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Appendix B – Summary of Issues and Options representations.

01 Introduction

Inland Waterways Association

Questions relating to HRA.

Broads Authority comment:

The recreational impact work assesses visitor numbers as well as behaviour at European designated wildlife sites. This will help us and our HRA consultant understand the impact of development in Norfolk - will more people walk their dogs at a particular place for example?

The HRA is effectively a separate piece of work, required by European regulations. We will prepare policies to reflect responses from the consultations we hold as well as evidence that we commission and the HRA consultant assesses these policies.

The HRA will be completed on the Preferred Options and Publication versions of the Local Plan. The policies that go out for consultation will reflect the findings of the HRA.

03 About the Broads - Spatial Portrait

Great Yarmouth Borough Council

Access and recreation in the Broads can contribute to the health and quality of life of residents of neighbouring areas, especially important for those in towns and deprived populations.

Broads Authority comment:

The benefit of the Broads to health is discussed at section 23.4, but we do not explicitly state that the Broads benefits more people than those who live in it. This could be added to the health section.

Norfolk and Suffolk Boating Association

Broads Authority Officer Summary of Representation:

May we suggest adding a new section to the Spatial Portrait regarding the boats and people who maintain them.

Broads Authority comment:

Suggestion noted and will be considered as this section is reviewed.

Historic England

Broads Authority Officer Summary of Representation:

We recommend changing the title of the section to: "The historic environment and culture of the Broads".

Broads Authority comment:

Noted and we will do this.

04 Policy Context

Waveney District Council

Broads Authority Officer Summary of Representation:

Update regarding Bungay Neighbourhood Plan.

Broads Authority comment:

This section will be updated as the Preferred Options is produced.

Inland Waterways Association

Query regarding legal challenges on Jenner's Basin and how the Local Plan will reflect these.

Broads Authority comment:

We need to refresh and review the saved Local Plan policy, TSA2 as it is quite old. The review could reflect the findings of the most recent Planning Inspector's decision as this has been tested at court on two or three occasions. We will also consider thoughts of locals, the landowner and those who use Jenner's Basin. Whether this forms part of the Preferred Options depends on the progress of the legal process.

05 Duty to Cooperate

South Norfolk Council

General support of the BA's approach to DTC and suggests adding the Greater Norwich Local Plan.

Broads Authority comment:

As stated in the Issues and Options, that list was not exhaustive but gave a flavour of the activities undertaken. The forthcoming AMR will set out in detail DTC activities. That being said, support noted.

Great Yarmouth Borough Council

Great Yarmouth Borough Council is satisfied by the cooperation undertaken by the Broads Authority, and looks forward to continuing to cooperate on strategic and other issues of mutual interest.

Broads Authority comment:

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Support for our approach to the Duty to Cooperate is noted and welcomed.

Inland Waterways Association

Questions regarding the Duty to Cooperate.

Broads Authority comment:

The Duty to Cooperate is more than a tick box exercise. For the Local Plan to be found sound, we need to prove ongoing and meaningful engagement and discussions with relevant authorities. The main way we are doing this is through the production of the Norfolk Strategic Framework which seeks to produce high level agreements relating to cross boundary issues which Local Plans will address as they are produced.

Regarding Waveney, we regularly talk to them about cross boundary issues. For example. Waveney, Great Yarmouth and the BA are working together to produce an assessment of settlement fringe issues in those districts.

The Duty to Cooperate has led to Local Plans being stalled or not found sound so we need to give it full regard as we produce our Local Plan.

The BA does value this opportunity as by our very nature (being over six districts and two counties) we are a cross boundary consideration.

06 Challenges and Opportunities

South Norfolk Council

Amend one bullet to say 'Provide jobs, facilities, services and homes for local residents through the Broads Local Plan or the development plans of constituent Local Authorities through the Duty to Cooperate'

Broads Authority comment:

Suggestion noted and will be considered as this section is reviewed.

Chedgrave Parish Council

A key threat is the impact of other public bodies making spending decisions that impact on Broads Authority key aims and result in not maintaining rights of way, reducing visitor facilities and the promotion of tourism.

Broads Authority comment:

Noted. An additional threat relating to the issue of cut in budgets and challenges organisations face in light of reduced funds could be included.

Environment Agency

Broadly agree with and support the challenges and opportunities

Broads Authority comment:

Agreement noted.

Great Yarmouth Borough Council

The Borough Council agrees with the generality of the issues identified.

Broads Authority comment:

Noted.

Historic England

Because of the specific meaning within the National Planning Policy Framework (NPPF) of "heritage assets" and "historic environment" we would recommend that textual amendments are made to ensure consistency with the NPPF. We would suggest that reference is made to palaeo-environmental and organic archaeological remains as these undesignated heritage assets are especially vulnerable and significant in the Broads. We would suggest that archaeology is specifically identified as a potential loss through climate change.

Broads Authority comment:

Text to be amended. Suggestions for changes noted and will be considered as the Preferred Options is produced.

Inland Waterways Association

These challenges seem a fair assessment of what the local plan needs to address. It is not entirely clear that the plan will do this.

Broads Authority comment:

Noted. See next version of the Plan.

Norfolk and Suffolk Boating Association

Deficiencies of moorings to meet the needs of various water-space users is one of the biggest challenges faced by The Broads.

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Broads Authority comment:

Noted and will consider this as we review this section.

Norfolk and Suffolk Boating Association

1: Amend a strength to say "Substantial engaged community of private boat owners, many of whom are members of local boating clubs and classes which enable local people, (whether or not boat owners), and including children, to acquire and hone the skills required to become good sailors'.

2: Suggest an additional opportunity of "Opportunities to encourage both local residents and visitors to join one of the many boating clubs, take part in organised events, go on formal sailing courses and gain recognised Royal Yachting Association (RYA) qualifications.'

Broads Authority comment:

1 and 2: These will be considered as this section of the Preferred Options is reviewed.

Residential Boat Owners Association

Suggests how residential boats can benefit some of the challenges and opportunities.

Broads Authority comment:

Suggestions regarding the benefit of residential boats noted. The BA has policies relating to residential moorings and appropriate locations.

RSPB

No mention is made of the specific risk of damaging a legally protected site, or to the Local Plan being found to be unsound due to being undeliverable in the context of the protected sites.

Broads Authority comment:

Noted regarding damaging legally protected sites and this will be included.

Disagree regarding including the issue of the Local Plan being found unsound. The SWOT analysis refers to principal sustainability challenges and opportunities in the area rather than plans for the area.

Chedgrave Parish Council

Main areas of concern are the R Chet and maintaining navigation and footpaths which in turn encourages visitors to the area which then supports the livelihoods of local people.

Broads Authority comment:

Noted and will be considered as the Preferred Options is produced.

07 Vision, objectives and existing policies

South Norfolk Council

1: The list seems to accurately reflect the special qualities of the Broads.

2: Should reflect the content of the new Broads Plan.

Broads Authority comment:

1: Noted.

2: The Issues and Options states that this is what we intend to do.

Historic England

"History: geoheritage, cultural heritage, skills, archaeology, traditions, historic structures" is conflating two points which would best be separated into historic environment aspects and cultural heritage aspects, which can be tangible and intangible.

Broads Authority comment:

Noted and we will consider changing this into two points.

Inland Waterways Association

1: The list is a reasonable take on what is present in the area, although a little short on the fact that most of it is man-made.

2: Thoughts on objectives or vision for the Broads Local Plan: These should reflect the high level ones presented in the Broads Plan 2017, focused on the early years of that strategy needed to address urgent issues and prepare the ground for later work.

Broads Authority comment:

1: Support noted. Comment re North Walsham and Dilham Canal noted.

2: We will work closely with the authors of the Broads Plan.

Residential Boat Owners Association

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As this is being retained the RBOA would support any future planning applications which assist the sustainability of the existing boatyard

Broads Authority comment:

Noted.

River Thurne Tenants Association

1: What do you like about the Broads?

The River and Broads as an amenity, for water transport and pleasure, also we like the wide and varied visual amenity of changing sky and countryside views. We enjoy the variety of the local vernacular architecture and diversity of the boats travelling through the waterways. Our members enjoy staying and living by the rivers, using the riverside properties for relaxation, family time and the pleasure of being beside the water. We enjoy the variety of wildlife that can be seen in the area.

2: What do you not like about the Broads?

We do not enjoy speeding boats, noisy visitors, litter, untidy, unkempt, riverside sites such as The Bridge inn site which has been derelict for many years. We do not like the difficulty in finding suitable parking for ourselves and visitors. We do not like the condition of Bastwick Staithe and the fact that it is a muddy, potholed car park, again next to the Medieval Bridge. Since the removal of refuse compounds and suitable places for boat hirers to deposit their inevitable rubbish, there has been a great litter problem with overflowing bins and black plastic bags deposited on both Bastwick Staithe, Potter Heigham Staithe and in the private Car Park on the Bridge Inn site. The footpaths behind the bungalows on the Hickling Bank, and the Martham bank have deteriorated and are in need of maintenance. The footpath from Martham Boatyard to Potter Heigham is completely impassable, with foliage, water, slime and vegetation covering it. Walkers have to walk on the Flood defences, behind the flood wall. We do not like intrusive and unnecessary signage on the Broads, especially advertising signage.

3: What would you like to stay the same about the Broads?

Retention and upkeep of bungalows along the Thurne should remain. We would like public access to the Broads area to continue. Would like amenities such as Public Houses, restaurants, boat hire companies, shops, hire bungalows, flats, hotels, camping and caravan sites to be encouraged. Wildlife and the varied scenery should remain, also the access to the wilder areas of the Broads system should be maintained, either by foot or by water. Areas of trees and shrubs should be encouraged as the variation of scenery is necessary to wildlife. Retention of toilet facilities is essential. Mooring spaces either on the main river, broad or in a boatyard should be retained. Quiet areas for moorings should be retained.

4: What changes would you like to see in the Broads?

In the Potter Heigham area we would like to see tasteful and sympathetic renovation of derelict sites improved parking in the Bridge area. Litter bins, and places for boat refuse are essential. An evening eating establishment is essential in this area.

Broads Authority comment:

1: This information will help inform the vision and objectives of the Local Plan.

2, 3 and 4: Noted and will be considered as the Preferred Options is produced.

08 Water

South Norfolk Council

General support in addressing water usage.

Broads Authority comment:

Support and other suggestions noted.

Anglian Water

New Local Plan should include a revised version of DP3.

Broads Authority comment:

Noted and this is currently out intention.

Anglian Water

1: AWS support higher water efficiency standard subject to financial viability.

2: AWS would welcome requirement for water efficiency measures for non-residential development subject to financial viability.

3: Where it is proposed that a connection will made to a public sewer the New Local Plan should include a requirement to demonstrate there is adequate sewage treatment to serve the development or that this can be

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made available in time for the development. It would also be helpful if the New Local Plan included a policy which required applicants to demonstrate that there is available capacity within the foul sewerage network or that capacity could be made available.

4: Anglian Water would wish to see a policy included in the Local Plan which requires the provision of SuDs as part of new developments. As part of which it would be helpful if developers were required to provide evidence that they have followed the hierarchy as outlined in page 36 of the consultation document before proposing that surface water should be discharged into a surface water sewer. Anglian Water's current standards for SuDs adoption are available to view at the following address:
<http://www.anglianwater.co.uk/developers/suds.aspx>

Broads Authority comment:

1 and 2: Support noted. We await confirmation of views from Essex and Suffolk Water. We can then consider the most appropriate policy response.

3 and 4: Policy proposals noted and will be considered as the Preferred Options version of the Local Plan is produced.

Environment Agency

1: All Local Plan approaches and policies should be considered with the objective of improving the status of waterbodies in mind.

