	SPC16, 17, 18, 19	31, 32	Section 9.2	n) Substantial engaged community of private boat owners, <u>many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), including children, to acquire and hone the skills required to become good sailors.</u> t) An area providing many ecosystem services <u>and natural resources</u>, as evidenced in the Norfolk and Suffolk natural capital assets compendium. u) The Broads has <u>peatland areas and there are opportunities for improved wetland areas, carbon storage, holding flood waters, storing water for droughts, nature enhancement</u> enchantment. w) <u>An area subject to flooding. This water can be stored and used by nature and people. Flooding can also filter pollutants out of rivers and nourishing land to support ecosystems and fertile areas for farming.</u>	Related to comment BLP33c, BLP191. Does not make sense as written.	REG19 representation. Grammatical.

Ref: AM	Ref from Schedule of proposed changes	Page	Part of Local Plan	Proposed change	Reason	Type of change
AM12	SPC20	32	Section 9.3 Weaknesses, part i	i) High reliance on tourism, which can leave the economy vulnerable and mean a loss of resilience because of changes to the holiday/recreational patterns. Indeed, the access restrictions because of COVID19 has had a large impact on tourism (as well as many other sectors of the local and national economy).	To update the weakness as the impact of COVID19 has reduced.	Factual.
AM13	SPC21	39	Section 11	Remove reference to 'pub'	To reflect that stage of the Local Pan has been completed and the policies are final.	Factual update
AM14	SPC26	56	Horning Knackers Wood Water Recycling Centre supporting text	14.11 Anglian Water Services (AWS) have investigated why the WRC is receiving excessive flows, and there is a Joint Position Statement <u>(written and endorsed by the Broads Authority, North Norfolk District Council and the Environment Agency)</u> setting out more detail including actions undertaken and proposed to address the issue. The Authority will keep itself informed of progress on this issue. <u>Horning is a small growth village in the North Norfolk Local Plan.</u>	To address comment BLP225	REG19 representation
AM15	SPC38	74	First paragraph	15.57 There is a range of possible SuDS techniques that can be used, although not all techniques will be appropriate for individual development sites <u>but a preference should be given to green, open features such as raingardens, tree pits, conveyance swales, and green/blue roofs.</u>	To address comment BLP61	REG19 representation
AM16	SPC40	74	Under 'Other consents that may also be required'	First sentence - remove random 'a' 15.59 Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010, a there is a need to obtain an	Typo	Typo
AM17	SPC53	85	Orange box	Delete.	Not needed in final version of Local Plan.	Factual update
AM18	SPC54	88	First paragraph	Include wording in the first part of the reasoned justification: <u>The PROW network plays an important role in linking people to services, employment and facilities by offering sustainable travel options.</u>	To address comment BLP65	
AM19	SPC55	89	First paragraph	Make Biodiversity Enhancements Guide link the right one and delete hyperlink for 'successor document'. Para 17.5.1.	To ensure correct hyperlinks in Local Plan.	Factual update
AM20	SPC66	113	First paragraph	Update as LNRS is adopted 20.8 The NPPG says 'when planning for biodiversity, local planning authorities must have regard to Local Nature Recovery Strategies, as these are prepared, because they will establish local priorities for biodiversity and other environmental benefits and identify locations where biodiversity enhancement would be particularly beneficial'. The Norfolk and Suffolk LNRS were being produced at the time of writing but <u>have been finalised and endorses and shall be</u> an important resource when determining applications.	To ensure the Local Plan is up to date.	Factual update
AM21	SPC81	122	Consultation on changes to the approach to BNG	Update as required. Consultation on changes to the approach to BNG 20.39 At the time of writing, the Government were consulting on proposed changes to BNG. It is not envisaged that the proposed changes necessarily affect the policy and supporting text as written, but the Authority will liaise with the Planning Inspector through the Examination of the Local Plan to amend the Local Plan as required. <u>Changes to the approach to BNG</u> <u>From 6 August 2026, the following changes are in place. It should be noted that more changes to BNG have been suggested by the Government and may not be reflected in this Local Plan.</u> <u>introduction of the new 0.2 hectare exemption, which means that the smallest developments will not be required to do mandatory BNG (unless onsite priority habitat is negatively impacted)</u>	To ensure the Local Plan is up to date.	Factual update

