

Broads Local Plan – Preferred Options (2017)

Original Responses

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

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Respondent: Anderson, J

Lottie Carlton

From: [REDACTED]
Sent: 20 January 2017 08:49
To: Planning Policy Mail
Subject: OBJECTION! - Church Close to Pits Lane, Chedgrave, Green Space Proposal

THE CENSORED FOR THE BROADS AUTHORITY VERSION, THE BROADS AUTHORITY OBVIOUSLY PREFER THEIR FICTION OVER FACT

Dear Sirs

Firstly, What an absolutly ludicrous proposal,

I had made my objection, if maybe a little bluntly, but being honest and forthwrite, but voicing my opion as any objection would. I received a response from the Broads Authority stating my objection needed to be sensored, I guess I was to honest and truthful for the Broads Authority. My father (personally) and fore fathers fought for freedom of speech against tyranny, yet the Broads Authority wish to sensor an individuals freedom of speech, I think that says more about the Broads Authority than any other statement I can make.

I have a far better location that is prime for green space status, if that is, you are applying the same critera as used to make the Church Close to Pits Lane Chedgrave proposal?

My proposed site is: Yare House, 62-64 Thorpe Road, Norwich, Norfolk, NR1 1RY.

Yare house is a site of Wildlife, you have wildlife around your offices, birds landing on your roof space, insects in your green spaces, such a reservoir of wildlife an important habit for many many creatures. You are a hub of the community, every time i read the paper your telling the public how much your doing for local communities, so Yare House as viable as any site for Green Space status, more so in reality than the Chedgrave Proposal. People could use your grounds to have picnics and parties, organisations could hold events in your car park the usage of your space could be such a real benefit to the community.

Now is someone really going to waste time and effort seeing if that is viable? i think not.

Pitts lane, you claim is used by the community? really, says who? anyone can see its being used by hardly, the proposal alledges walkers use it for werrymans way, Is that the werrymans way that is closed? or is there another one?

The area is a reservoir for wildlife? Says whom? where are the statistics to back this up? I myself took 2 hrs out of my day stood in the area clip board in hand waiting to experience the deluge of wildlife David Attenborough would of been proud of, It didnt happen! Now i wasted 2 hrs of my time, perhaps the Broads Authority should waste 2 hrs of theres, they are paid for it after all. Its a flood plain its scrub its as much a wildlife reservoir as your office at Yare House!

It has historic links? where? my grandad is 97 lived in Loddon all his life, i asked him, he said and to quote him "nah, dont be silly boy" so in 97 yrs its had no historic links, so who dreamt this statement uo?

Why does it need to be a green space? what would it achieve were already a national park with all that implies how would green space status change anything? it wouldnt! its just a tick box excersize and further waste of time and money.

From what i hear and read and speaking to people resentment in the community in the Broads Authority is growing, The Broads Authority havent communicated with anyone just snowballed this through without any consultation, to this end i will be writting to the Secretary of State for Communities and Local Government and why the Broads Authority are exempt from Government guidance.

The Broads Authority obviously have no concern for locals, residents, businesses or anyone, its a very very sorry state of affairs I for one have now lost all confidence in the Broads Authority and from what i hear there is a tidal wave of anger that i fear the authority may never recover from.

James Anderson



Anglian Water Services Ltd
Thorpewood House
Thorpewood
Peterborough
PE3 6WT

Planning Policy Team

Sent by email

3 February 2017

Tel [REDACTED]
www.anglianwater.co.uk
Our ref 00018757

The Broads Authority – Local Plan Consultation

Anglian Water has made an assessment of the available capacity at Water Recycling Centre's (WRC) (formerly known as sewage treatment works) and the foul sewerage network for each of the proposed sites.

Please find Anglian Water's comments below, these comments relate to the sites identified in the consultation and should be read along side the attached RAG sheet.

It is important to note that this assessment does not take account of the cumulative impact of development on the WRCs and the foul network.

Oulton Broad

The foul flows from future growth will have an impact on the existing sewerage network. Infrastructure upgrades will be required to serve the proposed growth.

Thorpe Hamlet

The foul flows from future growth will have an impact on the existing sewerage network. Infrastructure upgrades will be required to serve the proposed growth.

Thurne

Thurne is served by Ludham-Walton Hall WRC that does not currently have capacity to accommodate the proposed growth and therefore will require enhancements to treatment capacity. As such it is crucial that development is phased to ensure Anglian Water can make timely improvements in order to serve the proposed growth.

The site is also remote from the nearest sewer. Connecting foul water may not be viable.

Asset Encroachment

The site allocation at Pegasus Mews/Caldecott Road is in close proximity to an existing pumping station. It may be that the layout of these sites can be adjusted so as not to encroach on the protection zone. Development should be located a minimum of 15 meters from Pumping Stations. The landowner/developer is advised to contact us at the earliest opportunity to discuss the viability of the site.

Where there are sewers or water mains crossing the site, the site layout should be designed to take these into account; this existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The sewers or mains should be located in highways or public open space. If it is not possible to accommodate the existing sewers or mains within its design then diversions may be possible under section 185 of the Water Industry Act 1991 or entering into a build over/near agreement may be considered.

I would draw your attention to Anglian Water's encroachment policy:
<http://www.anglianwater.co.uk/developers/encroachment.aspx>

Surface Water

With regards to surface water, disposal to surface water should be seen as the last option when all sustainable drainage solutions (SuDS) and discharge direct to watercourses have been investigated and proven non viable. Anglian Water strongly recommends that there is inclusion of a district wide or site specific policy regarding SuDS in the Local Plan.

General Comments

Anglian Water recommends that the above comments are considered prior to finalizing site allocations.

The highlighting of these potential upgrades should not be seen as an objection to the allocation of these sites as we can work with the Local Planning Authorities to ensure development is brought online at the correct time.

We closely monitor housing and economic growth in our region to align investment and the operation of our infrastructure to additional demand for used water.

Where we have identified a need for further investment at WRCs we are currently working to identify to what extent improvements are required to serve additional growth in the relevant catchment and how we will ensure that we continue to protect the water environment. Our investment uses a total expenditure, known as totex, approach to provide the best outcome for customers so where a need is identified the solution and investment may change as our internal asset planning processes refines the options.

Anglian Water will be preparing a business plan in the next year which will identify the need for further investment to accommodate growth within the Anglian Water region. Local Plan growth targets and the timing of sites will be a key source of information to inform our business plan. At the appropriate stage we will be consulting on this document.

Policy PODM3: Water Efficiency

Anglian Water fully support this policy.

If you wish to discuss any aspect of this response please do not hesitate to contact me.



Hannah Wilson
Planning Liaison Manager

Registered Office
Anglian Water Services Ltd
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6YJ
Registered in England
No. 2366656.

an AWG Company

Lottie Carlton

From: Natalie Beal
Sent: 20 January 2017 13:23
To: Lottie Carlton
Subject: Anonymous comments made for database

Please can you add these to the database as anonymous? Made at Chedgrave drop in session.

Thanks

Nats

Advertise meetings date and venue better

What plans are there to increase navigable water to make for what has been lost over last 100 years?

Public moorings are non-existent prior to Wroxham Bridge.

Small business rates not applicable throughout the Broads – not an even playing field

Natalie Beal
Planning Policy Officer
01603 756050

Richard Bacon, M.P.

MEMBER OF PARLIAMENT FOR SOUTH NORFOLK



House of Commons
London SW1A 0AA

Private Secretary

Tel [REDACTED]

Fax [REDACTED]

Ms Cally Smith
Head of Planning
Broads Authority
Yare House
62-64 Thorpe Road
NORWICH NR1 1RY

19 January 2017

Dear Ms Smith

Broads Local Plan – Preferred Options Consultation

I am writing in order to comment on the preferred options of the Broads Authority's draft Local Plan. The central part of the Broads Executive Area overlaps with much of the eastern boundary of my constituency.

As you will be aware, the Broads differ from other National Parks in that a third purpose – Navigation – sits alongside the traditional National Park purposes of public enjoyment and conservation. I am firmly of the view that navigation must not be diluted or downgraded in favour of the other two National Park purposes.

I therefore welcome the emphasis on navigation within the draft Broads Local Plan. In particular, I am pleased that the strategic policies of the draft Plan allow for not only the maintenance but also the enhancement and extension of navigation, subject to other policies being adhered to. However, whilst Local Plans are predominantly about development, I would welcome navigation being given greater prominence within the plan, which would be appropriate given its importance to the Broads.

As Chairman of the All-Party Parliamentary Group on Self-Build, Custom and Community Housebuilding and Placemaking, I am pleased to see the inclusion of a specific policy – policy PODM39 - on self-build and custom housebuilding in the draft Local Plan. Ideally I would prefer to see the policy *require*, and not simply encourage, developers of multi-dwelling sites to set aside part of their scheme for custom and self-build plots. Whilst I recognise that a very limited number of multi-dwelling sites are likely to come forward in the Broads Executive Area, I would be delighted to support such a policy. I would also strongly encourage the Broads Authority to consider adding a single-plot rural site exception policy as part of its Local Plan to boost self-build.

Please do not hesitate to contact me if you would like to discuss any of the above points in greater detail.

Yours sincerely

RICHARD BACON

Member of Parliament for South Norfolk

Respondent: Baldry, D

Lottie Carlton

From: Dean Baldry [REDACTED]
Sent: 26 January 2017 13:18
To: Planning Policy Mail
Subject: Local Green Space Chedgrave

Policy POXNS12: Local Green Space Chedgrave

I am writing to tell you of my concerns of the proposal that Greenway Marine and Pacific cruisers land would be made local Green space .

As a self employed Boat Builder this policy would have an effect on my business , As i work for both yards anything that would alter their way of operating would have a knock on effect to me .

I Hope you take my concerns into consideration when making your decision with this matter .

Regards

Dean Baldry

Lottie Carlton

From: Lottie Carlton
Sent: 20 December 2016 13:46
To: Paul Fletcher
Subject: RE: Draft Broads Flood Risk Supplementary Planning Document

Dear Paul Fletcher

Thank you for submitting a response on behalf of Beccles Society to the Draft Broads Flood Risk SPD consultation. Please treat this email as acknowledgement of receipt.

Kind regards

Lottie Carlton
Administrative Officer
[REDACTED]

-----Original Message-----

From: Paul Fletcher [REDACTED]
Sent: 19 December 2016 16:42
To: Planning Policy Mail
Subject: Draft Broads Flood Risk Supplementary Planning Document

Beccles Society have considered the above document and concur with the aims and objectives set out.

We therefore have no comments to make on these Supplementary Planning Proposals.

Kind regards,

Paul Fletcher

Chairman, Beccles Society

From: Paul Fletche [REDACTED]
Sent: 28 January 2017 15:05
To: Planning Policy Mail; Lottie Carlton
Subject: Broads Local Plan - Consultation

Categories: Ack and Filed

Further to our earlier comments on the above, I can now let you know that Beccles Society has considered the areas nominated for discussion as Local Green Space and concurs with most of the points raised on pages 230 and 231 in so far as they relate to Beccles.

However this is with the following provisos :-

1) Beccles Marsh Trail off Norwich Road (A146), Beccles is indicated as a footpath and as such is identified as already being protected under planning.

We would point out that this is not a definitive footpath and hence its protection is not that secure.

2) Green Space off Lowestoft Road, Beccles (opposite Beccles Primary Academy) is indicated as not being in the Broads Authority Executive Area.

This site appears to be covered within the draft Waveney Local Plan (site 72) with the following wording :-

"Provides visual amenity and physical separation between the built up areas of Beccles and Worlingham. Vegetation in the south western part of the site screens existing development and helps integrate the area into the wider surroundings. Seek to protect the open character and setting of the area. Consider identifying the site as an open break as part of a review of the Local Plan".

I hope these comments are useful.

Kind regards,

Paul Fletcher
Chairman, Beccles Society



BECCLES TOWN COUNCIL

TOWN HALL, THE WALK, BECCLES, NR34 9AJ

TEL [REDACTED]

www.beccles.info

Andrea Long
Broad's Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

- 2 FEB 2017

31st January 2017

Dear Andrea

Former Loaves and Fishes Public House, Beccles

I am writing as Chair of the Planning Committee of Beccles Town Council to express our reservations with regard to the above premises being retained as a licensed premises or tourist facility as proposed within Policy POBEC1 of the Local Plan for the Broads.

It is the reluctant conclusion of the Planning Committee that it is unviable to retain these premises for commercial use and that the site would be better suited for residential use. This conclusion is drawn from the many years of experience concerning the economic viability of this area of the town and it is considered that any future venture located at this site would be unlikely to succeed.

I therefore request that you give due consideration to recategorising this site for residential rather than commercial usage,

Kind regards



Richard Stubbings

Chair of Planning Committee
Beccles Town Council

Lottie Carlton

From: Claire Boyne [REDACTED]
Sent: 19 July 2017 12:08
To: Natalie Beal
Cc: Nicky Elliott
Subject: RE: No word from the Houghtons

Follow Up Flag: Follow up
Flag Status: Completed

Hi Natalie

Please see response below from Nicky Elliott, who is chair of our Planning Committee.

Kind regards
Claire

From: Nicky Elliott [mailto:[REDACTED]]
Sent: 19 July 2017 11:56
To: Claire Boyne [REDACTED] ; Richard Stubbings [REDACTED]
Cc: Charlie Middleton [REDACTED] >
Subject: Re: FW: No word from the Houghtons

I spoke with Natalie on the phone about this issue a few weeks ago having spoken to Richard and others at a planning meeting, as everyone at the meeting felt that retaining the Loaves and Fishes for pub use would be our preferred option for the property. Indeed with no other pubs or restaurants in the Quay area, we felt it was very important to keep it for pub use. I think our initial response below resulted from frustration that the property had been empty for many years, and was falling into disrepair.

She said she would effectively ignore the written comments we had made below and put it into the Broads plan as retention of pub use, as we would be able to comment during the public consultation.

Please feel free to forward this email to Natalie.

Thanks Claire,

Nicky

From: Natalie Beal [mailto:Natalie.Beal@broads-authority.gov.uk]
Sent: 19 July 2017 09:37
To: Claire Boyne [REDACTED]
Subject: RE: No word from the Houghtons

Did you get back to me on this?

From: Natalie Beal
Sent: 16 May 2017 08:56

To: 'Claire Boyne'
Subject: RE: No word from the Houghtons

Hello

On reflection, it might be a better to email thoughts initially. It would have been ideal to meet the owners.

Your comment is below and our response below that.

The site is in flood zone 3a and is a more vulnerable use.

Why do you think it should not be brought back into a pub use?

Why do you think it is unviable to retain in commercial use?

Why do you think residential?

Thanks

Natalie

Beccles Town Council

I am writing as Chair of the Planning Committee of Beccles Town Council to express our reservations with regard to the above premises being retained as a licensed premises or tourist facility as proposed within Policy POBEC1 of the Local Plan for the Broads. It is the reluctant conclusion of the Planning Committee that it is unviable to retain these premises for commercial use and that the site would be better suited for residential use.

This conclusion is drawn from the many years of experience concerning the economic viability of this area of the town and it is considered that any future venture located at this site would be unlikely to succeed. I therefore request that you give due consideration to recategorising this site for residential rather than commercial usage

BA summary: Consider pub use unviable. Suggest residential.

BA comment: The Town Council will be contacted regarding this comment. So too will the owner of the site. At a recent meeting on site about another topic, there was emphasis from the Town Council that the quay area is imperative to business success in the town centre. If that is the case, would a pub in this location also be successful from being in close proximity to the quay. In terms of residential, the flood risk to the site may mean this is difficult.

From: Claire Boyne [redacted]
Sent: 15 May 2017 14:47
To: Natalie Beal
Subject: RE: No word from the Houghtons

Hi Natalie

Not sure what more we can do really. Councillor Stubbings is still happy to meet with you on Thursday 18 May at 10am if you feel this would be worthwhile.

Kind regards

Claire

From: Natalie Beal [mailto:Natalie.Beal@broads-authority.gov.uk]
Sent: 15 May 2017 11:55
To: Claire Boyne [redacted]
Subject: No word from the Houghtons

Hello Claire

Despite two letters, no luck in getting any contact from the Houghtons.

Any thoughts on how to progress?

Natalie

Natalie Beal
Planning Policy Officer
01603 756050

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

Lottie Carlton

From: Natalie Beal
Sent: 07 February 2017 10:57
To: Lottie Carlton
Cc: Planning Policy Mail
Subject: FW: Thursday Evening (19th January) Broads Local Plan Pubic Consultation in Loddon

From: Hugh Taylor [REDACTED]
Sent: 02 February 2017 11:54
To: Andrea Long
Cc: Natalie Beal
Subject: Re: Thursday Evening (19th January) Broads Local Plan Pubic Consultation in Loddon

Good morning Andrea, Natalie,

I am conscious that the deadline for consultation is tomorrow and that I have been slow to send this to you - I do apologise and hope that the short summary below will allow for consideration in the next consultative 'round' . . .

On behalf of Beccles Town Council (aka Beccles Fenland Charity Trust) :

Wish to develop the 'hotel site' next to 'Morrisons Roundabout' in order to release funds to help with the urgently needed restoration and renovation of Beccles Quay and the surrounding area. Site meeting arranged with Natalie (potentially others) for 10 am on February 22nd.

As an individual with strong links with River Waveney Trust and Beccles Town Council :

Development of footpath network within general area Beccles, Worlingham, Geldeston and Bungay.

Construction of a Community Stage at Beccles Quay (design based on an upturned boat.

Creation of a foot passenger crossing of the river in Beccles to link the footpaths on the Norfolk bank with one of the 'scores' thereby enabling access to the Angles Way and the facilities of the town.

I may have mentioned something else when we spoke, but it has slipped my mind - can your notes assist, possibly ?

With my best regards,

Hugh.

=====

On 23 Jan 2017, at 12:31, Andrea Long [REDACTED] wrote:

Thanks Hugh. It was good to see you and look forward to receiving something from you

Andrea

-----Original Message-----

From: Hugh Taylo [REDACTED]
Sent: 23 January 2017 12:18
To: Andrea Long
Cc: Essie Guds; Natalie Beal; Beccles Town Hall
Subject: Thursday Evening (19th January) Broads Local Plan Pubic Consultation in Loddon

Good afternoon Andrea,

It was a pleasure to see you, to meet Natalie and also be able to have a few words with both Jacquie Burgess and John Packman, on Thursday evening. Later on today (with a bit of luck) I will write to you, copy to Natalie and our Town Clerk, to summarise the conversation we had and the input which I was making on behalf of Beccles Town Council and also some separate matters as an individual 'interested person' . . .

With my best regards,

Hugh.

--

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Your ref:
Our ref: 38227
OO:
E:
Date:



Broads Authority
Planning Policy Department
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

Email and post

Dear Sir/Madam

**BROADS AUTHORITY EMERGING LOCAL PLAN PREFERRED OPTIONS CONSULTATION /
PROMOTION OF SITE ON LAND ON CORNER OF THUNDER LANE / WHITLINGHAM LANE &
YARMOUTH ROAD**

In response to the above consultation, we take this opportunity on behalf of our client, Dr Simon Cooke, to promote a site for allocation. The site is considered a sustainable location for future growth and presents no insurmountable constraints to development.

To support the promotion, we consider the following matters to be of relevance to the suitability of the site for development:

Ownership and Availability – As the accompanying OS extract and Land Registry Map confirms the land is owned by our client. The owner confirms that the site is available for development. Furthermore, it is confirmed that the owner owns the whole area outlined in red on the accompanying map and that there are no third party interests on the land.

Potential Development – The site covers a total site area of 0.760ha (approx.). Given the location of the site and its proximities to the Broads and Rail Line on the southern boundary of the site, the total developable area is likely to be 0.46 ha (60% net developable). Given the surrounding land uses, it is considered that a mix of commercial and residential development would be in keeping with the scale and context of the surrounding area.

Relevant Planning History – There is no known planning history on the site.

Other Relevant Planning Applications

It is important to also consider any existing or previous applications within the surrounding area which may have weighting to the successful promotion of the subject site. These are as follows:

Site Access – The site is located on the corner of Yarmouth Road and Whitlingham Lane, at the junction with Thunder Lane, with vehicular access obtainable from Whitlingham Lane. The point of access onto Thunder Lane does not present any potential safety issues with regards to sight-lines, and is traffic light controlled. A detailed Transport Assessment will accompany any future promotion and/or application for the development of the site. Likewise, early consultation with Norfolk County Council Highways Department will form a central part of this.

Local Facilities and Services – The immediate area features a range of local facilities and services all within walking distance of the site, enabling any proposed site development to meet any future planning aspiration that might evolve from the Norfolk & Waveney Sustainability and Transformation Plan for health, including:

- **Public Transport Links** – There are regular bus links to Norwich city centre (every 5-10mins) and in the alternative direction Great Yarmouth, Blofield Heath, Lingwood, Hoveton and Horning (also every 5-10mins).
- **Shops and leisure facilities** – Directly west, Thorpe River Green waterfront and its immediate surrounding facilities include popular leisure and sporting facilities, and a Church. In the opposite direction is a large national supermarket, Community Centre and Post Office. Due south, Thorpe Marsh's Nature Reserve provides extensive dog walking, personal exercise, and wildlife experience opportunities, as well as Mooring access on the River Yare.
- **Healthcare** - Proximity to a large supermarket in store pharmacy and soon to be developed GP branch surgery, on a bus route are all within a ¼ mile of the site.

Local and National Planning Designations (including Planning) – Given that the site is located within the Broads Authority, special regard must be had to the protection of the Norfolk Broads. The design, placement and layout of the development on site will ensure that this Area of Special Protection will be retained and enhanced. The site is also located within the Thorpe St Andrew Conservation Area. Special consideration will be placed on the design of development on the site, to ensure that new building is in keeping and sympathetic with existing development within the surrounding area. We consider that development of this site offers an opportunity to enhance the character of the Conservation Area in this location, and might provide an opportunity for joint working with Thorpe St Andrew Town Council, in delivering their conservation aspirations.

Flood Risk – A search has been conducted of the Environment Agency Flood Risk Map and the site is located in Flood Risk Areas 2 and 3. A site specific Flood Risk and Drainage Assessment will be undertaken on the site. We consider that development could be designed to incorporate commercial uses and car parking at ground floor level within the Flood Zone 2 are with residential development above. Open space provision could be made within the Flood Zone 3 area towards the south of the site.

After considering the Authority's current Local Plan (1997) and Development Management Policies (2011), as well as the emerging Local Plan Policies (to be adopted 2018), together with the Norfolk Housing and Economic Land Availability Assessment (July 2016), we consider that the provision of suitable sites for development (for both residential and commercial land uses) is a vital planning challenge to face the area over the next 20 years. Furthermore, it is important that a sufficient number of sustainable sites for development are found in appropriate locations, in order to help people to have sustainable housing and local business opportunities in the area, while enhancing and protecting the natural characteristics of the Broads. With this in mind, we consider that a combination of both residential and commercial development on the subject site would be appropriate. This site immediately adjoins the urban area of Thorpe St Andrew and is a very sustainable location for new development, provided that new development can be designed to address flood risk. We consider that this is possible.

Together with the OS Plan, which is enclosed, the submission has demonstrated how the subject site is available and would be an appropriate, sustainable location for residential and commercial development.

I trust the above is of assistance to you. If in the meantime, you have any questions, please do not hesitate to contact me.

Yours faithfully

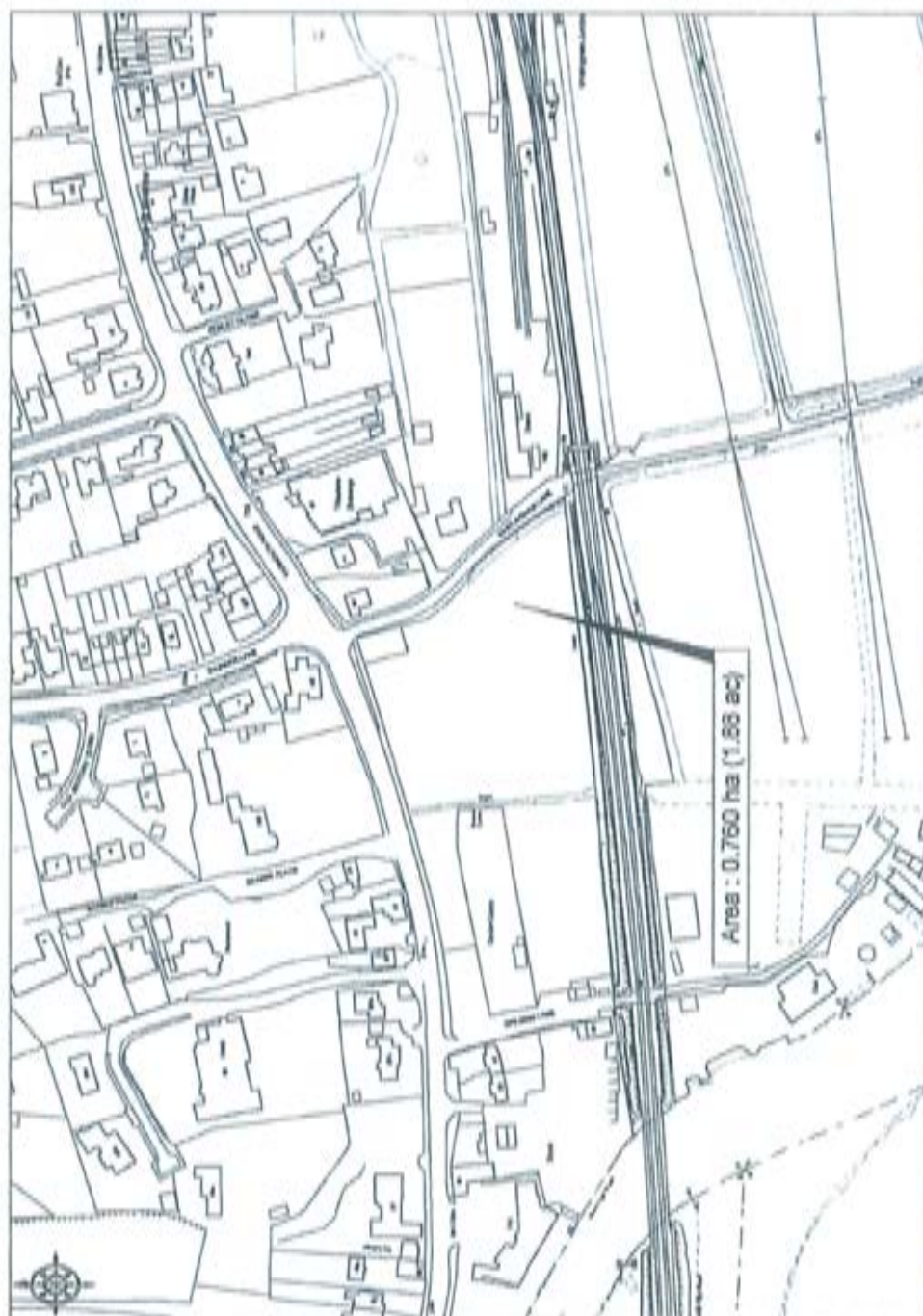


Aimee Fowler
Principal Planner

Enclosures

Copy Dr Simon Cooke

Land at, Yarmouth Road, Thorpe St. Andrew, Norwich



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05 Ordinance Survey

Drawing Number : A. 27,516
O.S. Ref: TG 2608 SE
Date : 16/2/2006

BIDWELLS

Telephone : 01503 763639
www.bcdmedia.co.uk

Respondent: Bircham, J

Lottie Carlton

From: Natalie Beal
Sent: 19 January 2017 09:42
To: [REDACTED]
Cc: Lottie Carlton; Planning Policy Mail
Subject: Local Plan Comment

Dear Jacqueline

Many thanks for your comment.

It will be logged on our system.

Natalie

Policy POXNS12: Local Green Space Some areas are allocated as Local Green Space. See maps here.

I object to land at Chedgrave being allocated as a Local Green Space. This land was nominated by a member of the public whose own property bounds this land. The nomination was made without any consultation with the landowners, Parish Council or local community. The allocation has been recommended by the BA without any contact being made with the landowners, Parish Council or local community. This is completely unjust. A NIMBY should not be allowed to do this and the BA should have the decency to at least discuss with the landowners prior to recommending for allocation.

- **Name** Jacqueline Bircham
- **Email** [REDACTED]

Natalie Beal
Planning Policy Officer
01603 756050

Lottie Carlton

From: Roger Black [REDACTED]
Sent: 03 February 2017 13:53
To: Planning Policy Mail
Cc: [REDACTED]
Subject: POX4S12

Dear Sirs,

Policy POX4S12 Local Green Space at Chedgrave

I have just been made aware of the outlines of the above application and am appalled that this can be a serious application.

I have been a client of Greenway Marine at Loddon for many years and know that this land, owned by Mr. Jonathan Greenway, has been used in the conduct of his business for storing boats for many years.

Greenway Marine is one of the few boatyards remaining on the Broads that still carries on the age old tradition of building and repairing wooden boats. The skills used here have been passed down through the family, and I know Jonathan is intending to pass these onto his son.

This boatyard is a vital amenity for Broads boaters and also brings much revenue to the local villages of Chedgrave and Loddon.

The loss of this Green Space would have a serious detrimental effect on Greenway Marine and could cause the business much harm.

One would assume that the land in question is totally unsuitable for building on as it is just marshland with a high water table.

Roger Black
[REDACTED]

Respondent: Bland, D

Lottie Carlton

From: [REDACTED]
Sent: 01 January 2017 17:48
To: Planning Policy Mail
Subject: Greenspace Chedgrave

To whom this may concern

I am a customer of Greenway Marine in Chedgrave, Norfolk.

I wish to raise an objection to the green space nomination on land belonging to Mr Johnathon Greenway of Greenway Marine Chedgrave for the following reasons.

I know Mr Greenway has for some time been looking into sustainable options for uses of this section of his land in order to further his business for the future.

Im also aware that Mr Greenway is keen to improve future business turnover enabling him to bring his son into the family business and teach him vital skills that are in rapid decline on the broads and sustaining these skills for future generations of the boating fraternity.

I feel that a blanket ban on any future planning applications for uses of this part of his land will have a negative impact on any future aspirations Mr Greenway may have in diversifying his business for the future.

I would be grateful if receipt of this objection is confirmed by reply.

Kind Regards
Danial Bland

[REDACTED]

Sent from my iPhone

Respondent: Bostock, S

Lottie Carlton

From: Bostock, Sue (Aalco Norwich) [REDACTED]
Sent: 20 January 2017 12:06
To: Planning Policy Mail
Subject: Policy POXNS12: Local Green Space Chedgrave

Dear Sirs,

As a local resident of Loddon and Chedgrave, I have great concerns for the policy above being implemented to our local community.

We have thriving businesses and established environments that have worked extremely well over many decades. Disruption of any business for this purpose will have a detrimental effect on 'The Broads' and our local villages and amenities.

The Broads are being promoted as :

- **Growing sustainable tourism to appreciate and protect our greatest natural asset.**
- **Promoting competitive agriculture and high quality local produce.**
- **Engendering growth from new and existing small businesses.**
- **Fostering Sustainable Vibrant Communities.**

I therefore cannot see how this Local Green Space can be viable.?

Best Regards

Sue Bostock

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Lottie Carlton

From: richard starling [REDACTED]
Sent: 02 February 2017 22:22
To: Planning Policy Mail
Cc: Adrian Clarke
Subject: BRASCA

Categories: Ack and Filed

Members of the Broads Reed & Sedge Cutters Association were made aware of the Local Plan Consultation and the documents available on the Broads Authority website. Unfortunately, not one single member expressed any support for this plan.

There appears to be nothing in the plan to address the concerns for those involved with the Broads only true sustainable management method ie traditional reed and sedge cutting. Quality reed and sedge products suitable for the UK thatching industry require good water quality and good water flow. There is nothing included to resolve the main impacts on water quality and there has been little interest by the Broads Authority on water quality issues in general. Despite this, Brasca has, through direct talks with the Environment Agency, been able to achieve the implementation of the first Broads Water Quality report (2015 River Thurne). Similar reports for the other Broads' catchments have been promised by the Environment Agency. Brasca has also recently obtained the Environment Agency's agreement to increase monitoring for total nitrogen on one water where previously no monitoring was undertaken. The references to water quality in the plan are considered mainly irrelevant and Brasca will continue to seek improvements to the Broads water quality with direct communication with the Environment Agency and Drainage Boards.

Reed and sedge has been harvested for centuries in the Broads and staithes are vital for our industry since they provide locations to stack and load reed and sedge for onward transportation by road. Our members do not take the use of these staithes for granted. They do not consider the use of staithes comes with any rights but always ask permission from the persons/bodies charged with the upkeep and/or ownership of the individual staithes. We had, therefore, looked forward to the staithes report on which policy PODM7 has been used as evidence. It is regrettable that the majority of the public will not be able to comment on this report during the time allocated for the consultation period of the Local Plan since it does not or has not to date, been put on the Authority's website. We have been fortunate to have been sent a copy of the report although the final version is not, we understand, ready. Unfortunately, the report is not the accurate document expected. Apart from missing out some private owned staithes which have considerable importance for the Broads' history ie staithes where wherries were built, coal was landed to power steam drainage pumps, etc, there are many inaccuracies in the report. One example of this is the reference to Damgate Staithe at Martham in which the author refers to "the frontage is used for moorings". Having cut reed opposite this location for 34 years, I have never seen any boat moored at this location!

Once again the report is an opportunity wasted by the Broads Authority. It is a great pity that no consultation was done with those who own or look after the Broads Staithes. We therefore object to Policy PODM7 on the grounds that the report used as evidence is not accurate therefore the policy is not sound. We do hope that the report is not abandoned and local people be given the opportunity to contribute to what could be a useful reference document with accurate information of both historical interest and current arrangements at the individual staithes.

This leads on well to the Local Plan vision statement and demonstrates the lack of real community engagement. Local communities do not feel that they are engaged in the decision making process and there is nothing in this plan to suggest that the situation has changed in any way. Could you

not at least acknowledge that there is some desire locally to seek a more accountable Broads Authority?

The policy references to Affordable Housing PODM32 mainly concerned our younger members. It is sad that none of our members now expects anything from the Broads Authority policy on affordable housing. The reality of the situation is that younger reed cutters and probably most younger people born in the Broads on low to middle incomes have completely given up that any policy will lead to a solution. The majority of younger Cutters now have to commute from Norwich, Great Yarmouth and Lowestoft to the Broads. It is only a matter of time when the Broads will have no reed or sedge cutters actually living in the Broads. The planning process in the Broads is now too expensive for those on low incomes and therefore, for future reed cutters, the Broads has become a 'No Go' area for the young generation wishing to live in the area.

PODM22 Light Pollution policy does have merits but the general feeling is that since the majority of light pollution originates outside the Broads Authority area, it would be best to concentrate pollution reduction at source by engaging with those responsible. This can only be done by a light pollution reduction initiative with Parish/District Councils and perhaps schools to increase light pollution awareness.

Policy POXNS5 : Drainage Mills. Although important for the Broads landscape, it should be accepted that the owners of the majority of these redundant buildings are unable to finance renovations to the standard demanded with listed status etc etc. The ability to replace traditional timber caps and exterior walkways with more cost effective and longer lasting modern materials would at least reduce some drainage mills deterioration without compromising the traditional appearances of these buildings.

Policy PODM10: Another commendable policy but the reality on the ground is that traditional broads fen & reed bed dykes continue to be dug wider and deeper regardless of whether any peat is present and some peat sites have been subjected to 'improvements' by digging scrapes, ponds in peat areas. Is this do as I say but not as I do?

Policy PODM24: Acle Straight. The environmental concerns for upgrading to a dual carriageway status seem to have completely ignored the ongoing current environmental pollution from the existing road. Salt applied during the winter months washes off the road directly into the nearby dykes. The road has become notorious for frequent road accidents/incidents resulting in vehicles ending up submerged in the dykes running parallel to the highway. Apart from the tragic loss of life, when vehicles crash into and become submerged in the dykes, fuel, brake fluid, radiator & screen water, gear oil, lubricants etc together with plastics and metals enter the environment. Water from the roadside dykes flows, in places, through SSSI areas via the adjoining dyke network to drainage pumps.

A modern dual carriageway would include pollution control measures as standard and therefore, on environmental grounds alone, should be welcome.

There is nothing in the Broads Local Plan to address the ongoing problems with the Broads floodplains not being able to function naturally and correctly owing to many sites having their access dykes from the main rivers blocked off. This also impedes natural water flow on and off sites resulting in stagnation and decline.

