

Name ²³	Your organisation (if appropriate)	Organisation	Section:	Paragraph:	Policy number:	Map ref	Appendix:	Supporting document:	Do you consider that this part of the Plan meets the legal and procedural requirements?	Do you consider this part of the Plan has met the tests of soundness?	If you answered No, to Q18 - Do you consider this part of the Plan to be unsound because it is not:	Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to se...	Have you raised this issue during previous consultations on the Local Plan?	If you have answered 'No' to question 21 could you please explain why this has not been raised before:	Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound.	If your representation is seeking a change, do you consider it necessary to participate in the public examination?	Would like to be notified of the following Local Plan stages?	Signature:	Date
Chris Balls			PUBSP13	General	PUBSP13	n/a	9		Yes	Yes		Whilst legally compliant I feel there needs to be more consideration of the potential for restoration of more commercial use of the waterways by shipping and cross river ferries etc. Autonomous technology could make this economically viable in the medium term future and integrated transportation strategy needs to consider both current and future needs. Inappropriate developments could hinder these potentially environmentally and socially friendly developments difficult. e.g. lack of dredging, removal of moorings. Must ensure the Norwich Navigation rights are maintained with Norwich still designated as a port. Automation is already seeing a return to smaller ships in Europe as well as on demand small foot ferries, in time this could easily be adapted to the Broads	No	Had raised direct with Broads Authority but seems to have been essentially ignored!	I feel the Navigation and other related legal responsibilities (including environmental shipping legislation) needs more mention as waterways are navigable by Internationally trading (and Pleasure) vessels which comply with a reasonably high International Standard that does not always directly translate to local regulation but is reasonable to consider equivalent. Similar could possibly be said for foreign road vehicles.	No	Yes	Chris BALLS	1/11/2026
Alex Jessop	Suffolk Wildlife Trust		Natural Environment	Biodiversity Net Gain	Policy PUBDM16				Yes	Yes		With specific regard to Section 1 of Policy PUBDM16: There is currently no clear guidance which states that a local authority cannot include required net gain above the minimum statutory level of 10%. 20% has widely been shown to offer greater confidence in delivering a gain (whereas 10% is the minimum level to have confidence in no net loss). Suffolk Wildlife Trust have long advocated for plans in Suffolk to include a minimum 20% policy and support the Broads Authority in including this in their vision for the Broads.	Yes		We do not think a change is necessary. However, should it be necessary to change the wording of the plan to remove the requirement for delivery of 20% then we would support and encourage the plan to read that an "ambition to deliver 20% net gain should be evident" or similar.	No	Yes	Alex Jessop	1/15/2026
Sunny Raggett	Great Yarmouth Borough Council				Policy PUBSP15 – Residential Development				Yes	Yes		The Borough Council previously expressed their support through the previous Broads Local Plan Regulation 19 Consultation for the objectively assessed housing need from the part of the Broads within the Borough likely needing to be met in those parts of the borough outside of the Broads, in accordance with Agreement 13 of the Norfolk Strategic Planning Framework (NSPF), and reiterated through the 2025 Statement of Common Ground between the Broads Authority and Great Yarmouth Borough Council. Furthermore, The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation, that they are supportive of the Broads endeavour to meet its own assessed need for gypsies and travellers and recognise that the future need for Gypsy and Traveller pitches arising from the Broads part of the Borough is likely to be met within the borough and that the emerging Local Plan contains policies aimed at addressing this need, which reflects the most recent (2025) Statement of Common Ground agreed between the Broads Authority and Great Yarmouth Borough Council. The Council maintains its position in regard to Policy PUBSP15, which is assessed in the Sustainability Appraisal (SA) as having a positive impact on objectives ENV1, ENV3, UNV4, ENV7, SOCA and SOCE. The inclusion of a note to explain why alternative need numbers have not been identified and assessed is welcomed and provides further clarity on Policy PUBSP15.	Yes		Not seeking changes	Not seeking changes	Yes	Sunny Raggett	1/16/2026