2: 8.3 Diffuse water pollution plans have been written and are currently being reviewed. The plans attribute actions to help improve water quality and habitats. The Local Plan should also acknowledge these and seek to contribute to the actions within them where appropriate. We would also highlight that addressing rural runoff from verge erosion can help in reducing diffuse pollution. Working with the highways departments of local councils and developers to identify and resolve these issues as part of development proposals would help improve water quality.

3: 8.4 We would support the inclusion of more detail within the Plan on this issue with the intention of improving understanding and therefore compliance.

4: 8.5 & 8.6 We would be supportive of the Local Plan seeking the higher water efficiency standard for new residential development. We would also suggest that the promotion of water efficiency for non-residential development should also be considered.

5: 8.7 We would support an approach that highlighted the hierarchy of preferred treatment methods and also gave advice on the suitability and maintenance of non-mains systems. We do have some concerns over the inclusion of reed bed filtration systems. Whilst they can provide a very useful polishing for treatment plant effluent, we are less certain that they can always clean effluent adequately on their own.

6: 8.8 We would support the inclusion of appropriate text in the final Plan if the situation remains an issue for future development to consider.

7: 8.9 Flood risk in the Broads does have specific characteristics, and it is appropriate and important that the Plan considers this, and provides sufficiently detailed policies and guidance to ensure that development is safe and flood risk elsewhere is not increased. However, it remains equally important that the approach taken is consistent with that contained within national planning policy and guidance. As you are no doubt aware, we support the intention to update the Strategic Flood Risk Assessment, as highlighted in this section. We would encourage further dialogue with all relevant authorities including Anglian Water, NCC as Lead Local Flood Authority, the IDB and neighbouring LPAs. We are aware that Waveney District Council is also intending an SFRA update in the coming months. Updating the SFRA will mean that the latest hydraulic modelling and climate change allowances can be incorporated to inform the evidence base. We have identified a number of communities within the Broads area which we have recognized as potential 'Communities at Risk'. These communities are shown to be at risk of flooding based on our modelling and flood history investigations. These areas were all previously discussed in the Broadland Rivers Catchment Flood Management Plan 2009. In March 2016 we published the Anglian river basin district Flood Risk Management Plan (FRMP).

8: 8.10 There are a wide range of SuDS methods available; the Plan should seek to ensure that SuDS appropriate to the Broads area and that contribute widely to key objectives are delivered.

Broads Authority comment:

1: Noted. The various policies in the water section should contribute to this aim.

2: Diffuse water pollution plans to be assessed. Issue of verges to be considered as the Preferred Options is produced.

3: Noted.

4: Support to address water efficiency noted.

5: Support regarding a policy approach noted. Concern re reed beds noted.

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6: Noted and all parts of the Issues and Options will be updated to reflect the situation at writing the Preferred Options.

7: FRMP 2016 noted.

8: Advice noted.

Inland Waterways Association

1: Assuming the Broads and some of the water bodies linking them together are in reality heavily modified water bodies, the WFD requires these water bodies to reach 'good potential' not good status.

2: Run off from boat wash in the new Local Plan: IWA agrees this needs to be subject of a separate improved policy to address the issue, within the context of a need to maintain a thriving local economy.

3: Proposing 110 l/hd/d for new dwellings, seems an appropriate response to water resources for the future, and the impacts of water usage on the Broads environment.

4: Thoughts on how the local plan should address water usage on non-residential premises: This seems a good idea, and standards for equivalent industries, premises or processes may be suitable for using as 'good practice' which BA might expect to be achieved.

5: Sewage rather than sewerage. A formal policy should better assist domestic properties reduce the pollution from their property.

6: It is hard to see how flood risk on the Broads differs from that elsewhere. However there could be a case for deploying 'local solutions' as a requirement for some types and locations of properties in potentially flooded areas. The Local Plan needs to highlight this issue, and see whether consideration of a tidal surge flood barrier is needed, similar to that projected at Boston.

7: There is a role for exploiting SUDS/ Rural SUDS in areas where there is sufficient space, and where groundwater conditions are suitable- not the case for many parts of the Broads. Equally, combining SUDS type retention systems and reed beds could provide both detention and slow release of run-off water and improvement in its chemical and biological quality before reaching a water body. This could therefore be usefully encouraged in the local plan, provided the SUDS systems have credible ownership, operation and maintenance plans.

Broads Authority comment:

1: noted.

2, 3, 4, 5, 6, 7: Support for various options and comments noted.

Natural England

Note that the issues scoped in at this stage includes Water quality/resources/flood risk issues.

Broads Authority comment:

Noted.

Residential Boat Owners Association

We support the use of filtration systems to reduce the contamination from washing down of vessels

Broads Authority comment:

Support noted.

RSPB

1: Issues 1: The Authority must ensure that, whichever option is chosen, they are confident that the use of anti-fouling paint is managed in a way that ensures that it does not cause damage to the ecosystem, particularly to designated features or habitats.

2: Issue 3: The development of additional reedbed habitat could deliver multiple benefits, especially helping to maintain and enhance ecological networks and landscape character.

3: The RSPB has published guidance on SuDS which can be found at https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf.

Broads Authority comment:

1: That is the reason for looking into this issue in the Issues and Options.

2 and 3: Noted.

Anglian Water

Essex and Suffolk Water also provide water services to part of the Broads Authority area

Broads Authority comment:

Noted

09 Open Space (land and water), Parks & Allotments

South Norfolk Council

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Support Option 3 to include a policy in the new Local Plan that refers/defers to existing and future play and open space policies in constituent districts policy documents

Broads Authority comment:

Support for option 3 noted.

Great Yarmouth Borough Council

Core Strategy was adopted in December 2015. Site Allocations, as well as the Development Management Policies mentioned, are currently in preparation.

Broads Authority comment:

Noted. This will be updated in future versions of the Local Plan.

Chedgrave Parish Council

Support Option 4. Loddon & Chedgrave be included when considering the lack of public launching facilities as there has been a long standing demand for these facilities in the area.

Broads Authority comment:

Support for option 4 noted.

Comment regarding public launching facilities to be passed onto Waterways and Recreation Team.

Inland Waterways Association

- 1: Broads has plenty of potential water recreation capabilities, and BA could more actively deploy/ exploit this.
- 2: Safety of children in an otherwise more hazardous water environment
- 3: Retention and new provision of staithes and slipways is an important issue.

Broads Authority comment:

- 1: The BA does promote the appropriate use of the Broads. That is one of its statutory purposes.
 - 2: We are producing a safety by the water section of the Local plan.
 - 3: Noted and will be considered as the Preferred Options is produced.
-

Natural England

For more information see the Accessible Natural Greenspace Standard (ANGSt) [weblink].

Broads Authority comment:

Link and further information noted.

Norfolk and Suffolk Boating Association

- 1: There is inadequate weight on restoring staithes at key sites (such as Ludham Bridge) back to their legally protected status.
- 2: Ensure that local users are consulted in detail about their requirements and preferences for the details of materials and layout.

Broads Authority comment:

- 1: Noted. The Authority is undertaking work to understand staithes in the Broads further.
 - 2: Noted and will be passed onto the Waterways and Recreation Team.
-

Norfolk County Council

Public Health welcome the acknowledgements given to the value of open spaces, play etc. to public health

Broads Authority comment:

Support noted.

River Thurne Tenants Association

Suggestions include: Bridge Green at Potter Heigham, Pugg Street Staithe, East of Potter Heigham Bridge.

Broads Authority comment:

Suggestions noted. RTTA will be asked to complete forms.

RSPB

There does need to be a guiding principle established as to the requirement for open space and play areas to be included in the design of developments.

Broads Authority comment:

Noted.

10 Green Infrastructure

South Norfolk Council

Support Option 2

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Broads Authority comment:

Support for option 2 noted.

Broadland District Council

Support Option 2 and 3.

Broads Authority comment:

Support for options 2 and 3 as well as the benefits of GI are noted.

Environment Agency

Blue infrastructure, multifunctionality of SuDS and WFD important considerations.

Broads Authority comment:

Blue infrastructure is talked about at section 9.4 of the Issues and Options - water open space.

SuDS is talked about at section 8.10 of the Issues and Options.

Water Framework Directive is referred to throughout section 8 of the Issues and Options.

Inland Waterways Association

Setting out a strategic role for green infrastructure in the Broads is key to demonstrating the benefit of living in and visiting such a location. Ideally, the plan would show how deploying green infrastructure would achieve equally effective outcomes for locals and visitors, with better sustainability and lower impact on the Broads environment.

Broads Authority comment:

Support for a policy on GI noted.

Natural England

Advise that the Plan should ensure the creation, protection, enhancement and management of green infrastructure. For more information, see the PPG on Green Infrastructure [weblink].

Broads Authority comment:

Link and further information noted.

Norfolk and Suffolk Boating Association

We failed to find any reference in either of these sections, to the most sustainable form of transport and the most sustainable form of tourism, that is, transport by engineless boat propelled by the harnessing of wind and tide.

Broads Authority comment:

Comment noted and we will consider this as the Preferred Options is produced.

Norfolk County Council

1: Both Option 2, a Strategic GI Policy, and Option 3, Specific GI policies for specific locations/projects, would appear to be suitable delivery mechanisms.

Areas for consideration could include requiring development to

- * contribute to the Public Rights of Way (PRoW) network

- * take measures to minimise impacts from recreational on the internationally designated biodiversity sites

- * contribute to ecological networks and connectivity (NPPF para 117), both within the Broad Authority area and to the wider network of Norfolk

2: Open Space and allotments (Issue 9) could be covered by a strategic GI policy as they are included in the GI definition used in the Issues and Options report.

3: We would support either option 2 or 3 of Issue 5.

Broads Authority comment:

1: Support for option 2 and 3 noted. Suggested requirements also noted.

2: Suggested approach noted and will be considered as the Preferred Options is produced.

3: Support for option 2 and 3 noted.

RSPB

Option 2 would be the most appropriate.

Broads Authority comment:

Support for option 2 of Issue 5 noted.

Suffolk Wildlife Trust

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Green Infrastructure (Issue 5): We support Option 2, a Strategic Green Infrastructure Policy. Such a policy could also be expanded to include specific GI projects (in line with Option 3), where these have been identified.

Broads Authority comment:

Support for option 2 and 3 noted.

11 Climate Change

South Norfolk Council

The Broads Local Plan should include policies to address both the mitigation of, and adaptation to climate change

Broads Authority comment:

Noted.

Historic England

We would expect that the evidence base for this section would include Historic England's advice Energy Efficiency and Historic Buildings- Application of Part L of the Building Regulations to historically and traditionally constructed buildings. It should be noted that listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. These considerations need to be taken into account when considering how best to mitigate against climate change in historic buildings and areas. Therefore, any policy coming forward should take into account its effect on such buildings and areas.

Broads Authority comment:

Comments noted and will be considered as the Preferred Options is produced.

Inland Waterways Association

Scoping of development type and scale seems the more appropriate response in the local plan. At this stage, Option 5 seems more difficult to specify and implement given the uncertainty around effective solutions and the quantum of need.

Broads Authority comment:

Comments noted and will be considered as the Preferred Options is produced.

Natural England

Advise that the Plan should detail the approach to mitigation of and adaptation to climate change.

Broads Authority comment:

Noted.

RSPB

A strategic approach to climate change which, for example, connected areas to allow for movement of species, or identified and adapted areas which would be able to take extra water in the future, should be adopted.

Broads Authority comment:

Noted and will be considered as we address climate change in the Preferred Options.

12 Peat

Historic England

As policies are developed, consideration should be given to how potential archaeological deposits are conserved when faced with development proposals.

Broads Authority comment:

Comments noted and will inform this section as it is progressed.

Inland Waterways Association

If useful and not unduly onerous, provision of guidance in Option 4 seems the better way to address peat exploitation.