In conclusion, the document is, unfortunately, more of the same old plan. The majority of local people and interest groups will probably not bother to respond to yet another plan on which they have little chance to influence yet alone change. It is another missed opportunity to take on board the issues and concerns we have.

Richard Starling
Broads Reed & Sedge Cutters Association.

Lottie Carlton

From: Lands [REDACTED]
Sent: 01 June 2017 12:46
To: Natalie Beal
Subject: RE: Revised draft Broads Plan 2017 - Public Consultation

To Natalie.

Sorry for the delay in responding but in regards to any works being carried out within the HSE Consolation Zone for the GYPL Pipeline as shown on the previous plan (Red/Green/Blue Hashed Area) BPA will need to be consulted as this will affect the pipeline and will need to be approved by us.

As with other pipelines any works within the easement will need to be notified to BPA, this is 6m on the Bacton to North Walsham Line and under the HSE Zone for the GYPL Line.

For all consultations we usually ask all parties to write into us including the details of the work and location and we in turn will respond back.

I hope this helps

Regards

Nicki

From: Natalie Beal [mailto:Natalie.Beal@broads-authority.gov.uk]
Sent: 09 May 2017 08:12
To: Adam Canning [REDACTED]
Cc: [REDACTED]
Subject: RE: Revised draft Broads Plan 2017 - Public Consultation

Hello

Thanks for this.

Well, how do you want us to use the information?

If a development proposal is near or over the pipeline what do you want us to do?

If we tell the applicant it is over the pipeline, then it is in the public domain. If it is on the policies maps, it is in the public domain.

What do you do elsewhere? What would you like us to do?

Natalie

From: Adam Cannin [REDACTED]
Sent: 08 May 2017 18:36
To: Natalie Beal
Cc: Lands
Subject: Revised draft Broads Plan 2017 - Public Consultation

Dear Natalie,

Apologies I have just picked up an E-mail from yourself chasing for a response (see attached).

In reference to your E-mail could you please ensure that our pipeline is listed as a constraint on the policies map that accompanies the Local Plan.

What format dataset do you require? As we prefer to keep the accurate pipeline route out of the public domain for security reasons.

Kind Regards

Adam

Adam Canning
Lands Team Leader



British Pipeline Agency Limited
BPA Head Office • 5-7 Alexandra Road
Hemel Hempstead • Hertfordshire • HP2 5BS • UK
☎ +44 (0)1442 242200 • www.bpa.co.uk



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01603 610734
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Lottie Carlton

From: Lottie Carlton
Sent: 03 January 2017 15:07
To: Lands
Subject: British Pipeline Agency

Dear Nicki Farenden

Please could you confirm that you are responding on behalf of British Pipeline Agency to the Broads Local Plan – Preferred Options consultation? You have responded via the Revised Broads Plan 2017 consultation email, but your response and the attachment are in reference to the Broads Local Plan – Preferred Options consultation.

Thank you and kind regards

Lottie Carlton
Administrative Officer
01603 756044

From: Lands [REDACTED]
Sent: 29 December 2016 13:23
To: Lottie Carlton
Cc: Adam Canning; Simon Ashdown
Subject: FW: Revised draft Broads Plan 2017 - Public Consultation

To Lottie Carlton.

We have looked at you plan and noted in certain areas relating to the Local Plan the GYPL Pipeline will affect some of the sites, Potter Heigham Bridge noted. This is a reminder of the location of the pipeline and BPA will need to be consulted on any future works in these locations.

I have enclosed a map for information purposes only.



Ask for: Isabel Appleyard
Extension: 2619
Direct Dial: 01603 430619
E-mail: [REDACTED]
Our ref: IA/PLA/13
Your ref:
Date: 01/31/2017

Miss Natalie Beal, Planner
Spatial Planning
Broads Authority
Yare House 62-64 Thorpe Road,
Norwich
NR1 1RY

Dear Miss Beal

Re Consultation on the Broads Local Plan – Preferred Options

I refer to the above consultation.

The Council offers these comments in response to the following issues:

Policy TSA2 – Thorpe Island

The consultation document states that 'The Authority does not intend to roll forward the 1997 Local Plan TSA2 in its current form. It is not included within this Local Plan Preferred Options document as there continues to be outstanding issues relating to Thorpe Island. A new policy will form part of the Publication version of the Local Plan'.

Therefore, effectively there will be no consultation on this policy and nor have the 'outstanding issues' been consulted on. Therefore, this could be found unsound. It is disappointing to see that this area is treated different in that there is no mention about the prospects for this area, and the public will not have an earlier opportunity to comment on this policy, particularly when National policy encourages early engagement in policy making.

Policy PODM34: Gypsy, Traveller and Travelling Show People

We note the Consultation document states that 'the issue of Gypsy and Traveller need, at the time of writing, work was underway to ascertain need in Norfolk and Suffolk. The findings of the report will inform the Publication version of the Local Plan'.

Furthermore, the consultation document makes reference to National Policy stating 'where there is no need identified ...criteria based policy should be included...'. However, the National Policy also states 'Criteria should be set to guide land supply allocations where there is identified need'. As the outcome of the Assessment is not known as of yet, there may be a gap in terms of allocating sites should the need

arise. There is no mention of maintaining a supply of deliverable sites and how the Broads Authority intends to address this. The National Planning Policy for traveller sites state that 'if a local planning authority cannot demonstrate an up to-date five year land supply of deliverable sites, this should be a significant material consideration in any subsequent planning decision when considering applications for the grant of temporary planning permission'.

In addition, one of the requirements in the Broads Authorities proposed criteria based policy is that sites that come forward 'd) Are on brownfield (previously developed) land.' However, this could potentially limit the sites that come forward due to costs associated with developing on brownfield land or lack of availability of such sites. Other non-brownfield land could also be acceptable.

The Consultation document also states that 'the Authority does not consider those who live on boats to be Gypsy and Travellers'. However, the Assessment currently underway to assess the needs of Gypsy and Travellers also includes 'houseboats' to assist the authorities in determining the requirements for moorings for residential houseboats, in particular to clarify how the definition of "houseboats" as set out in the 2016 Housing and Planning Act to be considered alongside the Broads Authority's definitions of "houseboats". Therefore, the outcome of the study may highlight that those who live or could potentially live on houseboats may come within the definition of Gypsy and Travellers.

I hope the above are useful comments in response to your consultation documents. If you wish to discuss any of the points raised above please do not hesitate to contact me directly.

Yours sincerely

Isabel Appleyard, MRTPI
Senior Planning Officer

Lottie Carlton

From: Tony Howes [REDACTED]
Sent: 01 February 2017 09:36
To: Planning Policy Mail
Subject: Fw: Broads Local Plan - Consultation response

From: Tony Howes
Sent: Monday, January 30, 2017 3:54 PM
To: Lottie Carlton
Subject: Broads Local Plan - Consultation response

Dear Lottie,

In response to your reminder I have prepared the following but was unable to get an e-mail through addressed to planningpolicy@broads-authority.gov.uk Would you please forward this to the relevant officer.

Thank you and regards

Tony

On behalf of the Broads Hire Boat Federation I submit the following comments on the Broads Local Plan.

PODM2 – Boat Wash Down Facilities

We note that this policy refers in part to proposed development that increases the use of **existing** boatyards, marinas and mooring basins. However, emphasis on filtration of waste water from boat wash down facilities to remove antifouling paint residues is considered unnecessary and excessively restrictive in these situations. There is no evidence that modern antifouling paint (which does not contain tributyltin) is a pollutant and, in any event, its use on hire craft is either limited to a very small waterline hull area or not at all. Invasive non-native species will not be introduced by hire craft which operate permanently in the Broads navigable waters. We recognise that cost considerations are mentioned but would seek amendment to the policy wording so that it clearly does not seek to remedy a non-existent situation and impose on existing hire boatyards requirements that are impractical and disproportionately costly.

24. The Broads Economy – Redundant Boatyards

Whilst we are anxious to see boatyard facilities retained as far as economically and practically possible for service and moorings provision, where this is not a realistic possibility it would be preferable to permit suitable development rather than allow the site to become derelict.

25. Sustainable Tourism – POSP9

In the context of “encouraging an appropriate network of tourism and recreational facilities” it would be helpful to include somewhere the need to promote, or even require in some cases, the provision of toilets and refuse disposal points available to the general public. This is covered in POSP11 but not elsewhere as far as we could see.

PODM35 – New Residential Moorings

We are opposed to residential moorings in principle unless they can be justified by an accommodation requirement for marine, navigational, tourism or conservation purposes and do not result in the loss of visitor short term moorings.

Floating Buildings

We support the Authority's current approach with a presumption against such buildings unless they are not an intrusion in the Broads landscape and are required specifically to service an accommodation requirement that is not otherwise available for on site management of a boatyard, marina, tourism facility or conservation site.

POXNS12 – Local Green Space, Chedgrave

We are concerned about the implications of this proposal as far as the operation of our member hire boat operator, Pacific Cruisers, is concerned. Others, we understand, will be making critical observations on the overall desirability of this allocation from a local value viewpoint.

The area owned by Pacific Cruisers is essential to the operation of their business, having been used for over 20 years for boat storage and hire boat customer car parking for which there is insufficient space in the boatyard premises fronting the River Chet on the other side of Pitts Lane. To be compatible with previously declared policies to encourage sustainable tourism it is important that Pacific Cruisers, one of a currently reducing number of hire boatyards on the Southern rivers, is not unreasonably restricted if the business is to remain viable.

We are not clear how this company's use of its land would be affected by Local Green Space designation and whether it would apply more restrictions than under existing planning rules. Unfortunately neither are Pacific Cruisers because the Broads Authority Planning Department apparently did not consider it necessary to discuss this with them before its inclusion in the Plan.

T. E. Howes
Secretary, Broads Hire Boat Federation

Lottie Carlton

From: Colin Gould [REDACTED]
Sent: 07 February 2017 21:14
To: Planning Policy Mail
Subject: Local Green Space Nomination - Chedgrave Common
Attachments: Appendix D Nomination for Suitable Areas for Local Green Space.docx; Norfolk Wildlife Trust ~ County Wildlife Site ~ Chedgrave Common.pdf; CPC Order for Possession.pdf; CHEDGRAVE COMMON or LYES HEATH or LIVES HEATH 30-4-14 history.docx; Charity Commission details - 255453 - Chedgrave Common.pdf; Charity Commission 1984.pdf; BA Draft Management Plan for Chedgrave Common.tif

Please find attached a Local Green Space Nomination by Chedgrave Parish Council for Chedgrave Common, Hardley Road, Chedgrave. Supporting information will be forwarded with the application. Further photographs of the site will be forwarded to accompany the application.

Enclosed is a Court Order naming Chedgrave PC as the owners/responsible party for the Common following an illegal incursion.

Kind regards

Colin

Councillor Colin Gould
South Norfolk Council
Loddon Ward
Chedgrave Parish Councillor
[REDACTED]

Appendix D - Local Green Space – Nominations for Suitable Areas

Are there any green spaces in your parish that are important to your community?

If so, please fill out this form with details of your nomination of areas to be designated as Local Green Space.

Please email the completed form, maps and photos to: PlanningPolicy@broads-authority.gov.uk and title your email 'Local Green Space Nomination'.

Your name:

Your email address:

Chedgrave Parish Council

[REDACTED]

Your phone number:

Your address:

[REDACTED]

[REDACTED]

- What is the address of the proposed local green space?

Chedgrave Common, Chedgrave, Norwich, NR14 6BE

- Have you included a map? Yes

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

- Have you included photographs of the proposed local green space? Yes

Please answer these questions:

1: Will the green space endure to 2036 and beyond? Why do you think this?

The Common will endure to 2036 and beyond as it is a piece of land managed by Chedgrave Parish Council under Charity no. 255453, Chedgrave Common, for the benefit of the public and in the interests of social welfare, with the support of Norfolk Wildlife Trust and The Broads Authority for the benefit of the community.

2: How far is the green space from the community it serves?

It is on the boundary of the parish of Chedgrave, less than 1km from the centre of the village, accessible by road, the River Chet and public footpaths, including The Wherryman's Way.

4: Is the green space local in character? Why do you think this?

It is an acid grassland with a small pond, patches of scrub, bracken and reed beds. It is typical lowland grassland with a surrounding hedge providing habitat for numerous plant species, breeding birds and wildlife. It is adjacent to the river Chet a tributary of the river Yare and also to Hardley Floods a SSSI and RAMSAR site.

3: Why/how is this green space special/how is it significant to the local community?

For example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.

It is of historical importance and a haven for wildlife, flora, fauna and biodiversity. It is already enjoyed by the community for recreation purposes, bird spotters, walkers and fishermen. Its location adjacent to a SSSI site (Hardley Floods) is a haven for birds and consequently a destination for locals and visitors.

Please find attached various documents supporting the significance of this piece of land.

Please note that:

- Your nomination will be assessed by a panel of Officers from the Broads Authority as well as relevant District Council. Some sites will be taken forward to the Preferred Options for consultation and some will not. We will make our reasons known and aim for the process to be as transparent as possible.
- We cannot guarantee that your nomination will be allocated as a Local Green Space as the nomination might not be suitable.
- Your nomination will be made public.

You can find more information on Local Green Space here:

- The Government's National Planning Policy Guidance:
<http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>
- Open Spaces Society Information Sheet:
<http://www.oss.org.uk/wp-content/uploads/2014/03/C20-Local-Green-Space-Designation.pdf>

- Get the green space you want: How the Government can help:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/5907/2203637.pdf



Contents

1. Background
2. History
3. Habitats & current site condition
4. Vision
5. Aim of management plan
6. Conservation priorities & aims of management work
7. Indicators of success
8. Constraints
9. Management prescriptions
10. Detailed specifications for management tasks

Appendix 1 – Soil site report; Chedgrave Common

County Wildlife Site Chedgrave Common

Norfolk Wildlife Trust
2013

Acid grassland:

The acid grassland is improved, tussocky and relatively species poor with areas dominated by bracken and some patches of ragwort *Jacobaea vulgaris*. There are also occasional germander speedwell *Veronica chamaedrys*, silverweed (*Potentilla anserina*), creeping buttercup *Ranunculus repens* and ribwort plantain (*Plantago lanceolata*). Southern marsh orchid *Dactylorhiza praetermissa* has been observed towards the south of the site, in front of the alder carr (Correspondence; 2013). To the east of the site there is an area of tall ruderal vegetation with abundant stinging nettle *Urtica dioica*.

Scrub:

There are parcels of isolated and continuous scrub; the isolated gorse scrub *Ulex europaeus* has some contrast in age and structure, with a mixture of open and closed canopies. The two areas of continuous scrub consist of hawthorn *Crataegus monogyna*, gorse and bramble *Rubus fruticosus*, there is structural variation, but some vegetation has grown over mature.

Pond:

The pond appears to be unmanaged, the surrounding vegetation, particularly goat willow scrub *Salix caprea*, is decreasing the water level, causing a build up of leaf litter and shading approximately 70% of the water.

Reedbed/swamp:

The easternmost end of the site adjacent to the river contains an area of mixed swamp, tall swamp species include abundant common reed (*Phragmites australis*) and reed canary-grass (*Phalaris arundinacea*).

Hedgerow:

The hedgerow is the northern boundary of the site and dominated by hawthorn with a height and width varying between 1-2m with noticeable gaps.

4. Vision for Chedgrave Common CWS

The acid grassland will be managed in a way that allows the maintenance of tussock structure and reduces the populations of bracken, tall ruderals, ragwort and prevents scrub encroachment. Preferable management of grassland would be light seasonal grazing by large herbivores. Areas of undesirable dominant species should be cut frequently in a season to reduce the population. The management will support the existing small mammal and invertebrate species.

The areas of scrub will be maintained to encourage a variation of canopy structure and age range. Rotational pruning will prevent an over mature structure and maintain sections of closed canopy to provide suitable nesting sites for warblers.

A proportion of the pond vegetation and surrounding scrub will be gradually cleared to reduce the leaf litter, shading and decreasing water level. Restoration work should be carried out in late autumn and early winter to minimise disturbance to wildlife.

The hedgerow will be restored through coppice management.

5. Aim of management plan

The aim of this management plan is to set out a methodology for maintaining open tussocky grassland, reedbed and scrub habitats, whilst implementing restoration to the pond and hedgerow in a sustainable, cost effective manner.

Acid grassland is a priority habitat for biodiversity work in Norfolk and targets for maintaining and expanding the county's heathland resource are set out in the Norfolk lowland heathland acid grassland biodiversity action plan, which can be found at:

www.norfolk-biodiversity.org/actions/plan/heathland/lowland_heathland

6. Conservation priorities & aims of management work

- To improve the grassland habitat by reducing dominant undesirable species to increase biodiversity, whilst maintaining tussocky structure to support invertebrates and small mammal populations.
- To maintain areas of isolated and continuous scrub for breeding birds, specifically for willow warblers and white throats due to the wildlife importance and amber status.
- To restore the pond, increasing biodiversity and wildlife value.
- To improve structure and species diversity of the hedgerow.

7. Indicators of Success

- By year 5, cover of Bracken should be reduced by 50-80% in target areas.
- By year 5, cover of tall ruderals should be reduced by 50%.
- By year 5, management to eradicate or reduce the population of ragwort by 80%
- By year 5, restoration of the pond should be complete.
- By year 10, hedgerow restoration should be complete.

8. Table 1, constraints

Existing uses	The site is relatively unused, but is accessed by the public for recreation, including dog walkers. The owner of the property adjacent to the site has 10 cats (Correspondence; 2013), which will affect the breeding bird populations.
Fencing & common land	The site is not listed as a registered common, but comes under the jurisdiction of Chedgrave Parish Council. The site has livestock proof fencing in place, therefore grazing can be utilised as a management option.
Access	The site is listed as open access land under the Countryside and Rights of Way act 2000.
Costs	Contact Mikey Bentley (Tel: [REDACTED] South Norfolk District Council, for Email: [REDACTED] Neighbourhood fund advice and application.

Existing uses	The site is relatively unused, but is accessed by the public for recreation, including dog walkers. The owner of the property adjacent to the site has 10 cats (Correspondence, 2013), which will affect the breeding bird populations.
Felling licences	A felling licence is not required for lopping, topping or pruning, or if less than 5 cubic metres is felled within a calendar quarter, or for any tree which has a diameter of less than 15cm when measured 1.3m from the ground (for coppice), or 10cm when measured 1.3m from the ground (for thinning). If felling exceeds these conditions, it will be necessary to apply for a felling licence.

9. Table 1, management Prescriptions

Conservation Priorities	Prescriptions	Years	Timing	Who to deliver	Details
Maintain the open grassland preventing succession	Light grazing with livestock	1-10	Late summer grazing (Mid July through to December or until the soil becomes too wet)	Parish council	Organise an agreement with the local farmer to arrange the leasing of the common for grazing
Reduce and eventually eradicate the ragwort population	Spot spraying	1-2	Spray 1-2 times in the early summer or when rosettes start growing	Broads Authority	Spray 21 days prior to livestock reintroduction (timings only a guide - follow manufacturers guidelines) Remove all cuttings from the site
Increase plant diversity by reducing the bracken population	Out 2-3 times per season	1-5	Out in the summer (July-August)	Parish council	
Increase plant diversity by reducing the population of tall ruderals	Out 2-3 times per season	1-5	Out in the summer (July-August)	Parish council	Remove all cuttings from the site or out and leave for livestock

Isolated gorse and bramble scrub	1-10	Out between September and February	Parish Council	Leave berry bearing scrub until after December as a food resource
Continuous gorse scrub		All scrub should be cut in a rotation of one shrub per year		Clear all cuttings off site.
Continuous hawthorn and bramble scrub				Allow for hawthorn regeneration in continuous patch in the eastern section
Reed bed maintenance	1-10	Out on a 3 year rotation	Parish	Remove all vegetative litter off site
Pond restoration	1-3	Remove 1/3 of the vegetation surrounding and aquatic	Parish council	Removal of terrestrial and aquatic vegetation. Mature willow trees should remain with some scrub patches.
Hedgerow restoration	1-10	Coppice	Parish Council	Out growth to 7m above the ground on a cutting rotation of 7-20 years
Hedgerow maintenance	1-10	Rotational hedge trimming every 2-3 years	Parish Council	This will vary depending on choice of restoration
Monitor willow warbler and white throated populations	1-10	Annual breeding bird survey	Volunteer	To insure that the management is supporting the priority species
Review management plan	5		owner, local authority & NMT	

10. Detailed specifications for management tasks



Map 5 - Management sections (Ordnance Survey; 2013)

Each management section is marked with letters a to f designating the relevant area to the specification of the task.

Table 2, management specifications

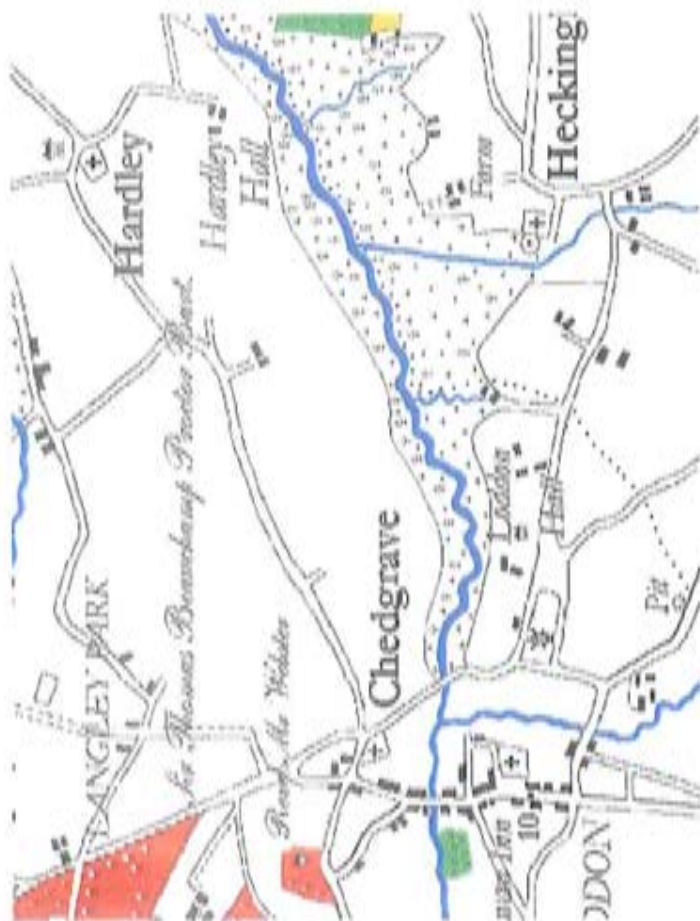
(a) Grassland management	<p>To orchestrate cattle grazing, a contract should be agreed with the local farmer, Mr Lufkin, whose stock previously utilised the site, to establish terms of livestock grazing for conservation.</p> <p>All regrowth must be sprayed a minimum of 21 days prior to reintroduction of cattle to prevent damage to livestock.</p> <p>Seasonal grazing is prescribed at a low stocking rate of 3 cattle for a period of 16 weeks during the late summer months of mid July through to December or until the soil becomes too wet. This should be implemented annually for a 10 year period.</p>
(b) Tall ruderals	<p>To reduce the population of tall ruderals, cut 2-3 times per season between the months of July and August, annually for a 5 year period. All vegetative waste should be removed from the site or left for livestock. A brush cutter would be suitable.</p>

(c) Bracken control	<p>To reduce the bracken population, cut 2-3 times per season between the months of July and August, annually for a 5 year period. All vegetative waste should be removed from the site to prevent nutrient enrichment. A brush cutter would be suitable.</p>
(e) Pond restoration	<p>Removal of 1/3 of the vegetation, surrounding and aquatic would improve wildlife value, this work should be carried out in late autumn - early winter to minimise disturbance. Aquatic vegetation could be dug out by hand and a proportion of scrub, cut and removed, using a fall, chainsaw or by hand. Cut scrub to ground level, leaving no protruding stems. Regrowth should be controlled by cutting or grazing.</p> <p>The mature goat willow trees should remain along with some scrub patches. Remove the majority of vegetative waste from the site, leave some as resource for invertebrates.</p> <p>Aim to complete pond restoration within the first 3 years of the management plan.</p>
(f) Scrub maintenance	<p>To maintain scrub, cut on a rotation of one shrub per year for 10 years across the entire site. Cut and remove selected stands to ensure that vigour is maintained and that a full range of age class is represented. This management is prescribed from September - February, however cutting of hawthorn should be delayed until after December to preserve the food resource for wintering birds. Loppers and a hack saw are recommended.</p> <p>The area of hawthorn scrub to the east of the site is fenced and protected from livestock; regeneration of hawthorn in this section should be encouraged to diversify vegetative structure and provide a valuable habitat for priority species.</p>
(g) Hedgerow restoration	<p>Coppicing of hedgerow should be completed mid November - early March; cut growth to 70cm above the ground on a cutting rotation of 7-20 years. A chainsaw is required.</p> <p>Restoration of the hedgerow should be completed by year 10.</p>
Breeding bird survey	<p>An annual breeding bird survey should be performed from March - June, for a 10 year period, to record the presence of willow warblers and white throats, this is to ascertain if the management is effective in supporting these species.</p>
Waste disposal	<p>Vegetational waste can be composted and used on the Parish Council allotment, soon to be situated on the adjacent marsh land.</p>

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Appendix 1, Faden's map of Chedgrave Common (Macnair, 2005)



Appendix 2, soil site report, Chedgrave Common

INTRODUCTION

Thank you for the opportunity to respond to the above consultation. We were impressed by the comprehensive and thorough approach as regards both in background information, and in the meticulous and evidenced approach to policies and the allocations of sites.

Our response therefore is more general, and looks more to what may happen than could, in an era of high uncertainty, that may have a dramatic effect on the Broads over the next few years. We realise not all of what we say is within the scope of the Local Plan remit; a generic problem of planning, whether in policy or determining planning applications, if a matter is not yet 'current'. However, there may be some flexibility here, or even if not, give 'internal' thought on how best to respond quickly. Following from our 'wider view' comments, we do in the context of these give a comment on Questions 1 and 2.

BREXIT AND THE LOCAL PLAN

We note at paragraph 1.5 this is touched on very briefly, under the heading of BREXIT and Local Plan production, it says 'based on current rules and regulations'. That is all. However there will be much national discussion, and business pressure, to abandon or dilute over time the Water Framework Directive and Habitats Regulations. This would of course have a huge impact on the Broads. The only certainty is that with the dismantling of the CAP, farming policies and practices will change alongside a reduced support income to farmers. This presents both an opportunity and a threat, principally for the Broads as to whether there is a reduction in pollution by agriculture, or intensification under the banner of less red tape and regulation, and increased efficiency and growth.

The UK government has the scope now to reform farming policies and support with the central aims on reducing diffuse pollution of our aquifers by agri-chemicals, nutrients and pesticides; and water borne soil erosion (arable run-off) which takes soil and agrichemicals, by surface movement into our rivers. After decades of intensive farming, there has been the start of efforts to rectify, but there is a long way to go; see the HRA and Local Plan for the Broads, at Appendix 2 – European Site Information, paragraph 7.8.

Water quality continues to be an issue in The Broads, with none of the Broads and only one of 27 river reaches monitored for Water Framework Directive purposes reaching 'good' ecological status/potential. Clear water now only occurs in around five of the 63 Broads. The naturally nutrient-rich water bodies have become hyper-eutrophic as a result of nutrients inputs entering the water bodies through discharged sewage and agricultural run-off. Some point sources of pollution have been addressed through sewage works stripping phosphorus, and mud-pumping has been carried out in some broads to remove enriched sediment.

The Anglian Water document Water Resource Management Plan 2015-2040, written pre-Brexit decision, has a very similar opening sentence at paragraph 3.7.2.2: *Water quality due to diffuse source contamination from agriculture will continue to be an issue going forward.* The following two paragraphs also set out concerns on run-off and the vulnerable nature of groundwater systems in East Anglia (see first attachment). It is clear that the interests of consumers and the public water supply/Anglian Water coincides with those of nature conservation (see second attachment); and this

combination provides the best hope for retaining both the EU based legislation and reforming policies for agriculture. We also add that navigation interests are served by reducing the need and frequency of dredging silt from waterways through a decrease in water borne soil erosion.

The Broads Plan, due for review in 2017 on a five year cycle could present an opportunity to raise the profile of the issues arising from Brexit; and perhaps also through the information and educational material used by the Authority.

SECTION 7, CHALLENGES AND OPPORTUNITIES

The weaknesses and threats include a number of water quality and quantity issues which we have given a view above, except on quantity. On quantity this again a Brexit issue, in that at long last, through the combination of the WFD and HR, the Anglian Water WRMP is embedding reductions in abstractions from boreholes and rivers where they are impacting adversely on high designated sites such as SACs. It is vital that these 'sustainability reductions' stay in place, and are not over time weakened or lost through modifications to the supporting current EU legislation.

Among the list of threats we pick out the following:

- Major housing and employment growth planned for nearby areas, and associated impacts
- Increased recreational pressure, both on 'honey-pots' and remoter, more tranquil and sensitive localities
- Traffic growth
- Major highway improvements

Again we have a problem with the planning system, where Councils are restricted in mentioning, far less commenting on, that is major road building that is not actually physically within their boundary, but could have a huge impact on their land. The NDR is now well into construction, but no mention is made of the impact it will have through people pressure and implications of this. In our view this will bring a huge increase in the number of visitors, and particularly day visitors, to the Broads. They will arrive not just because of the planned increases in population around Norwich, but more so with the combination of the completion of A 11 dualling, and that of the NDR in 2018 (if on schedule); and again with the A47 dualling from Easton to North Tuddenham in 2022. This view is also clearly that of a large part of the tourism lobby who actively campaigned for the NDR. London and the Midlands are now clearly in the day visit orbit.

As a general comment, we suggest that Councils, can make more use of the Local impact Report procedure; and unlike NDDC when with they did no analysis and sufficed with a five line email saying they supported as it would be good for jobs and the economy. That may be for the future, including a Norwich Western Link Road which the County Council are now actively progressing. However, it will be the Broads Authority who will have to manage increased numbers of visitors who will arrive by car, and perhaps some also by coach travel. As such they can seek information to help the planning for this.

We would suggest that the County Council should carry out AADT forecasts for the traffic entering the NDR between Postwick and the A140, and how much extra traffic will be generated peeling off

onto the radial roads towards the Broads. In particular for the A1151 Wroxham Rd. There should be baseline data now, prior to the opening of the NDR; with forecasts for one year after opening, and five years after opening, with the assumptions stated. This should be supplemented by actual measurements every 2-3 years, to build up data as future major road schemes come into operation, A47 dualling and, if it happens, a Western Link Road.

Possible approaches to reducing the impact of increased vehicle movements should start to be considered now; for example a Park and Ride from the NDR to Wroxham/Hoveton. Issues such as this could be raised through Transport for Norwich (formerly NATS) consultations; assuming the change of name does not imply benefits are not restricted to Norwich City, rather than the Norwich Area.

On Transport issues, we commend Policy PODM 24, pages 93-99, on the Acle Straight. This gives a reasoned framework as regards future changes and options for this road. This road of course traverses the Broads area and changes could have a profound impact, in particular for dualling. The need for this analysis is well met; but that also points to the stark contrast for absence of discussion on the huge impact of major road schemes around Norwich, and associated with that the role as unlocking the potential for housing and other development; as made clear in the funding support from the DfT, and NSIP status.

QUESTIONS 1 and 2

Question 1. *Do you have any thoughts on the Authority's approach to the Duty to Cooperate?*

The Duty to Cooperate is a two way street, or should be. This means that the Greater Norwich Councils, and the County Council, should take account of the impact on the Broads integrity on the housing and associated development they plan and implement; and the County Council considers the environmental impacts on the Broads, direct and indirect, arising from major road projects. The Greater Norwich Local Plan must take account of the landscape and nature conservation interests of the Broads. This in for particular development in the vicinity of the Broads; and in wider terms water abstraction issues, and the capacity of waste water works, in their Water Cycle statements. In the case of waste water works, now re-named water recycling centres, an investment now in 'cleaning up' of these would make the introduction of water re-use for the Norwich and Broads Resource Zone by 2030-35 more palatable in consumer perception.

Question 2. *Do you have any thoughts on the Broads Plan and the Broads Local Plan following a shared Vision for the Broads?*

We consider that there should be a shared Vision for the two Plans, as they are interdependent, the Local Plan being centred on a policy and sites allocations base, and the Broads Plan on management issues. There is also a potential advantage in this as the Broads Plan is reviewed every five years, and due again in 2017. The Broads Plan can be more responsive to changes, good or bad, and better 'tracking' of the Vision over five year timescales. It can also be a vehicle for thinking ahead on a continuous process, flagging up achievements and problems, and for the latter also offering potential solutions and what needs to be prioritised.

Ian Shepherd and Stephen Picton Pegg, CPRE Norfolk. 27th January 2017

Lottie Carlton

From: Ian Shepherd <ian.shepherd03@btinternet.com>
Sent: 10 February 2017 15:31
To: Natalie Beal
Cc: Lottie Carlton
Subject: Re: CPRE Norfolk (2)

Hi Natalie

I was linking on page 1 paragraphs six and seven (which runs on to top of page two), and left too implicit. So I propose a summary point on this as regards the Broads and comments on the Local Plan.

The point would be:

"There is a common interest of wetlands such as the Broads, and those of the public water supply, in reducing the levels of pollution from agriculture.

In the case of the Broads, not just a reduction of nutrients and pesticides, but also the amount of silt from arable run off entering rivers and the Broads. Overall there would be benefit to both navigation and nature conservation interests. Brexit offers an opportunity for this change".

Just for your reference, in amplification of the above proposed summary statement, there were attachments to our submission, first the Anglian Water document Water Resource Management Plan 2015-2040. The main reference to AW in their document stating that they have an on going issue with pollution by agriculture is at page 59, paragraph 3.7.2 (1-3), Deteriorating raw water quality. This is quoted in full in our comments on the AW WRMP, at page 4 of our the CPRE Norfolk document on the WRMP.

The second attachment is the River Glaven Conservation Group Newsletter, pages 4 and 5. It sets out the case for less pollution by agriculture of the water in our aquifers and rivers; these are the source of the water in the Broads, and are one and the same of what AW call their raw water, to be processed to give potable water for domestic supply.

I hope this is helpful, and apologies for the delay in responding. Kind regards, Ian Sheoherd

-----Original Message-----

From: Natalie Beal
Sent: Wednesday, February 01, 2017 10:00 AM
To: Ian Shepherd
Cc: Lottie Carlton
Subject: RE: CPRE Norfolk (2)

Dear Mr Shepherd

Thanks again for your comments.

We are now going through the comments we have received and transferring them to our database.

I have looked at the part of your comments relating to Water Resource Management Plan for East Anglia 2015-2040: And Local Plans (including appendix 1 and 2). I am sorry to say that I cannot see a specific comments relating to the Broads Local Plan in there. Please can you summarise and clarify your point in relation to the Local Plan?

Thanks

Natalie

-----Original Message-----

From: Ian Shepherd [REDACTED]
Sent: 30 January 2017 09:58
To: Planning Policy Mail
Cc: [REDACTED]
Subject: CPRE Norfolk (2)

Dear Sir/Madam

Thank you for the acknowledgement of the CPRE Norfolk. Our response included a mention that the consultation document, under threats, made no direct mention of the NDR, singly and in combination with other major schemes such as the A11 completion, and programmed works such as the A47 dualling from Easton to North Tuddenham, will have on the Broads Local Plan. What we consider to be threats, and developers consider as opportunities, is exemplified by an article in the EDP at page 33, printed on the day we made our submission (27th January).

The new layout, launched on the 26th, included what was the Section, is now entitled HOMES: Property/Lifestyle/Interiors. We ask that you look at the article 'The beauty that is Norfolk'. 'Those in the new homes market believe there are many reasons to build in Norfolk'. The article goes on at some length on targeting on the Norfolk hot-spots, including of course the Broads. The pressure will not just come for a much increased demand for housing close to the Broads, but also the coast. Also, but not mentioned by this article, there will be a step-change in the number of day visitors, which will extend as far as London and the Midlands; hence affecting the Broads Plan as well as the Broads Local Plan and the need to seek to strengthen policies as far as possible with adjacent LPAs on the Duty to Cooperate on housing and associated development; and as regards the Broads Plan, on the management of visitors, including transport issues which we mention.

As the consultation does not close until the 3rd February, could you please treat this as evidence for what we say. We separately post a copy of the article.

Yours sincerely, Ian Shepherd, CPRE Norfolk

-----Original Message-----

From: Stephen Picton Pegg
Sent: Friday, January 27, 2017 12:43 PM
To: planningpolicy@broads-authority.gov.uk
Cc: CPRE Norfolk ; Ian Shepherd
Subject: Broads Local Plan - Preferred Option Consultation

Dear Sir,

Please see attached CPRE Norfolk's response.