Sunny Raggett	Great Yarmouth Borough Council				Policy PUBLE1 – Broadland Sports Club				Yes	Yes		The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation that they are keen to support the continued use and potential improvement to Broadland Sports Club as a health and wellbeing facility that supports the area. The Council maintains their support for Policy PUBLE1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV1, ENV3, ENV4, ENV7, SOCA and ENV6, and the stronger wording around walking, cycling, car parking and light pollution in comparison to the 2019 Local Plan policy.	Yes		Not seeking changes	Not seeking changes	Yes	Sunny Raggett	1/16/2026
Sunny Raggett	Great Yarmouth Borough Council				Policy PUBGT1 – Marina Quays (Part of Yarmouth Marina)				Yes	Yes		The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation that they would support the re-use and enhancement of the space for river and other leisure activities where compatible with the flood risk of the site, particularly as this site benefits from planning consent. The Council maintains their support for Policy PUBGT1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV10, EV11, SOCA and SOCE and SOCE.	Yes		Not seeking changes	Not seeking changes	Yes	Sunny Raggett	1/16/2026
Sunny Raggett	Great Yarmouth Borough Council				Policy PUBORM1 – Ormesby Waterworks				Yes	Yes		The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support of the protection of Ormesby Water treatment works from development which may adversely affect the proper functioning of the water works, and its contribution to the landscape and visual amenity of the locality. The Ormesby waterworks provide much of the public water supply to the Great Yarmouth Borough, and the upgrading and maintenance of these works are important in supporting economic and population growth in the Borough. The Council maintains their support for Policy PUBORM1, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV2, ENV3, ENV4, ENV10, ENV11 and SOCA.	Yes		Not seeking changes	Not seeking changes	Yes	Sunny Raggett	1/16/2026
Sunny Raggett	Great Yarmouth Borough Council				Policy PUBTHU1 – Tourism development at Hedera House, Thurne				Yes	Yes		The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support for the allocation of the site for tourism uses and a proportionate amount of general market housing enabling development. The Borough Council recognises that the allocation may assist in supporting the small-scale range of services and facilities within Thurne (including the Local convenience store and public house. Whilst Policy PUBTHU1 is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV3, ENV4, ENV7, ENV10, ENV11 SOCL, SOCA and ECO1 it was assessed as having a negative impact on objectives ENV1 and SOCE. The policy rated negative in terms of access to services and facilities as well as impact on roads due to likely single occupancy car use. However, THU1 was allocated in the 2014 Sites Specifics Local Plan by the Inspector, and the allocation has been rolled forward into the subsequent Local Plan and now benefits from planning permission. The Sustainability Appraisal shows that the overall impact of the policies in combination as positive and subsequently the council maintains its support for PUBTHU1.	Yes		Not seeking changes	Not seeking changes	Yes	Sunny Raggett	1/16/2026
Sunny Raggett	Great Yarmouth Borough Council				PUBSTRACKS – Former Rail Trackways				Yes	Yes		The Borough Council previously expressed through the previous Broads Local Plan Regulation 19 Consultation their support for the Policy and its potential to expand and integrate the networks of paths, cycleways, and bridleways which benefits residents and visitors whilst considering impacts on habitats sites, as well as seeking development to deliver the tracks. The policy would align with adopted Policy GSP7 of the Great Yarmouth Local Plan Part 2 (and emerging Policy SUT1 of the publication final Local Plan) by seeking to use former rail trackways to provide a link between Bradwell, Belton and areas outside of the borough to the south-west. The Council maintains their support for Policy PUBSTRACKS, which is assessed in the Sustainability Appraisal as having a positive impact on objectives ENV1, ENV3, ENV4, SOCL and ECO3.	Yes		Not seeking changes	Not seeking changes	Yes	Sunny Raggett	1/16/2026
Sunny Raggett	Great Yarmouth Borough Council				Policy PUBSSA47 – Road Schemes on the Acle Straight (A47)				Yes	Yes		The Borough Council previously noted within the previous Broads Local Plan Regulation 19 Consultation the provision of a Policy that would be used to assess proposals for changes to the Acle Straight. Realising the full dualling of the Acle Straight continues to be a key ambition of the Borough Council and is critical to the long-term health of industries and job growth in the borough, which are of importance to the wider and national economy. The Borough Council welcomed the potential identification of a strategic cycling route between Acle and Great Yarmouth, as required to be considered by criterion '8' of the Policy. The Council acknowledges the emphasis placed on climate change resilience, and notes the overall positive impact on objectives ENV1, ENV2, ENV3, ENV4, ENV5, ENV6, ENV9, ENV10 and ENV11 in the Sustainability Appraisal.	Yes		Not seeking changes	Not seeking changes	Yes	Sunny Raggett	1/16/2026