Broads Authority comment:

Support for option 4 noted.

RSPB

It is not possible to mitigate for its loss as it cannot be recreated in any reasonable timeframe. The chosen option needs to minimise disruption, protect and restrict removal of peat soils. The wording needs to be carefully considered as some operations which are beneficial to the conservation of the Broads and the maintenance of internationally important species and habitats requires the carefully controlled and monitored removal of peat for conservation purposes, e.g. the creation of turf ponds and scrapes. A combination of Options 2 and 6, with a caveat that disturbance or small-scale removal for the management of land for conservation should be permitted, could be used to ensure the correct level of protection is appropriately applied.

Broads Authority comment:

Noted and will be considered as we look into the issue of peat in the Preferred Options.

Natural England

The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity. We advise that the Plan policies refer to the Defra Code of practice for the sustainable use of soils on construction sites. Reference should also be made to Best and Most Versatile (BMV) agricultural land. BMV land is defined as Grades 1, 2 and 3a in the Agricultural Land Classification (ALC) system. The plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land.

Broads Authority comment:

Comment noted and will be considered as the Preferred Options is produced.

13 Heritage and Historic Assets

Suffolk County Council

- 1: reference to the Norfolk and Suffolk Historic Environment Records should be added
- 2: Page 56, 1st paragraph – add Historic Environment Records to the list?
- 3: Non-designated assets – SCC preferred option would be Option 3
- 4: a stronger policy CS5/DP5 (as above, Issue 8, Option 3) would mean that there is a policy to which a guide could relate.
- 5: The approach as set out, which involves improved policies CS5/DP5 as well as a strategy led by Historic England, is one that we would support and encourage.
- 6: Option 3, to develop guidance for cultural and heritage interpretation, could work best in combination with clauses in Policies CS5 and DP5 that require outreach and presentation

Broads Authority comment:

All comments noted. These will be considered as this section of the Preferred Options is worked up.

South Norfolk Council

Support option 3 and support improvement of existing policies re exceptional waterlogged heritage.

Broads Authority comment:

Support noted.

Historic England

- 1: As before, consistency with the NPPF in respect of the terms "historic environment" and "heritage assets" would improve clarity.
- 2: Suggest renaming the section "Historic Environment and Cultural Heritage", however, we recommend that the cultural elements are separated from the historic environment and that this chapter is renamed "historic environment".
- 3: Introduction, p55: We would recommend this specific textual change: "The Broads has a rich and varied historic environment recognised by the statutory..." We would recommend deleting the word "landmark" from the second paragraph as not all buildings, structures, historic landscapes or features that contribute to local character will be landmarks.

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4: We would welcome development of a policy on the Local List and undesignated heritage assets given the significance and uniqueness of the Broads and the vulnerability to various types of heritage assets from a variety of factors as outlined in the issues and options consultation.

5: We would recommend this textual amendment: "drainage mills are a defining feature of the historic landscape of the Broads...." We would welcome the development of a policy on drainage mills in principle, however, we note that these buildings and their locations pose particular difficulties and that the options suggested in the consultation document all have significant issues attached.

6: We welcome the recognition of the Broads as an area of exception waterlogged heritage.

7: England's Advice Notes 1-6.

Broads Authority comment:

1: Noted and will be amended in the next version.

2: We will consider this as the Preferred Options is produced.

3: Noted and will be amended in the next version.

4: Support for a policy noted.

5: Noted and will be amended in the next version. Support for a policy noted.

6: Noted.

7: Advice notes will be considered and inform the Preferred Options.

Inland Waterways Association

1: The introduction mentions many of the Broads heritage assets but none relating to those around boats and navigation- a significant omission given how many there are, and how they impact the landscape.

2: Option 2 an additional generic policy on reuse of historic and heritage assets will improve the focus on how these can be kept or brought into useful existence, and demonstrate a more flexible response to innovative ideas and good design.

3: This proposal by Historic England seems an unhelpful 'blunderbuss' approach to anyone who wants to conduct any development. A more focused approach is needed, to help identify smaller areas or sites which have a high likelihood of needing investigation or protection

4: Option 2 using a policy or criteria relating to interpretation seems a low key but useful route to follow.

Broads Authority comment:

1: Noted, however the introduction is a reflection of fact – those are the structures on the local list. The Historic Environment Manager plans to look into staithes and boatyards over the coming years.

2: Support for Option 2 noted.

3: Noted, but it is an allocation by Historic England which we need to consider.

4: Support for Option 4 noted.

River Thurne Tenants Association

Support heritage interpretation. Suggest a heritage trail.

Broads Authority comment:

Support for a policy in the Local Plan relating to heritage interpretation noted. A trail is a specific project and the idea will be passed to the Authority's Historic Environment Manager.

14 Biodiversity

South Norfolk Council

Support Option 2

Broads Authority comment:

Support for option 2 noted.

Inland Waterways Association

1: Surely a more measured approach should start with why is it necessary to do this, given NPPF statements. If local people don't support going further than current planning, why does the BA think it necessary to tell them that it is? Why not have a process to identify local areas (ie Local Wildlife Sites?) which are nationally or regionally significant, and then support them?

2: It needs to be born in mind that providing off-site compensation is not always possible for small private developers.

3: Option 2 a compensation policy seems rather like a ransom proposal, and will no doubt be challenged at some point in the courts. The relative powers of the BA and a small developer are disproportionate, and the assessments of adverse impacts too easy to use to swing work the BA cannot afford to undertake onto others who are unable to afford the evidence needed to counter the BA's precautionary principles. More work needs

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to be done on how residual adverse biodiversity impacts will be measured before a policy can be drawn up, otherwise there is no process to implement the policy. Alternatively BA could find someone else already successfully implementing such a policy, and copy it.

Broads Authority comment:

Comments noted and will be considered as the Preferred Options is produced.

Natural England

1: Criteria should also be set out to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity and geodiversity.

2: Distinction should be made between the protected sites hierarchy of European (i.e. Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites), national (i.e. Sites of Special Scientific Interest (SSSIs)) and local (e.g. Local Wildlife Sites (LWS)) sites.

3: The Plan should also make clear that any proposal which would adversely affect a European site, or cause significant harm to a SSSI will not normally be granted permission.

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

Norfolk County Council

1: We support the concept of adding what effectively will be a fourth tier of biodiversity sites. Strongly support Option 2 of Issue 11.

2: We would support Option 2 of Issue 12

3: Our view of Issue 13 is that as off-site compensation is already permitted by the NPPF, no specific policy is necessary (Option 1).

Broads Authority comment:

Support for various options is noted and will be considered as the Preferred Options is produced.

RSPB

Issue 11: The allocation of non-designated, but biologically and ecologically important sites would be valuable. Option 2 would be appropriate.

Issue 12: The Local Plan should acknowledge the possibility that brownfield sites could be of 'High Environmental Value' and should require the developer to establish whether that is the case as part of the application process. Option 2 would therefore be appropriate.

Issue 13: This issue and policy can only realistically apply to non-designated areas, and we would expect that to be stated. Unless carefully worded, there is a danger that this policy could be confused with the requirements of the Habitats Regulations and infer that residual adverse biodiversity impacts from developments in Natura 2000 sites (SPA, SAC, Ramsar) could be considered. We would welcome a policy that confirmed the hierarchy described in NPPF paragraph 118, and which required measures to address residual harm to biodiversity in non-designated areas, but any policy would need to state that it excluded development within or near European Sites which would require HRA. The word 'compensate' should not be used in this option and would cause confusion.

Broads Authority comment:

Preferred Options and advice noted and will be considered as the Preferred Options is produced.

Suffolk Wildlife Trust

Issue 11: We support Option 2.

Issue 12: We support Option 2

Issue 13: would support the use of Option 2, a compensation policy. We would also query the use of such a policy for compensating for impacts on sites designated for their European nature conservation importance

Broads Authority comment:

Preferred approaches and offers of assistance noted.

Natural England

1: The Plan should specifically promote protection and recovery of priority habitats and species

2: The Plan should ensure that ecological networks are enhanced.

3: Plan should ensure that ancient woodland is protected

Broads Authority comment:

1: Policy CS2 currently addresses this and could be rolled forward.

2: There is potential to update ecological networks on a county level, with all authorities working together.

This issue will be addressed in the Preferred Options.

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3: Ancient Woodland will be considered as the Preferred Options is produced.

15 Renewable Energy

South Norfolk Council

South Norfolk Council strongly supports the Broads Authority in its consideration that allocating land within the Broads Authority Executive Area for wind turbines is not appropriate.

Broads Authority comment:

Support noted.

Historic England

We welcome the Authority's consideration not to allocate land for wind turbines based on the effect on the Broads Landscape sensitivity.

Broads Authority comment:

Support noted.

Inland Waterways Association

Notwithstanding that current wind turbines are closely related to the windmills and drainage mills of the Broads heritage, they seem now to be out of scale for the landscape, and inappropriate.

Broads Authority comment:

Stance noted.

16 Landscape Character

South Norfolk Council

1: support the inclusion of a general landscape policy in the Broads Local Plan although it would be important for any such assessment to be consistent across Local Planning Authority boundaries.

2: Issue 16, support option 2.

3: Issue 17, support option 2 and 3.

4: Issue 18, support option 4.

Broads Authority comment:

Support for various options noted and will be considered as the Preferred Options is produced.

Environment Agency

Flood Defence Consent, if within 8m of a Main River or Land Drainage Consent, if affecting an ordinary watercourse, may be required. Additionally, the disposal of material must be in accordance with the requirements of the Environmental Permitting Regulations 2010.

Broads Authority comment:

Further information such as consents and permits noted and will be considered as this section is progressed.

Historic England

Historic England's Advice Note 3-

Broads Authority comment:

Advice notes will be considered as the Preferred Options is produced.

Inland Waterways Association

1: 16.1 Introduction, second paragraph could also include the challenge to control the growth of scrub and trees not only on river banks but also in the reed beds, which are slowly affecting the landscape character.

2: It is not clear why having an LCA adds anything to the Broads, already itself identified as unique. The only apparent benefit from having guidance on how to interpret them is to judge how a planning application might be impacted, which seems little different to what would be obtained from local planning officers.

3: It is not clear from the section whether land raising only applies to physically raising the land surface, or also includes buildings erected on stilts, or indeed perhaps buildings which can float in floods. Option 3 seems bureaucratic and unlikely to reflect the more positive approach the BA is trying to project. Therefore, Option 2 seems to be preferable. Other options could then include (if not already in) buildings on stilts, or floating buildings to avoid the need for land raising.

4: Option 2 addresses the potential for diverting the material to a more 'green' solution, and identifies the importance of making effective disposal arrangements.

5: Option 3 provision of a guide offers the potential to truly help developers and reach better solutions.

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6: Given the fact of existing Permitted Development Rights, working to implement a protocol seems more sensible. For example, effectively banning improvements in broadband type services will significantly affect business and domestic quality of life in the area, so some compromise is needed.

7: Option 2 Criteria based policy provides guidance for anyone considering such development.

Broads Authority comment:

1: Noted and will be raised with the BA's Landscape Consultant.

2: The Landscape Character Assessment is a study of the Broads developed to aid decision-making that could affect its condition or visual quality. The study has concentrated on identifying a series of areas each with a unique set of characteristics, which combine to give them their own distinct sense of place. The process of Landscape Character Assessment has evolved over the last decade to become an increasingly important tool in planning and decision-making. The work has a range of potential applications from a strategic level through to the production of detailed guidance. Production of a Landscape Character Assessment is part of the information gathering exercise recommended by Government as part of the Local Development Framework process.

3: This is raising of land on which buildings sit. Not use of buildings on stilts. Support for option 2 noted.

4: Support for option 2 noted.

5: Support for option 3 noted.