Please do not hesitate to contact us if we can be of assistance.

Yours faithfully,
Stephen Pegg

Lottie Carlton

From: Ian Shepher [REDACTED]
Sent: 30 January 2017 09:58
To: Planning Policy Mail
Cc: [REDACTED]
Subject: Fw: Broads Local Plan - Preferred Option Consultation
Attachments: BroadsLPoptionsJan17 amended.doc; AW wrmp15.doc; RGCG Newsletter A16 web.pdf

Dear Sir/Madam

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Yours faithfully,
Stephen Pegg

WATER RESOURCE MANAGEMENT PLAN FOR EAST ANGLIA, 2015-2040: AND LOCAL PLANS

A CPRE NORFOLK PERSPECTIVE (Author Dr Ian Shepherd)

BACKGROUND

I participated in the Greater Norwich Local Plan workshop in the Environment Session held on the 13th September 2016. There were 18 participants spread across four tables, and by chance on table 4 there were just three of us, and of differing backgrounds; a former Chief Planning Officer for South Norfolk, a representative of a development company and myself representing CPRE Norfolk. The facilitator was Adam Banham of the Greater Norwich Local Plan (GNLP). The longest discussions were around spatial strategy issues, and water resource.

My interest in water resource, and the various demands made in relation to the natural environment goes back to a succession of drought periods in the late 1980s-early 1990s. I wrote a booklet on this topic in 1998 on behalf of CPRE Norfolk, while Chairman; it was used at the Inquiries on the Norfolk Structure Plan in 1998 and the East Anglia Region Plan in 1999, with the support of Norfolk County Council, English Nature and Norfolk Wildlife Trust. I am a member of an advisory group formed by the Environment Agency eastern area, part of the Anglian Region, which ran from 1994 to 2004. I am a founding member of the River Glaven Conservation Group in 1999, and Secretary from 2001.

The GN LP workshop provided a useful discussion and interesting exchange of information and ideas. I had by this time had an initial read of the Anglian Water document Water Resource Management Plan, 2015-2040. Although the workshops are not a statutory part of the Local Plan development, I offered to make some comment on the document after further reading. Mike Burrell, manager for the GN LP, agreed with this proposal. There is a great deal of valuable information within the Water Resource Management Plan (WRMP). A list of abbreviations would help it to reach a wider audience.

AN OVERVIEW OF THE WRMP AND INTERACTION WITH LOCAL PLAN DEVELOPMENT IN NORFOLK

Anglian Water have clearly had much detailed discussion and worked closely over the years with the Environment Agency and Natural England, and the benefits of this show in what is a thorough and comprehensive long term plan. The plan faces challenges from being in an area of extreme stress as regards water resource, and pressures from climate change, demands for high levels of growth, and reductions in deployable output in part to restore abstraction to sustainable levels. The plan includes delivering a Habitats Regulation and Water Framework Directive solution to meet a sustainability reduction in abstraction levels for the River Wensum, a SSSI chalk river and Special Area of Conservation (SAC), in the Norwich and the Broads Resource Zone (RZ). Reducing abstraction at Hunstanton restores the water flow through the chalk aquifer of the North Norfolk Coast RZ, to benefit of the coastal marsh and lagoon SAC, and with it the Chalk rivers in this area, which include the Glaven and Stiffkey. Changes at the Fenland RZ will benefit the River Nar, SSSI and SAC.

We warmly welcome these measures, and with it the implementation of the legislation that has enabled a review of licences which lead to a reduction of abstraction levels where they had been damaging our most valuable habitats and the wildlife supported. It may be however this still leaves at risk those County Wildlife Sites which are water dependent habitats and their landscapes. As we discuss later, agriculture greatly affects the sourcing and treatment of potable water, and depends on the same sources; as also do our river and wetland sites of nature conservation.

We would urge Local Plan makers to consider what is planned for water resource in their district, but also in adjacent districts - and we hope this document might aid this. Water Resource Zones do not fit neatly with district boundaries, most districts are served by more than one Resource Zone (RZ). In Appendix 1 we summarise information on the Norfolk Water Resources Zones: Norwich and Broadland RZ; North Norfolk Coastal RZ; Norfolk Rural RZ; Fenland RZ including the Hunstanton RZ. Newmarket RZ and Ely RZ are more peripheral. The Rothamford North RZ is geographically some 50 miles from Fenland, but comes into play in the first five years in the plan to support North Norfolk in sequence of five year steps.

A map at page 7 of the WRMP shows the geography of Anglian Water RZs. It also shows the impact of the sustainability reductions on water available as the % average daily sources works output in each RZ. This is more than 50% for Norwich and the Broads, and 25-50% for Fenland RZ. Work starts with a relocation of Wensum abstraction in the current AMP from Costessey to Heigham. This moves the abstraction from the lower reaches of 71 km of SAC river to a location outside the SAC, a return to original site at Heigham. The move to Costessey took place in the 1990s after concerns on historic mercury levels in the river arising from the then legal discharges from a chemicals factory. The table at page 55 shows the sustainability reduction for the Norfolk and Broads RZ to be 46.2 MI/d; that for the Fenland RZ is 19.00 MI/day. The map at page 11 illustrates the complexity of water transfers around the region RZs. The 'no deficit' in supply-demand for North Norfolk Coastal RZ, arises from sustainability reduction at Hunstanton current abstraction. This requires water transfer from the Fenland RZ, and in turn, compensation for that from Ruthamford North RZ.

The figure at page 100 illustrates the AMP period for the preferred supply-side schemes for the RZs to be implemented; and how these relate to the Local Plan horizon of 2036. Options to go forward include water transfers through a series of resource zones; and treating waste water to near potable condition and returning to a river upstream or storage at riverside banks (waste water treatment works are now to be known as water recycling centres). At AMP9 Norwich will be on water reuse, and Ipswich at AMP10. Desalination of sea water is also seen as a viable option and an alternative to water reuse. Beyond 2035-40 AMP 10 we will be facing a mix of other types of water resource, to supplement the boreholes to the aquifer and surface abstraction from a river. These options discussed include a large reservoir in north west Norfolk, transfer of raw water through a joined up Trent-Nene-Ouse system, and re-charge of aquifers by pumping in winter storage water to them.

These scenarios were floated in the 1990's. There was a proposal for a reservoir at Feltwell, drawing water from the Ouse at the Denver Sluice, but even then this was being used for a long distance transfer to Essex, The Ely Ouse Transfer. There are limits to the amount to be abstracted, not least as regards the Wash SAC. The Trent, at least then, suffered from high levels of PCB; and as recent research shows there are issues around the use of mixed water sources which naturally have differing origins, at least for wildlife. Our concern then about re-charge of aquifers is more so with recent Anglian Water research, see later. Any permanent damage to aquifers, just on supply-demand considerations, would be disastrous. The replacement with surface water would both be very difficult in an area of extreme water stress, but a push to surface water would see greater loss through evaporation.

For water resource issues and other reasons we argue that the drive for population transfer into Norfolk and plans for economic growth are set at too high a level to be sustainable in the longer

term. The economic and job growth should be more selective; and a high quality countryside and its wildlife supports this aim. A moderation of land use plans would reduce the need to become involved in increasingly complicated, expensive and energy dependent measures to meet the stated Government aims for Anglian Water; have a secure water supply and demand balance, and to protect the environment. We should not be exacerbating a difficult situation by excessive levels of growth. While many take the opposite view, we ask for consideration of the views we put forward.

Over the next 25 years the plan has to manage risks from drought, deteriorating raw water quality and the impact of cold, dry weather on distribution system and customer supply pipes. The raw water to be refined at Water Treatment Works to potable standard is drawn at present from just two sources within the boundary of Norfolk. These are from ground water held in soft rock strata and abstracted by boreholes. Recharge comes from rainfall water percolates through the ground, mainly in winter. This same ground water is also the source which feeds our rivers and wetlands. Surface abstraction takes place on our larger rivers. Five decades of intensive agriculture have taken a contamination toll on both sources, well recognised by successive Governments, but efforts to mitigate these have been and are inadequate, a point we enlarge on later.

A reduction in contamination by nutrients and pesticides, and we add soil, would be of great benefit to wildlife and ecology as well as the processing requirements of raw water. While there may be a relatively low baseline of contamination from agriculture, it is cumulative. In the groundwater in the long term, to the extent that Anglian Water are having to abandon some sources and face increased 'clean-up' costs in those they retain. On surface water abstraction a heavy rain event can result in a contamination peak from arable run-off. Heavy rain events also have an impact, along with general drainage water, in the processing at waste water processing works. There is a risk of inadequate capacity to process, and resulting flooding and pollution incidents. By remit the AW WRMP deals solely with water resource; however we discuss this in our document, if only because in longer term the plan requires that one source of raw water is reuse of waste treatment water to near potable.

CURRENT AND ON-GOING CHALLENGES

As is well recognised, Anglian Water have pursued the reduction of water leakage in distribution, and seek to reduce water usage by extending metering. Both are important, but are only part of the solution to meet need in the longer term. It is made very clear in the WRMP that a number of other sources will be required. Inevitably in looking to the longer term there are a range of interacting variables which are difficult to assess individually far less cumulatively; the consequence of growth, climate change, sustainability reduction and deteriorating raw water quality (Appendix 2 for detail on growth and climate change in particular). The WRMP succeeds as well as can be expected in working with the existing wider framework set by Government in planning for a supply-demand security. This really needs sustainable development; those born today will be 24 at end plan.

Anglian Water has very difficult technical challenges, but also in our view as an organisation. Like all water companies they have a statutory duty to supply water to all new development. At the other end of the process OTWAT have to approve the plans and associated cost for future investment. Expenditure is passed on to the consumer, and as such there is a need for some regulation. However there is a political imperative from successive Governments also to protect the consumer from major increases in the cost of water. There could also be some debate on the level of financial return made to shareholders.

In our view, the 'squeeze' comes hardest in the least visible part of the overall process. While the replacement and maintenance of existing water supply infrastructure gets high priority in a drive to reduce leakage of potable water in the distribution and supply network, that for waste water – the input pipe network, the treatment works capacity, and effluent discharge - is the Cinderella of investment. This more so, as we also argue that the consent licences for discharge set the bar too low for baseline conditions; and more so for the not infrequent heavy rain events, and an 'allowance' of one incident a year which might greatly exceed the consent conditions. Water companies have a duty to record effluent contaminant levels, but consent levels can be questioned as both too high and undue flexibility. These issues need to be addressed now, both for the impact on our rivers and the wildlife dependent on them; and more so again if the public are to be persuaded on Norwich Water Reuse at 2030-2035, and Ipswich Water Reuse at 2035-40. The alternative to water reuse is the sourcing of raw water by desalination of sea water, technically possible but at what financial and environmental cost.

Environmental interests have expressed concern over decades at the impact of agriculture on the level of contaminants in our aquifers, rivers and wetlands. However we can do no better than directly quote from what Anglian Water say (page 59 of the WRMP, three paragraphs) on the deterioration in what is their raw water. This raw water is also of course also the source of life in our rivers, freshwater marshes and lakes and fens, but the points here are those affecting water supply.

Paragraph 3.7.2.2. "Water quality deterioration due to diffuse source contamination from agriculture will continue to be an issue going forward. Nitrate concentrations will continue to rise in many parts of our groundwater system and are unlikely to decline anytime in the next 20 to 50 years. Catchment management solutions to deal with high nitrates are very expensive and are ineffective in the short to medium term. We will, however, continue to model the movement and persistence using the advanced modelling techniques developed in AMP5 (2010-15, of the Asset Management Plan) and continue to raise awareness at catchment and farm level on the impact of land use practices on raw water quality.

Paragraph 3.7.2.2. Concentrations of pesticides in raw water increased markedly in the period following the 2011/2012 drought and in response to high levels of catchment run-off in October 2013. In the current AMP, we have developed models to predict the impact of land use change on pesticide concentrations in surface waters. The outputs of these models allow us to identify the areas within catchments that carry the highest risk in terms of mitigation of pesticides in rivers either through direct run-off or via by pass flow. Our strategy going forward involves catchment officers working at farm and catchment level to provide advice and education and to carry out catchment monitoring. In a few catchments classified as high risk under the modelling program, including those that directly support reservoirs, we plan to investigate the effectiveness of subsidising farmers to use alternative products. Our strategy will also focus on the future impact of emerging pesticides on raw water quality in the groundwater and surface water systems operated by Anglian Water.

Paragraph 3.7.2.3. We are also at risk of point source contamination due to the vulnerable nature of groundwater systems in East Anglia. Risks to the security of supply are identified and managed through our Drinking Water Safety Planning (DWSP) approach, and, where appropriate, we have invested in additional monitoring and treatment. In addition, subtle changes to natural raw water

have been identified through our intensive raw water monitoring programme. These changes are due to complex hydro-geochemical processes operating in aquifers, some triggered by extreme hydrological events and changes to abstraction. Where appropriate, investment is planned to maintain full compliance with drinking water standards”.

We warmly support the management, monitoring approaches, and the high level research being undertaken, as set out in these three paragraphs. We also offer the following observations on them.

For wildlife, as opposed to drinking water safety alone, the presence in fertilisers of phosphate as a nutrient, as well as the nitrate, is a major wildlife issue. The most striking example is in the post-war history of the Broads. Agricultural run-off carried silt down the rivers with deposition in the still water, which affects navigation interests. It also brought nutrients which over time resulted in algal blooms which degraded the whole ecology of the Broads. Clean-up is a long and expensive operation; and will need repeating unless the root cause of the problem is tackled.

Nutrients in groundwater will remain there for decades, even if the whole farming industry went organic overnight. More finely tuned application of agrichemicals makes a contribution, but Catchment Management Plans (CMP) must remain in place aimed at reducing arable run-off. North Norfolk was chosen as one of three pilot sites for testing the CMP approach before the national roll-out. Natural England and the Environment Agency pursued with some success, but this is a long term process. It is good to see the involvement of Anglian Water also, but efforts were set back with the 2015 CAP review, which saw agri-environment payments cut back to about 60% of the previous level.

The Wensum catchment, along those of the Avon and Eden, is now the subject of another pilot Defra scheme, aimed at developing in-field instrumentation for measuring levels of fertilisers and pesticides to evaluate the efficiency and discrimination in use. The research on the complex hydro-geochemical processes in aquifers is highly important. One consideration for the future is the storage of available raw water by recharge of aquifers by high pressure. This proposal was around in the 1990's, and intuitively seemed very high risk, and more so now in the light of the research mentioned. It has in our view the potential to destroy the ecology of Chalk rivers. These are of great wildlife importance, as witness the award by Defra of £1.3 m through the Catchment Restoration Fund, as a result of a competitive bid by the Norfolk Coast Partnership and Norfolk Rivers Trust. The resulting North Norfolk Nine Chalk Rivers Project (2012-15) had a very successful outcome for river restoration work and other catchment activities.

CPRE (and the RGCG) have always been supportive of the farming industry, and recognise the vital importance to landscapes and wildlife; and no proposed river restoration project has any chance of progressing without the support and goodwill of landowners and farming. The difficulties in a globalised world and the leverage used by major retailers to keep prices low is well known but less well recognised. Again successive Governments are sensitive to increases in food prices to the consumer, which directly affect the cost of living index. Costs in the food chain are externalised, including those of water companies and conservation interests. This inevitably gives rise to some major tensions.

A specific example that indicates this was an Anglian Water Business Awards advertisement in the EDP of 29 July 2016, and the 'Love every drop campaign', much needed to raise the profile that water is not a mundane, guaranteed on-tap commodity. The text said "See the water in everything!

It takes 450 litres of water to produce a single pound of potatoes". It goes on to point out that we each use 145 litres of water every day, and as our population grows, so too will the total amount we use. We would add that potatoes are an example of a high risk crop as regards water borne soil erosion; and they are often grown in a high risk field, that is one on a slope, and worse still within reach of a river or other water body. The furrows in a heavy rain event act as fast open drains, and may exit as a torrent of silt-laden water at one corner off the field, and on to a hard surface, and into a river. With it the silt comes agri-chemicals. As an illustration, see RGCG Newsletter Autumn 2015.

CONCLUSIONS

Local Plans now take policies and site allocations in tandem, with the aim of adoption by early 2019 or thereabout. Alongside of this runs a Sustainability Appraisal, and within that consideration on water resource that are informed by the Water Resource Management Plan. There are also issues on infrastructure, such as waste water and drainage as well as water resource and supply.

There is good reason to most carefully review proposed levels growth assigned to Local Plans, and assess rigorously through the Sustainability Appraisal

Added to the uncertainty inherent in long term planning for water resource supply and demand, and for that matter also for the development of Local Plans, there will be a huge range of issues arising from the Brexit decision. A key issue for Anglian Water is their need for good quality raw water, and what happens in agriculture; and likewise for wildlife.

There will be much pressure to determine quickly the new future of farming, certainly by 2020, with the Government guaranteeing the existing subsidies until then. There will be pressures for farming to go more intensive, and also to discard much environmental legislation as 'red tape'. Both would be entirely wrong.

We suggest instead that we are now at a point where the changes to come in farming can be looked at as an opportunity rather than threat as regards the issues discussed here. That there will be schemes and financial inducements for farming that take the necessary account of both soil and water conditions. For water resource and quality, with the EU environmental legislation in place in our national policies, and research programmes in hand, we would argue that at last and long overdue, we have embarked on a much needed 'caring' approach to water resource. We are much more aware of what needs to be done, albeit still major challenges to implement.

However, this will be totally undermined if we do not make the necessary radical changes to farming practices and devise and implement appropriate incentives to make this happen. There are our two most fundamental requirements at stake here, assets if you prefer, water and soil, and soil and water. There is a need to support these needs through campaigns to raise public awareness and understanding, and with it the political will to take up the challenges.

APPENDIX 1. SELECTED INFORMATION FROM THE RESOURCE SUMMARIES

Norwich and the Broads RZ

The RZ serves the City of Norwich and surrounding areas. There are about 140,000 household customers, and equivalent non-household customers about 7,000. The AW projections of annual delivery are somewhat lower than those in the JCS over next few years, page 208. The confirmed sustainability reduction for the Wensum will be implemented in AMP6 (2015-20), with an abstraction relocation of 46MI/d. This is the preferred option NB10, the relocation of the intake and bankside storage. A further 11 MI/d will be required at AMP9. The preferred option is water reuse, NB11. See pages 206-217 for the Zone summary

We also refer to a summary at page 14 of what Anglian Water will deliver in AMP 6 for their region as a whole as regards a combination of cost-beneficial demand management measures and cost-effective supply-side schemes. The two environmental actions are:

- We will relocate one of our intakes on the River Wensum, restoring favourable hydro-ecological conditions in the river, and
- We will transfer additional resources into our Hunstanton RZ, restoring sustainable abstraction to the North Norfolk Chalk.

North Norfolk Coast RZ

The RZ extends from the near the Wash to the Norfolk Broads. All abstraction in the RZ is from Chalk groundwater. There are six abstraction points near the coast, and another five near Norwich and the Broads RZ, and one near Norfolk Rural RZ. The towns served are Wells, Fakenham, Sheringham, Aylsham, North Walsham and Ludham. In total there are ca 55,000 householders, and 3,500 equivalent non-householders. Most householders are supplied from the Chalk. A minority of customers in the extreme east of the RZ get some from the adjacent Norwich and Broads RZ. One likely sustainability reduction of 3MI/d in 2025-25 would affect Aylsham and Ludham. See pages 198 to 203 for the Zone summary.

To comply with the Habitats Directive Review of Consents, the interim arrangement is to reduce abstraction at Hunstanton and then Fenland, see page 192 and map at page 11. The Hunstanton RZ supplies the town and a small area around. The reduction at Hunstanton will be compensated by supply from the southern part of the Fenland RZ. The Hunstanton Zone summary at pages 190-195.

Fenland RZ

The Fenland RZ lies to the south and east of the Wash and is based on the supply systems for Wisbech, Downham Market and King's Lynn. Customers in the RZ are supplied with groundwater from the Chalk and Sandringham Sands and surface water which is abstracted from the River Nar and River Wissey. In 2012/13 the total number of household customers was estimated at 80,000. The equivalent number of non-household was approximately 5,000. There are significant adjustments to the baseline supply forecast since the 2019 WRMP. These include:

- A confirmed sustainability reduction affecting our source on the River Nar. This is estimated to be equivalent to a 9.1ml/d reduction in average daily supply output (ADSO) in 1024/25. This reduction will also result in a 12.dml/d reduction in critical peak periods
- A confirmed sustainability reduction affecting one of our Chalk groundwater sources impacting flows in the River Nar and the Old Car Stream. This is estimated to be equivalent to a 6.9MI/d reduction in ADSO in 2024/25
- Two likely sustainability reductions have been identified to restore flows in Stringsides Stream and River Gaywood, totalling 2.96MI/d.

Scenarios and options to deal with new sources for raw water are shown at page 182, Table 14.8. They include desalination plant at Kings Lynn at 2015-20; Ruthamford North transfer at 2020-25, and King's Lynn and Wisbech Water Reuse; and combinations of these leading the following AMP periods. Desalination at King's Lynn is problematic, the discharge back into the Wash would likely impact on the ecology of the SAC. Water Reuse in 2015 to 2020 might also have problems. The preferred option in the WRMP is the Ruthamstead North transfer, as shown at page 100 for the working plan for all RZs. The Fenland Zone summary is at pages 173-183. Note the last paragraph, 14.6.5, which is also found as an end note to other RZs. This says:

Under all scenarios Fenland RZ has adequate resource however it is reliant on resources being available in Ruthamford North RZ which in the worst case combination and recent actuals scenarios is shown to be in deficit at the end of the forecast. Under these circumstances, strategic options for maintaining the water supply-demand balance include:

- Development of the South Lincolnshire Reservoir. This would store water abstracted from the River Trent during the winter for year-round treatment and distribution. Originally envisaged as a scheme to support growth in demand areas to the south and east of our supply system, this could be used to support other areas
- Development of a new storage reservoir in the Norfolk Fens. This would store water abstracted from the River Ouse during the winter for year-round treatment and distribution. Since the resources of the Ouse are already used to support the Ely Ouse Essex Transfer, careful consideration of the available yield would be required. If support is necessary, it is possible that a raw water transfer from the River Trent could be developed. This would link the Trent, Nene and Ouse to support supply systems in East Anglia.
- In investment to support the additional storage capacity created by dam raising in Ruthamford North by a transfer of resources from the Trent basin.

The fourth and associated option is from trading with other companies. How far away will any available water be? Worst case scenarios may be the average by 2040.

Norfolk Rural RZ The Norfolk Rural RZ lies to the east of Norwich and includes the supply systems for Swaffham, Dereham, Wymondham, Attleborough and Diss. Customers in the RZ are supplied with water pumped from the Chalk aquifer. Total customers are ca 66,000; non-household equivalent 4,300. No deficits are forecast. Water for the Thetford area comes from the Newmarket RZ, a Chalk aquifer. The Newmarket resource summary is at pages 220-225.

APPENDIX 2. ANGLIAN WATER OVERVIEW OF THEIR CHALLENGES. EXTRACTS TAKEN AS BELOW

Paragraph 3.7.1. Existing supply-demand pressure in the Anglian Region will increase in future as a consequence of growth, climate change, sustainability reductions and deteriorating raw water quality. Summarising from work completed for this plan:

- Over 500,000 new properties are forecast to be built in the region in the period between 2015 and 2040. These will be built at an average rate of approximately 21,000 properties per year, with the build rate suppressed by the effects of the current down-turn in the housing market
- Over the same period, the population is forecast to grow by over 1,000,000, or 20% from population levels on 2011/12. Even if water efficiency rates per capita consumption are achieved, this growth is equivalent to an additional 72MI/d of demand. Including target headroom requirements and other changes, our overall demand is forecast to increase by 144.3MI/d. This excludes 87.5MI/d of water savings from leakage, metering and water efficiency in our baseline forecast
- Mean impacts of climate change, including target headroom requirements and effects on demand, are of the order of 50MI/d
- In the worst case, climate change impacts may reduce our average daily source works output by 154MI/d
- In the worst case climate change may reduce our average daily source works output by 154MI/d. The majority of the impact is predicted to affect our reservoir and direct intake resources, with the worst case reductions in our Ruthamford system alone accounting for 87MI/d (60%) of the total impact, and

From ongoing discussion with the Environment Agency, up to 30% of our resources are subject to confirmed, likely or unknown sustainability changes. This is equivalent to 13% of the total number of sources we operate. In total, up to 182MI/d may be affected

Paragraph 3.7.2. Overall, our supply-demand balance is potentially at risk from adverse changes which may be as large as 587MI/d, or approximately 50% of our Daily Intake. Since the equivalent available headroom in 2012/13 was only 362MI/d, the scale of the potential threat is significant.

On sustainability changes and reductions we have:

3.7.1.1 The Environment Agency (EA) has defined a list of sites on the AMP6 Water Resources National Environment Programme where there is still some concern that our abstractions may be having an unacceptable environmental impact. The sites have been classified as having a confirmed impact, a likely impact or a (currently) unknown impact.

3.7.1.2 Where the EA has concluded the impact, we are expected to implement a solution to reduce abstraction or provide mitigation measures. If the solution results in a reduction to the deployable output of a source then it is referred to as a sustainability reduction.

3.7.1.3 Where the EA has concluded a likely impact, we are required to complete an options appraisal report. The report must appraise and cost all reasonable options that can, alone, or in combination, help to mitigate the effects of Anglian Water abstractions on low flows.

3.7.1.4 The WRP guidance states that we should convert both confirmed and likely sustainability changes to reductions in deployable output and include any reductions in our baseline supply-demand balance.

3.7.1.5 We referred to this table with respect to the Norwich and Broads sustainability reduction at Heigham of 46.2MI/d. The resource zone summary (page 206) states the plan for maintaining the supply demand balance combines source relocation with water efficiency, enhanced metering and additional leakage control. This will be completed by 2020. In the long term additional supplies will also be required. As in our text, this will be Norwich Water resource at AMP9. The table shows other Resource zones with a high sustainability reduction. For Central Lincolnshire it is 24.05MI/d; East Lincolnshire the SD is 59.07I/d.

At page 59, on climate change there is a summary of worst case climate change impact with particular vulnerabilities in some Resource Zones, data expressed as MI/d This is given as Ruthamford North 33.4; Ruthamford South 61.1; Norwich and the Broads 32; Fenland 8.8; East Suffolk 11.5; East Lincolnshire 2; Newmarket 2; South Essex 2.8. In each case it is the deployable output from our reservoir and direct river intakes that is threatened.

END

Ian Shepherd, CPRE Norfolk. 3rd October 2016.

There is available also the RGCG Newsletter for Autumn 2015, see page 11 for arable run-off, electronic version.

Also a print copy of a CPRE booklet, July 1998. Water Resource and Usage in Norfolk; Time for the Effective Protection of the Natural Environment



The new logo you see above was adopted at the AGM; our thanks to Tony Leech for the design. We saw it as a crisp and clear depiction of what we do, and the instant recognition of what RGCG means. It arose from a review of how the RGCG communicates to both members and others who share or could share our interests. Our Newsletter and web site will continue as they are, but there was also a need to reach the "could shares". Hence the RGCG now has a Twitter account, and all three outlets and will use the new logo. Willie Brownlow has been much involved, and has this message:

"I am grateful to Ursula Jutta of the Norfolk for Rivers Trust for setting up our Twitter account @RiverGlaven

and building up the "followers" who currently number 160. We are trying to focus on topics that are relevant to the Glaven Valley. Many of our "followers" are from similar organisations to ourselves so the account is proving to be a very useful forum for information on a variety of subjects.

If you have a Twitter account, please follow us on @RiverGlaven and send us anything of interest from the Glaven Valley. We hope to introduce the Twitter feed to the web site shortly so it will be available for everybody to see on the Internet".

We are now completing a review of the overall RGCG Strategy, which has been running on a four year cycle from 2008. The word Strategy sounds rather grand for a voluntary group, but we

feel it has two very useful purposes. It is a collective way of thinking about the on-going and future activities; but is also useful in making any grant application, albeit even for a modest amount of funding. It shows the application is another step in a process, rather than a one-off task.

The period 2012-2016 was notable for the large injection of money and specialist skills that saw the advance of many of the major projects we wished to do. The funding for this came from the Defra Catchment Restoration Fund, and was followed by the Eel Project. There remains one or two major projects we would like to see done, and behind that a wish-list for the longer term. However there is much to keep us very busy, including

long term issues around water, soil and agriculture, pages 4-5. We now though have just heard some excellent news on farmland ponds.

Local farmer Richard Waddingham has been presented with the Marsh Award for Wetland Conservation at the annual meeting of the Wildfowl and Wetlands Trust (WWT). The prize honours the best individual in local wetland creation. It commemorates the legacy of Sir Peter Scott and the 70th anniversary of the WWT. Richard has farmed at Manor Farm at Briston since the 1950s. Carl Sayer, who with his UCL team has been studying Richard's pond conservation work for ten years, introduced Richard by saying "Richard has inspired countless people to value and love the British countryside. He has been a conservation stalwart of the very best kind, and strikes the balance between nature conservation and farming perfectly". Richard's response was: "I think, as a country, we're on the threshold of realising that water management is more important to us than food. The ponds on my land are special because I haven't made them; they are fed by spring water and are at the source of two rivers".

The first sentence is perceptive, but perhaps there are as yet too few on this threshold. The second sentence shows both an eye for detail and his modesty. Many ponds have arisen from previous generations that dug pits for marl, which in time filled with water; and later used as a dumping ground or overgrown. In that sense Richard did not create them, but he had the knowledge and foresight to see their potential as ponds for wildlife, and the enthusiasm and commitment to tackle the restoration. As Carl says Richard's ponds have given him great inspiration, and it now enthuses the Norfolk Ponds Project, involving a several conservation bodies.

Manor Farm and its Ponds.

Dr Carl Sayer

The 253 hectares on Manor Farm include orchid meadows, grassland margins, old hedges and lanes and bluebell woods. There are forty or so small marl pits in the fields, but also eight crops and intensive farming. Richard has spent his life managing his ponds by traditional methods. The result is a network of ponds that is bucking the national trend by providing habitat with high water quality that is invaluable for biodiversity. Plants, insects, amphibians are all thriving. At a time



A restored pond at Richard Waddingham's Manor Farm at Briston. See also page 1.

when farmland birds in the UK are doing badly, those at Manor Farm are doing well. University College London research shows that farmland birds and pollinating insects derive huge benefits from Richard's ponds. There are more substantial populations of birds, greater diversity, and much higher number of birds visiting, including yellowhammers, linnets and swallows. It is thought that this is due to the much higher numbers of insects that emerge from the open ponds.

Traditional methods are simple in essence: the ponds are managed to have open water with aquatic plants within them and fringe vegetation, but letting in sunlight from the south by removing scrub. Removal of mud and leaf litter during restoration uncovers old seed banks which germinate to give the aquatic plants that belong to this habitat. This enables a balance between plants, insects and birds to be established, and extends the food chain beyond the ponds into the terrestrial landscape.

Geoff Hilton, Chief Scientist at WWT said: "Richard's ponds seem to be key to the birdlife that is flourishing on his land. So maybe the rest of us are missing a trick. It could be that water quality is central to such success; there are all of these forgotten ponds in the countryside that we could restore and manage, and they could be fantastic at propping up farmland bird populations."

Signal Crayfish Trapping and Barrier: and our Native Species

Dr Henry Crawley

Robin Combe continues to do sterling work monitoring and trapping Signal crayfish that exist in very small numbers on the lower Glaven between Bayfield and Letheringsett. A handful were caught in a single location for a brief period. The conclusion is that the few Signals that escaped into the river from Watering Lane some years ago, are fortunately not an expanding population in the main river.

Trapping in Watering Lane over 9 months continues to produce a small number of immature Signal crayfish. The population here has been massively reduced by Robin's trapping over 4 years, and a drop trap prevents them getting into Letheringsett Lake or beyond to the river. The original source of Signals from a pond at Lawn farm is also much reduced and natural predators (pike, perch and eels) have been introduced there to control any future expansion.

Despite all this hard work, we cannot be sure that one day the Signal population will not expand in the main river and migrate upstream towards the flourishing population of native White Clawed Crayfish (WCC) that exists in the river upstream of Letheringsett Mill. This could spell disaster for one of the few remaining healthy populations of WCC in Norfolk (or Southern UK for that matter). Signals out-compete WCC, and carry crayfish plague with some resistance, but which can wipe out the WCCs (as



**From the top: 1. Concrete topped weir with the river flow reduced.
2. Assembly and fixing of overhanging barrier and side support
components.
3. Signal crayfish barrier in place and restored river flow.**

has recently occurred on parts of the Wensum).

We also have been considering the barriers to upward migration of Signals on the Glaven. Although Letheringsett Mill is a major barrier, we cannot be sure that it is 100% effective. There are some bypassing water ways. With consultation and support of the riparian owners, the RGCG has proposed and installed an overhanging lip barrier of stainless steel on the main river and a side channel. The design is such that downstream crayfish would find it impossible to get traction on a shiny metal overhang with a plume of water cascading over it. We believe fish and eels will be able surmount it.

There is a concerted effort by conservationists to preserve WCCs in Norfolk. This is led by the Environment Agency, Norfolk Biodiversity (NCC) and other groups including Norfolk Rivers Trust and the RGCG on the Norfolk Crayfish Group. One important aspect of protection is biosecurity. Transferring disease with muddy boots or dogs and fishing gear from one river to another is a real risk. Clean and dry all equipment as a routine, especially if you go from one river to another; and the dog.

For some years efforts to protect remaining populations of WCC have been taken, including transference of healthy WCCs to isolated streams and suitable habitats that act as 'Ark' sites, in case the remaining populations are overrun. This Ark project has used the Glaven as a source of healthy WCCs in recent years and also as an Ark site in the upper reaches. This is an insurance policy. RGCG volunteers have helped with this project regularly.

The support for the barrier by the Norfolk Crayfish Group has been most welcome, together with design advice from the EA, and financial support from NCC Biodiversity. North Norfolk Engineering of Holt have been very helpful in producing the metalwork for the barrier components.

The installation has just been successfully completed with volunteer labour, and we look forward to monitoring its effectiveness in the future. Thanks go to all those who have contributed to making this happen, in particular the Letheringsett Estate as landowner. Also Laura at Letheringsett Hall who came to our help with electricity and a 50 m cable when the generator we had refused to start; and the Mill for slowing river flow in the two hours it took to install the barrier.

Water, Soil and Agriculture: the Big Debate

Dr Ian Shepherd

Water management in Norfolk begins with the soil which receives our rainfall, and for much of our land this means arable farming. Agriculture has a frontal position in the management of the quality of water. The abstraction for our domestic needs is a matter of both quantity and quality of water resource, and the same applies to our wildlife. There is a need for a three way conversation. The present debate is more limited and polarised, between wildlife and farming. Water security is important to all three. The dismantling of the Common Agriculture Policy gives an opportunity to re-think in this wider context. There is an opportunity to put in place policies and support for farming both for the short and long term, and with it benefit the public water supply and nature conservation.

Anglian Water has a statutory requirement to plan ahead for a secure long term water supply-demand balance. They have done this in a five year investment cycle running from 2015-2040, known as the Water Resource Management Plan (WRMP). The public water supply in Norfolk is largely dependent on abstraction from our aquifers and rivers; as such it potentially 'competes' with the requirement and needs of all wildlife, particular aquatic. The greater the population growth and the demand for water, the more difficult it is to satisfy both domestic supply and wildlife. However there is a shared cause that the water in our natural environment be 'clean', with minimum levels of pollution from agriculture.

Norfolk and East Anglia as a whole is defined by the Environment Agency as an area of extreme water stress due to low rainfall. It is rain water that fills our chalk aquifers, and in turn feeds our rivers, and abstraction can be from aquifer groundwater or river surface. The recharge of our natural underground reservoirs is greatest in the winter months, and least for the rest of the year with less rainfall and increased 'losses' due to evaporation and plant growth. By 2030-2035 additional sources of water will be required for domestic supply to keep ahead of demand.

We are in most of Norfolk already over-abstracting water, to the detriment of the many of our nesting sites for wildlife; and seeking levels of growth far in excess of anything previously planned. Plus decades of intensive farming has resulted in pollution issues, which require changes in policies and practice, and sustained funding support from Government to turn around. The good news though

is that the WRMP is implementing where necessary a cutback in abstraction levels where they are adversely impacting on the Special Area of Conservation (SAC) sites. Norfolk is notable for our chalk rivers, freshwater marshes, coastal lagoons and wetland areas which include the Broads, many of which are designated SAC. The necessary 'sustainability reductions' on some abstractions are based on the Water Framework Directive, and Habitat Regulations.