Sandra Squire	Forestry Commission				PUBDM15				Yes	Yes		Under "Biodiversity enhancements and wildlife friendly features" the first bullet point mentions "expecting as the norm, planting of native species". We would recommend this wording be changed to "planting of native species in areas predominantly laid out for biodiversity and wildlife (as opposed to amenity)". This is because the wording as it is would conflict with the "delivery and implementation" section on policy PUBDM19, especially sections 6a, 6e, 6f & 6j.	No	Recently recommended by our Nature Recovery Advisor	As stated above, change "expecting as the norm, planting of native species" to "planting of native species in areas predominantly laid out for biodiversity and wildlife (as opposed to amenity)"	No	Yes	sandra squire	1/16/2026
Trustees of the Somerleyton Estate	Somerleyton Estate	Evolution Town Planning	30 Housing and Residential Moorings	Supporting text of policy PUBDM46 New Residential Moorings	Supporting text of policy PUBDM46 New Residential Moorings				Yes	No	Positively Prepared;Justified;	These representations are an objection to the supporting text of policy PUBDM46 New Residential Moorings. The representations are made by the Trustees of the Somerleyton Estate. The Trustees own the Somerleyton Marina which has been proposed in the emerging Local Plan for an allocation for 15 residential moorings. The allocation is increasing from 10 moorings in the 2019 Local Plan, to 15 moorings in the emerging Local Plan, and this increase is supported by the Trustees. The Somerleyton Estate owns the Somerleyton Marina and the adjacent boatyard. Both are longstanding local businesses. The Marina was bought by the Estate around 14 years ago from the holiday company TUI who had planned to use it to support their holiday camps near Gt Yarmouth. Their plan was not successful so the Marina was put up for sale and bought by the Estate to so support the boatyard which they owned, and other village facilities. The Estate has now paid off the borrowing it incurred when buying the Marina and would like to invest in new facilities and create residential moorings. The Estate has submitted a planning application for a first phase of 9 residential moorings which at the time of writing has not been decided pending discussions with the planning authority. Research has shown that none of the other 5 residential mooring's allocations in the 2019 Local Plan have seen planning applications come forward to date. The Somerleyton Estate is the only organization actively trying to deliver residential moorings who has got as far as submitting a planning application. The 2019 Local Plan had predicted that aside from the Somerleyton allocation that 23 residential moorings would have been applied for by this point. The 2019 Local Plan suggested that 41 residential moorings would be applied for between 2019 and 2030, so delivery is significantly behind what was planned.	No	The issue became known as the result of a recent planning application.	The Estate has an extensive database of people who have visited Somerleyton Hall or other Estate facilities and attractions as well as Marina users. From this database it has sought expressions of interest from people who would be interested in residential moorings. They have had several sensible expressions of interest which is considered a good start to a project which is likely to take several years to deliver all the moorings. As noted in the emerging Local Plan supporting text, the Council has found that most people interested in residential moorings would be single people or childless couples. The Estate agrees with this view. The Estates research has found that the people choosing residential moorings over bricks and mortar want a more flexible way of living. While people are interested in living on the moorings, some want flexibility as they will work away for periods of time, or if they are retired want to travel and whilst not using the boat would rent their boat. This flexibility would be prevented by the Councils strict interpretation of the supporting text. When planning to live on a residential mooring, residents also want security so will take a long lease from the Estate to give them security of where they will live. It is difficult for people to commit to long term arrangements with the Estate if they do not have flexibility, for example if they have to live elsewhere or want to rent the boats to others for any reason.	Yes	Yes	David Barker	1/16/2026