Ref: AM	Ref from Schedule of proposed changes	Page	Part of Local Plan	Proposed change	Reason	Type of change
				<u>introduction of a new temporary development exemption, for land which is to be reinstated within a period of 5 years or less (unless onsite priority habitat is negatively impacted)</u> <u>modification of the biodiversity gain hierarchy for minor development, meaning that minor sites which aren't exempt from BNG (e.g. over 0.2 hectares) can choose to go straight to offsite in the first instance</u> <u>removal of the existing exemption for self and custom build development</u>		
AM22	SPC83	124	Para above PUBDM17	Add information about the self-build proforma and potential for UU. Also reflect changes to exemptions from 6 August 2026. 20.50 Also of relevance is that at the time of writing, self/custom build on small sites is exempted from Biodiversity Net Gain. The Authority will require some additional information relating to proposals seeking exemption; <u>a self/custom build proforma will need to be completed. Furthermore, a Unilateral Undertaking will be required to secure the development as self/custom build.</u>	To ensure the Local Plan is up to date.	Factual update
AM23	SPC94	127	Bottom paragraph, last sentence	Update reference to Natural England mitigation scheme. Para 20.60.	To ensure the Local Plan is up to date.	Factual update
AM24	SPC98	128	Para 20.62	Amend supporting text as follows: 20.62 Due to the impacts on navigation and the open character of some parts of the Broads landscape, and the priority habitats of grazing marsh and fen and the unique peatland-based ecosystem of fen and the requirements of breeding and wintering birds of the marshes, <u>tree retention and tree planting</u> will not always be appropriate.	To address comment BLP146	REG19 representation
AM25	SPC101	130	New 20.66	Add to supporting text: <u>Planting the right species in the right place creates a positive impact. "Right tree in the right place" is a principle for planting trees to maximise benefits like carbon sequestration, biodiversity, and soil health, while minimising negative impacts by considering the species' needs and the site's conditions. More information on the right tree in the right place can be found here: https://www.woodlandtrust.org.uk/plant-trees/advice/where/.</u>	To address comment BLP146	REG19 representation
AM26	SPC102	130	After current 20.66 reasoned justification.	Refer to para 136 of NPPF - 'Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible'.	Improved reference to trees in the NPPF.	Factual update
AM27	SPC114	139	Orange box	Delete.	Not needed in final version of Local Plan.	Factual update
AM28	SPC115	147	22.30	When disposing of material, the Environment Agency needs to be contacted as a licence may be required. <u>Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit from the Environment Agency for flood risk activities for work or structures in, under, over or within 16m from a main river and from any flood defence structure or culvert. The works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.</u>	To address comment BLP21	REG19 representation
AM29	SPC125	163	25.10 b	Update link to Suffolk Local Cycling and Walking Infrastructure Plan.	To address comment BLP82	REG19 representation
AM30	SPC132	177	26.9	Delete 'the authority'.	Better wording.	Improved wording
AM31	SPC135	197	Supporting text, first paragraph 28.14	Make The Sustainable Tourism and Recreation Strategy a hyperlink and add (or successor strategy)	For convenience as well as to refer to any successor document	Factual update
AM32	SPC136	200	Paragraph 28.22	see previous <u>earlier</u> paragraph regarding marketing and independent review of viability assessments	The previous paragraph is not the relevant one.	Typo
AM33	SPC137	200	28.25	Cross refer to Natural Environment section.	For convenience.	Factual update

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AM34	SPC139	204	Para relating to Environmental Permitting Regulations 28.39	Make this the title to this section: Other consents that may also be required.	To make a new title for this section.	Improved wording
AM35	SPC159	245	30.87	Add GIL1	GIL1 is missing from the list of allocated residential mooring sites.	Improved wording