So therefore the sustainability reduction in groundwater abstraction at Hunstanton will restore the water flow through the chalk aquifer to the benefit

of the coastal freshwater marshes, and the coastal lagoon area around the estuaries of the Glaven and Stiffkey. These and other North Norfolk rivers should have a better flow, particularly in the summer months. There will be also be a reduction in surface abstraction from the River Nar SAC. Likewise over the longer term for the Wensum SAC, the largest chalk river in the county, and in turn benefit the Norfolk Broads.

The River Wensum however also suffers worse badly from sedimentation from arable run-off. Silt in rivers results in degradation of the whole ecology, for example the smothering of gravel areas, which impacts on aquatic plants, invertebrates and fish. All our rivers suffer to a greater or lesser degree from this.

This brings us to the longstanding debate between nature conservation and farming practices. With Brexit this has become very high profile, and rightly so. It throws up some huge challenges. The arguments from both sides were well set out in the EDP farming section 22 October, with quotes from various Conservation Reports (panel on this page) and the Farming Union's responses which are shown in the panel on the facing page. Both included a number of statistics.

The marriage between nature conservation and farming is clearly under stress, and in answer to the question which side is right we perhaps get the most common answer; in the broader sense both. But what we tend to forget is that this particular marriage has a third and much needed partner, the public water supply. As hinted at in the first NFU statement, there is the need for all for a clean water resource. Water and soil are intertwined at the most fundamental level. We must

- 55% of UK species have declined since 1970. One in 10 are at risk of disappearing from our countryside. State of Nature Report, September 2016; also, 20% of all impact on species populations was attributed to "intensive management of land"
- The subsidy system has produced the dramatic and disastrous decline, in nature, in species. Dame Helen Ghosh, National Trust Director General, August 2016
- Do we really want to continue the pattern of ever larger agri-business, less connected to communities and out of kilter with nature? Graeme Willis, Campaign to Protect Rural England; 93% decline in turtle dove numbers since 1994, Breeding Bird Survey, 2016
- The natural world is in serious trouble and it needs our help as never before. David Attenborough
- £1.2bn damage to soil caused by farming a year, while populations of farmland birds in England have more than halved in the past 40 years. CPRE report, August 2016



Left. A high risk crop and field: water borne soil erosion running direct into a river.

Right: Source of the run-off, potato field after a heavy burst of rain.

raise our sights, and those of our politicians, to get past the everyday life of a week, and work for the long term aim for a secure and 'clean' water resource; a reversal of the sad decline in our wildlife; and a productive agriculture which delivers the first two aims as well as supplying our food. This is a huge ask, but with the dismantling of the CAP and the need for new and holistic policies and commitment there is an opportunity to rise to the challenge. We must take it.

To do so this we must be clear on one point made by the NFU, farming has not got any more intensive over the past 25 years. This is true, but obscures the fact that intensive farming is a cumulative process; the contamination of our aquifers with agrichemicals has grown year by year. Anglian Water say in their WRMP: "Water quality deterioration due to diffuse source contamination from agriculture will continue to be an issue going forward. Nitrate concentrations will continue to rise in many parts of our groundwater system and are unlikely to decline anytime in the next 20 to 50 years". They also state the solutions to deal with high nitrates are very expensive and some groundwater source will become too difficult or expensive to use. Diffuse pollution is insidious, cannot be seen, but contaminants in our aquifers are monitored by Anglian Water.

At another point on water quality they state: "Concentrations of pesticides in raw water increased markedly following the 2011/2012 drought and in response to high levels of catchment run-off in October 2013". We

- 37,000 km of grass margins by farmers, which help prevent pollution of water and protect hedgerows from agricultural activities
- 130 species of birds by over 1,000 farmers in 2016 Farmland Bird Count, including seven new species
- 234,000 ponds, and an estimated increase of 18% from 1987 to 2007
- 16% fall in total greenhouse gas emissions from agriculture since 1990
- Millions of pounds are spent on agri-environment schemes which have planted or restored over 30,000 km of hedgerows, providing habitat and shelter for a range of wildlife
- It makes little sense to attribute cause and effect to the intensification of agriculture in the UK in the last quarter when there has not been any. NFU Vice-President Guy Smith
- 80% of England's landscape character is now in stable or improving condition.

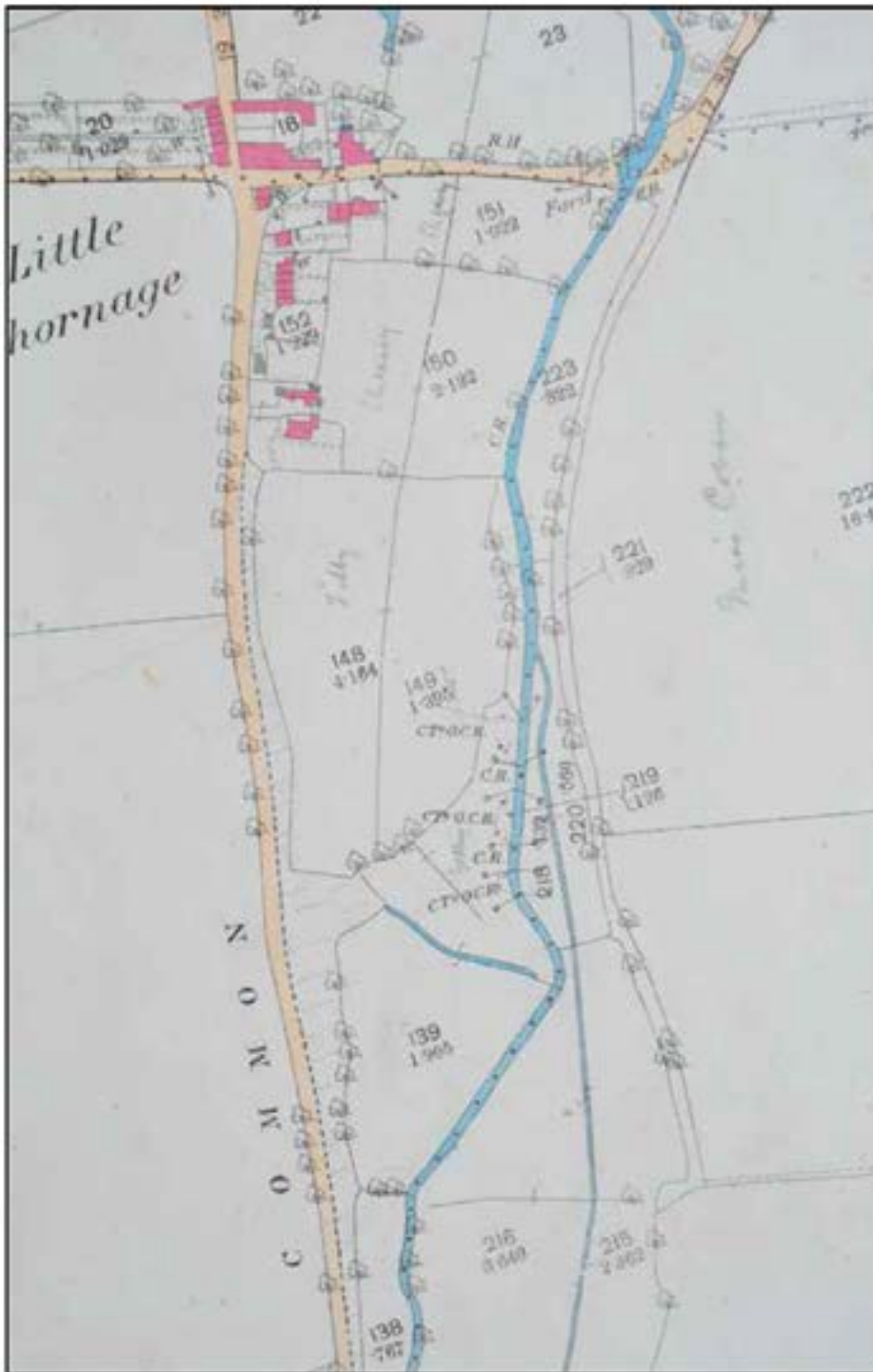
would add to this that silt entering a river system is also cumulative, and apart from nature conservation, can damage interests such as navigation. It is expensive to de-silt; and it will be again the next time it needs to be done.

Run-off pollution after a heavy rain event can be both fast and very noticeable. An example is a high risk crop such as potatoes in a high risk field such as on the slopes of a river valley (see photos above). The compaction of soil and tramlines of heavy machinery can also lead to rainwater coming off the land very quickly.

Farmers are more than ever in an extremely difficult and uncertain future. For decades there has been pressures to produce 'cheap' food in a competitive global market; competition often with lesser environmental, food safety and animal welfare standards; income varying from year to year due to unpredictable global prices in food and other commodities, including fuel and fertilisers; the vagaries of weather and crop yield; and seeking to do their best in difficult circumstances for our wildlife. The financial and environmental costs in the food chain have been externalised. Brexit is an opportunity to make changes for a better and more sustainable future for soil and water management.

A Glaven Meadow Past and Present

Dr Ian Shepherd



1886 1st Edition Ordnance Survey map. The features remain the same today. Prior to 1886, the river had been re-aligned from the west to the east side of the meadow. The original meandering course would have been between the central drainage ditch and the course as shown on this map. NB: for orientation purposes, north is, as usual, at the top,

Little Thornage meadows lie to the immediate south of the lane from the cross-roads to the ford. The area of 27 acres is a County Wildlife Site, designated for the biodiversity of the plants. This is a legacy to hundreds of years of summer grazing cattle, typically a family herd with the bull, cows and calves. Just as can be seen now, in this case with a Dexter breed. These 'wet' river meadows produce an early flush of grass in May, and the stocking level is such that the vegetation is not eaten right down until late October. This pattern of grazing allows for the flourishing of a succession of different species of flowering plants and grasses. This is a historic and iconic landscape and wildlife habitat, impossible to simulate by planting. The 1886 1st edition ordinance map shows the mosaic of meadows and drainage ditches, and the alignment of the river channel, and this remains exactly the same to this day. There is evidence though at some earlier date than 1886 there had been a transverse re-alignment of the river from the west to the east side of the meadows.

Since the end of WW2, nationally some 97% of lowland meadow has been lost; so we are indeed fortunate to retain some on the Glaven. For centuries meadow land was worth perhaps twice that of arable land. The price of both would have sharply increased by the time three of the Glaven Mills (Letheringsett, Thornage and Glandford) were re-built, all very close to 1800. By then the Napoleonic wars had seen trade cut-off with the European mainland with a resulting drive for self-sufficiency. In each case the Mill was re-located, much enlarged, and then if not earlier, the river channel moved to allow a more direct and faster flow. This would better re-charge the ponding area of the Mill.

The Domesday Book records a mill at Letheringsett, and likely there would have been a number of re-builds, one reason being their propensity to catch fire. A 1798 map of the Letheringsett Estate indicates that the move of the channel from the west

Top. Dexter cattle on the meadow next to Walsingham Water Way lane.

Centre. Common Spotted Orchid; with yellow rattle.

Bottom. Stand of common spotted orchids; plus buttercups.

to the east side of the meadow had taken place prior to then; it shows the northern end of the meadows, with the 1886 'east bend' already in place. We can speculate though, that while the re-alignment is in place at 1798, it might have happened not too long after 1740. The diagonal alignment runs between two meadows that were part of the Glaven Farm land holding. While in the 19th C there had been different ownerships on parts of the meadows, that of Glaven Farm was likely stable over centuries. A wealthy and influential landowner then might have been reluctant to see their meadows disturbed. We quote from local historian Basil Cozens-Hardy, in the History of Letheringsett, referring to Glaven Farm:

"This is one of the oldest dwellings in the parish and must have been a farmstead from the earliest of times. Many wayfarers must have passed it as they went along Long Water Walsingham Way (nb a map shows that is from the Ford to the Little Thornage crossroads) to the monastic houses to the west. In the reign of Queen Elizabeth it belonged to Thomas Pettus of Norwich, a much trusted and assiduous alderman, Sheriff in 1600 and Mayor in 1614. It then passed by purchase to Jeoffrey Might, the squire of Gunthorpe"....then two other major landowners until.... "John Holmes, the headmaster of Holt Free Grammar School acquired in about 1740". So a best guess of the river realignment would be within the second half of the 1700s. The name Water Walsingham Way indicates that the river would have had a much stronger flow and the meadows would have been very much wetter than we see today.

The present day area of concentration of wetland flowers, grasses and rushes mark out for us the original broad line of flow of the river, or perhaps more apt the spread of water across the meadows. For the 'wayfarers', in those 'wetter days' of near zero abstraction, the meadows flowers would have likely carpeted the whole site. Only along the original and lower alignment of the river, where the hy-





Clockwise from top left: Marsh Thistle; Ragged Robin; Fleabane; Lady's Smock, always the first to flower; white flowering Common Spotted Orchid, rather than the purple variety seen on page 7.



draulic contact with the water table is greatest, do we now see an abundance of flowering plants, and the greatest diversity of vegetation.

In the 1950s and 1960s there was a greater emphasis on land drainage which coincided with a step-change in large scale water abstraction for population growth and a rapid increase in per capita consumption of water. At this time the meadows were becoming

ing of little financial value to the landowner or tenant farmer. Farming had become much more intensive, globalisation of the food market was accelerating, and the grazing of cattle on river meadows was becoming a modest side-income, or hobby. The much bigger value could come where a meadow fronted the river and there was a licence in place to abstract water from the river for use of irrigation of arable land. The introduction of the original 1992 Countryside Stewardship Scheme (CSS) however enabled conservation grazing to be reintroduced by two successive ten years periods at Little Thornage and elsewhere.

To bring us up to date, following the 2015 CAP review, the overall annual expenditure on agri-environment schemes dropped to 60% of what it had been. Within that the grant for a CSS meadow fell far more, being placed in the basic standard payment tier. The protection of our remaining 3% meadows relies entirely on the goodwill of farmers and landowners, and many will seek to maintain

as they are. But the financial incentive with re-fencing costs included, is strongly negative; any inclination to turn to an alternative use for the meadows, or just neglect, leaves us in a perilous situation. With the dismantling of the CAP, a key part of developing new policies must be to support the habitats and landscapes of our countryside; what can be more precious than our river meadows.

We aim to work in friendly collaboration with landowners and farmers, conservation organisations and relevant public bodies.

River Glaven Conservation Group

Henry Crawley Chairman

Ian Shepherd Secretary

Anne Rolfe Treasurer & Membership Secretary

Web site www.riverglaven.co.uk

Respondent: Cressey, L

Lottie Carlton

From: [REDACTED]
Sent: 11 January 2017 22:00
To: Planning Policy Mail
Subject: Policy no Poxns12

Local green space Chedgrave I do not support the nomination for this it is obviously been brought up by someone in the village and has no idea that our dykes are cleared out i believe whoever put this forward were thinking that a building was coming next on the land which had been cleared .this would never happen we all like the land it is has and will always will be a haven for our wildlife without local nomination .I was asked several times having to explain this happens every few years to clear the dykes all over the fields as well done by the drainage board. also as the road is private accept for a permissive footpath I am very concerned about people coming on our properties to take photos Uninvited Security issue . As we all run hire cruisers which is an important part of local employment and economy of the village most of the yards running in the sixties here have been storing boats and parking cars this is part and parcel of boatyards. And storing boat related equipment for years

Without this land you can not operate a boatyard. . It is not a benefit to local people it is after all private land and none of us were contacted about this issue does this mean I can pick a piece of land in someone's garden and say I want to nominate this as local green space. Without telling anyone my intentions going behind their back which is unforgivable. we feel very upset about this. Especially underhanded way photographs have been taken

Note

As a matter of interest we have a varied amount of fauna and flora that no one actually sees protected by all of us who work and live on the broads boatyards .we are not fine weather people we work hard we are out in all weathers making sure the swans are okay in the winter that the otter is not chased of by someone's dog of the lead the kingfisher is left in peace to visit us and to bring up their young and that people who are busy bodies should mind their own .

Regards

Mrs Lynda cressy maffett cruisers

Gale cruisers

Sent from my Samsung Galaxy smartphone.

Respondent: Dilham Boating Club

BROADS LOCAL PLAN – PREFERRED OPTIONS – DECEMBER 2016

I have two points to raise in this consultation:-

1. Policy PODIL 1: Dilham Marina (Tylers Cut Moorings)
2. Policy POSP 10: Navigable Water Space

1. POLICY PODIL 1. : DILHAM MARINA (Tylers Cut Moorings)

a) As I was involved in the last development of this policy, I have no further comment, other than requesting a clarification of the word 'generally' in the second paragraph.

b) Albeit development is covered in the policy, it would be good to see clarification that housing development particularly on the field at the extreme southern end of the Marina (as shown on Inset Map 5. Dilham) would not be permitted. On the deeds attaching to all of these individual moorings in the Marina, is shown a 20 foot access road running along the southern boundary to the moorings on the eastern side of the Marina. If building were permitted, this legal access would be denied to the relevant owners/users.

2. POLICY POSP 10 :Navigable Water Space.

a) Whilst the depth of navigable water, by dredging or de-silting (two entirely different actions), is covered in this policy, there is no mention of headroom clearances, another major requirement for safe navigation.

b) I refer particularly here to Wayford Bridge, which is, I am informed, slowly sinking. Today there are times when the air-draft is below 6 feet, thus preventing navigation to many vessels, some of which are moored upstream of this bridge. The other road bridges on the North Walsham & Dilham Canal (The Canal) all have an air-draft of 8' 6", as was the case at Wayford Bridge. The enabling Act of Parliament for construction of the Canal, signed by King George III on 5th May 1812 (The Act) stated that vessels plying the canal should carry goods from '...North Walsham...' to Wayford and Great Yarmouth. The current air-draft at Wayford Bridge would not permit this and is therefore in contravention of The Act, which is extant.

David Revill
Commodore
Dilham Boating Club
02 February 2017

Broads Authority Local Plan - Preferred Options Consultation

Representations from Boyer on behalf of East Anglian Group

Introduction

- 1.1 The Broads Authority Preferred Options Local Plan will be important to set out the long-term vision and partnership actions to the benefit of the local environment, communities and visitors. This will greatly benefit the area and all of its users. The Plan combines strategies, programmes and policies that are relevant to the Broads which are reviewed regularly.
- 1.2 This Local Plan is concerned with planning and planning applications in the area, whereas The Broads Plan has a focus on the management of the Broads for the enjoyment of others both local and visitors.
- 1.3 The Broads Authority has several purposes including; conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads; promoting opportunities for the Broads understanding and protecting the interests of navigation. It is identified there needs to be a balance with that which affords opportunity and has regard to the needs of agriculture, forestry and the economic and social interests of those who are connected to the Broads.
- 1.4 These representations relate to land owned by East Anglian Group at Marina Quays, Great Yarmouth (see site location plan at Appendix 1). These representations are made in response to the Broads Authority new Preferred Options Local Plan (2016) and presented on behalf of East Anglian Group.
- 1.5 Also supporting these representations are a series of documents consisting of; a Landscape Summary Statement, Engineering Visual Inspection and Report, Flood Response Evacuation Plan, Flood Risk Assessment and Transport Statement, which are submitted alongside these representations to the Local Plan. These documents consisting of assessments and reports demonstrate that the land at Marina Quays is capable of supporting development in terms of landscape, structural engineering, flood risk and transport. Development here would greatly benefit the surrounding area as well as helping to support the economy through tourism and increased visitors to the area. Regeneration will also be a significant benefit to this underused and partly derelict site.

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

Policy POSP9: Sustainable Tourism

- 1.9 We support Policy POSP9 and PODM26 which details sustainable tourism due to the fact tourist attractions and tourism infrastructure will be supported. Particular emphasis is placed on improving the quality of visitor accommodation as well as broadening the range of accommodation provided.
- 1.10 The proposed development at Marina Quays will provide additional visitor accommodation for the area and therefore conforms to proposed Policies POSP9 and PODM26. This policy is supported.

Policy PODM27: Holiday Accommodation – New Provision and Retention

- 1.11 We support Policy PODM27 which deals with holiday accommodation. We agree with points A - E within the policy and the supporting text that accompanies it. The proposed development at Marina Quays will be in line with this policy in the Preferred Options Local Plan.

Policy POSP12: Residential Development

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

Policy PODM35: New Residential Moorings

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

Policy POGTY 1: Marina Quays (Port of Great Yarmouth)

1.15 Although we support the general intent of Policy POGTY 1 it is our submission that the policy be amended in line with a focussed policy with more relevance to the issues of the site and future viable and deliverable development.

1.16 The following wording is proposed for this policy:

'Marina Quays (as shown on Inset Map 8) is identified as a regeneration area where redevelopment will ensure a continuation of water based facilities and provide holiday accommodation and small scale residential development.

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

- *Retention of 34 moorings of which 4 shall be retained solely for visitors;*
- *Provision of 11 houseboat moorings;*
- *12 new holiday units as permanent structures; and*
- *5 new permanent residential dwellings.*

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

1.17 This policy wording will help to ensure the area is regenerated in line with the abilities and scope of site owners to ensure a successful, sustainable and enjoyable place for both local people and visitors to the area. This specific wording for this policy will help to ensure the appropriate development will happen on this site as well as the knowledge that the development in the policy will be delivered to that exact detail.

1.18 The supporting documents that accompany these representations show that development is appropriate on this site and will not cause any adverse effects on highways, landscape, the structural soundness of the river wall and flood risk. These reports indicate that development can be supported on this site and that there will be no negative impacts on the surrounding area and safety.

Inset Map 8 – Marina Quays

1.19 We object to Inset Map 8 which covers the area of Marina Quays.

1.20 Objection is raised to the northern boundary and well as the limited size of the policy area. We believe the policy area should extend northwards following the river until the edge of Bure Park parts from the riverside walk on the river's edge (see Appendix 1). This thin but important extension to the site area will ensure the regeneration of this area will be delivered in an efficient and timely manner. These amendments to the policy will be key to the delivery of this site and will ensure best use is made of this site.

- 1.21 This site extension will enable moorings to be provided along the length of the river bank that resides in the site and these will be for the use of permanent residents as well as visitors to the area. This will add to the provision of moorings for visitors and facilitate overnight stays in the area and as a result, supporting the local tourist economy.

Conclusions

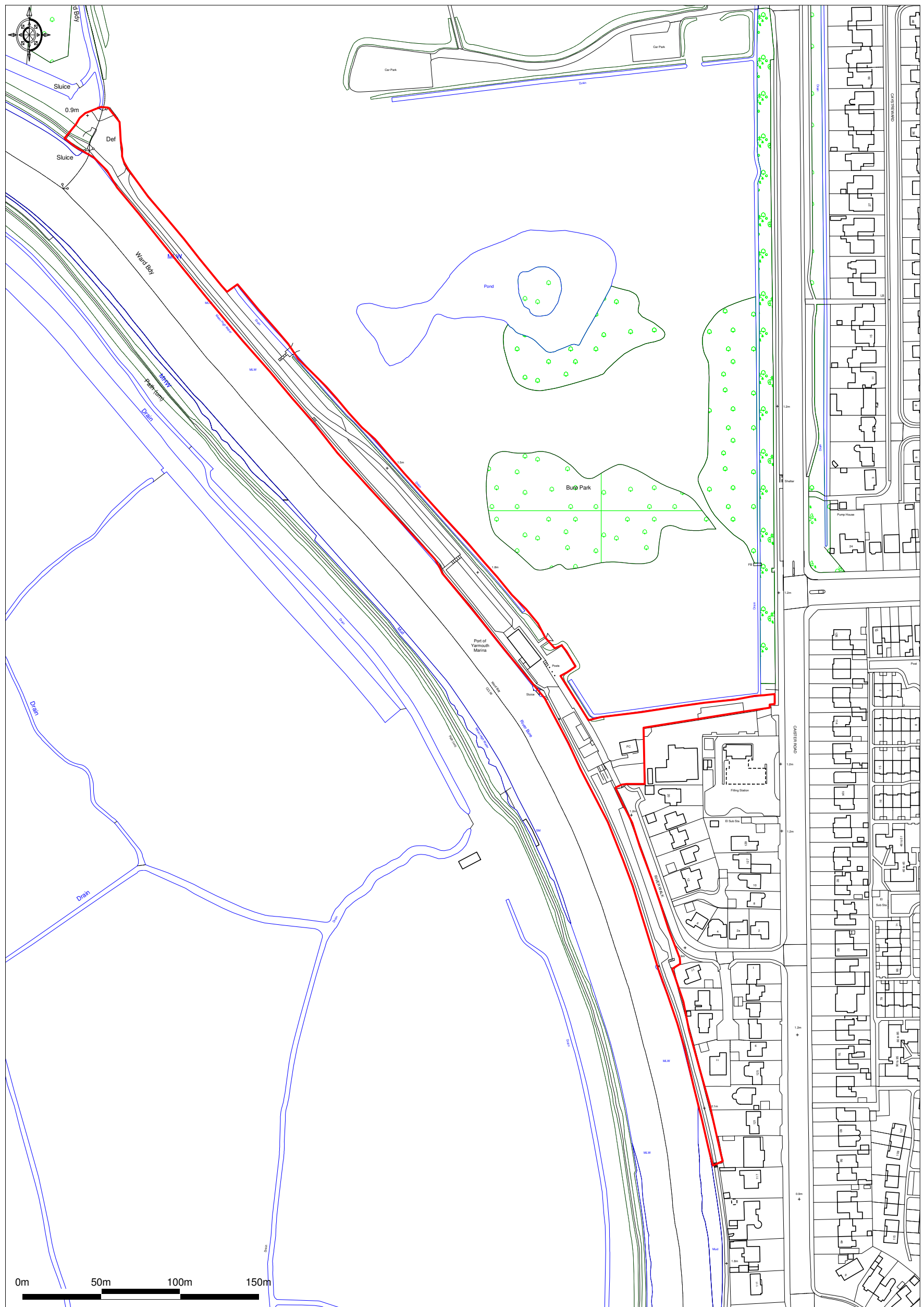
- 1.22 East Anglian Group generally supports the Broads Authority Local Plan – Preferred Options and its policies, with the exception of Policy POGTY 1 and an objection to Inset Map 8.
- 1.23 Policy POGTY 1 must be amended in line with the suggested text at paragraph 1.16 to ensure the proposed development can be delivered for the benefit of both local residents and visitors. Inset Map 8 should also be amended to allow for land north of the current boundary that extends along the length of the River Bure, following the river walk. This would allow for moorings to be provided for the use of visitors and residents and would contribute to the vibrancy and enjoyment of the Broads for all users.
- 1.24 It is considered these modifications will benefit the site and the surrounding area as well as supporting the local tourism economy which benefits the Authority as a whole.
- 1.25 Overall East Anglian Group suggest amendments and object to the areas mentioned above and support the remainder of the Local Plan Preferred Options.

Boyer

January 2017

APPENDIX 1 – Site Location Plan

Great Yarmouth Marina



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Licence number 100022432. Plotted Scale - 1:2500

Site Location Plan 14.649
Prepared by Boyer (July 2016)

Respondent: Edmonds, M

Lottie Carlton

From: Martin Edmonds [REDACTED]
Sent: 03 February 2017 11:31
To: Planning Policy Mail
Subject: Edmonds, Mr M

Categories: Ack and Filed

I have recently been advised of the above and wish to raise my objections to such an ill conceived idea.

Having been a customer of Jonathan Greenway for many years I very much value his expertise and the wonderful service he provides.

I believe it is very important to secure the skills and knowledge of people such as he particularly in what is a fast declining industry.

I am lead to believe that these proposals are likely to jeopardize his future in the business and instead of putting this at risk we should all be seeking ways to encourage him and future generations to retain our heritage.

I have to admit that I do not have a great deal of knowledge of this policy but on the face of it it appears to be a quite ludicrous idea in this instance and would have thought that there must be other far more appropriate sites for you to consider.

Regards

Martin Edmonds

[REDACTED]

Broads Authority
18 Colegate
Norwich
Norfolk
NR3 1BQ

Our ref: AE/2006/000197/CS-
02/IS2-L01
Your ref: None
Date: 26 January 2017

Dear Sir/Madam

BROADS LOCAL PLAN – PREFERRED OPTIONS CONSULTATION.

Thank you for the opportunity to comment on the draft local plan. Our comments in regards to this document are included in this letter following the same format as the plan.

Part 4 - Pressures on the Broads

Paragraph 4.9 – We feel this section identifies most of the pressures on the Broads but fails to acknowledge the pressures on water resources related to new development. Whilst this included later in the document we feel this is an opportunity to highlight this issue and it should be included here.

Part 8 – Vision, Objectives and existing policies

We generally agree with the Broads vision, welcoming the emphasis placed on water quality. The statement acknowledges the importance of biodiversity and the need to manage land and water in an integrated way. However in terms of sustainable living we would like to see the need for environment protection and enhancement strengthened as the focus appears to be on economic sustainability and the need to develop a “buoyant economy”.

Part 9 – Sustainable Development in the Broads

Policy POSP1

We would support the inclusion of this policy which is underpinned by the sustainable principles of the NPPF. In particular we welcome the inclusion of the need for development to adapt to the challenges posed by climate change and the need to

incorporate design that protects the local ecology and supports green infrastructure. We note that sustainable development will need to consider flood risk, however the justifications for this policy could be strengthened by drawing attention to both the Strategic Flood Risk Assessment and Shoreline Management Plan. Both documents provide key evidence base in regards to flooding but are not referenced in this section.

Policy POSP3

We support this policy which appears to be based on the Water Framework Directive. Whilst the policy acknowledges the potential for pollution to the water environment from the “run-off” of nutrients used in agriculture, it does not highlight the risk to the water environment from other sources of pollution that may occur outside the boundary of the Broads. Further information regarding the risks posed to the water environment from nitrates can be found in the Nitrates Directive (2013) and should be referenced as supporting this policy. The Nitrate Directive 2013 can be found at <https://www.gov.uk/government/consultations/implementation-of-the-nitrates-directive-in-england-2013-2016>. We acknowledge that SuDS play an important role in surface water flooding and can provide green infrastructure, however it should be noted that sufficient treatment steps are required to ensure the water environment is protected. More information can be found at http://www.ciria.org/Resources/Free_publications/SuDS_manual_C753.aspx and we would be willing to assist further.

We welcome the aspiration the Broads Authority has in regards to becoming a “zero Waste Authority” by following the Waste Framework Directive 2011.

Part 10 – Water and Flooding

Policy PODM1: Water quality

We agree with this policy and the requirement for new development to connect to the mains foul sewer. The justification correctly states alternative methods of foul water disposal would require Environmental Permitting through ourselves, in order to protect the water environment.

Policy PODM2: Boat wash down facilities

We welcome this policy in regards to preventing the spread of invasive species and the damage they could inflict on native eco-systems and species. The policy also recognises the potential for pollution of the water environment from such activities.

Policy PODM3: Water Efficiency

We welcome the inclusion that all new and replacement development served by Anglian Water Service should incorporate designs that limit water usage, including schemes to recycle grey water and shall have a domestic design demand equivalent of 110 l/h/d. Both Anglia Water and Essex and Suffolk water supply areas have serious water stress as shown in the final classification report. If the Broads Authority choose to give further consideration to policies to limit water usage across the whole plan area we work with the Authority to consider the evidence.

Policy PODM4: Flood Risk

We agree with policy PODM4 on flood risk and the majority of the requirements of the Flood Risk Assessment (FRA). We recommend that the policy is amended to also include the requirement for a Flood Response Plan to be included within the FRA. This is particularly important as policy PODM4 part n) requires the FRA to demonstrate safe access and egress from the site, which will not be possible for many sites within the Broads during a flood event due to unsafe flood depths. Therefore the safety of people will need to be managed through a Flood Response Plan which advocates evacuation in advance of flooding or remaining in situ within an appropriate refuge.

The NPPG requires flood response plans to be included and considered as part of a Flood Risk Assessment. Unless point n) of the policy requiring safe access requires new development to have safe access during the peak of a flood (flood depths less than 250mm) and does not allow the lack of safe access to be managed through submission of a Flood Response Plan. If this is the case, then this should be clearly stipulated within the policy to avoid any confusion.

Page 41 states 'For the purposes of this policy, footprint will be defined as the ground floor area of the existing buildings, excluding temporary buildings, open spaces with direct external access between wings of a building, and areas of hardstanding'. It is unclear from this whether the 'open spaces with direct external access between wings of a building, and areas of hardstanding' are included or excluded from the footprint. This requires clarification in the report.

Question 9: What are your thoughts on the development boundary and flood risk issue?

We agree that the development boundary can include areas in the flood zones, as some development may be acceptable, providing it passes the Sequential Test (and Exception Test if required) and is shown to be safe and not increase flood risk elsewhere in the FRA in accordance with the NPPG. We agree that including the flood zones on the development boundary maps gives an indication of the areas where flood risk will need further consideration.

Environmental Permitting Regulations 2010

We recommend that flood risk policy PODM4 makes reference, either in the policy or the explanatory text, to the need to obtain an Environmental Permit from us, for flood risk activities for work or structures in, under, over or within 16m from a main river and from any flood defence structure or culvert.

The EPR are a risk-based framework that enables us to focus regulatory effort towards activities with highest flood or environmental risk. Lower risk activities will be excluded or exempt and only higher risk activities will require a permit. The works may fall under an either one or more of the below:

- 'Exemption,
- 'Exclusion',
- 'Standard Rules Permit'
- 'Bespoke permit.

New forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

Access and Maintenance

We will always seek an undeveloped margin between built development and the top of bank or rear edge of river wall/defence as a starting position when we are advised about any proposals close to a main river watercourse.

We would also highlight that maintenance of the area close to and within a watercourse, out to the centreline of the channel, is a riparian responsibility. More details about this are in our 'Living on the Edge' document which can be found at :

<http://www.environment-agency.gov.uk/homeandleisure/floods/31626.aspx>

Policy PODM5: Surface water run-off

We acknowledge that sustainable drainage systems (SuDS) can play an important role in managing surface water run-off. SuDS mimic natural drainage systems and retain water on or near site as opposed to traditional drainage approaches that involve piping water off site as quickly as possible. Where SuDS are incorporated in developments we would wish to see sufficient treatment steps to avoid pollution to the water environment and this should be included in the policy. Generally we would not support the use of deep bore soakaway systems as these can present an unacceptable risk to groundwater environment. If deep bore soakaways are proposed the developer may require an environmental permit from ourselves for a direct discharge to groundwater. SuDS can also be used to enhance the environment of a site by contributing to green infrastructure and providing habitats for wildlife. To be most effective SuDS proposals need to be integrated into scheme designs at an early stage and not retro-fitted once layout has already been established.

Part 11 – Open Space (land), play and allotments

Policy PODM6: Open spaces on land, play, sports field and allotments

We welcome this policy in regards to biodiversity and new habitat creation and note that any new cemetery or an extension to an existing site would require and assessment of the risk posed to groundwater.

Part 13 – Green Infrastructure

Policy PODM8: Green Infrastructure

We welcome the expectation that developers should incorporate green infrastructure into their schemes and agree with the positive effects of green infrastructure that are outlined in the policy. In particular we would stress the requirement to connect areas of green infrastructure in order to prevent habitat fragmentation.

As previously stated the inclusion of SuDS can provide an opportunity to contribute to green infrastructure and this policy would appear to compliment policy PODM5. Whilst the many advantages of green infrastructure are noted in the justified reasoning, you should also consider adding the benefits green infrastructure can provide in relation to reducing the impacts of climate change.

Part 14 – Climate Change

Policy POSP5: Climate Change

Whilst this policy outlines two approaches for dealing with climate change, we would highlight that development should be avoided in areas that are considered most vulnerable to future flood risk rather than merely building in mitigation measures. We recognise that a high standard of design will be promoted in order to incorporate resource efficiency and energy conservation into future developments. Water resource is a further key issue linked to climate change and should be referenced by this policy.

This section should also highlight the importance of identifying and using opportunities to help wildlife adapt to climate change. This maybe through the use of sustainable drainage systems, wetland creation and restoration, promoting green infrastructure and creating green corridors.

Part 15 – Soils

Policy PODM10 – Peat

This section highlights the environmental benefits provided by peat, including those related to biodiversity and in relation to flooding. In addition peatland restoration delivers greenhouse gas benefits by protecting stored carbon and drastically reducing the amount of carbon dioxide emitted.

We welcome the commitment to protect soils. In particular consideration should be given to the transportation and disposal of soil during development to prevent possible movement of invasive species. The issue of soil erosion and possible contamination of the water environment should also be considered.