Trustees of the Somerleyton Estate	Somerleyton Estate	Evolution Town Planning	30 Housing and Residential Moorings	Supporting text of policy PUBDBM46 New Residential Moorings	Supporting text of policy PUBDBM46 New Residential Moorings	Yes	No	Positively Prepared; Justified;	The Estate has recently found delivering the residential moorings more complex as the application has progressed. This is because of the local planning authority's interpretation of the supporting text of the residential moorings policy which is making it more difficult to deliver residential moorings. This text is similar in the existing and proposed Local Plans, hence the need for these representations in order to provide clarity. In the supporting text of the emerging Local Plan under the sub heading 'Definition of a Residential Mooring and what can moor there', it states that the vessel will be used as the 'main residence.' This is a significant restriction on the property rights of those using residential moorings as it prevents letting or other such activities which are commonly allowed for other homes unless there are exceptional circumstances. This creates problems for the Estate Trustees finding people to occupy the moorings as it imposes a significant restriction on the homes.	No	The issue became known as the result of a recent planning application.	Discussions with the first interested parties about residential moorings in Somerleyton Marina have shown that the restrictions proposed by the Broads Authority will make it less likely that they will use the moorings. The Broads Authority Boat Dwellers Accommodation Assessment Final Report August 2022 (BDAA) is part of the evidence base for the new Local Plan. This shows that the definition of a boat dweller is someone who uses the boat as a main residence. This should not be taken to mean that the boats in the allocations should only be main residences. When other types of homes are developed for main residences, it is accepted that to function effectively that flexibility is needed so that sometimes they will not be main residences. Section 2 headed Consultation in the BDAA report sets out issues delivering residential moorings. These comments reflect the flexibility that potential boat residents have made about the Somerleyton residential moorings. It highlights that providers can be put off delivering residential moorings which is supported by the evidence that none of the Local Plan allocations for residential moorings have been delivered. It highlights the lack of residential moorings in the Broads which further illustrates the difficulties of providing this type of accommodation. Section 2 of the BDAA report sets out that people often use boats or areas without permission for residential purposes which will deliver poorer quality accommodation compared to sites with planning permission.	Yes	Yes	David Barker	1/16/2026
Trustees of the Somerleyton Estate	Somerleyton Estate	Evolution Town Planning	30 Housing and Residential Moorings	Supporting text of policy PUBDBM46 New Residential Moorings	Supporting text of policy PUBDBM46 New Residential Moorings	Yes	No	Positively Prepared; Justified;	This is not a type of restriction proposed on bricks and mortar homes which may be built in the Broads area. It is not a restriction proposed by East Suffolk on homes allowed in Somerleyton village. There is no justification given in the Local Plan why this significant restriction is required. If it is intended to help deliver moorings as the Council has suggested in discussions on the planning application, then it has the opposite effect. The Estates aim is that the residential moorings will bring people to live in the area. They hope that active boat owners will support the boatyard more effectively than the current marina users, many of whom are not active boat users. The hope is that the new residents will support the nearby pub which is owned and supported by the Estate to ensure that it remains a village amenity. These representations are continued below and on an accompanying document.	No	The issue became known as the result of a recent planning application.	Imposing such a significant restriction on the use of a home, requires a clear justification and a clear Local Plan policy. The delivery of residential moorings will be improved and the Plan will be made sound if the supporting text is made clear that the residential mooring does not have to be a main residence. This will make the Local Plan sound by meaning that it will be supported by the plans evidence base. It will be Positively Prepared as the strategy which will meet the need for residential moorings. It will be Justified by being a strategy based on reasonable evidence. The second point of objection is the supporting text which states that: 'the Authority requires images of what is intended to be moored at the residential moorings to be submitted with planning applications.' This is unsound and cannot be done as at the point a planning application is submitted it is impossible to know what the boats who will use the mooring over its lifetime will look like	Yes	Yes	David Barker	1/16/2026