6: Comments noted.

7: Support for option 2 noted.

Natural England

Advise that the Plan should ensure protection and enhancement of landscape (both direct and indirect pressures can impact on character).

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

Norfolk County Council

1: There are opportunities to produce guidance derived from the Landscape Character Assessment which is more accessible to the public and potential applicants; guidance could briefly outline the key landscape features within each character type and, where appropriate, provide guidance on details such as typical planting type or form for each area.

2: Support Option 2 of Issue 14 as it is not restrictive, allows the significance of different landscape features to be assessed and can be flexible into the future.

3: Support option 2 of Issue 15 that seeks to formalise and better regulate the disposal of excavated material.

4: Support option 2 of Issue 16 which could be accompanied by supplementary guidance as discussed under the Section 16 Landscape question.

5: Some overhead line development is covered by permitted development rights, and so a policy would not necessarily safeguard all areas. With this in mind, we would support Options 2 or 3.

6: Favour Option 2 in a situation where it could sit alongside landscape guidance as discussed under Section 16 Landscape Question.

Broads Authority comment:

Support and reasons noted and will be considered as the Preferred Options is produced.

RSPB

Issue 14 and 15 - only apply to non-designated areas.

Broads Authority comment:

Noted.

17 Amenity and Tranquillity

South Norfolk Council

Supports option 1 and 2, but not 3.

Broads Authority comment:

Support for options noted. Concern about option 3 noted.

Great Yarmouth Borough Council

The types and speeds of movement in the landscape is another important dimension of tranquillity, and you may wish to mention this.

Broads Authority comment:

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Noted and we will consider this as we produce the Preferred Options.

Inland Waterways Association

1: Given no information is provided on DP28, other than an implication that it might refer to Amenity, we do not have any comments.

2: Option 3 have a strategic policy, criteria based, which supports the enhancement of tranquillity.

Broads Authority comment:

1: DP28 is in the Development Management DPD. Policies that are already in place were generally not copied into the Issues and Options, rather those interested could go to them on-line.

2: Support for option 3 noted.

Natural England

Advise that any areas of tranquillity should be considered, mapped (or otherwise spatially identified) and provided appropriate policy protection within the Plan.

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

Norfolk County Council

Encouraging the use of these areas for recreation - even quiet recreation - may be detrimental to the biodiversity and, in the case of 'designated features' of the Natura 2000 sites, may contravene the Habitat Regulations 2012

Broads Authority comment:

Agree that if sites allocated for their tranquill nature, they could become more attractive to visitors than they are now. This will be a consideration as the Preferred Options is produced. A HRA is needed for the entire plan.

River Thurne Tenants Association

Hickling, Horsey. The bungalows are particularly tranquil during the early hours and evening times.

Broads Authority comment:

Noted. These areas already benefit from a tranquillity related policy - XNS2 of the Sites Specifics Local Plan.

Natural England

Advise that, in particular, any potential traffic impacts of new development including agricultural (e.g. intensive pig and poultry) on European sites and SSSIs may pose a risk to air quality.

Broads Authority comment:

Noted.

18 Light Pollution

South Norfolk Council

General support of guide and tackling light pollution but need to consider differences on edge of Norwich when compared to rural areas as well as consider safety issues and cost implications.

Broads Authority comment:

Support to tackle light pollution noted and suggestions will be considered as the Local Plan progresses.

Inland Waterways Association

Via a BA bespoke light pollution guidance

Broads Authority comment:

Support for guidance noted.

Natural England

Light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Policies (usually design policies) should address impacts on the natural environment.

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

Norfolk and Suffolk Boating Association

Support to address light pollution.

Broads Authority comment:

Support to address light pollution noted.

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Norfolk County Council

We would support Options 2 and 3 coming forward together.

Broads Authority comment:

Support to address light pollution noted. The suggested approach will be considered as the Preferred Options Local Plan is produced.

River Thurne Tenants Association

Support tackling light pollution.

Broads Authority comment:

Support noted.

19 Retail

Waveney District Council

Bridge Road shopping centre - split between two LPAs. There is an opportunity to ensure a consistent approach.

Broads Authority comment:

Noted and we will work together on the policy approach to this area.

South Norfolk Council

Would support a combination of Options 2, 3, 4, 5 to fulfil the requirements of the NPPF. The policy needs to protect town centres outside the Broads Local Plan Area such as Loddon.

Broads Authority comment:

Support noted. Greater clarification relating to the Loddon Town Centre comment to be sought.

Broadland District Council

Combination of the following options be considered further:

[Agree] Option 2: set primary and secondary frontages

[Agree] Option 3: Retail hierarchy

[Agree] Option 5: Safeguard existing retail units

Broads Authority comment:

Noted. On reflection, it would appear sensible to work with North Norfolk and Waveney Council in relation to the areas of retail that are identified. Waveney Council for example has completed a retail study that addresses all of Waveney. We will talk to North Norfolk about their plans relating to retail as we produce the Preferred Options.

Inland Waterways Association

1: What account is BA going to take of demand- such as hire boaters, outside the area?

2: How is BA going to provide for retail changes through the plan period such as more home delivery of on-line shopping from outside the area which makes existing retail unsustainable, and how might BA try to encourage outlets such as service providers like pubs and restaurants, linked to tourism/ boating?

Broads Authority comment:

1 and 2: This policy addresses the types of land use as discussed at 25.2 as well as those types of centres. It does not refer to retail outside of the areas discussed at this stage. Evidence has been produced by Waveney that covers some of the retail areas discussed in the Issues and Options and we will work with them to formulate an appropriate and consistent policy approach. The same with North Norfolk - discussion regarding their future evidence on retail are on going.

Residential Boat Owners Association

RBOA policy identifies residential moorings in appropriate locations as supporting the local retail centres, particularly out-of-centre developments away from the main tourist areas and outside the main tourist seasons.

Broads Authority comment:

Noted.

20 Transport

South Norfolk Council

1: Support Acle Straight dualling. A criteria based policy may be best way forward without being too prescriptive about the precise land take needed for the scheme.

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2: South Norfolk Council considers that the safeguarding of future recreation routes is important for recreation and connectivity.

Broads Authority comment:

1: Support for the dualling and a criteria based policy noted.

2: Support for safeguarding recreational routes noted.

Great Yarmouth Borough Council

1: Hence the Borough Council considers that it could be appropriate for the Broads to have a policy which supported the development of the dualled road, subject to realistic criteria for appropriate protections and enhancements of the area's special qualities.

2: Broads recreation has the potential to be an even greater contributor than at present to the health and quality of life for residents in surrounding areas such as Great Yarmouth (some of whom suffer severe deprivation), and access improvements could help realise some of that potential.

3: The Borough Council is keen to work with the Broads Authority to explore the recreational potential of these routes, and will consider protecting those parts of the route within the Borough Council's planning area in its own future Local Plan documents.

Broads Authority comment:

1: Support for a policy on the Acle Straight noted. The wording of the policy will reflect the corporate stance on the dualling.

2: Noted.

3: Support noted.

Historic England

We would expect consideration of the historic environment in any policy development for this section.

Broads Authority Officer Summary of Representation:

We would expect consideration of the historic environment in any policy development for this section.

Broads Authority comment:

Noted.

Inland Waterways Association

1: As has already been stated, planning must preserve access to waterways, and could limit 'excessive' road transportation especially for large developments. The BA could engage with organisations of water transport to ask them to assist. IWA can provide links if needed.

2: Option 2, with a policy which safeguards routes.

3: Option 2, a policy relating to car parks.

Broads Authority comment:

1: Comments noted and will be considered as the Local Plan is progressed.

2: Support for option 2 noted.

3: Support for option 2 noted.

Natural England

Advise that full account should be taken of any impacts from transport (and associated infrastructure) on the natural environment.

Broads Authority comment:

Advice noted and will inform the production of the Preferred Options.

21 The Broads Economy

South Norfolk Council

Issue 38: Support option 2.

Issue 39: Support a combination of Option 2 and 3 aimed at directing employment uses to sustainable locations.

Broads Authority comment:

Support for options noted.

Broadland District Council

1: Issue 38: support options 1 and 2

2: Issue 39: support option 3. Another option could be to prepare a 'criteria based policy'.

Broads Authority comment:

BDC's preferred approaches noted and will be considered as the Preferred Options document is produced.

Environment Agency

Refers to the issue of flood risk.

Broads Authority comment:

It is noted that flood risk is a cross cutting theme in the Broads.

Inland Waterways Association

1: Option 3: Seek to retain sites in employment use. This should be modified to ensure moorings, slippage and parking facilities for visiting boats and canoes are retained. This will have the advantage that continued provision of services to boaters such as water, visitor moorings etc. will be maintained. Any new development on the site must also be so designed to prevent a wind shadow or turbulence impairing the use of the adjacent navigation by traditional yachts and wherries. For certain marine uses, providing starter units might also work well in retaining some of the character and boat interest in a site.

2: It is better to do encouragement through 'promote starter units' and other ways to provide what is needed, than try to guess where businesses want to go and make them go there. What does BA know about what conditions businesses need to go somewhere? What shortfalls are there currently?

Broads Authority comment:

1: Support for option 3 with suggested content noted.

2: Work to understand the economy is being looked into at a Norfolk-wide level. The BA also rely on the knowledge of its districts' Economic Development Officers.

Littlewood, Mr & Mrs P

Support Options 1 or 3 in Issue 38, Broads Economy Chapter 21.

Broads Authority comment:

Support for options 1 or 3 noted.

Norfolk County Council

1: Either no change to the existing policy or having a less restrictive policy would be the preferred options in relation to redundant boat yards

2: Reintroducing the approach from the 1997 local plan with development boundaries relating to employment development would be the preferred option from an economic development perspective.

Broads Authority comment:

Prerences noted and will inform the production of the Preferred Options.

Residential Boat Owners Association

Appropriate residential moorings can support the viability of boatyards by maintaining regular income streams, regular need for boatyard facilities, maintenance, fuel etc and by providing affordable accommodation for boatyard operatives. Whilst understanding that some boatyard operations do not need to be carried out adjacent to the water, it is important to conserve this traditional connection.

Broads Authority comment:

Information noted and will be considered as we produce the Preferred Options.

River Thurne Tenants Association

Suggest encouraging a wide variety of uses and businesses in redundant boatyards.

Broads Authority comment:

Preffered approach noted.

Evolution Town Planning

Somerleyton Marina Ltd are looking to achieve a future policy context that is flexible and positive towards the potential extension of the Somerleyton marina and boatyard supporting and responding to the demands of economic development and tourism. Existing strategic objectives and Development Management policies DP16, DP19 and DP20 in particular currently provide a clear and positive framework but work is needed to bring them in line with more up to date national planning policy. Despite recognising the importance of marinas and boatyards to economic prosperity the Issues and Options consultation document does not identify the need to provide policy guidance on the identification, recognition, development and expansion of existing sites. Issue 38 deals with redundant boatyards and is not relevant to the aspirations for Somerleyton Marina.

Our Preferred Option:

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Given that existing Development Management policies are broadly acceptable in their current form as a means to judge the future potential expansion of the marina and boatyard at Somerleyton, and on the proviso of more positively worded strategic policies, we would prefer Option 1 as a means to guide and support our clients development aims. Option 3 would require a greater amount of input and therefore be less efficient than Option 1. Plus Option 3 includes a degree of uncertainty at this stage about whether and how generalised criteria intended for all employment sites could apply to Somerleyton marina. Equally if a site specific approach were taken, whether a size threshold might mean Somerleyton marina were excluded, despite its sustainability credentials. We would prefer Option 1 over Option 3. Option 2 could be acceptable but the risk to Somerleyton marina that the boatyard exception criteria were missed out or poorly worded is too great at this stage to lend this Option any support. We would prefer Option 3 over Option 2 and then Option 1 over Option 3. I.e. our preferred ranking of the options with the most preferable first is:

- * Option 1 (preferred) maintain the approach in the Development Management DPD on the proviso that the strategic policies were more positively worded.