Part 17 – Biodiversity

Policy PODM13: Natural Environment

This policy seems to identify the threats posed to the biodiversity of the Broads including the threats from climate change, deteriorating water quality and invasive species. This policy is closely linked to other policies such as PODM8 and appears to compliment these.

Whilst the policy indicates that any adverse impact from a development would require appropriate mitigation measures, we would prefer that it includes a requirement to consider alternative development sites are in order to protect sensitive and designated sites.

Part 18 – Landscape Character

Policy PODM18: Excavated material

We support this policy and welcome the inclusion of the statement that material that is disposed of in development will require an Environmental Permit

Part 23 – Transport

Policy PODM24: Changes to Acle straight

We welcome the policy's aim to address environmental issues raised by the policy in regards to straightening the Acle straight. In particular we note the aim to protect and where possible enhance biodiversity as this project is delivered. We also support the use of SuDS in order to maintain water quality and prevent pollution through spills or water run-off and would reinforce the need to include appropriate treatment steps in order to ensure the water environment is protected. It should be added, that any work on the road that crosses or requires work to be undertaken close to a main river may need a permit under the Environmental Permitting Regulations 2010.

Part 27 - Housing

We would reinforce our previous comments in regards to flood risk that all residential development should have passed the sequential test and where appropriate be accompanied with a site-specific flood risk assessment.

Policy PODM34: Gypsy, traveller and travelling show people

If the gypsy/traveller caravans are classified as more vulnerable then they would need to pass the Exception Test and shown to be safe. We consider that the NPPG requires more vulnerable development to have floor levels raised above the design actual risk flood levels (1% plus climate change) to be considered safe. Consequently in this instance that would potentially require raised sites or raised plinths to ensure the caravan thresholds were raised above the flood levels, unless the sites were defended to above the design flood levels. This is of particular importance in this instance as the transit nature of the sites occupiers would mean it would be difficult for the risk to be managed by other measures such as prior evacuation as the occupants would not have signed up for flood warnings.

Policy PODM35: New residential moorings

It appears that this text has just been copied from one of our previous comments. It would be better if the text could be reworded to remove the questions and phrases. It could be reworded in the following way:

Proposals for residential moorings need to ensure they have adequately considered the following:

1. The technique/method of mooring the vessel. The FRA should show how the boat will be able to be moored to prevent it from being too tight or too loose. If the vessel is moored too tightly the vessel could list and by being too loose the vessel could float onto the landside of the quay heading or be cast adrift at times of flooding. Both scenarios have safety concerns relating to occupiers, possessions and other objects or vessels that could be hit by a loose boat, so should be addressed within the FRA.
2. A Flood Response Plan needs to be produced. While it is acknowledged that residential boats will float, the access to the boat could be disrupted at times of flood which would cause the occupier to be stranded on board the boat. The Flood Response Plan needs to advise what the occupier should do at times of flood to ensure their safety; whether they should evacuate the boat in advance of flooding or take refuge in the boat and therefore have supplies to help them sit out the flood.

3. Finally, the FRA should include consideration of how the boat moored at the residential mooring will be monitored at times of flood to ensure it does not cause damage to other vessels and to prevent damage to the belongings on board (and indeed the boat itself).

Our previous comments in relation to floating buildings remain unchanged. Such property may be deemed to be inappropriate as defined by NPPG table flood risk vulnerability and flood zone compatibility. . In terms of safety of people, it would need to be ensured that the buildings would float adequately above the flood level, which may be difficult to satisfy as it is dependent on the mechanisms working adequately every time.

Part 28 – Design

We are pleased to see this policy includes measures to incorporate flood risk and resilience measures, as well as reinforcing the need to consider biodiversity within design. We feel this should also include the need to incorporate water efficiency measures and suggest this is linked to policy PODM3.

Part 32 – Developer contributions / planning Obligations

Policy PODM44 – Developer Contributions

In terms of i) flood management/mitigation, it would be beneficial for developer contributions to be sought where the safety and acceptability of the development is dependent on flood defences and their future maintenance and raising in line with climate change. We would reinforce our previous comments regarding a coordinated approach between us and developers at the earliest possible stage, in order that opportunities for enhancing and including flood defences are fully considered in developments.

Part 34 Site Specific Policies

We welcome the introduction to this section which emphasises the need for development to be sited away from areas of the highest flood risk and to pass the sequential test. We note there is no reference made for the need for certain developments to pass the exemption test and feel this should be included in this section. We also welcome the inclusion of the need for developments close to main rivers to obtain an Environmental Permit. The inclusion of this statement compliments policies PODM4.

Whilst only a small number of proposed development sites would appear to be at risk from contamination caused by previous use, we feel it would be useful to include a similar statement in regards to contaminated land in line with the NPPF.

We have considered the various proposed development sites within the draft local plan and concur with the constraints that have been noted. We offer bespoke comments on sites where we feel more clarification is required.

Policy POACL1: Acle Cemetery Extension – We would reinforce the need to undertake a risk assessment in regards to pollution of groundwater prior to this development being undertaken.

Policy POBEC2: Beecles Residential Moorings – Should new residential moorings be proposed consideration should be given to the impact on water quality. This should be added to the policy.

Policy POBRU1: Riverside chalets and mooring plots – Requires clarification regarding development being “well back” from the river frontage. As already stated development in, on, under or within 16m a main river would require a permit. Similarly any work within 8m of a flood defence would require an environment permit and we would require access to maintain those defences. This should be included in the policy.

Policy POCAN1: Canley Sugar Factory - As noted in this policy waterside development can pose a risk to the water environment. It should be stated that this risk needs to be mitigated where new development is undertaken and on an ongoing basis to ensure the water environment is protected.

Honing – Knackers yard water recycling centre – We support the statement indicating that all new development in this area will need to connect to the public foul drainage system and that development will not be approved until capacity is demonstrated within the water recycling centre. Development which does not connect to the main sewage system would require permitting and need to demonstrate that it does not cause environment degradation.

We trust this information is useful

Yours faithfully



Mr. Pat Abbott
Planning Advisor

Direct dial [REDACTED]

Direct e-mail [REDACTED]

Broads Local Plan

Preferred Options Consultation

Representations in Respect of Somerleyton Marina and Boatyard

January 2017

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Broads Local Plan
Preferred Options Consultation Document
Representations in Respect of Somerleyton Marina and Boatyard

Reference: E374.C1.BLPR.Rep02

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1.0 Introduction

- 1.1 Somerleyton marina and boatyard is an economic asset to the area. From its history of pioneering research leading to the invention of the Hovercraft, through early innovation in Broads Cruiser design to the modern day where it provides a range of services and facilities to the increasing number of private boat owners on the Broads, as well as a sustainable point of access between the waterways, the railways and the tourist offer of Somerleyton and the wider area.
- 1.2 The boatyard and marina is owned by Somerleyton Marina Ltd which is associated with the Somerleyton Estate. The Somerleyton Estate purchased the marina in 2011, securing its future given its previous uncertain prospects as part of a worldwide group of companies.
- 1.3 Our clients, Somerleyton Marina Ltd, require a clear and positive planning policy framework in order to judge investment risk before this potential can be realised. The Broads Local Plan Review provides an excellent and timely opportunity to engage in the plan making process and to provide the framework necessary for future economic development.
- 1.4 On behalf of Somerleyton Marina Ltd we made representations to the Issues and Options consultation in March 2016 and those representations sought to introduce the existing marina and boatyard, their context and facilities to the Broads Authority. Those representations set out the future aspirations for the site and responded to Issue 39 which questioned “How to address location of new employment land in the Local Plan” under the heading ‘**The Broads Economy**’.
- 1.5 The Preferred Options consultation document introduces draft policy PODM30 which is a successor policy to DP16 to which we made representations at the Issues and Options stage under the heading ‘**The Broads Economy**’ but which is now under ‘**Navigation**’.
- 1.6 The consultation document also states that “*The Authority is in the process of commissioning work to better understand the economy and employment needs of the Broads. It is intended that the final version of this research will*

inform the publication version of the Local Plan". This is understood to be in relation to current policies DP19 and DP20 and remains under the heading **'The Broads Economy'**.

- 1.7 Our representations can be split into two parts; the 'wet side' – the existing moorings and marina and relevant DM policies (blue oval) and the 'dry side' – the existing boatyard and its facilities (brown oval). Where the 'wet side' relates to draft policy **PODM30** and the 'dry side' relates to the **Broads Economy** section; the content of which, according to the Preferred Options consultation document, awaits commissioned evidence gathering work:



- 1.8 We look forward to engaging further in the process in relation to employment sites (boatyards) in due course. These representations focus on the proposed draft policy PODM30 and follow on from our representations at Issues and Options Stage and should be read in context.

2.0 Response to Preferred Options Consultation

Draft policy PODM30

- 2.1 Appendix J of the Preferred Options consultation document indicates that emerging policy PODM30 is a replacement for policy DP16.
- 2.2 In our response to the Issues and Options consultation we expressed a preference for policy DP16 to be continued generally in its current form with appropriate updating as relevant.
- 2.3 This consultation document states that the preferred option is to adopt policy PODM30 which is very similar to DP16. One of the principle changes is the reference to the mooring 'Pre-application Questionnaire' and the requirement for short stay moorings.
- 2.4 The pre-application questionnaire is useful and will aid the preparation of planning applications. The requirement for short stay moorings is clearly explained and in a location such as Somerleyton the provision of short stay (tourist) moorings in any future marina expansion has direct benefits to the village of Somerleyton and the nearby Dukes Head pub.
- 2.5 The proposed draft policy PODM30 repeats the key policy criteria we identified as being important and positive in their approach in relation to the Estate's plans for the marina and moorings.
- 2.6 As such we support the Preferred Option for policy DM30.

The Broads Economy Question 6

- 2.7 We look forward to discussing with the Broads Authority how the economy section of the Local Plan Review is taken forwards.
- 2.8 As set out in our representations to the Issues and Options consultation the Somerleyton Estate are keen to secure a positive policy landscape in order to consider the potential for expanding the existing boatyard buildings in order to maintain and enhance the boat repair and service function.
- 2.9 It will be important for the Broads Authority to recognise the unique range

of facilities and services at Somerleyton Marina (moorings, hardstand, storage, boat lift, slipway, nearby pub, footpath access to railway station and a village with facilities in walking distance).

Site Specific Policy for Somerleyton Marina and Boatyard

2.10 To maintain and enhance the Somerleyton Marina it needs a positive policy framework which is flexible in its approach and does not constrain opportunities for economic development.

2.11 If, following a recent site visit to Somerleyton Marina and Boatyard, the local planning authority were minded to draft a site specific policy for the site then provided that policy were positively worded and included the following suggested criteria, we would be supportive of a site specific policy for the site:

- Acknowledgement of the site's sustainable location proximate to Somerleyton, the Duke's Head pub, Somerleyton Hall and Gardens, the local rights of way network and the rail station.
- Acknowledgement of the site's boating infrastructure identified on the enclosed plan.
- Support for improvement and reconfiguration proposals to the existing marina.
- Support for the retention and expansion of the boatyard subject to meeting the criteria in Broads policies on General Employment and Boatyards (to follow in publication version).
- Encouragement for the provision of houseboat moorings to reflect need (as explained to us at the site visit) where their provision would not conflict with any future general employment designation or similar.

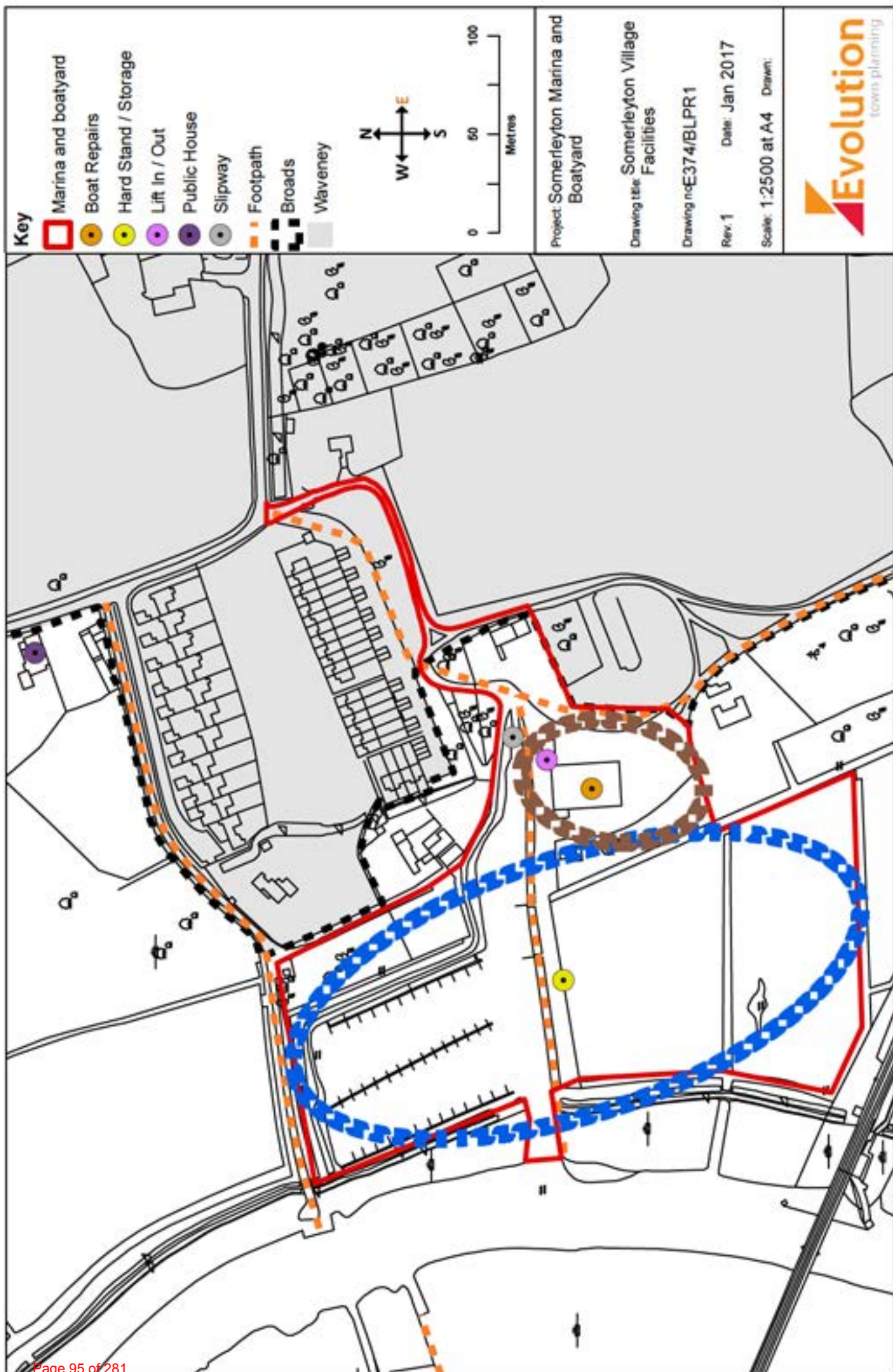
2.12 Whilst we understand that the 'Broads Economy' section of the plan is yet to be written, if the local planning authority were minded to write a site specific policy for the site, now being more familiar with it following their site visit, Somerleyton Marina would be keen to be involved in the drafting ahead of the next consultation stage.

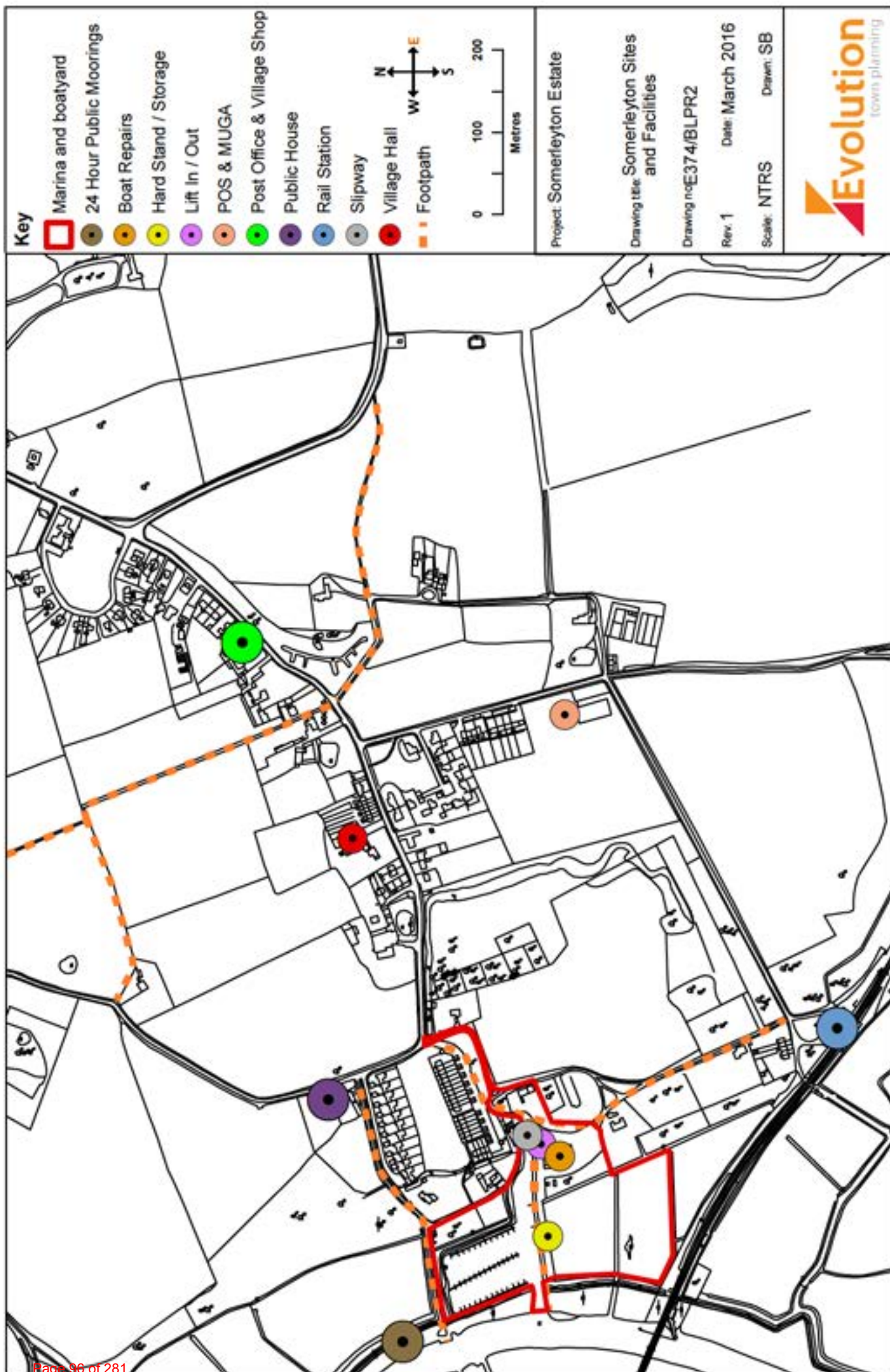
3.0 Conclusion

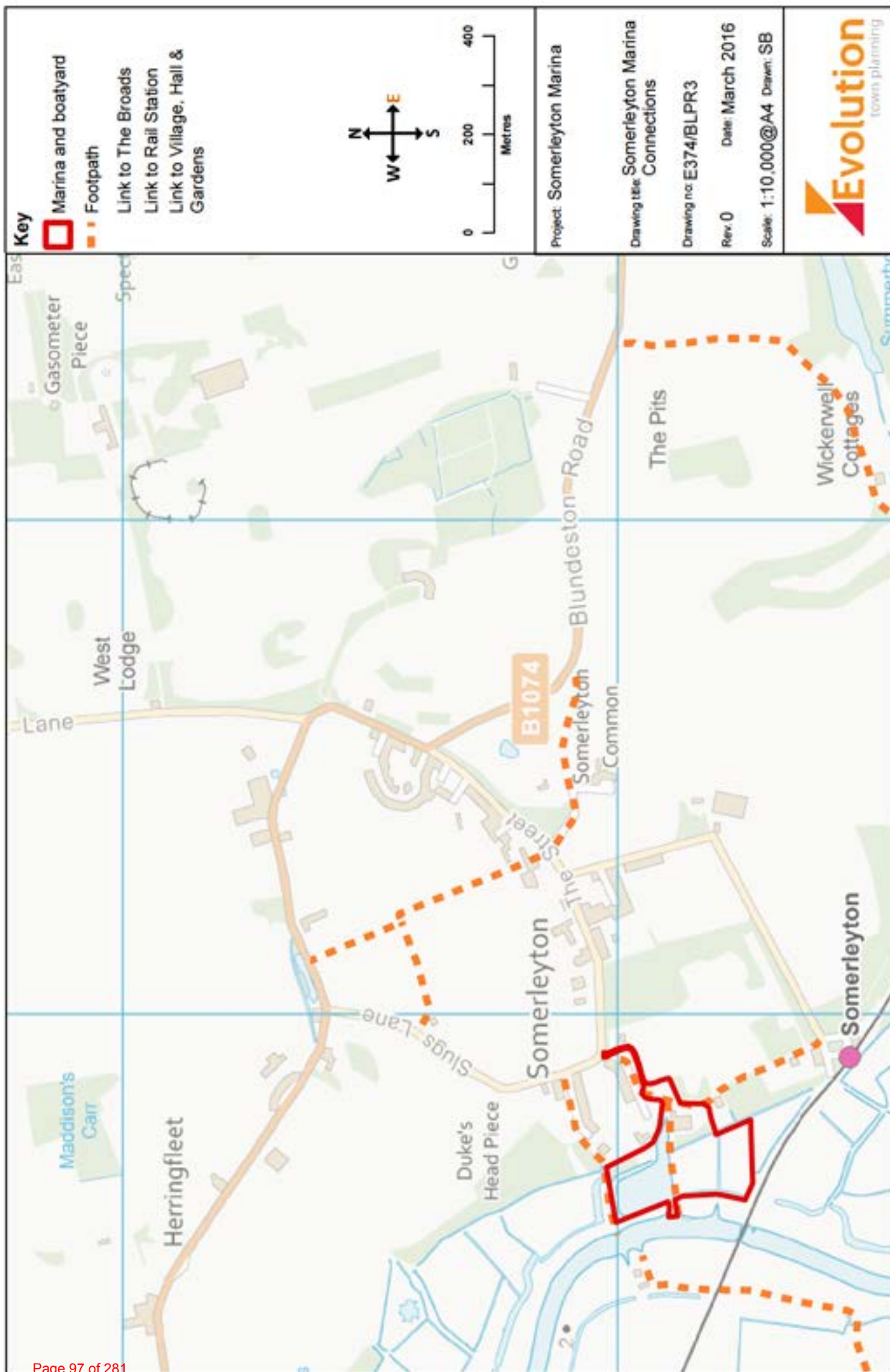
- 3.1 Somerleyton marina and boatyard has a long and rich history of innovation and endurance. It has remained while other boatyards elsewhere on the Broads have gone. This endurance ensures the continued retention of skilled crafts *“on which the distinctive character of the Broads relies”*¹.
- 3.2 Somerleyton marina and boatyard is well located in relation to the village of Somerleyton which provides facilities and services to the users and customers of the marina and boatyard.
- 3.3 Somerleyton Hall and Gardens are also a prime tourist attraction and the close proximity of the Somerleyton rail station means the marina and the Broads beyond is easily accessible by sustainable modes of transport.
- 3.4 We have outlined the future potential expansion of the private mooring marina and the resultant increase in boatyard services and facilities. In order to take the Somerleyton marina and boatyard forwards Somerleyton Marina Ltd require a positive and clear planning policy framework against which to judge investment risk.
- 3.5 The Broads Authority have set out a new draft policy concerning ‘Mooring Basins and Marinas’ (PODM30) which sets a criteria based approach very similar to its predecessor DP16 for the assessment of planning applications relating to existing moorings and new marinas.
- 3.6 We supported the reuse of policy DP16 at the Issues and Options stage. Policy PODM30 is a natural progression for that policy and is supported as the preferred option for dealing with development proposals for existing moorings and new marinas.
- 3.7 In terms of the policy approach for employment areas, and existing boatyards in particular, the Somerleyton Estate look forward to discussing with the Broads Authority further about how this part of the local plan will be taken forwards and how the Somerleyton Marina and Boatyard will feature in it.

¹ CS22 Point ii.

Appendix 1







Respondent: Gould, C (Ward Councillor - Loddon)

Lottie Carlton

From: Natalie Beal
Sent: 06 February 2017 09:00
To: [REDACTED]
Cc: Cally Smith; Lottie Carlton; Planning Policy Mail
Subject: RE: Local Green Space - Chedgrave Common
Attachments: Appendix D Nomination for Suitable Areas for Local Green Space.docx

Dear Colin

Thank you for the comments.

The deadline was 4pm on 3 February as widely advertised, but we are happy to accept your comment.

Please can you or the Parish council fill out the attached form and return it by end of Wednesday.

Thanks

Yours sincerely

Natalie

From: Colin Goul [REDACTED]
Sent: 03 February 2017 22:50
To: Cally Smith
Cc: Debra Yeomans
Subject: Local Green Space - Chedgrave Common

Dear Cally

I have been asked to write to you concerning the allocation of Local Green Space in the Parish of Chedgrave. As you are no doubt aware, the Parish Council objects vehemently to the designation of Local Green Space on land to the rear of the Boat yards on the River Chet, ref **POXNS12** in the Site Specific document.

The Chedgrave Parish Council have asked that Chedgrave Common be put forward as Local Green Space. It meets all the criteria for designation, and is well known to the Broads Authority. Under Section 77 of the NPPF the area fulfils the criteria in that it is in reasonably close proximity to the community. It can be accessed by a dedicated footpath from Pits Lane (The Wherryman's Way) and by road and by river where there is a mooring quay heading. The area is special to the community and has been managed by the Parish Council for many years. It is used for recreational purposes and is used to hold village fetes. It is an area of quiet tranquillity with many varied species of flora and fauna. The area is bounded by the river and enclosed on the other sides by hedging and amounts to some 2 – 3 hectares (my estimation). It is a wonderful spot adjacent to the Hardley Floods which is a SSSI, RAMSAR site plus other designations. This request is submitted following the Broads Authority visit to Loddon to explain the new Broads Local Plan and from comments made by Officers that there was still time to submit applications'. The deadline for comments does not expire until February 3rd and consequently I am in time.

Kind regards

Colin

Respondent: Gray, S

Lottie Carlton

From: [REDACTED]
Sent: 24 January 2017 08:18
To: Planning Policy Mail
Subject: Local Green Space Chedgrave, Policy POXNS12 OBJECTION

I have to my dismay noted that the area covered in the above policy is being considered for green space.

How is this area even being considered as a green space? There can hardly be any unique wildlife given that the drainage board have totally cleared a significant part of this area. In the many years I have lived in the area I never seen anyone, beyond the existing businesses, use any of this area. From the river the majority of this area is not visible.

Local boatyards will be severely impacted, are they not having a hard enough time as it is with increasing legislation, increasing costs, competition from larger boatyards on the Northern Broads etc - would this not be the 'nail in the coffin' for these businesses that have existed quite happily in the community for many years bringing tourists and employment to the local area.

I do wonder what the true agenda is here, is the applicant doing this to prevent further housing or to force out local businesses?

This should not even be open for consideration and I do hope common sense prevails.

Kind regards,

Mr Gray

Lottie Carlton

From: John Clements [REDACTED]
Sent: 26 January 2017 17:23
To: Planning Policy Mail
Subject: Great Yarmouth Borough Council

Categories: Ack and Filed

Dear Natalie,

Thank you for consulting Great Yarmouth Borough Council on this Draft Local Plan.

The Borough Council is supportive of the generality of the 'Preferred Options' draft of the Broads Local Plan, and has no major objections to the content. It offers the following comments on particular aspects of the draft document.

Page 17-19 - Paragraph 5.9, 5.10 and Section 6: The Borough Council looks forward to continuing a good working relationship with the Broads Authority in relation to local plan production, Norfolk Strategic Framework, and a range of other strategic matters under the planning 'Duty to Cooperate'.

Page 46 - Policy PODM6: Open Space on land, play sports fields and allotments: The Borough Council supports in principle the proposal to 'defer' to the standard set by the relevant constituent district council, and the ongoing liaison between the Broads Authority and district councils for the location and management of offsite provision. (This would, however, more properly be written as 'will have regard to', in order to avoid the implication that development plan weight will be given to documents and standards which are not (currently) available for scrutiny through the development plan adoption process.) Note that it should not be assumed that the Borough Council would necessarily accept responsibility for the management of any such provision.

Page 53 - Policy POSP5: Climate Change: The Borough Council supports the promotion of green travel, and supports the promotion of Great Yarmouth as a gateway between the sea and the Broads. (Note the current wording of the document excludes Broads based boats and departing visitors.)

Page 85 - Policy PODM22: Light pollution and dark skies: (Should read Appendix E, not C, and categories 1 & 2, not A & B.)

Page 89 - Policy POSP7: Getting to the Broads: Attention is drawn to the potential value of engaging with the Great Yarmouth Cycle Forum (hosted by the Borough Council) to maximise opportunities for connections and looped routes.

Page 93 - Policy PODM24: Changes to the Acle Straight (A47T): The Borough Council strongly supports and promotes improvements to the Acle Straight, including dualling of its entire length and improvements to the Vauxhall roundabout (A12/A47 junction). This is in the interests of the long term growth of the local and national economy, as well as road safety and reducing congestion. The Council recognises the generality of the issues raised in the policy and supporting text, but considers that these are presented in an overly negative and defensive way, and that there are also potential advantages and improvements to Broads interests and special qualities (including delivery of aspects of other policies of the Preferred Options Draft Plan) which have not been fully recognised or given due prominence.

Page 102 - Policy POSP9: Sustainable Tourism: The Borough Council is in support of Broads tourism and promoting the distinctive identity of the area. Attention is drawn, however, to the potential to encourage a wider "network of tourism and recreational facilities" by exploiting the proximity to the coast. This could expand the offerings available for tourists, promote a wider distribution of visitor pressure and potentially draw visits from some of the millions who visit the coastline for holidays and day trips.

Page 117 - Policy PODM31: New Housing in the Broads Authority Executive Area: The Borough Council stands by the Memorandum of Understanding between itself and the Broads Authority with respect to the delivery of housing, as generally outlined in the written justification. It confirms that the Great Yarmouth Local Plan seeks to meet the whole of the Borough's housing need (including that part arising in the part of the Broads within the Borough) through a combination of delivery of the great majority within its own plan area, and by working with the Broads Authority to (a) facilitate an appropriate level of delivery (giving full regard to its special status, constraints and opportunities) within the Great Yarmouth Borough part of the Broads; and (b) counting such delivery achieved within that area during the plan period against the Borough's overall housing target. In accordance with the Memorandum of Understanding, the Borough Council has not separately enumerated the housing need within the Broads part of the Borough, and to date has not identified a specific target or assumption of how much would or should be delivered in that area. The Borough Council has a degree of scepticism as to the robustness of the figure of 44 quoted, and neither endorses nor objects to its use by the Broads Authority.

Page 130 - Policy PODM34: Gypsy, Traveller and Travelling Show People: The Borough Council supports the allocation of sites for Gypsies, Travellers and Travelling Show People in appropriate circumstances and where there is an identified need. A need for 10 pitches within Great Yarmouth Borough (including that part within the Broads) has previously been identified. The Borough Council looks forward to continuing to work with the Broads Authority to identify a suitable location for such a facility (either within or without the Broads) and, with other Norfolk Authorities, updating the assessment of needs.

There are, however, some of the draft policy's criteria for the assessment of such proposals which are unduly onerous and not consistent with the policy's overall approach or the NPPF. Note that most of the criteria are expressed in a suitably qualified way, reflecting the difficult balancing decisions and qualitative judgements that would likely need to be made, e.g. 'unacceptable. . . over-concentrated . . . disproportionate . . . nearby . . . Well related . . . reasonable distances . . . adequate . . . close proximity . . . appropriately . . . sufficient . . . adequate . . . unacceptable . . . Due regard . . . ' etc. By contrast criteria d, e, i, & p are expressed in inappropriately absolute terms, e.g. the policy proscription of 'any significant effects' on transport networks in criterion 'e' is not consistent with NPPF para 32, which states 'Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'. Thus criteria d, e & j should be qualified in some way, similar to the other criteria in the policy.

Page 144 - Housing for Older People: The Borough Council looks forward to continuing a working partnership within the Norfolk Strategic Framework Housing Group to address housing for older people across the County.

Page 185 - Policy POFLE1: Broadland Sports Club: The Borough Council is keen to support the continued use and aspirations of Broadland Sports club, which is located near Fleggburgh, as a health and wellbeing facility for the area.

Page 186 - Policy POGTY1: Marina Quays (Port of Yarmouth Marina): The Borough Council supports of the re-use and enhancement of the space for river and other leisure activity.

Page 202 - Policy POORM1: Ormesby waterworks: The Borough Council is in 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 area. The Ormesby waterworks provide much of the public water supply to Great Yarmouth Borough, and the upgrading and maintenance of these works are important in supporting economic and population growth in the Borough.

Page 228 - POXNS11: Former rail trackways: The Borough Council supports the policy for its potential to expand and integrate the network of paths, cycle-ways and bridleways, which benefit both residents and visitors. The Borough Council would welcome the opportunity to work with the Broads Authority to foster delivery of such potential, and create loop and interconnections to complement these. Note the potential value of engaging with the Great Yarmouth Cycle Forum (hosted by the Borough Council) to maximise opportunities for such connections in relation to cycling.

Should you wish to discuss any of the above, please do not hesitate to contact me.

Regards,

John

John Clements
Principal Strategic Planner
Great Yarmouth Borough Council

Direct Dial [REDACTED]
[REDACTED]

www.great-yarmouth.gov.uk

2nd Floor, Town Hall, Hall Plain, Great Yarmouth, Norfolk, NR30 2QF

Greenway Marine Ltd

Riverside, Loddon Norwich Norfolk NR14 6HA

Telephone: [REDACTED]

E-mail: [REDACTED]

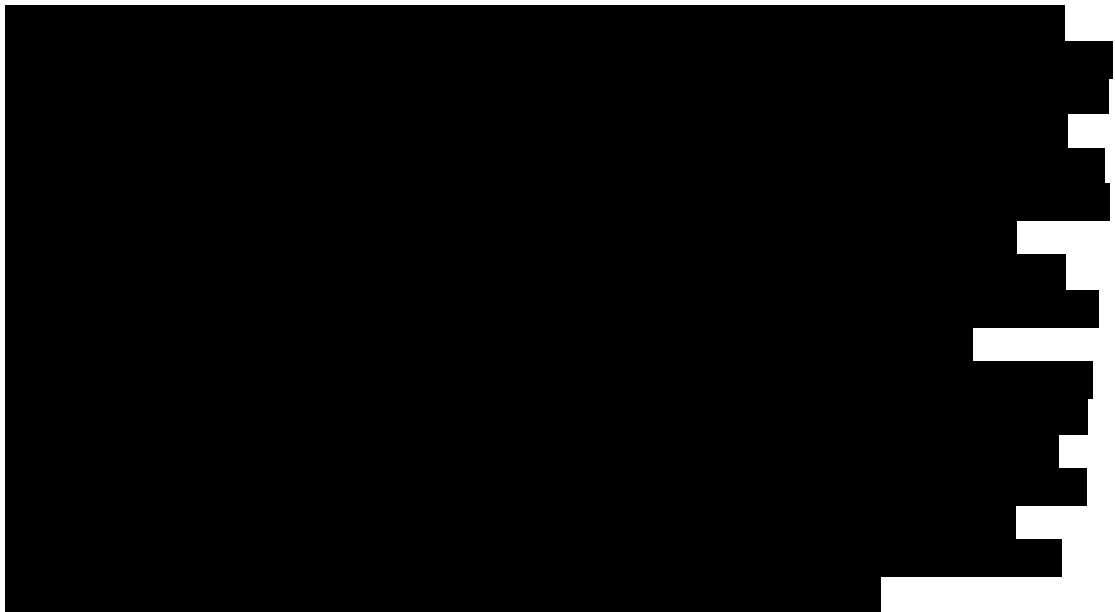
31st January 2017

As the owner of Greenway Marine Ltd of Riverside, Loddon I would first of all like to say that I am very unhappy about the way I learnt that Greenway Marine's land had been nominated as local green space. I was told by someone I happened to bump into on the street, in mid December 2016 a lot less upset would have been caused if I had been informed by the Broads Authority personally, clearly stating the whole process. To this date I still have not received an official letter. Nobody I know, including the parish council knew that this was going on. I feel that more effort should have been made to make people aware of the situation.