AM36	SPC161	252	30.101	With regard to criterion j-5b),	The correct reference is 5b	Improved wording
AM37	SPC167	261	30.134	Update section re self and custom build register to reflect the slight change to the register and how it is not clear if we have an exemption currently or not. Custom/self-build register Since April 2016, the Authority has had a register in place where those wishing to build their own homes can register their interest. At the time of writing, there were around 370 400 individuals interested in building their own home on the register. However, it is important to note that the register covers four Local Planning Authorities who use the same register: South Norfolk, Breckland, King's Lynn and West Norfolk and the Broads Authority. When assessing the register, in the vast majority of cases, individuals have stated that they wish to develop in the Broads as well as in another district; few, if any, individuals express a desire to develop in the Broads alone. There is a duty on Local Planning Authorities to grant sufficient development permissions to meet the demand for self-build and custom house building. Importantly, the Broads Authority has had an exemption to this duty to since base period 2 (from 31 October 2016) and this is re assessed each year as part of the Annual Monitoring Report produced by the Broads Authority. This exemption effectively reflects that the Broads is a desirable place to build a dwelling, but there is limited land available. Also of relevance is that at the time of writing, self/custom build on small sites is exempted from Biodiversity Net Gain. The Authority will require some additional information relating to proposals seeking exemption.	To ensure the Local Plan is up to date.	Factual update
AM38	SPC168	262	31.5	Sort reference to the status of the design SPD	To ensure the Local Plan is up to date.	Factual update
AM39	SPC170	266	31.9	Sort reference to the status of the design SPD	To ensure the Local Plan is up to date.	Factual update
AM40	SPC171	266	31.10 b)	Amend RTPI Dementia link.	To address comment BLP76	
AM41	SPC172	270	31.27	Delete section relating to 2020 consultation on adaptable dwellings The Authority is aware of the consultation in 2020 relating to accessibility standards for new homes: Raising accessibility standards for new homes: summary of consultation responses and government response – GOV.UK (www.gov.uk). The Government responded to the consultation saying the following. At the time of writing, the technical consultation had not been released. • Government proposes that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes – option 2 in the consultation. M4(1) will apply by exception only, where M4(2) is impractical and unachievable (as detailed below). Subject to a further consultation on the draft technical details, we will implement this change in due course with a change to building regulations. • M4(3) (Category 3: Wheelchair user dwellings) would continue as now where there is a local planning policy in place in which a need has been identified and evidenced. Local authorities will need to continue to tailor the supply of wheelchair user dwellings to local demand.	To ensure the Local Plan is up to date.	Factual update
AM42	SPC189	307	Constraints and features	Refer to Broadland SPA.	To address comment BLP143	REG19 representation

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AM43	SPC196	315	Orange box	Delete	Not needed in final version of Local Plan.	Factual update
AM44	SPC202	326	44.7	that the sites itself is	Improved wording	Improved wording
AM45	SPC204	329	45.7	that the sites itself is	Improved wording	Improved wording
AM46	SPC205	340	47.3 3	Hoveton Parish Council has previously stated that it wished ed to see Granary Staithe kept open	Typo	Typo
AM47	SPC206	341	Orange box	Delete	Not needed in final version of Local Plan.	Factual update
AM48	SPC209	345	47.14	This end of the village has many car parking spaces, with more on the other side of the railway, and the Authority is aware that some people would like to see more car parking in this area of the village. Any proposals for car parking for public use must be thoroughly justified through a car park assessment undertaken at peak times over a suitable time period, assessing weekend and weekdays. The proposals also need to be well designed, with safety a key factor.	Links back to change proposed in policy itself.	Improved wording
AM49	SPC211	349	Constraints and features, bullet 3	Hoveton Village Centre is classed as a Medium Town Centre in the emerging <u>adopted</u> North Norfolk District Council Local Plan.	NNDC Local Plan now adopted	Factual update