- * Option 3 could be supported provided a bespoke site specific policy for Somerleyton marina and boatyard were adopted.

- * Option 2 could only be supported if the boatyard exception were retained.

Broads Authority comment:

Assessment of options noted. Preferred Option noted.

22 Sustainable Tourism

South Norfolk Council

Support a combination of Options 2, 3 and 4

Broads Authority comment:

Support for these options noted.

Broadland District Council

Supports Options 2 and 3.

Broads Authority comment:

BDC's preferred approaches noted and will be considered as the Preferred Options document is produced.

Inland Waterways Association

1: IWA is keen to ensure the BA manages the balance between the importance of tourism to the local economy, and navigation & conservation. Both the latter are also important in maintaining a dynamic tourism industry, and offering visitors something which represents the reality and diversity of things to see and do which the Broads has.

2: IWA considers that the best way forward in the plan is with Options 3 & 4

Broads Authority comment:

1; Noted and that is what the Sustainable Tourism Broads Plan and Local Plan will try to do - balance the three purposes of the BA.

2: Support for options 3 and 4 noted.

Norfolk and Suffolk Boating Association

We failed to find any reference in either of these sections, to the most sustainable form of transport and the most sustainable form of tourism, that is, transport by engineless boat propelled by the harnessing of wind and tide.

Broads Authority comment:

Comment noted and we will consider this as the Preferred Options is produced.

Norfolk County Council

It is felt that no new policy is needed for sustainable tourism and existing policies would cover what is required from an economic development perspective.

Broads Authority comment:

Noted.

23 Navigation

South Norfolk Council

Issue 44: The Council would support Option 3 to encourage improved mooring provision through improvements to the existing policy.

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Electric charging points: General support. Need to consider cost and landscape impacts. Could be provided as part of developments.

Broads Authority comment:

Issue 44: Support for option 3 noted.

Electric charging points: But yes, this will be a consideration. Another factor is the provision of electricity supply in isolated areas. Comments noted.

Historic England

Raises issues of loss of archaeological deposits when considering sediment management and bank erosion and issue of damage to historic bridges.

Broads Authority comment:

Comments noted and will be considered as the Local Plan is progressed.

Inland Waterways Association

1: Navigation keeps the Broads free of weed and reed, creates jobs, maintains a spectacle and provides a large part of the leisure income the area generates. Maintenance of the various facilities is essential to keep the attraction functioning and able to provide an experience on a par with its costs to the visitor.

2: The report mentions moorings, with the suggestion that the Broads Authority would like others to become involved. Whilst this may be feasible, it is likely to revolve around a 'premium offering' to ensure some boaters are prepared to pay the extra required to fund such facilities, with such elements as mains power hook-ups, recharging for electric boats, wi-fi and other new technologies as time passes. Any levies by BA to fund their provision will need to be hypothecated to ensure they do not go to fund work the BA is already funded for, and there will be issues of fair competition to address. In summary, IWA agrees that the current policy needs an update, as suggested in Option 3.

3: On electric charging points and their delivery, IWA would suggest a standard approach, using proven commercial kit to a single common Broads design (if not wider across other navigations in the UK) rather than a new specific BA design.

Broads Authority comment:

1: Benefits of navigation noted.

2: Support for policy 3 noted. Extra information noted.

3: Suggestions noted.

Norfolk and Suffolk Boating Association

1: Section 23. We also note your remark that planning is not directly linked to all of these threats, but would suggest that policies are appropriate to inform development control in the event of any proposals, such as the Broadland Flood Alleviation project, which would have an impact on any of these threats.

2: Issue 41 we would recommend Option 3: 'Improve the existing Policy'.

3: Regarding wild and informal moorings, Page 111. We concur with your remarks about not formalising these through the local plan process.

4: Re electric charging points, this simple provision, which is almost universally provided in yacht marinas for safety amenity and to minimise the running of diesel engines especially at anti-social times, should be rolled out, in our view, at appropriate sites, but not in wilderness locations where there is no mains power in any case.

Broads Authority comment:

1: Point taken. The text referred to the direct provision or carrying out of these issues which tend to be delivered through partners or other teams in the BA.

2: Support for Option 3 noted.

3: Support noted.

4: Views noted and will be considered as the Preferred Options is produced.

Residential Boat Owners Association

It would be good to see moorings fully integrated between visitor, permanent leisure and residential as we believe that the latter can add security and other benefits. Servicing of moorings is an important issue for all users and whilst supporting the provision of charging points it would be very useful would to explore the option of residential moorings using renewable energy sources.

Broads Authority comment:

Comments noted and will be considered as the Local Plan and Mooring Strategy are produced.

Thomas, Mr P

Culture of safe thinking is needed.

Broads Authority comment:

Comment noted, however this section refers to ways of getting out the water if you have climbed over the fence and fallen in. It also talks about throw lines and the like. Not all incidences of people falling in the water relate to alcohol. Whilst there is of course a role for education with regards to safety by the water, this section of the Local Plan refers to the equipment side of the issue that helps people if they do fall in, no matter what the reason is.

23 Navigation

Codling, Mr R

would like to see more commitment on preserving the navigational rights into the centre of Norwich.

Broads Authority comment:

Discussions are ongoing with Network Rail. Were the rail bridge to be replaced with a fixed bridge appropriate compensation will be required to mitigate.

24 Housing

South Norfolk Council

- 1: Support Option 2. However we would accept the implications of a smaller total allocation if it proved impossible to identify sufficient viable sites without significant environmental impact. In such a situation the unmet residual need would have to be met elsewhere, possibly including South Norfolk.
- 2: Request clarification of "We intend to roll forward the policy approach of using the percentages of our districts. Set out particular thing to consider.
- 3: Support option 2. Consideration should be given to the inclusion of criteria which would cover both land and water based gypsies.
- 4: South Norfolk Council would support the principle of floating buildings, particularly as they may facilitate the development of the Deal Ground
- 5: Re housing for older people, support the proposal to monitor evidence, and address the issue in future versions of the Local Plan.
- 6: Issue 26: Prefer a combination of Option 2 and Option 3 – plots on allocated sites and requiring housing sites over a specified size to require a specified proportion of plots to be delivered as serviced plots for custom build. Proposals might come forward adjacent to settlements within and outside the administrative boundary on the basis of providing serviced plots, creating pressure to approve, notwithstanding clear environmental sustainability issues in the Broads. Because of the potential pressure on unallocated sites adjacent to settlements within and adjacent to the administrative boundary, we suggest that the Broads Authority considers seeking Exemption status under the Housing and Planning Act 2016 (as it will be), and reflects this in planning policy if it chooses to do so. If successful, provided the Bill remains unchanged, this would exempt the Broads Authority from having to give planning permission to meet demand. We accept that this might result in more applications to other local planning authorities, including South Norfolk.
- 7: Starter Homes: Such homes are appropriate on allocated sites. The Broads Authority might wish to use the Local Plan as a means of justifying a local connection test on the grounds of environmental protection. Such an approach could extend to areas of the Broads which are adjacent to settlements outside its administrative boundary.

Broads Authority comment:

- 1: Support for option 2 noted.
 - 2: Comments regarding continued use of districts' policies for affordable housing noted and will be considered as this section of the Local Plan progresses.
 - 3: Support for option 2 noted. We do not class people who live on boats as water gypsies and as far as we understand it, those who live on boats do not refer to themselves using that term. The issue of assessing the need for houseboats (if that is what South Norfolk are referring to) is a complicated one. Indeed the proposed legislation states that housing authorities need to undertake this assessment. The BA is not the housing authority. Further understanding of the requirement to assess the need for houseboats is required.
 - 4: Support for floating houses noted.
 - 5: Comments regarding houses for older people noted.
 - 6: Support for Option 2 and Option 3 noted. Comments relating to developments on sites adjacent to settlements noted.
 - 7: Allocated sites approach noted. Local connection advice noted.
-

South Norfolk Council

Different OAN figures in the document.

Broads Authority comment:

As South Norfolk will be aware, the Broads Authority's OAN changed from the draft version saying 274 dwellings to 320 dwellings in the final report. This section was written to reflect the draft version of the SHMA and had not been updated. The OAN for the Broads is 320 dwellings. The change in numbers reflects better understanding of second and holiday homes.

Anglian Water

1: Anglian Water would wish to comment on the implications for our existing infrastructure when the scale and distribution of additional housing development is known. Similarly we would wish to comment further on any additional employment and retail allocation sites which are identified by the Broads Authority.

2: Anglian Water would not expect there to be provision within planning obligations or the Council's CIL Charging Schedule for water or water recycling water infrastructure.

Broads Authority comment:

1: This will form part of the Preferred Options version of the Local Plan. AWS will likely be contacted for their views on some allocations prior to the consultation as well.

2: Explanation regarding developer contributions to water infrastructure is noted.

Broadland District Council

1: Supports meeting full objectively assessed housing need in the broads in accordance with National guidance. HRA will be needed.

2: Deferring to relevant district's affordable housing policy supported.

3: There is no mention of Boat people or Travellers by boat.

4: No mention of Norwich in the Settlement Hierarchy section.

5: Appendix F 'Residential Moorings – call for suitable areas' appears to cover the necessary criteria to help in assessing appropriate location - subject to outcome of HRA assessment on visitor pressure.

6: The impact of houseboats, floating buildings and residential moorings will need to be assessed through SA and HRA assessment. The issue raised about Design could be addressed through 'design codes' as per NPPF para 59.

7: Rural Enterprise Dwellings - it is felt that the NPPF provides sufficient policy to address this issue. [Agree] Option 3: make a short guidance note for determining planning applications may be of assistance also.

8: It is suggested that legal advice is sought on this subject, as it is understood that second home owners cannot be treated differently in planning terms.

9: [Agree] Option 2: Set a requirement for self-build plots as part of site allocation policies. Any policy should ensure that development is only allowed in suitable and sustainable locations.

Broads Authority comment:

1: HRA will assess the next version of the Local Plan. Support to meet for OAN noted.

2: Support for continuing approach to affordable housing noted.

3: The Housing and Planning Bill is not an Act currently. That sets the requirement to assess houseboat need. However, the requirement is for Housing Authorities, not Local Planning Authorities. As such, the Broads Authority would liaise with the Housing teams of our districts on this issue. In reality, houseboats are likely to need moorings. We discuss the issue of residential moorings in the Issues and Options as well as do a call for suitable sites for residential moorings. Additionally we are likely to roll forward our criteria based policy relating to residential moorings as well as our support for these near to development boundaries and other areas discussed in the Sites Specifics Local Plan as being considered suitable for residential moorings. At this stage, the Authority are not aware of what more can be done.

4: Norwich is being assessed as part of the settlement study.

5: Support for call for residential moorings process noted. HRA will be completed on Preferred Options.

6: SA and HRA will be completed on the Preferred Options. Design code suggestion noted and will be explored.

7: Support for a short guide noted. Noted that BDC considers the NPPF to provide enough guidance.

8: Suggestion to get legal advice if the Authority seeks to address second and holiday homes noted. We are aware of the LynPlan Neighbourhood Plan policy that is adopted as well as the St Ives Neighbourhood Plan policy approach that is due to be voted for at referendum. Specific evidence on this subject is being finalised which will also inform the suggested way forward.

9: Support to set a requirement for self-build plots as part of site allocation policies noted. Location of such sites is important and will likely be in line with development boundaries and settlement hierarchy.

Littlewood, Mr & Mrs P

There is a real need to maintain our very precious natural environment and the continued respect of our flood plains for our future generations and thriving communities

Broads Authority comment:

Noted. We will consider this view as we produce the local plan.