I object to the nomination of the land as local green space at Greenway Marine Ltd for the following reasons

1. Greenway Marine Ltd has used part of the land nominated as boat storage area for in excess of 10 years with no complaints from locals. When told by the enforcement officer that some of the boats were on land that lacked permission, he told me that i could apply for permission ,the first stage of which would be to have a pre app visit ,i have asked for this but to date have had no response .I immediately removed the boats to prevent an enforcement notice. This Winter we will be down on income by £10,000 .It is absolutely essential for Greenway Marine Ltd to get permission to store boats on this piece of land to remain viable.
2. This nomination was made by Mr A Milner as part of a long standing and ongoing feud with Mr J tubby, following Mr Tubby's application to build three houses in his garden immediately behind Mr Milner's house in Church close, Chedgrave. As a result of this feud Mr Milner nominated Mr Tubby's land as local green space but also lumped in land at Greenway Marine Ltd, Pacific Cruisers and School House. During your pop-in session on the 19th January 2017, I had a long discussion with Mr Milner and he admitted to me that his sole objective was to stop Mr Tubby building on his land, and that we had been caught in the crossfire. He stopped short of apologising for the fact that two local businesses would be adversely affected but was upset that he had failed to achieve his sole objective.
3. This land could never be developed as the high voltage electricity cable (33,000 volts)is buried down the middle of the strip of land, running parallel to the river , and a wayleave given to the electricity company by Greenway Marine Ltd states that access must be given for repairs. If a fault occurs at any time the land would have to be torn up regardless of being local green space or a haven for wildlife , destroying any small trees and bushes ,meaning this land does not fit the criteria to be green open space .

4. The land is surrounded by drainage ditches , approximately every five years we have to allow access for the drainage board to clear and maintain them, The land does not fit the criteria of a haven for wildlife, or land as a benefit to the community as due to the small narrow size of the plot means the destructi0n is total.
5. The subject of liability is of concern. If this were to go ahead I would have to inform my insurance company and I am sure the premium would increase as the insurer would perceive increased risk. Would the Broads Authority pay the extra premium? Likewise we will be paying business rates on land we will never be able to use, will the Broads Authority pay the business rates on the land ? as I would no longer be prepared to do so.I am against the proposal as the definition of green open space is vague with no clear reference as to access and liability.



Regards,
Jonathan Greenway
Managing director
Greenway Marine Ltd

Respondent: Greenway, Mr

Lottie Carlton

From: Natalie Beal
Sent: 19 December 2016 10:37
To: Lottie Carlton
Subject: Please can you log this representation?

Mr Greenway from Greenway Marine LTD, Chedgrave.

Objects to the Local Green Space allocation.

States that he has ideas for that area and that he stores boats on that land.

Was offered an extension to the consultation period as is away until 3 February. Did not confirm if he will take it or not.

Asked for documentation to be sent in paper format as has no internet.

May provide more comprehensive representation.

But this is a note of his objection, received on the phone.

Natalie Beal
Planning Policy Officer
01603 756050

Lottie Carlton

From: Natalie Beal
Sent: 06 February 2017 08:30
To: Planning Policy Mail
Subject: FW: site allocation in Acle

-----Original Message-----

From: Natalie Beal
Sent: 03 February 2017 08:45
To: 'Lana Hemsall'
Cc: Lottie Carlton
Subject: RE: site allocation in Acle

Hello Lana

Thanks for this.

We will log this on the database.

Natalie

-----Original Message-----

From: Lana Hemsall [REDACTED]
Sent: 03 February 2017 06:46
To: Natalie Beal
Subject: site allocation in Acle

Morning Natalie,

unless it's too late, can I make the following comment on the site allocation for burial ground and recreation space that has been made in the Broads Executive area in Acle?

Whilst I do not disagree that the location of this allocation is the best solution for Acle and its residents, I remain concerned for the viability of this allocation as the landowner is resistant to sale of his land. The compulsory purchase of the land is still being considered by the Secretary of State and I suggest that a final decision on whether this site continues to be allocated is set aside till the outcome is known.

Best wishes,

Lana Hemsall
Ward Member for Acle

Respondent: Highways England

Lottie Carlton

From: Natalie Beal
Sent: 15 March 2017 10:29
To: Lottie Carlton
Subject: FW: Gapton roundabout and the Acle Straight

From: Galloway, Davina [REDACTED]
Sent: 15 March 2017 10:29
To: Natalie Beal
Subject: RE: Gapton roundabout and the Acle Straight

Natalie

I have tidied it up as below but no change is made to the meaning of my original comment:

“Highways England have no objections to the Broads Policy Plan on Acle Straight. If Highways England do make any changes at Acle Straight we will take into account the Broads Authority policies and liaise with both the Authority and Norfolk County Council on any improvements of significant impact that we would wish to make. Highways England already support the relocation of the Little Whirlpool Ramshorn snails to another environment that is equally habitable for them. Highways England supports the Broads Local Plan.”

Please use this as our official response.

Regards.

Davina

Davina Galloway
Asset Manager
Operations 'East'
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
Tel: [REDACTED]
Web: <http://www.highways.gov.uk>

Lottie Carlton

From: [REDACTED]
Sent: 03 February 2017 09:34
To: Planning Policy Mail
Subject: Hippersons Boatyard

Categories: Ack and Filed

Hi,

On the subject of the new local plan I would like to see the navigation into Norwich maintained for larger vessels. Although there has been no commercial activity for a number of years, it has been an active port for centuries. The need may arise again in the future so its important that the infrastructure is maintained. There are also opportunities for leisure/commercial use such as trip boats or maritime festivals.

Thanks,

Simon

phone: [REDACTED]

web: <http://www.hippersons.co.uk>

Facebook: <https://www.facebook.com/Hippersons-Boatyard-1020184551388281/>

Ms Natalie Beal
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

Direct Dial: [REDACTED]

Our ref: PL00015056

1 February 2017

Dear Ms Beal

Broads Authority Local Plan for the Broads Preferred Options Consultation - Plan Period 2012 to 2036

Thank you for the opportunity to make comments on the *Local Plan for the Broads Preferred Options Consultation*. As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the preservation and enjoyment of the historic environment.

We note that you have posed specific questions throughout the document as well as requesting feedback on any other element of the document. We will review the plan in the order that is presented and will answer the posed questions as they appear within the wider document.

Overall, we are pleased with this well-written plan that will, with some minor amendments, make a positive provision for the historic environment. By its nature, our letter focuses on those elements that we consider need some amendment or slight alteration to better achieve this aim but we welcome the significant efforts that have been made to date to produce this plan.

About the Broads - Spatial Portrait

We note that one of the statutory duties of the Broads Authority is to conserve and enhance the cultural heritage of the broads, as well as its natural beauty and wildlife. Additionally, the Broads Authority is required to promote opportunities for the understanding and enjoyment of the special qualities of the Broads.

We have reviewed the plan with the intention to recognise where the plan achieves these aims and to improve policy wording, if necessary, to ensure that these aims are achieved.

The landscape of the Broads itself is the defining element of the historic environment in this area which reflects human activity unique to this area and worthy of conservation and management as part of the historic environment in its own right. Landscape character is formed as a result of present and past human activity, and the

relationships of settlements with that landscape, and movement through that landscape, particularly on or around water within the Broads. We are pleased to note that landscape character is given prominence within this chapter as worthy of protection.

We are similarly pleased to note that the typical architecture of the Broads is briefly outlined: riverside structures, boating related structures and activity, Arts and Crafts buildings including Cottage Ornée, drainage mills and dykes. We note that the area's designated assets and the area's potential for waterlogged archaeology are identified and that this is stated to be a finite resource.

Policy Context

We recognise that the local plan seeks to note where the NPPF specifically references the unique landscape of the Broads. We request that the section reflecting the NPPF also references the requirement for Local Plan's to *have a positive strategy for the conservation and enjoyment of the historic environment* (NPPF, Paragraph 126).

Where we have not referred to a policy specifically, we have no comment to make.

Question 1 - Duty to co-operate (Do you have any thoughts on the Authority's approach to Duty to Cooperate)

We acknowledge the authority's duty to co-operate statement and seek to continue to work with the authority positively for the ongoing management of the living landscape of the Broads.

Challenges and Opportunities

We are pleased with the identification of challenges and opportunities set out within this chapter. We particularly welcome reference to heritage assets and the highly valued landscape within the first bullet point of the identified strengths.

Additionally, under *Weaknesses* we are supportive of the inclusion of the *'high levels of listed buildings and other heritage assets at risk and particular problems in finding compatible and beneficial uses that could help secure the restoration and maintenance of heritage assets such as wind pumps/drainage mills.'* As an identified weakness, we look forward to addressing this specifically within the plan (see X below).

Under the heading of *Opportunities*, we request that the following wording or similar is included to reflect the NPPF:

Drawing on the contribution made by the unique historic environment to the character of the Broads

and

The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring.

We additionally support the inclusion of the following *threat*:

Erosion of the special character of the area's landscape and built heritage through: loss of archaeology built/landscape and cultural heritage assets.

and

Incremental 'suburbanisation' and other changes

And

Paleo-environmental and organic archaeological remains are especially vulnerable and significant in the broads.

This last point may wish to be separated into two parts: the international significance of the paleo-archaeological remains within the Broads and the unusually well preserved organic remains are strengths; a wealth of archaeological deposits that are not well represented elsewhere within the country. These may be opportunities for investigation and study.

Question 1 - Vision (Do you have any thoughts on the Broads Plan and the Broads Local Plan having a shared Vision for the Broads?)

We have no objection to the inclusion of the shared vision statement for the Broads Plan (management document) and Broads Local Plan (planning policy document) and welcome reference within this vision statement to distinctive local character and historic significance.

Question 3 Local Plan Objectives (Do you have any thoughts on the draft Objectives for the Broads Local Plan?)

We are encouraged that the local plan objectives include Objective 3 (Protection of landscape character and its setting), Objective 8 (Historic Environment and Cultural Heritage and Objective 10 (Management of change) are particularly relevant to the active conservation of the historic environment.

Specific Qualities of the Broads

This an important section which defines the special qualities that most other policies refer to and against which the impacts of development will be judged. We are pleased to note that the special qualities are diverse and cover many different aspects of the historic environment including less tangible elements such as people's interactions with the landscape and traditional skills and traditions.

Question 3b Monitoring Indicators (Do you have any comments on the draft monitoring indicators?)

As the monitoring indicators are set out with each individual policy, these are addressed within each policy response.

Policy POSP1: DCLG/PINS Model Policy

We are satisfied with the wording of this policy.

Policy POSP2: Sustainable Development in the Broads

We are pleased to note that *all changes in land uses / management must ensure that all aspects of the environmental and cultural assets of the Broads' distinctive landscape are protected, enhanced and restored.*

We are encouraged that particular attention will be paid to the quality of the built environment. With regard to the efficient use of land, we request the following addition to ensure that density and development is not maximised to the detriment of surrounding landscape character or the setting of nearby historic structures:

Particular attention will be paid to

vi) the efficient use of land, buildings, services and infrastructure where appropriate to the historic environment

We also support the encouragement of mitigation of currently intrusive features.

Within the justification of this policy, we appreciate the work that has been carried out to identify landscape character, tranquillity and wildness and design. With regard to historic and cultural environment, we welcome the identification of the Broads' rich cultural heritage. To improve the scope of this text further, we request that reference is made to the significance of the setting of heritage assets, the value of the intangible historic environment (such as traditional craft skills) and the high potential for archaeological deposits.

Policy PODM7:Staithes

We request that this policy specifically refers to the historic character of staithes.

Staithes may not always be designated assets or located within Conservation Areas.

They may physically be contemporary replacements of earlier fabric but are a unique and distinctive feature of the historic environment typifying the Broads area. As such, we request that the following additional bullet point is added to the policy

The staithes identified on the policy map are protected from:

Development which detrimentally impacts their historic character and setting.

Policy PODM8: Green Infrastructure

We welcome the requirement for green infrastructure *to protect and enhance the natural environment.*

Policy PODM10: Peat

We welcome the protection offered to historic peat environments and the requirement for an evaluation for paleoenvironments and archaeology. We also welcome the requirement for suitable recording and interpretation prior to the commencement of development.

Policy POSP6: Heritage Assets

Whilst we appreciate that the plan makes provision for the historic environment and heritage assets, we note that the strategic policy addresses heritage assets whilst the specific development policy addresses the historic environment. We would prefer to see that the historic environment is considered strategically and this may be achieved by altering the name of Policy POSP6 to The Historic Environment.

We request that the opening paragraph which highlights the key buildings, structures and features makes reference to the historic environment, the significance of any identified heritage asset and their setting.

We welcome the requirement to maintain, enhance and provide a better understanding of the significance of cultural heritage value. In bullet point (ii) we request the following amendments to widen the scope of protection to the historic environment more generally:

(ii) Requiring the highest standard of design which will protect ~~existing assets~~ the historic environment and add to the future cultural heritage value.

We also request the following amendment for better clarity that the significance of a heritage asset is the critical factor which development should be appropriate to.

~~Appropriate development proposals that bring into use or remove an asset from the heritage at risk register will be supported~~ where appropriate to their significance.

As a minor point, and to widen the applicability of the policy as far as possible, we request the following substitution in the penultimate paragraph of Page 59:

Policies aim to set new standards to complement the current character and to create ~~buildings~~ development that will be valued in the future.

We welcome recognition of heritage assets and archaeology. We would also welcome provision for the creation and management of a locally managed heritage at risk register over the plan period for Grade II buildings and locally listed structures, neither

of which appear on the nationally managed heritage at risk register but which may include buildings that typify and provide evidence for the Broads' unique landscape character and heritage.

Policy PODM11: Historic Environment

We welcome this development management policy which might be better considered to be the historic environment and development.

To assist with the widest application of this policy, we request some minor amendments as follows:

All ~~New~~ development will be expected to protect, preserve or enhance the significance fabric and setting of historic, cultural and architectural heritage assets and elements of the wider historic environment that give the Broads its distinctive character.

We note that designated assets are to be considered against the context of national policy whereas non-designated assets are to be considered against scale, significance and public benefits. We would reiterate that non-designated assets are heritage assets as defined within the NPPF and are subject to the protection and tests of national policy, applied commensurate with their significance.

We are very supportive of the positive approach to archaeology including the protection of archaeological and built structures which have not previously been identified.

We are encouraged by the supportive text to this policy which seeks a heritage statement for any development that may affect a heritage asset or its setting. We request that this includes reference to affecting the significance of any asset rather than just the asset itself. It may also avoid confusion to specifically include locally listed buildings within the list of heritage assets requiring a Heritage Statement.

Policy PODM12: Re-use of historic buildings

We welcome the inclusion of this policy and the proposed wording.

Link to practice guides

We note that the plan includes links to practice guides that are long out of date, even where the text refers to current guidance. We suggest that the plan is updated to include the link to the Good Practice Advice in Planning Note 1 at least, preferably with links to the additional good practice advice notes 2 and 3. It would also be useful to directly reference *The Historic Environment and Site Allocations in Local Plan - Advice Note 3* which we hope has also informed the plan.

<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment->

local-plans/>

and

<<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>>.

Policy PODM16: Landscape Character

We welcome the inclusion of this policy and the recognition within it that historic features and overall perceptions of landscape character form a part of the historic environment typifying the Broads and are worthy of protection and conservation.

Policy PODM17: Land Raising

We welcome the inclusion of this policy and the elements of the historic environment that are required to be considered We request that an additional point is included as follows;

e) the setting and significance of any heritage asset

Policy PODM17: Land Raising

We welcome the inclusion of this policy and the elements of the historic environment that are required to be considered We request that an additional point is included as follows;

e) the setting and significance of any heritage asset

Policy PODM19: Utilities Infrastructure Development

Where point (c) requires infrastructure development to have regard to character of the locality, landscape and amenity we request that the additional point of character and significance of the historic environment is also included.

We are encouraged that the authority has included a specific policy that relates to this form of development which can be well integrated into the landscape where it fully considered good design.

Policy PODM20: Protection and enhancement of settlement fringe landscape character

The transitional area between settlements and their surroundings is particularly subject to development pressure. These areas are often owe their form and character to historic natural and man-made boundaries and are important elements of the historic environment. We are particularly please therefore to read this well-written and important policy .

Policy POSP7: Getting to the Broad

We appreciate the encouragement of access to and enjoyment of the historic environment. We request the following additional wording:

The creation of links to/from settlements where appropriate to the historic character.

Policy POSP8: Getting around the Broad

We again appreciate the encouragement of access to and enjoyment of the historic environment but again request the following addition:

Improved access will only be permitted where impacts on the natural and historic environment have been assessed and mitigated for.

Policy PODM24: Changes to the Acle Straight.

We are pleased to see specific policy provision for the Acle Straight where this passes through the Broad, particularly with reference to the highly significant Grade II* listed Stacey Arms Windpump. This listed windpump is not the only designated heritage asset in close proximity to the road however with the route in close proximity to two Grade II listed mills (the Kerrisons Level Drainage Mill and the Tunstall Dyke Smock Mill) and forming part of the setting of the wider landscape, most of which is within the designated Halvergate Marshes Conservation Area.

Historic England will closely monitor any proposal for development of the Acle Straight that impacts the historic character of this landscape and the setting and significance of listed structures along its route.

Policy POSP9: Sustainable Tourism

We recognise the value of sustainable tourism in the active conservation of the historic Broad. We would welcome recognition that the historic environment conversely, provides direct opportunities for tourism and the local economy as part of the attraction and character of the Broad landscape. There is an opportunity within this policy to emphasise and promote heritage assets and the wider historic landscape as a positive contribution to sustainable tourism. In Paragraph 131, the NPPF requires local authorities to *take account of the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality* and we welcome reference to this within Policy POSP9.

Policy PODM26: Sustainable Tourism and Recreation Development

Recognising the importance of sustainable tourism to the sustainable management of the Broad, we welcome the requirements within this policy for such developments to respect landscape character. We request that a similar level of protection is added for

the wider historic environment with the following wording or similar:

Tourism and recreational facilities in the open countryside will be permitted only where there is a clear and demonstrable need for the facilities to be situated in the open countryside and where they:

ix) preserve or enhance the historic environment

We particularly welcome the policy wording which allows the consideration of the scale of activity and use rather than the development itself.

Policy PODM28: Access to the Water

We recognise the importance of the positive presumption for development allowing access to the water although we request that this is caveated so that development will be approved *where there is no harm to the character and significance of the historic environment*.

Policy PODM28: Access to the Water , Policy POSP11: Mooring Provision, Policy PODM30: Moorings, Mooring Basins and Marinas & PODM35 New Residential Moorings.

We recognise the importance of the positive presumption for development allowing access to the water although we request that this is caveated so these developments will be approved *where there is no harm to the character and significance of the historic environment*.

Policy PODM32: Affordable Housing

Similarly to above we request that the presumption in favour for this form of development is caveated so that development will be approved:

(v) where there is no harm to the character and significance of the historic environment.

Alternatively, the second paragraph of *Policy PODM33: Residential Development within Defined Development Boundaries* could be included into Policy PODM32.

Policy PODM33: Residential Development within Defined Development Boundaries.

We are encouraged that this policy includes the requirement for development to be of a suitable and appropriate scale.

We note that there are four settlements where heritage assets are listed as constraints and features to guide developers and we request the following minor amendments to

that list:

a) *Horning*

Horning Conservation Area

Listed Buildings and their settings

b) *Oulton Broad*

Setting of nearby listed buildings

c) *Thorpe St Andrew*

Large number of Listed Buildings and their settings including three, Grade II Listed Buildings:*

Thorpe Hall

Walpole House

Ruin of Church of St Andrew

d) *Wroxham and Hoveton*

Includes Grade II Listed The Grange and Wroxham Bridge, Scheduled Monument and their setting.

Policy PODM34: Gypsy, Traveller and Travelling Showpeople

We are encouraged that this policy includes appropriate caveats to ensure that heritage assets and their settings and the historic landscape will be appropriately protected from this form of development.

Policy PODM35: New Residential Moorings

We request that this policy includes an additional point which requires this form of development to make provision for the preservation of the historic environment.

Policy PODM36: Permanent and Temporary Dwellings for Rural Enterprise Workers

As above, we request that this policy makes a specific provision for the protection of the historic environment as it does for protected species and habitats at Point h).

Policy PODM38: Replacement Dwellings

We are pleased to note that proposals for replacement dwellings will be required to demonstrate that the original does not make a positive contribution to the character of the area or is of no significance that would make it worthy of retention.

Policy PODM38: Replacement Dwellings

We are pleased to note that proposals for replacement dwellings will be required to demonstrate that the original does not make a positive contribution to the character of the area or is of no significance that would make it worthy of retention.

Policy PODM40: Design

Design policies are one of the primary tools for ensuring that new development integrates well with the wider historic environment. We are pleased to note that specific provision is made within the design policies for the integration of new development with landscape character and local distinctiveness.

We also request that specific provision is made within the design policy for new development to have regard to preserving and enhancing the historic environment, heritage assets and their settings. This might be a separate point within the listed considerations or might be incorporated into *Relationship to surroundings and to other development*.

Policy PODM41: Visitor and Community Facilities and Services

We request that the presumption in favour of such developments is caveated by the consideration that applications will be approved where appropriate to the historic environment which includes but is not limited to landscape character.

Policy PODM44: Planning Obligations and Developer Contributions

We are encouraged that this policy includes the possibility for planning contributions to be used to support conservation and the enhancement of heritage assets. This might be directed to heritage at risk.

Policy PODM45: Conversion of Buildings

We support this policy. Whilst it does not specifically address the maintenance of the historic significance of a building or its setting, we recognise that Policy PODM12 Re-use of Historic Buildings does so.

Policy PODM46: Advertisements and Signs

We support appropriate control of advertisements and signs with regard to protecting the character and appearance of the historic environment. We request a minor alteration to the proposed wording to better secure the policy's aim to control adverse impact to the historic environment, particularly in the Broads where buildings can be appreciated from wider vantage points than main frontages.

Particular regard should be had to any impact of proposals on conservation areas and ~~the historic character of the frontage~~. Proposals which obscure features of

architectural or historical interest, or are uncharacteristic of a building's design or setting, will not be permitted.

Policy POACL1: Acle Cemetery and Extension & Policy POACL2: Acle Playing Field Extension

We are pleased to note that this policy requires an archaeological assessment to support any application for the cemetery's extension.

Policy POBEC2: Beccles Residential Moorings (HE Hipperson's Boatyard)

We request that the policy requires that any redevelopment addresses to the character and appearance of the Beccles Conservation Area across the river.

Policy POCAN1: Cantley Sugar Factory

We request that developments at this economically important site are requested to take account of the setting and significance of the nearby designated heritage assets, specifically the Langley Conservation Area, and the two Grade II* Churches of St Botolph at Limpenhoe and St Margaret at Cantley. Due to the open landscape around the factory, development should be particularly careful to respond to these assets and the historic environment more generally.

Policy POGTY1: Marina Quays (Port of Yarmouth Marina)

As above, we request that the policy requires that any redevelopment addresses to the character and appearance of the Halvergate Marshes Conservation Area across the river.

Policy POHOR7: Horning - Boatyards, etc at Ferry Road. & Ferry View Road

We request that this policy requires any development of this site to pay particular regard to the setting of the nearby Grade II* Listed Hobbs Mill and Grade II Listed Horning Ferry Mill.

Policy POOUL3: Oulton Broad - Former Pegasus/Hamptons Site

From the associated map, we understand that the site is within the Oulton Broad Conservation Area rather than adjacent to it as set out within the supporting text. We would welcome clarification. In either event, we request that development required to take account of it.

Policy POTHU1: Tourism development at Hedera House, Thurne



We are pleased to see the consideration given to landscape character within this policy. Similarly to the treatment of sensitive ecological sites, we request that the policy requires specific consideration of the setting and significance of the nearby Grade II* Listed Windpumps: Thurne Dyke Windpump and St Benets Level Windpump.

Policy POXNS5: Drainage Mills

We are very pleased to see that the plan includes specific provision for the conservation of these characteristic and locally distinctive Broads structures. To improve this policy, we request that the setting of these structures is included in the policy as an impact to be assessed.

Summary

We are pleased to note that a detailed understanding of the Broads' distinctive historic environment has informed the preparation of this thorough and clearly written plan document.

We request that the minor amendments that we have suggested will be incorporated to strengthen the plan, and the conservation of the historic environment that it proposes.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made then please do get back to me. In the meantime, we look forward to continuing to work with you and your colleagues in the preparation of the Local Plan documents.

Yours sincerely,

Alice Eggeling
HISTORIC ENVIRONMENT PLANNING ADVISER



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Email: planningpolicy@broads-authority.gov.uk

3 February 2017

Dear Sir / Madam

A RESPONSE BY THE HOME BUILDERS FEDERATION (HBF) TO THE BROADS LOCAL PLAN

Thank you for consulting the Home Builders Federation (HBF) on the Broads Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year.

Duty to Cooperate

We will expect to see a firm agreement among the districts of the Central Norfolk Housing Market Area that they will be able to accommodate the objectively assessed housing needs (OAN) of the HMA in full by 2036.

While the Council states that the duty to cooperate is not a duty to agree, it will need to demonstrate that it has worked positively with all the other authorities to ensure that the OAN of all three HMAs will be catered for. While we acknowledge that the ability for the Broads Council to accommodate housing (more than its own housing requirement of 212 homes) will be very limited, this fact does not absolve the Broads from ensuring that the housing need is planned for, and met, by the other authorities. The Council depends on housing need being provided for elsewhere in the HMA and it needs to make sure that the other councils will do this. This is especially the case with regard to Great Yarmouth Borough Council who will be accommodating some of the Broad's unmet housing need (44 homes according to Policy PODM31).

Policy PODM31: New Housing in the Broads Authority Executive Area

We do not understand the derivation of the housing requirement of 212 net new dwellings.

The Broads falls within the Central Norfolk, Great Yarmouth and Waveney Housing Market Areas. The Broads area is covered by a number of other local authority areas but page 119 states that the OAN for the Broads is 320 homes.

Policy PODM31 states that the requirement for the Broads Plan is 212 homes by 2036. A 'remaining requirement of 44 dwellings' to 2036 will be provided in the part of the Broads that falls within the Borough of Great Yarmouth. This would give a total of 256 homes. It is unclear if and where the other 64 homes will be provided. The Local Plan will need to clarify this. This issue cannot be neglected otherwise the plan is potentially unsound. If the Council is still trying to reach an agreement with one or more of the other authorities then this consultation ought to have said this.

It may be the case that the 64 dwelling shortfall represents the completions achieved since 2012 or is an unmet need that cannot be accommodated because of environmental constraints (page 119 suggests this might be the Council's view). It is not clear. The Council needs to clarify if it considers that there are 64 homes that it is unable to accommodate. If this is the case, it will need to utilise the mechanisms under the duty to cooperate to find a solution to this problem. We would expect to see correspondence with all of the authorities. However, given the small number of homes involved, and in view of the difficult decisions other authorities with sensitive designations have had to make elsewhere in the country to meet more of the housing need, we would really expect the Broads to be able to accommodate this shortfall itself.

The Council should identify allocations for the 64 homes.

Policy PODM32: Affordable Housing

Part A of the policy is unsound because it is contrary to national planning policy.

We cannot see how the Council can require applicants to have “regard to evidence provided by Council surveys and research, including the Council waiting list”. The Council needs to provide a clear policy in this Local Plan that sets out the requirements of the Council for this plan period. National planning policy is very clear that Local Plan must contain clear policies to assist applicants and decision-takers to ensure that the presumption in favour of sustainable development will operate effectively. The Council may vary those requirements through a partial review of the Local Plan, but it cannot be vague about what it expects in this version of the Plan.

Part B of the policy is unsound because it is contrary to national planning policy.

The Council will need to specify clearly its requirements in relation to affordable housing in the Local Plan (NPPF, paragraph 174). It cannot decide on the size, type, and tenure of the affordable housing element on a case-by-case basis “based on up-to-date evidence” and through “liaison with the applicant”.

The NPPF requires local plans to provide clear policies to “*provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency*” (NPPF, paragraph 17). This is necessary to enable speedy and efficient decision taking in accordance with paragraph 14 of the NPPF (the presumption). The Council needs to base the policies in its plan on the evidence it has prepared to support the preparation of the Plan.

If, however, the affordable housing policy is to be determined in accordance with the policies of the relevant local authority covered by the Broads area, then Policy PODM32 must clearly state this. That would be a sensible and workable solution. At the moment the policy is too confusing for applicants. It would be unclear to applicants whose affordable housing policy took precedence: the Broad's, or that of another local authority.

Part C v, vi and vii is unsound because the approach is unjustified.

The Council will need to specify an affordable housing percentage in its local plan. It cannot require a site-specific viability assessment if it has not specified in the first place (based on evidence) a percentage figure that it considers to be justified and viable (NPPF, paragraph 174). The applicant would need to know what percentage of affordable housing s/he would need to provide in order for his/her application to be in

accordance with the development plan so that it can be approved without delay (NPPF, paragraph 14).

We cannot see how the Council could decide what would be 'alternative provision' if it has not specified what the 'preferred provision' is (based on evidence). This would allow the Council to exercise arbitrary power which would go against principles of fairness and justice required of public life.

If those affordable housing percentages are to be determined by the other local authorities then the policy needs to be amended to say this. If this is the case we cannot see how the Broads Authority has the authority to determine what would be an appropriate alternative level of provision. This would be a matter for the relevant local authority to decide, not the Broads.

Policy PODM44: Planning Obligations and Developer Contributions

The Council states on page 160 that:

"The Authority will seek contributions towards transport, police and fire service provision, education facilities, libraries and social service provision where appropriate, utilising Planning Obligations standards prepared by Norfolk and Suffolk County Councils. The Authority will also apply the standards and thresholds adopted by the relevant constituent District Council to calculate the contributions to be sought. Contributions to affordable housing will be sought in accordance with the approach set out in policy PODM32 and Open Space as per policy POODM6."

This is not in accordance with national policy. Planning obligations can only be sought where they meet all of the tests that are set out in paragraph 204 of the NPPF; i.e. they are necessary, directly related to the development, and fair and reasonable in scale and kind. It would be more appropriate to collect money for the items listed through a CIL.

Yours faithfully

James Stevens, MRTPI
Strategic Planner

[Redacted signature]

21st Century Construction in Broadland

A variety of materials have been used over the years in the construction of properties adjacent to the waterways and for buildings situated nearby in boatyards and marinas. In general these materials reflected fashions of the time, necessity and availability.

In the case of waterside chalets, for example, the need to use a lightweight and flexible material compatible with a building that had to be placed on piling, or a float, because of the boggy peat ground meant that wood was predominately used. Later there was some use of asbestos sheeting with a form of mock Tudor wood framing but this is not so common.

Whilst attractive these materials suffer badly in the somewhat harsh conditions of a waterside environment.

In the Broads Authority document "Planning for waterside bungalows/chalets" this subject is touched upon along with the aspiration to maintain the appearance of these dwellings that form part of the Broads tourist history.

Whilst this is admirable there are some unfavourable comments about "plastic" and "uPVC" that do not really reflect how these materials have been developed from early examples of 40 years ago.

Equally plastic coated aluminium is lauded and it is difficult to understand the reason why this modern material is seen as attractive while another is not.

Overall the Broads Authority seems to have adopted a fairly strong policy for the continuing use of timber products that really does not take into account sustainability and energy efficiency and we propose that this policy is reviewed and changed.

Whereas we believe that most people would agree that the general shape, appearance, height etc of Broadland properties and commercial buildings should in some way reflect the history of design on the Broads; the construction should reflect best practice for the 21st century, not the only materials that were available 80 + years ago.

Modern uPVC windows are both energy efficient and can be designed to be virtually identical in appearance to wood or painted metal designs. There seems to be no reasonable objection to the use of such windows.

In the case of traditional wood cladding many would like to see buildings maintaining this traditional look and we agree wholeheartedly with this. In the early days of uPVC manufacture the use of this material to replace wood panelling was championed by some but it really does not have the correct appearance or thermal qualities.

In more recent times companies like Marley and Dura, amongst others, have produced cladding materials that have the same appearance as timber but do not rot or require regular maintenance, and, have thermal and fire resistant qualities far superior to wood. Those who came before us were somewhat profligate in the use of timber because they had no choice but fortunately we can now mimic the appearance of their buildings with far superior materials.

We have attached brochures for two typical cladding products.

Our view is that in the case of repairing wooden buildings modern materials should be permitted when these mimic the original appearance of the building and do not detract from any key feature.

For example a house with brown wood windows and leaded lights should have to have either a like for like replacement of a brown uPVC leaded light replacement.

A house or commercial building clad in wood should have to have either like for like replacement (where possible as some timber types may no longer be readily available) or a synthetic cladding that mimics the original in texture and of similar colour.

In the case of new build architects should be permitted to make best use of 21st century materials provided the appearance is in keeping with the vicinity.

As a Parish Council with a strong interest in preserving what is best about Broadland villages while wishing to see sustainable construction and maintenance we ask that these views and requests are incorporated in the planning for the future of Broadland.

Respondent: Knight, J (Broads Authority Member)

Local Plan for the Broads - Preferred Options Consultation

Submission by James Knight FRICS

Director of Waveney River Centre (Burgh St Peter) and Ferry Marina (Horning)

Introduction

My name is James Knight. I am a Fellow of the Royal Institution of Chartered Surveyors and I have lived and worked around the Broads for all of my life. In addition to enjoying recreational boating activities, I have worked in a professional capacity advising on planning matters. For the past 14 years, I have been a Director of two successful Broads tourism businesses which currently employ almost 100 people, and have engaged with the planning system as an applicant on numerous occasions.

I am a former member of the RICS Governing Council, a former member of the Broads Authority and currently a member of its Navigation Committee.

I have read the draft Local Plan carefully and can see that an enormous amount of detailed work has been undertaken in order to arrive at this stage in the process. It is an extensive document which, I suggest, attempts to cover more ground than is strictly necessary for a small planning Authority which processes application numbers in the low hundreds each year most of which are minor. Whilst it is accepted that the Local Plan has been written in order to comply with the requirements of the NPPF, there are a number of proposed policies which go well beyond what is required for a Local Plan and attempt to duplicate policies or regulations which are made at a national level. Not only is this duplication unnecessary and time consuming, but many of the policies are likely to become outdated during the 20 year life of the plan and may conflict with national policy in the future. These policies are identified within this submission, below.

Comments on the Draft Broads Local Plan

Section 4 - About the Broads - Spatial portrait

4.3 landscape

"There is no particular general building vernacular, but the traditional villages tend to have a variety of surviving older buildings which may have similar characteristics and be of considerable quality or interest, usually clustered near a staithe (traditional landing area), either on a river or connected to it by dyke, and surrounded by more modern housing of no particular distinction."

This is something of an unhelpful generalisation. The older buildings probably lacked any particular distinction at the time they were constructed, and the same is true of modern buildings today. This statement can be summarised as 'old is good, new is bad' and that is a very subjective judgement with no evidence base to support it. Like most areas, the Broads has evolved over time and this is reflected in its built heritage.

4.7 Navigation rights

“Some broads have public navigation rights, others have more limited access, generally for environmental or land ownership reasons...”

This is not an undisputed fact. The BA may have chosen, for pragmatic or financial reasons, not to take legal action against landowners for closing Broad to navigation, but many of these Broad were used for public navigation; once a public right has been established by prescription, it cannot be extinguished other than by Act of Parliament. This fact is enshrined in common law. The Local Plan should, at the very least, accept that there are conflicting legal opinions on this subject rather than make an assertion as though it were fact.

Section 5 - Policy context

5.2 National Planning Policy Framework

It is accepted that it would be impractical to reproduce the entire NPPF in the Local Plan. However, the chosen (limited) extract does not give a flavour of the overall thrust of the NPPF – it simply highlights a single policy (115 – conserving landscape & scenic beauty in the Broad) whilst apparently ignoring all the others. It would be useful, at least, to reproduce the core planning principles (para 17) and provide some links to some of the key policies relevant to the Broad, such as *supporting a prosperous rural economy* or *meeting the challenge of climate change, flooding and coastal change*.

Section 6 - Duty to co-operate

Question 1

The Authority appears to be in clear breach of its own Duty to Co operate Statement (section 2.2 (i) Co operation mechanisms – Direct links at member level), as it has excluded Broadland District Council's appointed councillor from the planning committee for over 6 months without explanation.