AM50	SPC212	347	Hoveton section	Replace 'town' with 'village'.	Village is the correct term	Factual update
AM51	SPC213	351	47.31	Village Centre and <u>Primary Shopping Area</u> PSA , the areas adjacent to the Village Centre	Clarify what is meant by PSA	Factual update
AM52	SPC220	366	50.20	Oulton Broad District Centre is located around Bridge Road in Oulton Broad. The area is shared between the Broads Authority and East Suffolk Council Local Planning Authority areas. There are around 58 retail units currently in operation <u>There are approximately 59 units in commercial use within Oulton Broad district shopping centre, of which 52 units (88%) were operating</u> (according to 2022 <u>2026</u> monitoring data).	To ensure the Local Plan is up to date.	Factual update
AM53	SPC222	372	Orange box	Delete	Not needed in final version of Local Plan.	Factual update
AM54	SPC225	379	constraints and features, bullet 6	Complete sentence	Typo	Typo
AM55	SPC226	382	Constraints and features part of supporting text to TSA1	Cary's Meadow is a Norfolk County Wildlife Site <u>and Local Nature Reserve</u> , part of which lies within the Thorpe St. Andrew with Thorpe Island Conservation Area.	To ensure the Local Plan is up to date.	Factual update
AM56	SPC231	392	56.9	that the sites itself is	Improved wording	Improved wording
AM57	SPC232	395	Orange box	Delete	Not needed in final version of Local Plan.	Factual update
AM58	SPC233	395	57.6	Tawny owls and ground nesting birds currently occupy land within the extension area <u>covered by this policy</u> and are	Correct wording	Improved wording
AM59	SPC234	406	58.19	(Local Planning Authority, Local Highways Authority, Local Transport Authority and National Highways)	Local Highways Authority/Local Transport Authority is the same thing	Factual update
AM60	SPC235	406	58.17	The highway authorities and Norfolk County Council have recommended that the Authority continues protecting these routes from any development that undermines their wider purpose or highway safety.	Norfolk County Council is a highways authority.	Factual update
AM61	SPC236	416	Orange box	Delete	Some text not needed in final version of Local Plan.	Factual update

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AM62	SPC237	416	58.58	58.58 As part of this review of the Local Plan for the Broads, a call for sites for areas of Local Green Space was held (end of 2022), and three new sites were put forward. The Parish Councils relevant to the Local Green Spaces allocated in the 2019 Local Plan for the Broads were contacted to ascertain if they wanted the status to continue. The analysis of local green spaces can be found in the Local Green Space Topic Paper.	Not needed in final version of Local Plan.	Factual update
AM63	SPC242	426	Section 60	Delete	Not needed in final version of Local Plan.	Factual update
AM64	SPC243	427	Appendix 1	Keep for main mods consultation, then delete.	Not needed in final version of Local Plan.	Factual update
AM65	SPC249	469	Throughout Appendix 13	Delete repeated word - 'strategic' in some cells: If appropriate to a scheme, policy used to help determine application. Strategic. Strategic Policies relevant to Neighbourhood Plans.	Typo	Typo
AM66	SPC250	476	Third column of table	Delete reference to New Anglia LEP	To ensure the Local Plan is up to date.	Factual update
AM67	SPC252	-	Numbering of policies - the 'A' ones - 42A and 52A	Update numbering throughout the Local Plan, HRA and SA for the final version.	To ensure the Local Plan is up to date.	Factual update
AM68	SPC253	Throughout	Throughout the Plan	Refer to the updated NSPF 2025	To ensure the Local Plan is up to date.	Factual update
AM69	SPC254	Throughout	Throughout the Plan and on Policies Maps	Remove 'PUB' from policy references.	To reflect that stage of the Local Plan has been completed and the policies are final.	Factual update
AM70	SPC267	Throughout	168 last paragraph, 325 second paragraph, 336 third paragraph	Amend the three occurrences of this typo: The Authority expects proposals to include an appropriate number of disabled parking spaces.	To address comment BLP71	Typo
AM71	SPC268	Throughout	Throughout	Ensure references to the Protocol is 'Planning in Health Protocol'.	To address comment BLP78	Factual update
AM72	SPC269	Throughout	Throughout	Consider paragraph numbers.	To address comment BLP57	Formatting
AM73	SPC270	Throughout	Throughout	Replace 'rain bursts' with 'intense rainfall events'.	Related to comment BLP91c	REG19 representation