Environment Agency

1: when considering how to address housing need, require robust evidence base including sequential test.

2: Where Local Plans contain policies relating to floating structures, they must be informed by the flood risk Sequential Test and Exception Test. For such development to be acceptable, it must also not increase flood risk elsewhere; reduce flood risk overall wherever possible; and be safe for its lifetime taking into account climate change.

3: The vulnerability classification of floating structures is not formally defined, this is for the LPA to decide based upon national planning policy and guidance, and we can assist in discussions on this. The main channel of rivers is usually considered as Flood Zone 3b, the functional floodplain. Only residential accommodation associated with water-compatible uses (as defined by Table 2), is appropriate in FZ3b.

4: Other considerations:

*Floating houses would need to offer safe access and egress routes to non-flooded areas

*Floating structures in the channel of a Main River or within byelaw distance will require Flood Defence Consent

*There may also be fisheries, navigation, water quality and aquatic biodiversity issues to consider.

*The potential 'downstream' effects on flood risk of floating buildings and residential moorings would also need to be taken into account in an FRA. Compensatory storage may need to be provided to at least equal displacement of the loaded structure.

*We should also be satisfied that the building or structure does not obstruct flows, and does not present a risk of breaking free and obstructing flow channels.

*During a flood, debris such as large branches or even cars that are carried in the floodwater can hit the structure below or above the waterline. At high velocities that could damage the structure, including the undercroft area or tanks that provide the floatation.

*After a flood the structure may be designed to settle back down upon its foundations. However if debris has come to rest underneath this will be trapped, potentially meaning the house does not settle evenly

*The design would also need to ensure its anchorage mechanism can withstand the floodwater velocities

*A fault or failure in any part of the design which compromises the structure's ability to operate properly may only become apparent during a flood. The LPA should satisfy itself that the structure can be maintained over its lifetime and apply appropriate conditions

*Such development would also need to consider WFD impacts through an assessment of direct effects on river morphology. Generally the objective should be to soften embankments where possible. If larger scale projects are planned, then it may be sensible to consider mitigation improvements in other areas of the system, i.e. have a habitat improvement plan / bank to offset development.

Broads Authority comment:

1: noted and will be completed in relation to any allocations.

2, 3 and 4: advice and considerations relating to floating buildings noted and will be considered as we look into this issue further.

Great Yarmouth Borough Council

1: It accepts that some, perhaps all, of any need arising within that part of the Broads within Great Yarmouth Borough should be met in those parts of the Borough outside the Broads. The planned housing growth in the Borough Council's adopted Core Strategy is based on the 'objectively assessed needs' for the whole of the Borough, including that part within the Broads. There is therefore no need for the Broads Local Plan to provide for that part of its 'objectively assessed need' relating to the Great Yarmouth Borough part of the Broads. That is not to say that there will not be opportunities for housing development in the Broads that would benefit the local community, provide environmental enhancements, or strengthen the sustainability of settlements. The Borough Council is keen to liaise with the Broads Authority to investigate whether there may be such opportunities in those settlements that straddle the boundary between the two planning authorities. Where housing does come forward in the Broads part of the Borough, either through allocations or as 'windfall' permissions, the Borough Council anticipates continuing the practice of counting these towards the whole Borough housing targets, as provided in the Memorandum of Understanding.

Appendix B – Summary of Issues and Options representations.

2: Having said that, the scale of the Broads' housing needs suggested in Appendix E is surprisingly high (notwithstanding the text suggesting it is low).

3: The Borough Council would be keen to liaise with the Broads Authority to ensure complementary development boundaries in settlements which straddle the shared planning boundary.

Broads Authority comment:

1: GYBC's stance noted and welcomed. It is the GYBC HMA area of the Broads where, according to analysis of completions, permissions and allocations, there is a residual need of around 50 dwellings. We have received advice from PAS on this issue as well as some initial legal advice. We will look into this issue further and will meet with GYBC to discuss the approach.

2: We were trying to get across that the figures are low compared to our surrounding district's need. The link to the Central Norfolk SHMA is at section 20.13. The Appendix E was only supposed to be a short summary rather than copy much of the SHMA. The figure averages at 13 per year which is not too dissimilar to that which have been permitted over recent years according to the AMR. The figure does reflect recent evidence into second and holiday homes which show that around 40% of homes in the Broads area of North Norfolk (for example) are vacant homes.

3: Noted. We will consider this as we produce the Preferred Options.

Historic England

We would expect to see locally-specific text and policies on design in respect of "floating houses" in the next iteration of the Broads Local Plan.

Broads Authority comment:

Noted and that is the purpose of the Preferred Options.

Inland Waterways Association

1: There will be opportunities to provide new housing within the Broads area and these should be sought to make a contribution to the overall need. Given the Broads special situation, there may also be opportunities to provide innovative housing such as floating housing as deployed in Holland to contribute. However such structures must not interfere with the ability of all craft to navigate the adjacent waterways.

2: As far as IWA is aware, there are not any genuine ethnic water travellers however criteria- based policy should prepare for claims in this area. There are individuals who adopt a travelling water- borne lifestyle, within the legal system of other navigation authorities licencing systems. Enforcement is an essential part of these regimes, to ensure those who adhere to the 'system' are encouraged to do so, and those who do not appreciate the consequences.

3: Potentially redundant boatyards which have large spaces of off-line mooring and good land- based services would be suitable for conversion to residential mooring. This may help maintain boater facilities for visitors as well as residents. Given sufficient water space, similar facilities may also allow development of floating houses as they usually have space for car parking, provided such structures do not interfere with the ability of all craft to navigate the adjacent waterways. It may be worth considering criteria for reuse of boatyards to include, if not prioritise their assessment for residential or floating home use.

4: IWA are prepared to assist BA in developing thoughts around this subject if this is helpful. Floating buildings appear to offer an opportunity to produce factory- built units which can combine good design with a standard product and connection system, and be fitted into the type of environs present within the Broads area. However such structures must not interfere with the ability of all craft to navigate the adjacent waterways.

5: Option 4 A policy approach that relates to locations seems the better way to plan for this eventuality.

Broads Authority comment:

1: Noted and there is a section on floating buildings.

2: It is not clear what the message here is. IWA to be contacted to clarify.

3: Suggestions noted.

4: Suggestions noted. Offers of assistance noted.

5: Support for option 4 noted.

King Line Cottages

1: Suggested differences between professional holiday home providers and individuals who offer holiday homes.

2: The Broads have a number of disused boat yards with moorings, these are the perfect locations for holiday accommodation, use these locations.

3: Individual properties that apply for planning , are more suitable for full time accommodation

4: Please in the next planning consultation give a fair playing field to the small established Holiday providers.

Appendix B – Summary of Issues and Options representations.

Broads Authority comment:

- 1: Noted
 - 2: Noted and will be considered as we look into the issue of redundant boatyards.
 - 3: Noted, although we assess planning applications to reflect what the promoter wishes to do.
 - 4: King Line Cottages to be contacted to clarify some of their comments as the Preferred Options is produced.
-

Littlewood, Mr & Mrs P

- 1: Support Housing requirement of zero
- 2: Raise issue of land cleared of trees and wildlife before planning permission granted.

Broads Authority comment:

- 1: Support for zero housing requirement noted.
 - 2: This issue will be raised with ecologists and planning colleagues.
-

Milner, Mr A

Express support for Option 1, Housing requirement of zero. Issue 22, Housing, Chapter 24:

- 1: District Councils meeting BA housing needs.
- 2: BA boundary tightly drawn so little opportunity for development.
- 3: Much of the Broads is flood plain.
- 4: Housing demand is for expensive dwellings. Affordable housing viability issues.
- 5: Already wildlife land is degraded before planning permission received. A call for sites would make this worse.
- 6: landowners seek to maximise the value of their investment frequently by downgrading habitat either by act or neglect.
- 7: Housing has negative impact on nearby businesses. Issue of why a boatyard is redundant.

Broads Authority comment:

Support for zero housing target noted.

As background, the BA is required to understand its housing need for its area as it is the Local Planning Authority. The OAN is 320 from 2012 to 2036. It is important to note that since 2012 we have met the need in two of our Housing Market Areas. The Authority needs to find around 50 dwellings in the GYBC Housing Market Area. We will take representations such as this into account as we consider the way forward with meeting our housing need.

To address the particular points raised:

- 1: That was the case. The East of England Plan did not allocate a housing number to the Broads, so yes, effectively the districts provided the housing with any development in the Broads being taken off their target. Now, the NPPF says that all Local Planning Authorities must understand their housing need and meet that need unless doing so would go against other policies in the NPPF. This is why we are asking for views on this subject.
 - 2: Yes, we agree with that point. There are and have been some opportunities for large development, as allocated in the Sites Specifics Local Plan.
 - 3: Yes, the impact of flood risk and indeed that of climate change is an important consideration.
 - 4: Types of housing delivered in the Broads varies from town houses and flats to larger housing. In the last 5 years or so, around 13 affordable houses have been delivered in the Broads (in Norwich) with other developments proving on site provision to be financially unviable. These particular schemes are subject to a clawback whereby if profits increase above the baseline considered when planning permission given, money is paid by the developer towards affordable housing. But generally, yes, viability is an issue when considering all types of planning obligations, not just affordable housing.
 - 5 and 6: This will be raised with the ecologists and planning team at the Broads.
 - 7: Amenity is an important consideration when assessing development proposals... will a development negatively impact existing residents and will future residents be negatively affected by an existing business. We do look into the issue of redundant boatyards in the Issues and Options.
-

Residential Boat Owners Association

- 1: The RBOA is involved at national level in promoting the contribution that residential boats can make to the supply of housing which does provide a alternative, diverse and affordable solution in appropriate locations. Government is recognising this in its current Periodic Review of Housing Needs by noting it under special housing needs.
- 2: The RBOA support the extension to the areas likely to permit residential moorings. Presently, we are working with our local members to identify suitable sites which comply with the criteria DP25.

Appendix B – Summary of Issues and Options representations.

3: The RBOA support the concept of floating housing (defined differently to residential boats) as a viable way to meet the need to build within flood risk areas and would be interested in discussing this further with the Broads Authority. We understand the uncertainty of the definitions boat/ houseboat/ floating home and would be interested to pursuing this further for mutual benefit.

Broads Authority comment:

1: Noted.

2 and 3: Support and offer of assistance noted.

River Thurne Tenants Association

1: What do you think about floating buildings in general? Like them? NO

Do you have any comments?

Some Broads folk have always lived in floating buildings. These are traditionally used as holiday accommodation and provided they are sited sympathetically in the Broads landscape they serve a purpose and could be retained. Caravans or something similar NOT designed for the purpose of floating are unpleasant, intrusive and generally not liked by our members. However if something such as the purpose- built floating Dutch and Scandinavian buildings, in areas susceptible to flooding or on lakes can be pleasant, beautiful and quite desirable, even in the Broads landscape. It all depends on the design and location of the 'floating buildings'.

2: How do you think second homes affect your community?

On the River Thurne there are 200 holiday homes, the majority of these are second homes, and not let commercially. These second homes have led to an area of social diversity, with some families having owned their properties through 3 generations, and by using their bungalows they take part in the local community, use the local facilities and help the home economy, boatyards, businesses, restaurants, etc. Indeed some of these businesses might not be viable without these bungalow owners. The Broads benefits from this in the number of tolls paid by the bungalow owners most of whom have at least one craft on the water.

If we could somehow restrict second homes in your area, is that something you would support? Against? NO
Do you have any comments?

We, as bungalow owners value and indeed love our waterside properties and would not like to see them restricted in any way. These properties are not part of the local housing stock and even if these wooden bungalows use were restricted then how else could they be used?