Section 8 - Vision, Objectives and Existing Policies

8.1 Draft Vision for the Broads

Question 2

The vision for the Broads pays little more than lip service to navigation, which is one of the Broads Authority's three statutory purposes. The word is mentioned once but is not followed up by any aspirations for the preservation and extension of the Broads navigation area, as required by the Broads Act 1988. In addition to the laudable goals proposed, the vision should talk about a flourishing navigation, where people are encouraged to take to the water in a diverse variety of ways, where navigation rights are protected and enhanced and where boating is supported and facilitated through maintenance and provision of moorings and other supporting infrastructure and services.

8.2 Draft Broads Local Plan Objectives (2012 to 2036)

Question 3a

Once again, navigation, tourism and recreation appear to have been included as afterthoughts, have been lumped in with one another (OBJ14) and lack focus or any strategic vision. The Authority has 3 equal statutory purposes and the objectives should reflect these and give equal weight to each.

Generally, the Broads Local Plan appears to extend its reach far beyond Broads specific policies and seeks to duplicate large swathes of National Planning Policy Guidance, the NPPF and other national policy frameworks and regulations. Not only is this duplication unnecessary and expensive, it is likely to leave the Broads Local Plan at odds with national guidance in the future. The policies will need to be kept under continuous review if they are not to fall out of step with national policies which will also be expensive.

Section 9 - Sustainable Development in the Broads

Policy POSP1 (DCLG/PINS model policy)

It would have been useful to see a copy of the actual model policy in addition to the altered version, for reference. I do not agree with some of the proposed amendments, which tend to reinforce the widely held perception that the Broads Authority believes itself to be some special case which needs to have its own framework of rules over and above local policies.

Note 2 the intention of the NPPF is to ensure that the BA will **always** work proactively with applicants, not just when it feels like it. To refuse to engage from the outset, due to a perception that there is no possibility of making proposals acceptable, shows unacceptable pre determination. The word 'always' should be retained.

Note 3 arguably the word 'jointly' is unnecessary but it does serve to stress that the parties should work together and that there is a joint responsibility to identify solutions.

Note 4 I do not believe that there is any requirement for development to meet the statutory purposes of the Broads Authority. Although development which meets the statutory purposes is of course desirable, the inclusion of these words implies that development which does not meet the statutory purposes is automatically unacceptable. Many proposals may not touch upon any of the 3 statutory purposes, for example, but that doesn't make them unacceptable in planning terms.

Note 7 this is unnecessary, unless there is an intention to apply disproportionate weight to NPPF policies which expressly relate to the Broads (of which there are in any event only 2).

POSP2 (sustainable development)

a) to c) place a positive obligation on applicants to comply with the Authority's statutory purposes, and to conserve and enhance the special qualities of the Broads. This is unrealistic, unreasonable and often impossible. A more realistic policy would be for applications not to conflict with these purposes and objectives as in item d)

Generally, the overarching policy places unacceptable positive planning obligations which, if rigidly enforced, would result in development only being possible by the wealthiest individuals and businesses. The thrust of the NPPF is for sustainable development proposals to be approved unless there are good reasons why not – a “what's the harm?” approach. POSP2 takes the reverse approach, only permitting development where there are positive enhancements or benefits beyond the proposal itself. This is contrary to the NPPF.

Much of the reasoned justification demonstrates the subjectivity of the proposed policy. What is included in 'landscape character' for example? Only natural features? Only features more than 100 years old? 50 years old? Only features which have not been managed by humans? The Broads has little or no 'natural beauty' it is a landscape which has been created and managed by humans over centuries from the drained marshes and wind pumps, to boatyards, pubs, houses and other buildings. Most of these things which we now value and cherish would never have been permitted under the proposed policy.

Design is another subjective area, especially in view of the varied nature of the local architecture as mentioned in the proposals. Care should be taken to maintain objectivity, especially in the choice of materials. Certainly materials should complement their surroundings, but there are conflicting ideas of 'sustainability'. Is timber, for example, which requires constant maintenance and early replacement, really more sustainable than modern alternatives which might last 25 years or more without attention? The word 'sustainable' is often (incorrectly) taken to mean 'traditional', but traditional materials are often the least sustainable when considered in a whole life context.

Policy PODM1 (water quality)

This policy is a duplication of effort with the Environment Agency, which is a statutory consultee. Why, for example, does the Broads Authority need to have its own policy on the means of disposing of sewage effluent when it will be consulting with the Environment Agency on individual applications?

PODM3 (water efficiency)

No justification is provided for requiring water efficiency measures in excess of the requirements of the Building Regulations, and it is the responsibility of water utility companies to provide adequate infrastructure for existing and new developments. It is not incumbent upon local planning authorities to respond to a lack of investment by utility companies by imposing additional costs on developers.

Grey water recycling and rainwater harvesting systems can be prohibitively expensive and consume energy and other resources for pumping and filtration. Where such a system is considered appropriate on riverside sites, consideration should be given to the use of river water, rather than the storing of rainwater next to a natural reservoir.

Policies POSP4/PODM4 (flood risk)

There is some question as to whether floating holiday accommodation is considered to be a water compatible use. Common sense dictates that it must be, as it is no different to a boat. Floating lodges or camping pods would for example be a popular extension to the Broads Tourism offering especially with anglers but have been resisted on the basis that they do not comply with the NPPG definition of 'water compatible'. Arguably, however, they could be considered to fall under the heading of 'docks, marinas and wharves' and consideration should be given to encouraging this form of development.

Policy PODM5 (surface water run-off)

This policy duplicates NPPF & NPPG policies and is therefore unnecessary.

Policy PODM6 (open space)

The joined up approach with district authorities is applauded

Policy POSP5 & PODM9 (climate change)

This policy duplicates national guidance, is unnecessary and will quickly become out of date. Encouraging a climate smart approach to development is supported, however.

Policy POSP6 (heritage assets)

Heritage assets deteriorate automatically with time, unless they are properly maintained. Without grant or charitable aid, assets need to have an economic value to ensure their future. Resisting any development which is perceived to be detrimental to the character, appearance or integrity of the building or structure, or insisting on unrealistic standards of design, may result in the asset deteriorating further or being lost.

Policy PODML11 (historic environment)

Old does not equal significant. Care must be taken to avoid imposing additional costs on developments just to preserve things which are old or keep things the same. The Broads has evolved over time and must be allowed to continue to do so.

Planning conditions requiring archaeological surveys or watching briefs should only be imposed when there are reasonable site specific grounds for doing so. Even a watching brief on a small site is likely to cost a 4 figure sum, which can impact the viability of the development.

Policy PODM12 (re-use of historic buildings)

In the absence of grant or charitable aid, historic buildings must continue to have an economic value in order to ensure their future. Resisting 'inappropriate' changes of use must be balanced against the need to ensure that the building has some future. It simply is not possible – or even necessarily desirable – to continue to use all buildings for the purpose for which they were originally designed. This policy is unnecessarily restrictive and generalised.

Policy PODM14 (energy demand)

The policy appears to value the character & appearance of heritage assets – along with historic interest and conservation – above the need for energy efficiency. Logically, if the Authority places such importance on reducing the impact of climate change, then energy efficiency should take priority. At the very least, the policy should be seeking a balance between heritage/conservation considerations and the need to reduce energy demand.

The Authority is basing its energy efficiency policy on its limited experience of two schemes – only one of which has actually been constructed. This is not a sufficiently broad evidence base and it would make more sense to require proposals to comply with relevant national policies.

Policy PODM15 (renewable energy)

The Broads needs to play its part in supporting renewable energy generation. It should not simply play lip service to the importance of renewable energy and then opt out on the basis that the Broads is 'special' – everywhere is special, in its own way. The fact that a development might alter the look of a landscape does not automatically make it inappropriate or undesirable. There would be no wind pumps across the Broads if that view had been taken in the 19th century, and the wind farm at Martham (for example) has its own beauty which adds to the character of the locality. All projects should be considered on their own merits and the plan should not discourage any form of renewable energy as a matter of principle.

Policy PODM16 (landscape)

Trees do not necessarily form an essential feature of the Broads landscape. In fact, in many areas immediately adjacent to the rivers and Broads they may have a detrimental impact on habitat and ecology. The policy should recognise that tree clearance is desirable in some areas, whilst other areas may need to be protected.

Policy PODM17 (land raising)

This criteria based approach is preferable to a ban on land raising. In an area where land is slowly sinking, and water levels are slowly rising, it is inevitable that some land raising operations will be necessary and not necessarily undesirable. Whilst it is accepted that it can be desirable to discover evidence of past human interaction with the environment, the future is at least as important as the past and the possible presence of hidden archaeology should not usually be an obstacle to development unless there are site specific considerations which indicate a likelihood of significant finds.

Policy PODM19 (utilities infrastructure)

It is not clear why there needs to be a special policy for infrastructure development, as any such development would already need to comply with other relevant policies, for example in relation to visual impact. Once again there appears to be a presumption against development unless there is special justification, whilst appearing to accept the fact that utilities infrastructure is a requirement of a modern society. Communications infrastructure is of particular importance, as rural coverage in the Broads is poor and planning authorities should be actively encouraging and facilitating such development.

Section 22 - retail

Oulton Broad needs special consideration as a village in decline, with a continued loss of shops and other services. As the southern 'gateway to the Broads', the Broads Authority and Waveney District Council need to take active steps to encourage and facilitate development in order to protect the heritage of this location as a tourist destination.

Policy POSP7 (getting to the Broads)

This policy lacks focus or detail. Although there is a general presumption in favour of the bicycle, the policy provides no clue as to how such a modal shift might be achieved, and does not consider the practicalities of expecting people to use a bicycle as their primary means of reaching a destination which may be a considerable distance away. The Broads is not a city, settlements are dispersed across a wide rural area and cars are often the only practical means of transportation.

Policy POSP8 (getting around the Broads)

The policy's objective of improving access to the water and creating new launching facilities is applauded.

Policy PODM23 (transport, highways & access)

This policy continues the anti car theme of the Local Plan, whilst ignoring the fact that, for most people, the car is the only practical means of transport within a rural area. Congestion is undesirable but can be reduced by a planning policy which encourages adequate parking provision and the free flow of vehicular traffic. The focus should be getting cars to their destination and off the road as quickly as possible, rather than pretending that everyone is suddenly going to abandon their car and ride a bicycle.

There is no mention anywhere in the Local Plan of the importance of ferries and river taxis to an integrated transport strategy. The Authority should be actively supporting and facilitating these sustainable services, through reduced (or free) tolls and mooring facilities. This is a surprising and concerning omission.

Policy PODM24 (changes to the Acle Straight (A47T))

This policy demonstrates a clear predisposition against the principle of dualling this important trunk road. There are clear economic and safety benefits to upgrading this stretch of road, and the constant blocking of this (and other A47 improvement schemes) over decades for environmental reasons has resulted in loss of life. Any ecological impact to such a scheme will be extremely short term, and it is not appropriate for the Broads Authority to seek to block trunk road improvements which will have considerable economic benefits to communities both within and outside of the Broads executive area.

The scheme is unlikely to have significant ecological impacts in excess of those already experienced through the routine management of the marshes and dykes which include regular ditching operations and the iconic views of the mills and marshes will not be lost by the widening of the road. The existing road is already a barrier for wildlife, and widening it is therefore unlikely to exacerbate the existing conditions in any meaningful way.

This policy can, by all means, list specific concerns which need to be addressed as part of any scheme, but at present it gives the impression that it seeks to make the project prohibitively expensive in the hope that it might be abandoned. The mitigation measures proposed are considered excessive in the context of the widening of a pre existing trunk road.

Policy PODM25 (recreation facilities parking areas)

This policy appears to ignore the fact that slipways and boat launching facilities can only be utilised by vehicles towing boats (although it is touched upon within the justification). A preference for public transport, walking and cycling for such facilities is clearly nonsensical and impractical. If slipways and boat launching facilities are to be encouraged, then it should be accepted that such facilities will be accessed by car and that adequate car and trailer parking must be provided.

Section 24 - Broads Economy

Question 6

Planning needs to be able to react to changes in the economy and market demands. Positive planning which lists 'desirable' uses of land and buildings in the minds of planners rarely matches what is commercially viable and this can result in derelict buildings and delays in project delivery. The National Planning Policy Framework makes clear that there should be a presumption in favour of sustainable development and it is inappropriate, time consuming and ultimately fruitless for planning authorities to draw up lists of 'appropriate' uses for existing buildings for which there may be no demand. Proposals for change of use of existing buildings should be considered in the light of the wider policies for protecting and enhancing the Broads (which should themselves be compliant with the NPPF) rather than getting hung up on historic uses of buildings for which there is no longer a demand.

The Broads economy is changing at an ever increasing pace, in common with the rest of the UK. Retailing has been and will continue to be greatly affected by changes in shopping habits driven by the availability of online options. Traditional boat building and other manufacturing will be affected by technological changes allowing rapid prototyping and more efficient build processes, which will inevitably result in the redundancy of some jobs and the creation of new ones with different skill requirements. Businesses may have to relocate, consolidate or close, and the planning process must be able to cope with these rapidly changing circumstances. Flexibility is therefore essential, meaning that policies should not be overly restrictive and must be capable of evolving over the life of the Local Plan.

The tourism industry has also experienced significant and accelerating change over the past 2 decades and there is every reason to suppose that this will continue. Customers demand ever higher quality at a lower price, and are constantly looking for something different to their previous experiences. This presents huge challenges to businesses which must be able to adapt quickly in order to compete, and planning policies should facilitate necessary changes without delay. A delay of a few months can easily mean that a whole year is lost, due to the seasonal nature of UK tourism.

More generally, the Authority should be proactive in encouraging developers to create employment opportunities and improved facilities both for visitors and the local community. Economic development should be at the heart of good planning, as a vibrant local economy provides the means of preserving the special characteristics of the Broads.

Policy POSP9 (Sustainable tourism)

This policy lacks objectivity and is full of words like 'appropriate', 'suitable' and 'sustainable' which are not clearly defined. This has the effect of allowing planning applications to be determined based on personal opinions of what is appropriate, suitable or sustainable, which is fair on neither the applicant nor planning officers. The lack of certainty or clarity in this policy is in breach of the guiding principles of the NPPF and National Planning Policy Guidance.

The policy, and the reasoned justification, has built in conflicts such as “supporting diversification of tourism where economically and environmentally sustainable”. This may lead to subjective judgements on what weight to apply to the conflicting demands of “diversification” and “sustainability”, meaning that the policy can be used to defend any outcome at all.

The policy needs to be clearer on how it will “protect against the loss of existing tourism and recreation facilities”. Simply preventing a change of use or development will not protect an existing facility, in fact it is likely to have the opposite effect. Successful tourism businesses like any other are driven by changes in customer demand and operators need to be able to adapt quickly in order to ensure the viability of their business.

The fixation on accessibility by means “other than a private car” rules out the vast majority of the Broads from any form of development at all especially when you consider that “small scale” or “local” development is rarely economically viable and is therefore, by definition, unsustainable. The reasoned justification seeks to spread visitor pressure across the system rather than focus on “honey pot” locations but the policy prevents this by permitting developments only in locations which are accessible by “sustainable” forms of transport which inevitably are the existing “honey pot” locations.

The recognition of the need for development to support land based accommodation and encourage diversification of the tourism base in the reasons justification is applauded, but this needs to be reflected more positively in the policy.

Policy PODM26 (sustainable tourism & recreation development)

Most of the comments above for POSP9 apply also to this policy.

I consider that the list of 12 principles of sustainable tourism & recreation development is overly restrictive and that it would be next to impossible for any development to comply with all of them.

The reasoned justification completely contradicts POSP9 which seeks to spread development across the system and avoid honey pot locations, by proposing that new tourism and recreational development should be in or adjacent to defined settlements and existing tourism sites. Whilst the reasons for the conflict are clear, the policies need either to resolve this conflict, or accept that it exists and create a much looser policy which allows all proposals to be considered on their own merits. The plan as drafted encourages subjective judgements on the suitability of a given location, justified by the application of arbitrary weight to either POSP9 or PODM26.

Policy PODM27 (holiday accommodation - new provision and retention)

Whilst the overall objective of this policy in supporting tourism is applauded, the policy is considered to be unreasonably restrictive and takes an overtly political stance against second home ownership which does not relate to planning. This might be defensible if properties in the Broads were being priced out of the reach of local residents and/or communities being compromised by a proliferation of second home owners who rarely visit or do not make use of local facilities but there is little or no evidence of this.

Second home ownership is a valuable part of the tourism mix within the Broads, with owners often being “regulars” in the local pubs & shops when they are in occupation and frequently letting their properties out to others either informally (to friends and family) or to other visitors on a commercial basis. Whilst the difference between permanent residential accommodation and holiday accommodation is understood and accepted, the distinction between a “second home” and “short stay accommodation” is woolly, vague, arbitrary and smacks of the politics of envy.

The requirement to “prove” that holiday accommodation will be “viable in perpetuity” (condition d) is impossible to comply with and should be removed.

The presumption against static caravans should be tempered with an acceptance not only that they can be appropriate in some locations, but that not all caravans have the appearance of “tin boxes”. Timber (or faux timber) exterior cladding can make caravans visually attractive and “appropriate” in many Broads locations, including environmentally sensitive areas which reflect the special qualities of the Broads.

The requirement to prove that a business is economically unviable over a period of 12 or even 24 months is grossly unreasonable and could easily result in the failure of a business which might otherwise be saved through a change of use or other development. Requiring the owner to fund this destruction of his asset simply adds insult to injury!

Policy POSP10 (navigable water space)

This policy is supported, particularly the focus on enhancing the navigation rather than simply preserving what we have.

It should be noted that para 5 of the reasoned justification asserts that landowners require planning consent for dredging disposal but this is not always the case. Planning consent is only required where the disposal would result in a material change to the receiving land. The insertion of the word “may” (“who *may* require planning consent”) would fix this.

The words “beneficial use of dredgings will be expected” are over prescriptive, as beneficial use is often not economically practical. For example, transporting dredged material by road to a site which needs to be raised may be undesirable and unaffordable compared to simply disposing of the material on site. “Beneficial use of dredgings will be encouraged” would be a more pragmatic and realistic approach.

Policy PODM28 (access to the water)

This policy is supported, particularly the focus on encouraging access to and use of the waterways.

Policy PODM29 (riverbank stabilisation)

Piling has traditionally been used as a means of stabilising banks and providing moorings throughout the Broads and the presumption against this is not supported. Soft engineering is certainly appropriate in some locations, but this comes with its own risks of increased siltation and erosion and can often result in hazards to navigation requiring marker posts which can be more visually intrusive than piling and less safe especially when visibility is poor.

Piling in itself does not give an urban feel it simply shows evidence of human intervention which is true of the entire Broads. The Broads themselves, wind pumps and open marshes are all evidence of human intervention and piling is simply one other method by which humans have managed the Broads over centuries. Certainly longevity and the cost of maintenance is an important consideration, however, and therefore encouragement should be given to the use of sustainable materials with a longer life such as recycled plastics, which have a similar appearance to steel piling.

The presumption against piling particularly in the Broadland Flood Alleviation Project has also resulted in a huge reduction in the availability of informal moorings, to the detriment of the visitor experience.

Policy POSP 11 (mooring provision)

This (short) policy is in conflict with PODM29 which discourages the use of piling and, by extension, the provision of moorings.

Policy PODM30 (moorings, mooring basins and marinas)

The overall thrust of this policy is supported, particularly the recognition of the need to improve the availability of short stay visitor moorings throughout the Broads. However, imposing a requirement on developers to provide short stay moorings should not be used as a way of the Authority avoiding its own responsibility to provide moorings at strategic locations.

The prescriptive approach to providing visitor moorings as part of any development may not be appropriate in all circumstances although there is undeniably a shortage of visitor moorings in the Broads, this shortage tends to be focused in specific areas rather than across the entire system. In some areas (especially in the southern broads where hire fleet numbers have collapsed), there may be an over supply of visitor moorings in relation to demand, and so adding further visitor moorings in those locations would be pointless. This policy needs to be supported by a map of visitor mooring provision, with deficiencies identified and specifically addressed in the policy rather than making sweeping generalisations.

The attempt to define 6 different “mooring types” is arbitrary and doesn't recognise the fact that mooring provision and occupation is rarely defined in this way. In most marinas, there will be varying intensities of use of the vessels moored within them with some boats hardly used at all and others used for months at a time. Clearly, a marina which was suddenly filled with full time live aboard families instead of casually used boats would represent an intensification of use but there is no evidence of such a development anywhere on the Broads.

This arbitrary distinction of mooring types could, if translated into policy, lead to a ghetto effect, where different areas are zoned for different “mooring types” and this would be undesirable, compared to the current mix of uses which works well and encourages co operation and tolerance amongst different users of the system.

A better approach would be to identify specific issues such as a lack of visitor moorings in one location, or demand for residential moorings in another, and apply a maximum permitted percentage for those “types”. This would allow for a mix of uses according to demand, whilst maintaining a sensible level of control to ensure undesirable intensifications of specific uses which might have other adverse effects.

Policy POSP12 (residential development)**Policy PODM31 (new housing in the Broads Authority Executive Area)**

This policy focuses exclusively on land based housing, and concludes that there are few opportunities for significant housing development within the Broads due to the constraints of flooding and existing settlement boundaries.

Serious consideration therefore should be given to a policy which supports and encourages the use of floating accommodation to help fulfil the Authority's Objectively Assessed Housing Need. This could take the form of encouraging residential moorings for boats, or allowing small developments of purpose built houseboats. This model is being used successfully in other countries such as the Netherlands.

Jenner's Basin at Thorpe Island, for example, could be an ideal location for such a development, as it has excellent accessibility by public transport, is close to the city of Norwich and is adjacent to an existing development boundary.

Policy PODM33 (residential development within defined development boundaries)**Question 8**

In the spirit of encouraging less prescriptive planning policy, discouraging arbitrary limits and encouraging objective policy making and planning decisions, the removal of the 5 dwelling threshold is supported.

Question 9

The draft plan confirms that the development boundary and flood risk are two separate things and that compliance with one does not mean automatic compliance with the other. Also, it is a matter of fact that some existing properties are in a flood risk zone. Therefore there is not necessarily a problem with areas of increased flood risk being included within a development boundary, as long as it is clear that development boundaries are an aid for the interpretation of specific policies rather than a general licence to develop. Floating buildings may, for example, be permissible within areas of flood risk, whilst some fixed buildings may not, even though they might be within a development boundary.

Policy PODM35 (new residential moorings)

The requirement not to lose visitor moorings should be balanced by an objectively assessed need for visitor moorings in the particular locality proposed for residential moorings.

Care should be taken to avoid the use of the term "houseboat" in this policy, because the Authority more widely considers houseboats to be a specific type of floating structure, and not necessarily the same thing as a boat used for residential purposes.

It is unclear why a boat used for residential purposes would have a different impact on a protected site or species compared to any other vessel moored in the same location.

There is no clear definition of “main residence” in the policy and this continues to create confusion and uncertainty for planning applicants and landowners. If, for example, a person occupies their boat during school term time and lives in a house during school holidays, which one is their main residence?

The reasoned justification steps outside the scope of planning in its requirements relating to the techniques of mooring a vessel, and monitoring the vessel at times of flood. Such considerations are for the master of a vessel to consider, rather than the landowner, and are in any event equally relevant to any vessel not just one used for residential purposes. These two considerations should be removed from the plan.

The justification touches upon the need for floating buildings as part of a future strategy which takes account of flood risk and climate change. Urgent consideration should be given to such a strategy which has been successful in other low lying countries so that the use of floating buildings can be actively encouraged and promoted as part of the sustainable development of the Broads.

Question 10

Development boundaries do not relate to the provision of essential services or infrastructure, but to the existence of a clearly defined settlement. As per the reasoned justification for policy PODM33:

The purpose of a development boundary is to consolidate development around existing built up communities where there is a clearly defined settlement where further development, if properly designed and constructed, would not be incongruous or intrusive because of the size of the settlement.

Since development boundaries relate to existing built up communities and settlements rather than mooring facilities, it seems entirely arbitrary and inappropriate to restrict residential moorings such that they can only be permitted within such boundaries especially in view of the fact that most if not all mooring basins, marinas and boatyards are expressly excluded from being within a development boundary. This has the effect of making the policy essentially site specific and not capable of being considered as a general development management policy for the Broads as a whole.

Clearly the availability of essential services is an important consideration for residential mooring provision, but this is adequately covered in the other strands of the policy and does not relate directly to the existence (or otherwise) of a development boundary. Therefore, I would support the removal of the development boundary criteria from PODM35 in order to allow more flexibility and objectivity when assessing proposals for residential moorings.

Policy PODM36 (permanent and temporary dwellings for rural enterprise workers)

It does not seem to be appropriate for temporary residential moorings to be lumped in with temporary dwellings. The considerations are quite different, evidenced by the fact that most of the conditions in the draft policy relate to building design rather than the existence of a place for an employee to sleep. It appears that “residential mooring” has been added to the policy as an afterthought.

It would be far simpler to incorporate an additional consideration relating to temporary accommodation into PODM33, rather than use PODM36 which relates to buildings and caravans.

Any policy relating to temporary accommodation for employees should give careful consideration to the fact that someone living on site will make far less use of the local road network than someone who has to commute to work each day, so their occupation can be considered to be a positive contribution to sustainable transportation and living.

Policy PODM40 (design)

Care should be taken to maintain objectivity, especially in the choice of materials, and the over use of the word “appropriate” can give rise to subjective judgements which are not evidence based. Certainly materials should complement their surroundings, but there are conflicting ideas of “sustainability”. Is timber cladding, for example, which requires constant maintenance and early replacement, really more sustainable than modern alternatives which might last 25 years or more without attention? The word “sustainable” is often (incorrectly) taken to mean “traditional”, but traditional materials are often the least sustainable when considered in a whole life context.

Policy PODM42 (designing places for healthy lives)

This policy covers ground which is better left to national policy makers and which will in any event change significantly over the life of the Local Plan.

Policy PODM43 (Safety by the Water)

Although water safety and the prevention of drowning is undeniably important, this may not be a suitable subject for inclusion in a local plan, as it is not directly related to planning. Certainly the BA should have a water safety policy and it should work in collaboration with district and parish councils to deliver improved awareness and safety around water. But its inclusion in a planning document is questioned.

Policy PODM45 (conversion of buildings)

The reasoned justification suggests that permitted development rights for change of use of buildings are less permissive in the Broads. In fact, this is only true for certain limited classes of agricultural and forestry developments. Most changes of use permitted under the GDO are unaffected by the fact that a building is located in the Broads.

Policy PODM47 (leisure plots and mooring plots)

Judgements about suburban appearance and domestic paraphernalia seem to be subjective and whilst a new leisure plot might well change the character of an otherwise undeveloped part of the Broads, the same cannot be said of some dykes and marinas which are already developed and which include existing leisure plots. Dykes and marinas around Brundall or Wroxham, for example, would not be adversely affected if additional leisure plots were permitted, as they already form an intrinsic part of the existing landscape. A blanket ban on all new leisure plots appears to be unduly restrictive.

Site Specific Policies

Absent policy on residential moorings - Waveney River Centre, Burgh St Peter

Having regard to the recent planning history and extensive discussions with both the Director and Head of Planning at the Broads Authority, I am surprised that there is no site specific policy for this marina (of which I am a Director). It was identified in June 2015 by Planning Officers as being suitable for residential moorings.

Although the marina does not fall within a development boundary, the Head of Planning said that, given the range of facilities on site, it would not be contrary to the objectives of the policy if a small number of residential moorings were permitted. The marina is part of a holiday destination which includes a pub, shop, swimming pool and various types of visitor accommodation.

It was argued that, although the site does not fall within a development boundary, it does not have the attributes of an open countryside location and that the site should be considered positively in view of the policy presumption in favour of residential moorings in suitable locations.

Therefore it is suggested that a site specific policy for residential moorings in this marina should be included in the Plan, in line with the advice of the Head of Planning as outlined above.

Policy POBEC1 (former Loaves & Fishes, Beccles)

There is no adequate justification provided for the policy of resisting residential development. The property has been empty for at least a decade and traded marginally before that, being operated as a lifestyle business by the owners (who lived in one of the adjacent houses). Although the property is located by the water, there is insufficient visitor trade from the river to make the business economically viable, and there are no other tourist facilities nearby. The surrounding properties are predominantly residential and a change of use to residential is the most logical and practical use for the building.

Policy POGTY1 (Marina Quays)

Could this site be considered for residential moorings or even floating buildings? These could look quite attractive on this site, on the approach to Yarmouth Yacht Station, and ought to be a suitable location in terms of access to amenities.

Policy POXNS12 (Local Green Space)

The area of land stretching from the rear of Church Close to Pits, Chedgrave appears to have been nominated as a result of a neighbour dispute and does not fulfil the criteria required of a Local Green Space. Not only could such an allocation adversely affect the viability of the boatyard of which this land is part, but the area offers no apparent special significance to the local community.

Conclusion

The Draft Local Plan is an evolving document which has clearly benefitted from considerable research and effort by Broads Authority Officers. It is hoped that the above comments and suggestions can be incorporated into the finished document and I will be pleased to answer any questions or expand upon any of the suggestions made.

James Knight FRICS
February 2017

Phone: [REDACTED]
Email: [REDACTED]

Natalie Beal
Planning Policy Officer
Broads Authority

LRW ref:70635.1

By Email Only

27 January 2017

Dear Natalie,

Land at 21a Church Close, Chedgrave

I have been instructed by Mr James Tubby, owner of the above site, to make a representation in response to the Broads Authority Local Plan Preferred Options Consultation.

It is noted that the site has previously been considered as part of the replacement Local Plan process and, as part of this process, is the subject of a topic paper which sets out the Authority's reasons for proposing neither an allocation (by way of site specific policy) or extension to the existing settlement boundary at the site (Appendix A of report titled 'Broads Local Plan December Bite Sized Pieces dated 9th December 2016).

In addition, the site has been subject of a recent planning application (BA/2015/0123/FUL). I understand that this application was withdrawn following officer advice regarding the principle of the development and issues concerning highways.

As such, there is no need to reiterate the history of the site in detail; other than to emphasise that this is a location which, prior to the Broads Authority Local Plan, lay within the Chedgrave development boundary and, as such, was a site where the principle of residential development was considered to be acceptable.

It is noted that the report considers, and dismisses, the possibility of extending the existing development boundary to include the site (i.e. restoration of previous development boundary).

The report concludes that extending the development boundary to include the site would be contrary to 'usual practice'. It cites the development boundary in the adjoining South Norfolk District Council area and another within Oulton Broad (distant to the site, but within the Broads Authority's Executive Area) as precedent for this decision.

Whilst these other examples are noted, it is the case that each site must be treated on its own merits: in the case of the South Norfolk boundary in Chedgrave the garden area excluded from the development boundary is a relatively narrow strip of land with constrained access and located between existing residential plots to the immediate east and west. Development in this location would likely face significant obstacles in achieving satisfactory access and would be problematic in maintaining and achieving an acceptable standard of amenity for existing and future residents. This is not the case at the site subject of this representation; where a limited amount of well-designed development could be easily accessed using an existing access onto the public highway (discussed in more detail below) and issues of amenity could be readily addressed.

In the case of the site at Oulton Broad, the large gardens excluded from the development boundary front directly onto the Broad and, as such, are extremely prominent in the local landscape: there is clear landscape justification for this approach. Again, this is not the case at this site, which sits between estate style residential development to the north and a boatyard and boat storage area to the south. Whilst it is noted that the Authority's Landscape Architect expressed reservations regarding the planning application which was submitted, the response does not suggest that this site is sufficiently sensitive in landscape terms so as to be undevelopable; merely that the particular scheme submitted provided insufficient detail to enable a proper assessment of the impact of the development on mature trees.

Whilst it may be that the Authority can highlight other incidents of precedents to respond to the above, the examples simply serve to emphasise the limited role of precedence in instance like this: each matter must be treated on its own merits.

In this case the site is sustainably located within a settlement which has been identified as being a suitable location for new residential development (the villages are identified as a Key Service Centre by South Norfolk District Council). Whilst it is acknowledged that highways have expressed some reservations the landowner is currently engaged in discussions with the relevant officer to resolve this issue, and is confident that the level of development achievable on the site (i.e. a very modest number of new dwellings) would have no adverse highways impacts.

In respect of landscape impacts, as stated above, the response from the Landscape Architect to the previous application expresses concern with that scheme. It does not suggest the site is undevelopable, nor is the site or general surrounding area highlighted within the Broads Landscape Character Assessment as an area being particularly sensitive to small scale development such as that proposed.

It is the case that the Broads Authority appear to concur with the general assessment set out above, noting in the report to committee that issues regarding landscape and highways are 'potentially surmountable'.

Whilst accepting this, the Authority state that, in any case, it has already exceeded its Objectively Assessed Housing Need (OAN) for delivery of housing within the relevant market housing area (Central Norfolk) and, as such, has no need to allocate sites such as the application site.

As a reason for not seeking to permit sustainable development this is not convincing, given the requirement at paragraph 47 of the NPPF for all local planning authorities to '*boost significantly the supply of housing*'. Whilst it is true that the NPPF also offers a high level of protection to the protected landscape of the Broads, this is a site immediately adjacent to a settlement boundary and which could be developed sensitively and without adverse landscape impacts. The protected status of the landscape within the Broads does not divest

the Authority of its requirement to permit sustainably located development where there would be no adverse impacts.

In addition, it is not clear that the OAN has, in fact been met or exceeded. Paragraph 47 of the NPPF requires local planning authorities to *'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area'*. Paragraph 50 explains what is meant by market and affordable housing, and makes it clear that it should include consideration of people wishing to build their own homes.

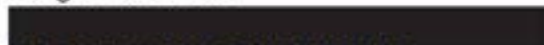
The Central Norfolk Strategic Housing Market assessment 2015 (January 2016) recognises that the OAN for self-build dwellings is unknown and that further work is required to identify this need. Given this, it is unclear how the Authority can state that the OAN need for market and affordable housing – including those wishing to build their own homes – has been met or exceeded. Allocation of this site – which by its location, nature and scale readily lends itself to a self-build project - would go some way to satisfy the requirement to proactively and positively plan for self-build housing proposals as required by paragraph 50 of the NPPF (which required authorities to plan for a mix of housing) and meet their requirements under the Self-Build and Custom Housing Act 2015.

For these reasons it is requested that consideration once again is given to allocation of this site for an appropriate level of residential development.

Yours sincerely,



Fergus Bootman



LA RONDE WRIGHT LIMITED

Planning Services
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
Norfolk
NR1 1RY

03 February 2017

Dear Sir/Madam,

Broads Local Plan Preferred Options Consultation

La Ronde Wright Ltd act on behalf of the trustees of the Arminghall Settlement Crown Point Estate to submit representations to the above consultation on their behalf.

This submission is a focused submission and does not seek to comment on all policies or questions posed within the preferred options consultation document. The following policies within the preferred options are supported:

- POSP9 - Sustainable Tourism;
- PODM26 - Sustainable Tourism and Recreation Development;
- PODM27 - Holiday Accommodation - New Provision and Retention;
- POSP13 - New Community Facilities;
- PODM41 - Visitor and Community Facilities and Services;
- PODM42 - Designing Places for Healthy Lives.

Question 7 – Affordable Housing

There might be circumstances where more than half of the affordable dwellings on a rural exceptions site (outside of development boundary) are needed as open market to provide grant-free cross-subsidy. We currently propose to say 'most of the proposed dwellings would be affordable'. Do you have any thoughts on the wording of this part of the policy? What are your reasons for your comments?

The wording of this policy is supported. Market housing is typically required to cross-subsidise affordable housing exception sites in the region given current high development costs and limited development values which can be achieved in the eastern region compared to the South East. The policy is consistent with paragraph 54 of the NPPF which states "Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs."

Question 8 – Scale of New Residential Development

What are your thoughts on the removal of the 5 dwelling threshold?

The removal of the five-dwelling threshold is supported. The former threshold is inconsistent with the presumption in favor of sustainable development in the NPPF. It is only appropriate to consider the scale of development on a case by case basis.

We would submit that sentences 1 and 3 of policy PODM33 appear to be contradictory.

Policy POWH11 - Whitlingham Country Park

The policy is supported in principal however, in closer examination could be simplified and worded in a more positive manner. We have provided a suggested reworded policy below. This reworded policy retains the criteria, however we would question if they are necessary as they effectively repeat matters which will be material and policy considerations in any planning application. For example, there are separate highway and sustainable travel policies which will require consideration in any proposal. The only criterion which is perhaps specific to Whitlingham Country Park is the last criterion relating to the management of the park.