3: How can the Broads Authority make it easier for people to build their own homes?

Could the BA release more brown field sites for housing development and residential development?

Broads Authority comment:

1: Noted. Design seems to be the main issue here.

2: Support for second homes noted.

3: The BA do not own such land. But the BA could allocate such land if appropriate.

Thomas, Mr P

1: "Floating accommodation" or building on stilts hardly sounds viable.

2: Unaware of Gypsy culture on the Broads. Preference should be on preserving traditions and culture.

Broads Authority comment:

1: If we have a policy that allows some sort of floating building, it would be the requirements of that policy that are assessed for financial viability, not the cost of actually delivering a floating building. The cost of delivering a floating building, like a dwelling on land, would be down to the details of the design.

2: As a Local Planning Authority, the Broads Authority is required by Government to assess the needs of Gypsy, Travellers and Travelling Show People. The Local Plan would be unsound without consideration for this sector of the community. Understanding the needs of Gypsy and Travellers is not at the expense of other areas of the Local Plan.

Tubby, Mr J

Would like property to be allocated or in a development boundary.

Broads Authority comment:

Comments and request noted and will be considered as the Preferred Options is produced.

Vanston, Mr R

Concern that allowing development in some areas is unsuitable and can affect habitat and wildlife.

Broads Authority comment:

Concern noted and is a consideration if sites are allocated or development boundaries put in place.

24 Housing

Sabberton, Mr P

Some parts of towns and villages incorporated into the Broads Executive Area. Policies need to be flexible in relation to developments that are small or not identified as suitable for development. Small scale development can be absorbed into the landscape with minor impacts. . Such small developments are ideal to cater for local need and contribute to the viability of existing local facilities and services.

Broads Authority comment:

Comment noted and will be considered as the Preferred Options is produced. It is important to note that there are many issues that are often competing and need to be balanced when producing a Local Plan.

25 Design

South Norfolk Council

1: Policy could refer to addressing context of development in the Broads with surrounding areas. There is also a wider strategic need to promote the highest standard of design in the Broads to preserve and enhance their value as a tourist destination, which would obviously have wider economic benefits for South Norfolk Council.

2: DP7 sounds like it is in line with JCS Policy 2. Not too familiar with the Fabric First concept but presumably this would create a difference in standards with ourselves if this has any implications for us.

3: From our recent experience in developing our Local Plan Development Management Policies document, we are not aware of any evidence that would support the adoption of space standards.

Broads Authority comment:

1: Support for addressing design noted.

2: Noted.

3: Noted and we may get in touch with South Norfolk to understand their experience with the space standards.

Environment Agency

Support the adoption of an approach that secures design which delivers multiple benefits through a joined up approach.

Broads Authority comment:

Noted and will be considered as this section of the Preferred Options progresses.

Historic England

We welcome the intention to update the building by the waterside design guides. Refers to climate change section.

Broads Authority comment:

Noted and support welcomed.

Inland Waterways Association

1: Options 2 & 3 both suggest some form of guidance, for differing sizes of development. Both could equally be catered for by standard design briefs for sites, locations or types of sites.

2: Option 2, Fabric first would enable energy efficiency to be well integrated into a development rather than retrofitted. This seems a more appropriate way to design and build an energy efficient and effective development.

3: These need to be managed through site specific policies. Setting expectations and carefully enforcing them will be essential.

4: Option 2 a more flexible approach should be designed to cater for leisure plots in the local plan.

5: It does not seem important compared to other issues, and could be market- led.

Broads Authority comment:

1: Support for options 2 and 3 noted.

2: Support for option 2 noted.

3: Suggestion noted.

4: Support for option 2 noted.

5: Maybe so, but it is something we should look into as stated in the NPPG.

Norfolk County Council

The content noted in Options 2 and 3 require further exploration and could be taken forward into an updated DP4 Policy.

Broads Authority comment:

Appendix B – Summary of Issues and Options representations.

Suggested way forward noted and will be considered as the Preferred Options is produced.

Residential Boat Owners Association

Issue 29: We believe that this can be resolved by satisfactory design of appropriate storage facilities linked to active management of the site. We are happy to discuss examples of good practice from elsewhere.

Broads Authority comment:

Support in addressing this issue noted.

River Thurne Tenants Association

1: Design is important.

2: Water efficiency is important.

Broads Authority comment:

Comments relating to design and water efficiency noted.

26 Sport and Recreation Venues/Buildings

Waveney District Council

Extra sport and recreation information.

Broads Authority comment:

Noted and will be considered as this section of the Preferred Options is produced.

South Norfolk Council

Support a combination of Options 2 and 3

Broads Authority comment:

Support for options 2 and 3 noted.

Inland Waterways Association

No comment.

Broads Authority comment:

Noted.

Sport England

Supports site specific policies relating to existing sport and recreational facilities within the Broads area. Also believe that a generic policy should be included to cover any applications received for new sports facilities or changes of use relating to sports activities within the Broads

Broads Authority comment:

Comments noted and will be considered as the Preferred Options is produced.

Thomas, Mr P

The Broads is an outdoor experience and provide of gyms etc would be a distraction.

Broads Authority comment:

This section of the Issues and Options relates to the existing venues that are operating in the Broads. It acknowledges how important they are to the local community. These venues are already in place and a policy approach would seek to address any future changes to these sites. We do not consider these a distraction to the Broads, but realise that these facilities are important to locals.

27 Health and Wellbeing

South Norfolk Council

1: Issue 33: Care not to have adverse impacts on South Norfolk.

2: Some Broads communities depend on facilities within the South Norfolk Council area (e.g. Loddon surgery etc.) and should this be reflected in the Broads Local Plan.

Broads Authority comment:

1: Do not understand this comment. Will seek clarification from South Norfolk Council.

2: Noted and we will include something along those lines in health sections.

Inland Waterways Association

Option 2 providing a checklist for design, ideally one which is common across the UK.

Broads Authority comment:

Support for option 2 noted.

Appendix B – Summary of Issues and Options representations.

Norfolk County Council

- 1: Public Health would like to see reference to the Broads as a health promoting environment in this section.
- 2: Strongly support option two: designing places for healthy lives checklist.

Broads Authority comment:

- 1: This is acknowledged at section 23.4 of the Issues and Options.
 - 2: Support for the checklist option noted.
-

28 Education

South Norfolk Council

Supports approach that the Local Plan should not include a specific education policy.

Broads Authority comment:

Support noted.

Inland Waterways Association

Given that others do not see any need for extensions in the Broads area, there seems no need to consider creating opportunities for them in the local plan.

Broads Authority comment:

Noted.

29 Waste and Minerals

Environment Agency

We would support the adoption of an approach that seeks to promote the management of waste from development sites in accordance with the waste hierarchy.

Broads Authority comment:

Noted.

Inland Waterways Association

There seems no real requirement for this, and no policy seems a good position to adopt.

Broads Authority comment:

Noted, however this section includes snippets of the NPPG which says that Local Planning Authorities are expected to help deliver the waste hierarchy.

Norfolk County Council

and Waste Local Plan.

Norfolk County Council in its capacity as the Mineral Planning Authority considers that in terms of mineral planning the Issues and Options document correctly address these issues in the context of the Broads Authority Executive Area.

Broads Authority comment:

Support noted.

30 Safety by the Water

Inland Waterways Association

Option 2 guidance should, if developed as experience dictates, be a valuable way of indicating what works and what does not, and ensuring that provision is adequate and maintained appropriately.

Broads Authority comment:

Support for option 2 noted.

31 Developer Contributions/Planning Obligations

Suffolk County Council

The Broads Authority may wish to explore the potential for contributions towards heritage presentation and archiving (tied to Issue 10).

Broads Authority comment:

All comments noted. These will be considered as this section of the Preferred Options is worked up.

South Norfolk Council

- 1: support rolling forward DP30.

- 2: Much infrastructure to support communities and growth located in adjoining LPAs. Our priorities would be for infrastructure that supports growth both in the Broads and South Norfolk – for example addressing any school capacity issues which include catchment in the Broads or road junction improvements along the A146.

Appendix B – Summary of Issues and Options representations.

Broads Authority comment:

Support noted. Suggested priorities noted.

Environment Agency

We would recommend that discussions should be held with partner organisations who are seeking to deliver actions across the area.

Broads Authority comment:

EA to be contacted to clarify what is suggested.

Inland Waterways Association

IWA believes these should be used in part to provide and maintain moorings and staithes, including provision of power and similar services. This should also include commuted sums for maintenance, unless the BA considers that these would not be eligible.

Broads Authority comment:

Suggestions noted.

Norfolk County Council

General support.

Broads Authority comment:

Support noted.

River Thurne Tenants Association

1. Footpaths along Weavers Way, enhancing the surface of the footpath.
2. Roundabout at the Post Office.
3. Enhancement works within the area of Potter Heigham Bridge.

Broads Authority comment:

Suggestions noted and will be shared with Development Management Officers.

RSPB

The Authority needs to ensure that it receives sufficient funds from development to manage pressures on Natura 2000 and other designated sites.

Broads Authority comment:

Noted.

32 Site-Specific Policies

Suffolk County Council

SCC Archaeological Service would be happy to discuss developments on both sites at an early stage

Broads Authority comment:

Comment re Wert deposits noted.

Offer for support noted.

Broadland District Council

There may be potential for a third and fourth option which could potentially involve:

- a) allocating the site as a Specific Policy as set in the planning permission or, b) based on the owners' proposal an alternative that should be considered.

Broads Authority comment:

The additional options noted and will be considered as the Preferred Options is produced.

Environment Agency

1: We would highlight that this site is partially impacted by Flood Zone 3; as such a flood risk assessment would be required for any application for a change of use.

2: All sites listed are subject to flood risk. For any proposed changes of use, as detailed above, an FRA would be required to demonstrate that the development would be safe for its lifetime taking into account the updated climate change allowances.

Broads Authority comment:

1 and 2: advice noted and will be considered as this section of the Preferred Options is progressed.

Historic England

Appendix B – Summary of Issues and Options representations.

1: Issue 43: This allocation falls within the conservation area and any future works to the car park would need to take account of the requirements of conservation law and policy. Ivy House (grade II) lies to the east and is unaffected by this allocation amendment.

2: Issue 44: This site is located along the southern boundary of the Thorpe St Andrew conservation area. To the north and also within the conservation area a group of listed buildings sit between the River Yare and the Yarmouth Road, including Garden House (grade II*), the Kings Head Inn (grade II), the Town House Hotel (grade II), 18-20 Yarmouth Road (grade II), Walpole House (grade II*), the Manor House (grade II), Manor Cottage (grade II) and 10 Yarmouth Road (grade II).

3: No historic environment issues appear to be raised by issue 45.

4: Other sites

Beccles Old Hotel site: No historic environment issues appear to be raised by this potential allocation.

Bridge Hotel Potter Heigham: It is difficult to determine if this site is within or outside the Potter Heigham conservation area.

Little Precinct in Hoveton: No historic environment issues appear to be raised by this potential allocation.

Wroxham Bridge (scheduled monument) is located to the south but by some distance and this historic asset would be unaffected by any upgrading work to this shopping precinct. If the land is to come forward for redevelopment Historic England would require that consideration is given to the scheduled monument, to ensure its setting is protected.

Former Waterside Rooms at Hoveton: This site would appear to have potential to improve the surrounding townscape. This site does not appear to raise any issues involving the historic environment.

Former Loaves and Fishes pub at Beccles: This site falls within the northern edge of the Beccles conservation area. Any policy details that emerge here will need to consider this relationship. This will mean that any development has a neutral or enhancing effect upon the character and appearance of the conservation area.

Broads Authority comment:

Information noted and will inform the Preferred Options

River Thurne Tenants Association

1: Feel that the Bridge Hotel Site at Potter Heigham is an area that is wasted and should be developed. A pleasant, thoughtful and well designed space/area, respectful of this unique site next to an ancient monument would greatly enhance this part of the Broads.

2: Could look at the Broads Haven Tavern Site which is in danger of becoming derelict. The Broads Authority should do all it can to assist a long term use of this facility.

Broads Authority comment:

1: We understand the strength of feeling of the RTTA following a recent meeting with representatives. We will look into ways of seeking improvements to the area as the Preferred Options is produced.

2: This area could be looked into with Potter Heigham Bridge area.

Inland Waterways Association

1: In general, any site specific plans need to protect adjacent navigation by traditional yachts and wherries by designing buildings and structures so they do not cause wind shadows or turbulence.

2: Protecting the car parking area near Staithe and Willow: Protecting the car park in the same way as that in Site Specific Policy HOR2 seems sensible.

3: How to address Thorpe Island in the Local Plan? A revised criteria-based policy seems a good way of learning from the exercise and moving forward, for all concerned.

4: Protecting the live/work units at Ferry Corner through the Local Plan and how? Option 3 mixed use of the development seems a sensible site specific alteration to accommodate the extension of uses of the site.

Broads Authority comment:

Comments on the sites noted and will be considered as the Preferred Options of the Local Plan is produced.

Crime

Norfolk Constabulary

1: We recommend the Broads Plan includes the security principles of deterring, delaying, denying and detecting criminal activity. Designing in good security processes with developers and builders at the outset is essential to combat criminality and its consequences.

2: The adoption of CPTED (Crime Prevention Through Environmental Design) principles in building design and development across the Broads National Park. The promotion of CPTED principles and practices will be a significant step towards protecting the wonder and heritage of the Broads National Park, for future generations to use and enjoy.

Appendix B – Summary of Issues and Options representations.

- 3: Unnecessary pedestrian and vehicular permeability should be reconsidered or removed
- 4: Communal areas (including public open spaces) & leisure facilities should be assessed to prevent the occurrence of anti-social behaviour
- 5: Secure boundary treatments should be considered proportionate to criminal statistics and not solely aesthetic considerations
- 6: Suitable security lighting provides safety for occupiers and visitors, reduces the fear of crime (Secured by Design, New Homes 2014) and is a significant deterrent for the criminal, who seeks to avoid being seen
- 7: Ongoing vigilance, effective natural surveillance and speedy reporting of emergency, urgent or suspicious activity will benefit all who live, work and visit the Broads National Park

Broads Authority comment:

- 1 and 2: These principles could be included in a future reviewed design policy.
 - 3, 4, 5: Noted and will be considered as allocations are worked up.
 - 6: Noted. Whilst the Authority may address light pollution, this does not necessarily mean that lighting should not be installed. It is about the design of the lighting.
 - 7: Noted, although there is limited scope to address this in the Local Plan as it is more of an education theme.
-

General comment

Waveney District Council

With both the Broads Authority and Waveney District Council moving forward with their respective Local Plans opportunities will exist to ensure the Plans work together.

Broads Authority comment:

Noted.

General Comment

Waller, Mr P

- 1: Queries what 'conservation' means in relation to the Broads.
- 2: General queries re Jenner's Basin.
- 3: BA pick and choose policies it upholds.
- 4: North Bay area of Oulton Broad – houses have had infill and redevelopments.
- 5: Refers to own planning application.
- 6: The time has surely come for a thorough revision of planning policies for the Broads. These policies have to be just and in keeping with local communities. Policies need to reflect the ongoing nature of the Broads and the communities within.
- 7: Conservation areas need reviewing.
- 8: The Broads is a unique member of the National Park's family. We should all remember that and work hard towards maintaining that very desirable trait. The Broads is the Broads, a very special place. However, it is not a national park.

Broads Authority comment:

- 1: Conservation can relate to heritage and wildlife. The Government's Planning Policy also relates to 'conserving soil resources'. With regards to the Broads Authority, one of its purposes is 'conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads'.
- 2: Full facts can be found at these web links: <http://www.broads-authority.gov.uk/news-and-publications/news/thorpe-island-full-facts> and <http://www.broads-authority.gov.uk/news-and-publications/news/authority-corrects-misleading-information-from-jenners-basin-campaign-co-ordinator>. Regarding the Thorpe St Andrew Conservation Area, the document that explains this is here: http://www.broads-authority.gov.uk/data/assets/pdf_file/0014/423140/Thorpe_St_Andrew_final_version.pdf

- 3: No elaboration on which policies the respondent is saying have been picked or ignored. The Planning Committee reports and minutes of the Committees as well as details of planning applications can be found on the BA website. All planning applications are assessed against relevant policies and a decision made to reflect the proposal and other considerations which can help inform a particular decision.
 - 4: The Oulton Broads Conservation Area has been recently re-appraised and can be found on the Conservation Areas website: <http://www.broads-authority.gov.uk/planning/Other-planning-issues/conservation-areas> (at the time of writing this was in the process of being put on the webpage).
 - 5: History of planning application is known. Comment noted.
-

Appendix B – Summary of Issues and Options representations.

6: I appreciate your concerns and advise that this is the purpose of this process. Policies also have to reflect National Planning Policies and Guidance.

7: The BA Executive Area has 25 Conservation Areas. The BA undertakes two reviews (re-appraisals) a year. This year the BA is re-appraising Stalham Staithe and Somerton.

8: Agree that the Broads is a special place. The Local Plan does not say that the Broads is a National Park. The Local Plan says that the Broads is a member of the National Park family. The Broads Authority uses the term National Park for branding – this is outside the scope of the Local Plan.

Thomas, Mr P

Compliments the draft document.

Broads Authority comment:

Noted with thanks.

Environment Agency

General introduction to their response.

Broads Authority comment:

Noted.

Great Yarmouth Borough Council

General introduction to their comments.

Broads Authority comment:

Noted.

Health and Safety Executive

We have concluded that we have no representation to make at this stage of your local planning process. This is because there is insufficient information in the consultation document on the location and use class of sites that could be developed.

Broads Authority comment:

Noted. The Preferred Options document will have more detail in.

Historic England

Refers to advice notes and that the consultation plan is well presented and accessible.

Broads Authority comment:

Advice notes noted. Compliments noted.

Marine Management Organisation

Decisions taken in relation to activities and development within the Broads will be capable of affecting the UK marine area and should consider the East Marine Plan. Specific East Marine Plan policies of note given the nature of the Boards and the activities occurring there are BIO1 and BIO2 (biodiversity protection and enhancement potential), CC1 (climate change), FISH 2 (protection of fish spawning and nursery areas), SOC2 (maintaining access to the coast for wellbeing), SOC3 (terrestrial and marine character consideration), TR2 (maintaining recreation boating routes), TR3 (promoting sustainable tourism) and PS2 (maintaining shipping channels).

Broads Authority comment:

Comment noted. Further liaison with the MMO could be of benefit to the Local Plan.

Norfolk County Council

NCC have concentrated on some certain issues.

Broads Authority comment:

Approach noted.

Residential Boat Owners Association

Sets out how the RBOA have responded to the consultation.

Broads Authority comment:

Approach noted.

Appendices

Natural England

Appendix B – Summary of Issues and Options representations.

Comments on the Broads Local Plan form: Summary questionnaire, Call for Areas of Tranquillity, Call for Areas Suitable for Residential Moorings and Call for Areas of Local Green Space: We have no comments to make on these documents.

Broads Authority comment:

Noted.

Great Yarmouth Borough Council

The maps in Appendix A (and the similar maps used elsewhere in the document) misrepresent the Broads population they are intended to characterise, and are based on a fundamental methodological error.

Broads Authority comment:

Concern noted. Acknowledge that a Super Output Area does not fall entirely within the Broads Executive Area.

We do have data that shows how many dwellings of a Super Output Area is within the Broads and how many are outside of the Broads. In the deprivation topic paper, this information could be included to give some clarity in this issue.

These are the best maps we have to show deprivation in the Broads, but we note the concern of GYBC.

H E Hipperson Ltd

Suggestions of locations for 4 residential moorings at H E Hipperson Ltd, Gillingham Dam, Beccles.

Broads Authority comment:

Forms completed and will be assessed separately to this consultation database.

Sustainability Appraisal

Natural England

General support to the methodology and baseline of the SA.

Broads Authority comment:

Support noted.

Historic England

1: We now note that PPS5 Practice Guide has been superseded by National Planning Policy Guidance, Good Practice Guidance Notes (as produced by Historic England on behalf of the sector) and Advice Notes (as produced by Historic England).

2: We now note SA objective ENV4 and ENV9. These are in response to our previous comments at scoping stage. Historic England welcomes this additional detail.

3: As the document is taken forward we would welcome additional commentary in explanatory script at the bottom of each option.

4: Where a question mark is denoted (unknown impact on SA objective), additional commentary in explanation of this uncertain outcome would be welcomed as the evaluation of options progresses.

Broads Authority comment:

1: Noted.

2: Support noted

3: This will of course be done as there will be policy wording to assess.

4: We do this in the interim SA under each table if required.

Habitat Regulations Assessment

Natural England

Natural England welcomes that a commitment is made to carry out HRAs on subsequent versions of the Plan (pg. 5)

Broads Authority comment:

HRA will be undertaken as the Preferred Options and later stages of the Local Plan are produced.

RSPB

1: In general, we agree that the Plan correctly identifies and considers some major areas of concern for the environmental conservation of the Broads, and the Authority's commitment to halt and reverse the decline in species and habitats. The risks to habitats and species posed by development, water abstraction, tourism etc. which have been identified in the Plan should be of the highest consideration when deciding which options will be preferred.

2: We note that it would have been possible to carry out a HRA on the various options available at this stage, and this would have helped in forming an opinion as to which should be the correct option to pursue.

However, we acknowledge that there was no specific requirement to undertake this assessment at the Issues

Appendix B – Summary of Issues and Options representations.

and Options stage. Many of the issues raised by the option choices in the draft Local Plan are covered under the HRAs for the Broads Plan and the Sustainable Tourism in the Broads 2016-20 document. We agree with many of the conclusions drawn in those HRAs and would expect the Authority to be cognisant of those when deciding which options to pursue in the future Local Plan Preferred Options document.

3: Having reviewed the draft Local Plan, we have concerns that it currently lacks a map showing the locations of protected sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites, Sites of Special Scientific Interest (SSSIs) etc. The lack of map, and lack of discussion of these sites or inclusion of them as named areas, causes concern that these sites are not being accorded their required importance. We would suggest that future iterations of this document include such information.

4: We look forward to the publication of the Recreational Impact Study that is currently being undertaken, and which is due in Spring/Summer 2016. This should provide an indication of the vulnerability of Natura 2000 sites to increased recreational pressure and provide a baseline understanding to inform the future HRA. It may also influence the options that the Broads Authority choose to take forward at the Preferred Options stage.

Broads Authority comment:

1: support noted.

2: As RSPB state there is no requirement to undertake a HRA and it would have added significantly to the extra cost of producing the HRA.

3: Noted. Whilst there is no specific chapter or map showing the designated sites, we disagree with the RSPB's interpretation that this means the sites are not being given their required recognition. This will be considered as the Preferred Options is produced.

4: Noted.

RSPB

Expect options to be chosen with full regard for the impact on species and biodiversity, whether impacting upon a statutorily designated site or not. We look forward to the Preferred Options version of the Local Plan, and accompanying HRA, and anticipate commenting further at that stage.

Broads Authority comment:

Noted.

Nominations received:

Nominations for residential moorings received at Beccles. These were assessed, visited and if appropriate were allocated in the Preferred Options.

Nominations for areas for Local Green Space received around the Broads. These were assessed, visited and if appropriate were allocated in the Preferred Options.