We are not sure that it would be clear what exactly is meant by the term bio-security in the policy. The Oxford English Dictionary definition of bio-security is:

“Procedures or measures designed to protect the population against harmful biological or biochemical substances.”

We have revised the wording of the second sentence to better reflect the positive and proactive approach supported by the NPPF and specifically paragraph 28 which states that plans should:

“support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural services centres.”

Policy POWH11: Whitlingham Country Park Inset Map 11

Whitlingham Country Park will continue to be managed to provide recreation and quiet enjoyment on land and water, supported by scenic landscape and wildlife habitat.

Further development of buildings, ~~and~~ facilities, ~~and sustainable compatible~~ recreation, ~~leisure and tourism~~ ~~and visitor~~ uses which contribute to these aims will be encouraged. The following considerations will need to be taken into account in determining planning applications: supported where they:

- a) ~~Are of high quality~~ Design quality and materials;
- b) ~~Contribute positively to~~ The river valley landscape and the setting of the Crown Point Registered Park and Gardens;
- c) The need to avoid a proliferation of buildings in the area, and provide for shared use of these buildings where practicable;

- d) The ability of the proposals to encourage travel by alternative modes of transport;~~improve provision for cycling and pedestrians;~~
- e) The transportation implications of the development; ~~Do not generate levels or types of traffic which would have adverse impacts on safety and amenity on Whitlingham Lane and the wider road network;~~
- f) ~~Have assessed and addressed~~ The impact of the proposal on existing uses, users or activities (on land and water) and on the quiet enjoyment of the area;
- g) Biodiversity impacts and the scope for enhancement (?); ~~Provide bio security measures;~~
- ~~h) Provide biodiversity enhancements;~~
- i) The ability of the proposals to contribute to the health and wellbeing of users;
- j) The ability of the proposals to improve the visitor experience; and
- k) The ability of the proposals to support the sustainable management of the Park.

Any proposals that affect car parking in the area need to be thoroughly justified and based on assessment of the use of the car parks.

Should you have any queries in relation to the above submission please do not hesitate to contact me and we look forward to being involved in later stages of the plan preparation.

Yours sincerely,

LA RONDE WRIGHT LIMITED

Lottie Carlton

From: Les Brown [REDACTED]
Sent: 03 February 2017 12:40
To: Planning Policy Mail
Cc: Samuel Dacre
Subject: Les Brown Associates for Brundall West Marina

Categories: Ack and Filed

Les Brown Associates for Brundall West Marina.

The model Policy POSP1 promotes the principle of sustainable development and the need for Authorities to work positively with developers to provide solutions such that the majority of proposals can be approved. This is underpinned by Policy POSP2 which also supports the presumption in favour of development subject to a number of tests. These policies are fully supported.

In response to current Environment Agency advice on flood risk and the tests in paragraphs (x) Which seeks sustainability and resistance to climate change is understood and
(xiii) Consideration of flood risk taking into account the likely changes as a result of climate changes

We feel there should be a statement in the policy which accepts that in the Broads Area there has historically been many solutions to development and flood risk. In part of the reasoned justifications for the policy it is acknowledged that innovative solutions are required to minimise impact of climate change and flood risk. However the policy itself should recognise there is significant potential for such innovative design solutions in areas of high flood risk and that flood risk solutions put forward by developers will be proactively and positively considered against the Environment Agency advice which is to a large extent generic and does not take account of development in unique locations such as the Broads where some 95% of the area is acknowledged as in an area of high flood risk.

Policy POSP9 (PODM26/PODM27)

These policies are supported however there should again be recognition that in areas of high flood risk innovative solutions to buildings which can be shown to be sustainable in the light of flood risk and climate change will be encouraged/supported as well as considering the advice within the Flood Risk SPD and Environment Agency recommendations.

Could you please acknowledge receipt of these comments.

Regards

Les Brown



Loddon & District Business Association
Speaking with one voice

Marsh View House
Pits Lane
Chedgrave
Norfolk
NR14 6NQ

26th January 2017

The Planning Officer
The Broads Authority
Yare House,
62-64 Thorpe Road,
Norwich,
Norfolk,
NR1 1RY

Dear Sir

Broads Local Plan Preferred Options Consultation

I am writing on behalf of the Loddon & District Business Association which represents over 70 businesses. and seeks to protect the interests of the business community in the Loddon/Chedgrave area

The Association has considered the Local Plan Options and we have the following observations to make. These are in respect specifically of the proposal to designate land adjacent to Pits Lane, Chedgrave which is land owned by a member of the Association.

We are concerned that it would appear possible for a private individual to initiate alone, proposals which have a material effect upon private land and the businesses operated legitimately from that land.

We query whether the land in question is really suitable for this type of treatment?

It is marshland intersected with drainage dykes and with rough vegetation. It is all in private ownership and in essence no different from the acres of marshland found elsewhere in the Broads area. A small part of the land is used for boat storage and for occasional customer parking. There is no public access to the land and none is or will be permitted. It is not suitable for development because of the nature of the land as flood plain, the marshy nature of the land and its inaccessibility because of the drainage dykes. There appears little in the way of bio-diversity particularly as

much of the land has recently been cleared of vegetation to enable the drainage ditches to be maintained.

We note that The Department for Communities and Local Government guidance on open space states under the heading 'What is Local Green Space', that Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities. We are not aware that the land has any **important** significance to local communities. Where is the evidence to support this criterion? In addition, the heading 'Can all communities benefit from Local Green Space?' states that Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighborhood in a town or city. How has this been demonstrated and what part of the local community has expressed this opinion? In paragraph 011 of the same Guidance, there is reference to existing designations of the land including National Park and suggests that consideration is given as to whether any additional local benefit would be gained by designation as Local Green Space. We assume that this land forms part of the BA National Park. How is it considered that this designation will have any additional benefit over and above the restrictions imposed by the designation as National Park? Paragraph 77 of the National Planning Policy Framework states 'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife
- where the green area concerned is local in character and is not an extensive tract of land'

Condition 1 is presumably satisfied as the land is in reasonably distance of the built area of Chedgrave. However, condition 2 refers to particular local significance (for example) because of its beauty, historic significance, recreational value, tranquillity or richness of wildlife. How is this demonstrated and what significant features have been taken into account in suggesting this designation? Condition 3 is relative but one might find it hard to describe the land as 'local in character' but might be considered more as an extensive tract of land.

The Department for Communities and Local Government guidance on open space under the paragraph heading 'Does land need to be in public ownership' states that the Local Planning Authority (LPA) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan. We understand that there has been little or no contact by the LPA with individual owners and indeed there seems to have been a considerable lack of information available to land owners and to the public.

We believe that the following matters are relevant:

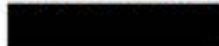
1. Why the governments planning guidance has not been followed in this case?
2. How does the LPA think that this land is demonstrably special to the local community and in particular how it conforms to the guidance in paragraph 77?
3. As the land forms part of a National Park, what additional benefits does the LPA think will gained?
4. The BA Nomination and Assessment Form refers to encroachment onto the land. The LPA must be more specific about the form and extent of this encroachment.
5. The LPA should be more specific as to the extent of land removed from the plan where titled 'This is a building and curtilage. Remove from allocation.' Why has the LPA not removed from the plan other areas which are lawfully used for buildings, boat storage and occasional customer parking if these are not currently excluded on the plan.

It is evident from the plan attached to the BA Nomination and Assessment Form has been amended from the original by the exclusion of certain areas. It is now unclear as to the exact boundaries of the proposal. The significance of an oval and a triangular shape as boundaries seems to be questionable.

In the meantime, we would suggest that the proposal is withdrawn pending proper consideration by the community as represented by the Chedgrave Parish Council which so far has not been specifically informed of this matter.

Yours faithfully

David Johnson
Secretary
Loddon & District Business Association



Respondent: Marine Management Organisation

Lottie Carlton

From: Consultations (MMO) [REDACTED]
Sent: 12 December 2016 09:29
To: Lottie Carlton
Subject: RE: Broads Local Plan – Preferred Options Consultation

Good morning Lottie,

Thank you for giving us the opportunity to comment on the draft Broads Local Plan.

I am very pleased to see reference to the MPS and East Marine Plan including the vision and that they have influenced the local plan.

The coast and marine environment is well referenced throughout the plan, directly and indirectly eg climate change and flood risk etc.

It is great to see a policy specific to the coast (POXNS3) – I would support this policy remaining, especially as you have linked in back to the UK vision for the seas.

I also like the references to the importance of maintaining the broad's for not only the environment but also the wellbeing and economic aspects eg when you mention the marina and boatyard and retention of marine skills. These make the plan a well-rounded document.

Many of the policies and supporting text link well to the east marine plan objectives and policy as I would expect given the nature of the area in question. I understand that you would not wish to reference each marine plan policy within the local plan, but you could highlight key policy in east marine plan that is relevant to your local plan within the SA.

If you would like to discuss this further please feel free to call me.

Kind regards,
Stacey

Stacey Clarke | Marine Planning Officer | Marine Planning Lowestoft | Marine Management Organisation

Direct line: [REDACTED]

| Address: District Office, Pakefield Road, Lowestoft, Suffolk, NR33 0HT

[Website](#) | [Twitter](#) | [Facebook](#) | [Blog](#) | [YouTube](#)

[Subscribe to our marine planning newsletter](#)

From: Lottie Carlton [REDACTED]
Sent: 02 December 2016 11:48
To: Consultations (MMO)
Subject: Broads Local Plan – Preferred Options Consultation

Dear Ms Angela Gemmill Relationship Manager Marine Management Organisation

Broads Local Plan – Preferred Options Consultation

The Broads Authority is producing a new Local Plan. The new Local Plan will have policies and land use allocations to help determine planning applications.

Respondent: Milner, A

Lottie Carlton

From: Natalie Beal
Sent: 14 December 2016 09:03
To: Lottie Carlton
Subject: FW: Local Green Space nomination

-----Original Message-----

From: Andrew Milner [REDACTED]
Sent: 13 December 2016 18:29
To: Natalie Beal
Subject: RE: Local Green Space nomination

Thank you Natalie. I agree with your assessment and welcome the area that is to be included in the Local Green Space. Andrew

=====

Message Received: Dec 05 2016, 03:02 PM
From: "Natalie Beal"
To:
Cc:
Subject: Local Green Space nomination

Dear Sir

You nominated a local green space for inclusion in the Local Plan.

Here is our assessment: http://www.broads-authority.gov.uk/_data/assets/pdf_file/0005/827276/Appendix-L-i-Local-Green-Space-Nominations-and-Assessment3.pdf

Please be advised that the consultation period of the Preferred Options version of the Local Plan is now open.

Please follow the link below.

<http://www.broads-authority.gov.uk/planning/planning-policies/development/future-local-plan>

Yours faithfully

Natalie Beal

Natalie Beal
Planning Policy Officer
01603 756050

--
Scanned by iCritical.

Respondent: Molineux, C

Lottie Carlton

From: Natalie Beal
Sent: 30 January 2017 10:37
To: Lottie Carlton
Subject: FW: Website contact enquiry - ref: 875741

From: [REDACTED]
Sent: 26 January 2017 14:18
To: Planning Mail
Subject: Website contact enquiry - ref: 875741

Reference number: 875741

Name: candice Molineux

Email: [REDACTED]

Phone: [REDACTED]

Type of contact: Complaint

Who to contact: Planning

Comments: The map that has been released for the Broads Local Plan of Inset Map 1 Acle is incorrect. It shows markings for Cemetery Extension and Playing Field extension. This land still belongs to the Molineux estate and should not show these highlighted areas, the highlighted areas have only been historical suggestions from the Acle Parish to acquire the land unsuccessfully. Please would you confirm the removal of these highlighted areas on your plans. Thank you Candice Molineux F P Molineux Ltd



Natalie Beal
Planning Policy Officer
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

planningpolicy@broads-authority.gov.uk

BY EMAIL ONLY

Dear Natalie

Local Plan for the Broads – Preferred Options Consultation Plan Period 2012-2036

Thank you for your consultation regarding the above, dated 2 December 2016, which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Local Plan for the Broads – Habitats Regulations Assessment

We commend the Broads Authority on the production of an exemplary Habitats Regulations Assessment (HRA) of its Local Plan. The report *Habitats Regulations Assessment of the Local Plan for the Broads*, dated October 2016, and prepared by Footprint Ecology, is thorough, clear and evidence based. Natural England is satisfied that the HRA provides a comprehensive assessment of the likely significant effects of the Local Plan on European sites and meets the requirements of the Conservation (Habitats & Species) Regulations 2010 as amended ('the Habitats Regulations').

We are pleased to note that the majority of modifications proposed in the Table 2 of the above HRA report have been made to the text of the policies in order to remove likely significant effects on European sites. For where the recommended modifications have not been fully reflected in the Local Plan, please see our comments on *Policy PODM31* under the *Preferred Options Consultation* heading below. In order for it to be concluded that the Local Plan is unlikely to have a significant effect on European sites and that an Appropriate Assessment will not be required, we recommend that all the modifications, identified in the HRA report, are made in full to the relevant Local Plan policies.

Local Plan for the Broads – Preferred Options Consultation

Natural England welcomes and supports the production of the *Local Plan for the Broads – Preferred Options Consultation 2012 -2036*.

In particular, we support and welcome those policies that seek to protect, maintain and enhance the special features and aspects for which the Broads was designated, and address those environmental interests within our remit. We have the following specific comments to make:

1.3. Habitats Regulation Assessment (p4)

For clarity, it would be helpful to add some explanatory text which lists those designated sites that are covered by the Habitats Regulations Assessment (HRA), ie Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites, and that these will be referred to collectively as 'European sites' in the Local Plan document, for example under xii of *Policy POSP2: Sustainable Development in the Broads* it refers to "...European and national nature conservation designations...".

Policy POSP2: Sustainable Development in the Broads (p28)

Under the *Nature Conservation* bullet point there appears to be a typo in the second sentence "Because all National Nature Reserves (NNRs_ are also SSSIs/**ASSIs**,...". In the third sentence Ramsar sites should be added to the text as some NNRs are also designated as these.

Policy PODM2: Boat wash down facilities (p35)

We welcome and support this policy to help reduce pollution impacts on the natural environment and the threat from invasive alien species.

15 Soils (p58)

Regarding the question on how the Local Plan should address soil issues, we recommend that an additional generic soil policy is added (in addition to *Policy PODM10: Peat*) which covers the issues raised in our previous response (our ref 179178) to the Issues and Options consultation stage (our letter dated 1 April 2016), and copied below:

"Soils (including protection of BMV land) – the issues of peat and mineral resources have been identified but we advise that soils in the wider sense should also be scoped in. Soil is a finite resource and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. 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. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land."

Policy PODM13: Natural Environment (69)

Monitoring indicator – 'Planning Application Habitat Regulation Assessments completed'. We suggest that as most local planning authorities usually seek to adopt the 'shadow HRAs' provided by applicants, the indicator could be amended reflect the **quality** of HRAs submitted and adopted by the Broads Authority. It could be amended to read 'Planning Application Habitat Regulation Assessments completed **correctly at first attempt**'.

Policy PODM19: Utilities Infrastructure Development (p78)

We welcome and support this policy to help protect the nationally important landscape of the Broads.

Policy PODM24: Changes to the Acle Straight (A47T) (p93)

Natural England supports this policy and has the following comments to make:

In the policy under e) delete the word '**Authority**'.

Amend the wording under i) as follows "...wildlife areas and species, **and to land management**

practices.” The impacts on land management practices needs to be assessed and understood as these could affect the designated areas, wildlife and landscapes of the Broads.

On p94 under the list of ‘Constraints and features’ the list for the western and eastern ends is incomplete and should be amended to include all SSIs, SACs, SPAs and Ramsar sites, and note the RSPB reserve should be listed.

On p95 under ‘Wildlife and habitats’ the text should be amended as water voles are protected under national legislation, so they are **not** a European Protected Species as stated.

Policy PODM31: New housing in the Broads Authority Executive Area (p117-120)

In order for this policy, which feeds through into policies: *PODM32 – Affordable housing and PODM33 – Residential development within defined development boundaries*, to be compliant with the Habitats Regulations, the following modifications should be made:

Policy wording: We **strongly recommend** that the wording in **the policy is amended** to reflect fully the proposed text modifications made in the HRA for the Plan (see under Table 2: *Policy PODM31 (p39) in the HRA report*). As a minimum, screening under the HRA process will need to be undertaken for all new housing proposals, given the potential impacts identified in the Plan’s HRA. Under d) ‘Protecting European Sites’ it states currently that “Project Level Habitat Regulation Assessments **may** be needed to assess implications on sensitive European Sites.” This should be amended to:

“Project Level Habitats Regulation Assessments **will** be needed to assess implications on sensitive European Sites. **Where identified, good quality on-site green infrastructure will need to be provided to help mitigate impacts from recreational disturbance.**” The latter sentence should be added to the policy for clarity and to cross reference the supporting text provided in the sixth paragraph on p120.

Supporting text (p120): It would be helpful if the supporting text section was given a heading to make it easier to find. Currently, the text could be interpreted as meaning that **only** the three sites identified for the 212 housing provision need to provide project level HRAs (and the associated mitigation), which is not the case.

Site-specific allocation policies

The wording of the following policies should be **amended** to comply with the HRA of the Local Plan:

- **Policy PONOR1: Utilities Site**
- **Policy POOUL3: Oulton Broad - Former Pegasus/Hamptons Site;** and
- **Policy POTHU1: Tourism development at Hedera House, Thurne**

Under each of the above policies, the wording should be amended to “A Project Level Habitats Regulation Assessment **will** be needed to assess implications on sensitive European Sites.” This is necessary for the same reasons as outlined in *Policy PODM31: New housing in the Broads Authority Executive Area* above.

Local Plan for the Broads – Sustainability Appraisal

Natural England welcomes the Sustainability Appraisal (SA) Report for the Local Plan.

A number of Local Plan objectives have been scored as having uncertain effects as listed in the table (p14) and as described in the text (p15) under 6. *Compatibility of the SA Objectives and Local Plan Objectives*. We recognise that the Local Plan is a high level spatial document and there are degrees of uncertainty as quantifiable details on the location, scale, extent or type of future proposals are not available at this time. Consideration should be given as to whether the right appraisal questions are being asked, if it is not possible to provide definite (negative, neutral or positive) answers, and we suggest that these questions are re-visited. Could the uncertainty in scoring be satisfactorily resolved by amending the wording of the relevant policies to ensure that any identified impacts can be avoided and/or mitigated for? It may also be worth revisiting the evidence base for the SA, in order that greater clarity can be brought to the appraisal process.

For any queries relating to the specific advice in this letter only please contact me on 020802 64893.
For any new consultations, or to provide further information on this consultation please send your
correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Louise Oliver
Norfolk and Suffolk Team



NORFOLK & SUFFOLK BOATING ASSOCIATION

President: R I Card Chairman: B E Wilkins
www.thegreenbook.org.uk

11 January 2017

Ms Natalie Beal
Yare House
62-64 Thorpe Road
NORWICH
NR1 1RY

Dear Ms Beal

Broads Local Plan 2012 to 2036, - Preferred options consultation, NSBA response, 11 January 2017

The NSBA is grateful for an opportunity to comment on the Preferred Options consultation on the Broads Local Plan 2012 to 2036.

Section 3, Spatial Portrait: In April, we commented on the draft Issues and Options document and suggested some wording to identify and embrace the special Broads heritage of unique boats and the local tradition of people who know how to build them, how to maintain them and how to sail them. Whilst we are pleased that an attempt was made to add a suitable section, unfortunately the relevant words were changed so as to completely lose the meaning and intention of the statement. By omitting the broads river cruisers and broads one design classes (principally Broads One Designs and Yare and Bure One Designs but there are others) the draft paragraph is fairly meaningless. Canoes, whilst being an entry level option for getting afloat, are not special or unique to the Broads and are not heritage boats. Plastic injection moulded and affordable, but not special. The trading wherries are special. However, there are only two remaining, so they are but a small part of the spatial backdrop whereas thousands of river cruisers, half deckers, sailing dinghies and motor cruisers all unique to the Broads, and many of timber construction, do survive and are maintained by their dedicated owners and enjoyed variously by their owners' families, helms and crews and hirer's customers, and admirers from other boats and from the river banks.

Our earlier advice is reiterated:

"Visitors to the broads, taking to the network of rivers and broads in the summer months, are routinely delighted, thrilled even, to find themselves sharing the water space with Yare and Bure One Designs ('White boats'), Broads One Designs ('Brown boats'), period launches and day boats some propelled by steam, the Broads River Cruisers, (a type of yacht complying with local rules making them unique to the Broads), 'Norfolk' varnished wooden dinghies, the racing derivatives of the traditional Norfolk punt, dozens of types of Nationally and Internationally recognised racing /sailing dinghy, and last but not least albeit in much smaller

numbers, the restored and maintained traditional trading wherries and leisure wherries. Many of the craft in this list are of wooden construction, a proportion are pre-war or even over 100 years old, and all require significant investment of skilled maintenance and periodic restoration by their owners and local specialist boatyards. This rich variety of boating heritage is probably unrivalled anywhere in the World. An indication of the commitment of local people to heritage boats and boating on the Broads is that there are over 50 voluntarily run clubs and classes affiliated to the Norfolk and Suffolk Boating Association. Additionally, local clubs produce National and International champions from time to time, whose fame and notoriety filters back to the 'grass roots' to enthuse and encourage younger members"

Section 26, Navigation, page 109.

We note and broadly agree the draft policies as set out in their respective boxes for strategic, development management and site specific types of policy :

- POSP10 Navigable water space – p108
- PODM28 Access to the water – p110
- PODM 29 Riverbank stabilisation – p111
- POSP11 Mooring provision – p113, (except that there ought to be reference to mast lowering moorings on all four quadrants at bridges over the main rivers)
- PODM30: Moorings, mooring basins and marinas – p113.

However, we do not agree with all of the supporting text, which appears in places to have been poorly drafted. Whilst we do not propose to go through the text in detail, examples include:

- a) The paragraph on p110 starting with "The principles for sediment management of Reduce/Reuse/Recycle should be adopted by relevant bodies", and concludes with this bullet point
 - Disposal – land filling should only be considered as a last resort, and in any event minimised as far as is possible.

is in our view potentially misleading. Sediment management is a large specialist topic beyond the scope of the Local Plan. Dredging from immediately downstream of the Whitlingham STW, with heavy metal contamination, ought to continue to go to the licenced tip opposite. The term 'land filling' requires much more clarification than is presented. All dredging processes, which are very necessary in the Broads, involve taking sediment out of the water (i.e. off the river bed) and placing it somewhere, albeit preferably with a beneficial use, on land.

- b) The "reasoned explanation" (p112) for PODM29 "Riverbank stabilisation" states:



Traditionally, riverbanks in the Broads have been protected using timber or steel piling driven into the riverbed at the bank edge. However, this approach can damage riverbank habitats, adversely affect protected species, encourage boat mooring in inappropriate locations and create an urban feel in an otherwise rural area. In many parts of the Broads, particularly those with an open rural location, natural or less intrusive engineering techniques such as alder poles, faggots, willow spiling, biodegradable geotextiles and vegetation will represent a more visually and ecologically appropriate solution that should be used in preference to piling where technically feasible. Accordingly, the Authority will ensure that the piling of banks only takes place where there is a demonstrable need to prevent bank erosion by this means, where it is appropriate to the local character of the area or for the use of the frontage for mooring. If a proposal is considered in the context of this policy to potentially have an effect on an internationally designated site then it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.

It is not helpful or accurate to state that the riverbanks have traditionally been piled. Whilst this became the preferred treatment post WWII, at those locations where the authorities intervened to control scour and erosion, the piled treatment was only ever applied to a small proportion of the Broads rivers and even smaller proportion of the Broads. Neither is a biodegradable geotextile, bunch of willow or whatever, the answer where the tidal flow is fast or adjacent to infrastructure including pump stations, bridges, mills or staithes. All of these issues are addressed in various BA reports and in the environmental assessment reports prepared by BESL for the Broads Flood Alleviation Project, to which this Plan could constructively refer. Whilst we are in agreement with the draft policy PODM29, the “reasoned explanation” falls short of the required clarity.

c) The “reasoned explanation” (p114) for PODM30 “Mooring etc” states:

- **De-masting moorings:** Used to moor a vessel to in order to lower the mast to enable the vessel to continue with the journey. Likely to be near bridges where the air draught (height between water and bridge) means the mast must be lowered. Again, these do not have to access land.

This fails to record BA policy to aim to provide mast lowering moorings on all four quadrants at bridges crossing the main rivers. Second, it is generally not true that they do not have access to land. Whilst true at Somerleyton, it isn’t at Beccles, Potter Heigham, Wroxham, Gt Yarmouth, Ludham Bridge, and Wayford Bridge. It is part of the cultural landscape of the Broads that settlements became established where the roads met the rivers, with the formalised establishment of the network of staithes, to which modern amenities and visitor facilities have been added.

LIGHT POLLUTION: In April 2016, we commented on the draft Issues and Options document in connection with bright waterside lighting interfering with helm’s night vision, thus having an impact on safety. We note that the IWA also commented on this issue. The proposed PODM22 in section 21 (Light Pollution, p85) is not adequate to address this issue, which should in any case be identified under the Navigation heading, because primary safety on the water is a different issue to on-shore irritation/loss of amenity resulting from inappropriately or badly designed artificial lighting.

General

1. We see no need for the BA, which is a comparatively small local authority, to burden itself with sustainability and resource management issues that are adequately addressed regionally and nationally. We note the draft policies to restrict personal water usage, draft

policy PODM3 on p37 refers, and suggest that this issue is adequately covered by national policy through the control of building design and design of sanitary appliances in The Building Regulations and associated British Standards, which apply to all UK property development.

2. **Sustainable transport:** As set out in our April 2016 consultation response, we again failed to find any reference in any section of the draft Plans, 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.
3. **Launching facilities.** Again we reiterate our support for policies for the improved provision of accessible slipways and canoe launching facilities, but in addition would urge the Authority, where it embarks on their provision, to ensure that local users are consulted in detail about their requirements and preferences for the details of materials and layout.

Yours sincerely



Brian Wilkins
Chairman



Lottie Carlton

From: Venes, Tim [REDACTED]
Sent: 01 February 2017 10:47
To: Planning Policy Mail
Subject: Norfolk Coast Partnership

Categories: Ack and Filed

Broads Local Plan Preferred Options Consultation

Thank you for the opportunity to comment on the preferred options for the new Broads Local Plan.

I'm afraid I haven't been able to find the time to consider each draft policy in detail so the following comments are necessarily generally broad in nature, but I hope they may be helpful.

The plan recognises the overlap between the Broads and Norfolk Coast AONB designated areas in the A1 designations map and the preferred policy options appear to me to be entirely suitable for a Local Plan for a Protected Landscape and consistent with objectives for the Norfolk Coast AONB.

I think it is entirely appropriate for the Broads Plan and the Broads Local Plan to have shared objectives, since they are so closely linked, and consider the proposed objectives to be appropriate.

The special qualities outlined in section 8.3 could be more specific, in that it is not always clear what is 'special' about the quality quoted. I recognise that these may well be expressed in other documents but it may be worth considering a fuller description of what is special about them in this plan to facilitate good planning applications and planning decisions.

The proposed policies are comprehensive and give a very clear view of what is appropriate in terms of development in a protected landscape. They strike me as being a useful reference point for policies in other Local Plans for policies relating to AONBs. I do not consider that any significant changes are required.

Draft policy POSP2 Sustainable Development is particularly helpful in defining what the Authority understands by the term 'sustainable development', adding much value to the NPPF in this regard.

Many other draft policies, too numerous for me to deal with individually, are also exemplars of what I consider are good policies for a protected landscape, but include PODM12, PODM15, PODM16, PODM22, policies relating to housing /including conversions and extensions etc, and sustainable tourism.

Policy PODM32: Affordable Housing

Provision of affordable housing is an issue everywhere but particularly so in protected landscapes where house prices are generally inflated above that in non-designated areas, and constraints on development are necessarily greater. In response to question 7, I suggest that it may be worth considering wording along the lines of 'the highest achievable proportion of affordable housing' and put the onus on developers to clearly demonstrate what is achievable (and be sceptical of what is claimed initially!).

The climate change policy POSP5 is also excellent in principle, covering mitigation, resilience and adaptation but doesn't appear to actually require developers to take measures to ensure adaptation and resilience. This may be covered by policy PODM9 but perhaps the wording "and incorporating measures to provide resilience and adaptation to climate change impacts" might be added to "iv) Considering the potential impacts as a result of climate change on development, the natural and historic environment and users of the development"

Tim Venes

Norfolk Coast Partnership Manager

Norfolk Coast Partnership

South Wing, Fakenham Fire Station
Norwich Road
Fakenham
Norfolk NR21 8BB

**Protecting an Area of Outstanding Natural Beauty**

Funded by Defra, Norfolk County Council, North Norfolk District Council, Borough Council of King's Lynn & West Norfolk and Great Yarmouth Borough Council

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Respondent: Norfolk Constabulary (Architectural Liaison Officers)

Lottie Carlton

From: Wolsey, Richard [REDACTED]
Sent: 06 December 2016 15:58
To: Lottie Carlton
Subject: RE: Broads Local Plan – Preferred Options Consultation

Lottie...I have gone through the draft of the Broads local Plan. There's nothing I believe to add beyond that originally submitted so nothing more at this time.

Regards

Mr Dick Wolsey
Architectural Liaison Officer/CPO
Norfolk Constabulary
GT Yarmouth & South Norfolk
Police Station
Howard St North
GT Yarmouth
Norfolk
NR30 1PH



From: Lottie Carlton [REDACTED]
Sent: 02 December 2016 11:46
To: Wolsey, Richard
Subject: Broads Local Plan – Preferred Options Consultation

Dear Mr Dick Wolsey Architectural Liaison Officer (Great Yarmouth & South Norfolk) Norfolk Constabulary

Broads Local Plan – Preferred Options Consultation

The Broads Authority is producing a new Local Plan. The new Local Plan will have policies and land use allocations to help determine planning applications.

This is the second stage of the Local Plan production process, where we introduce our draft policies. This consultation stage offers a real opportunity for you to influence the Local Plan.

This consultation ends at 4pm on 3 February 2017

All **consultation documents and maps** are available at
<http://www.broads-authority.gov.uk/broadsconsultations>.

You can tell us what you think by emailing planningpolicy@broads-authority.gov.uk.

We are also holding public sessions at venues around the Broads, where you can drop in and talk to the Authority's officers.

- Thursday 15 December, 6pm to 8pm, Horning Village Hall
- Saturday 7 January, 10am to 12:30pm, Oulton Community Centre
- Thursday 19 January, 6pm to 8pm, Loddon & Chedgrave Jubilee Hall Sports & Social Club

Lottie Carlton

From: Natalie Beal
Sent: 19 December 2016 08:47
To: Lottie Carlton
Subject: RE: Broads Local Plan – Preferred Options Consultation

From: Turner, Penny [REDACTED]
Sent: 16 December 2016 12:37
To: Lottie Carlton
Subject: RE: Broads Local Plan – Preferred Options Consultation

Dear Lottie,

Thank you for your email requesting comments on the New Local Plan. I am in communication with my colleague, Dick Wolsey and believe him to be in correspondence with yourselves - I have no further comment to add.

(This also applies to the Draft Broads Flood Risk Supplement)

Kind regards, Penny

Penny Turner

Architectural Liaison & Crime Reduction Officer Broadland and North Norfolk

Sprowston Police Station
105-109 Wroxham Road
Norwich
NR7 8TU

From: Lottie Carlton [REDACTED]
Sent: 02 December 2016 11:46
To: Turner, Penny
Subject: Broads Local Plan – Preferred Options Consultation

Dear Ms Penny Turner Architectural Liaison Officer (North Norfolk & Broadland) Norfolk Constabulary

Broads Local Plan – Preferred Options Consultation

The Broads Authority is producing a new Local Plan. The new Local Plan will have policies and land use allocations to help determine planning applications.

This is the second stage of the Local Plan production process, where we introduce our draft policies. This consultation stage offers a real opportunity for you to influence the Local Plan.

Norfolk County Council Comments on:

Broads Authority Local Plan – Preferred Options Consultation Document (January 2017) -

January 2017

1. Preface

- 1.1. The officer-level comments are made on a without prejudice basis and the County Council reserves the right to make further comments on the emerging Local Plan.
- 1.2. The schedule provides a series of strategic comments on the emerging Local Plan.

2. Introductory Comments

- 2.1. The County Council welcomes the opportunity to comment on the above Local Plan Preferred Options document. The County Council has not answered all the issues set out in the consultation document, but has instead concentrated on responding to the key strategic issues effecting the Authority in respect of its:
 - Infrastructure delivery role
 - Minerals and Waste Authority responsibility - ensuring that County Council policies and projects are not compromised;
 - Economic Development role

3. Minerals and Waste

- 3.1 Norfolk County Council, in its capacity as the Mineral Planning Authority for Norfolk, welcomes the inclusion within the Broads Local Plan (Preferred Options) of references in relevant policies to safeguarded mineral resources, and adopted Norfolk Minerals and Waste Core Strategy Policy CS16 - safeguarding.
- 3.2 Should you have any queries with the above comments please call or email Caroline Jeffery (Principal Planner, Minerals and Waste) on [REDACTED]
[REDACTED]

4. Water and Flooding (Section 10)

- 4.1 **Policy PODM4 – Flood Risk:** The second paragraph detailing that development will only be permitted in EA Flood Zones 2 and 3 should include references to 'all sources of flood risk' as this is the description of the NPPF para 100 otherwise you are narrowing its scope. Under evidence used to inform this section it should include references to The EA Risk of flooding from Surface Water maps as well as the Norfolk Local Flood Risk Management Strategy. Under monitoring indicators it should also state permissions granted contrary to the advice of the Lead Local Flood Authority

4.2 **Policy PODM5 – Surface Water run-off**

There is some confusion over what is being attempted by this policy. The LLFA is happy to meet with the Broads Authority to discuss the issues with this as it is complex. Specifically the discharge hierarchy and storage requirements are confused. It may also be difficult to relate this to the requirements of the national standards as set out in the reasoned justification. The statement beneath the priority list is incorrect. Some SuDS measures such as permeable paving can be used in combination with other drainage methods to reduce run-off even on sites which ultimately don't use infiltration as a final discharge location. This statement should be amended to reflect this. The monitoring statement is useful but needs to reflect how this would be targeted to those sites that would require it and be linked to the water level requirements of infiltration devices i.e. no ground water within 1.2 m of the base of infiltration devices. It is unclear what the intention is behind the statement referring to minor development. It is a requirement of development to ensure no flood risk is posed to the development or elsewhere in the 1 in 100 plus climate change otherwise it may be argued the development is not sustainable. Is it the intention to encourage developments to provide greater mitigation that this if possible. If so we would encourage this approach but would suggest it needs to be reworded to reflect the minimum requirement to ensure the development itself is sustainable and then reflect the additional ask.

4.3 The Flood and Water Management team are in the process of reviewing sites for different levels risk to those outlined above.

4.4 Should you have any queries with the above comments please call or email Graham Brown (Flood and water manager) on [REDACTED] or [REDACTED]

5. **Open space (land and water), play and allotments (Section 11)**

5.1 Public Health welcome the acknowledgements given to the value of open spaces, play etc. to public health and the consideration given to approaches to address land-based open space, allotments and play requirements in the Broads.

5.2 Should you have any queries with the above comments please call or email Martin Seymour (Specialty Registrar in Public Health) on [REDACTED] or [REDACTED]

6. **Green Infrastructure (Section 13)**

6.1 The Natural Environment Team makes representations regarding biodiversity, ecological networks, Public Rights of Way and Norfolk Trails as outlined in the Norfolk County Council Planning Obligations Standards (April 2016).

We support the policies relating to biodiversity, landscape and green infrastructure. However, we believe the Local Plan document is not consistent in the description or explanation of nature conservation designations. We note inconsistencies in our comments on specific policies.

6.2 Policy POSP2: Sustainable Development in the Broads.

We support the principles within this policy. However, in bullet point xii) where reference is made to European conservation designations, we would suggest that the policy could refer to “international conservation designations” so as to include Ramsar sites as well as sites with European designations. Ramsar sites should be treated the same as Natura2000 sites in the context of the Habitat and Species Regulations (as indeed is explicitly stated in the HRA report supporting the plan). In the same bullet point, we suggest that the word “priority” could be inserted before the phrase “habitats and species” to reflect national biodiversity policy and to be consistent with the NPPF (paragraph 117).

In the reasoned justification (p.28), the wording does not reflect the hierarchy of designated sites as described in the NPPF (Internationally-designated sites -> nationally-designated sites -> locally designated sites; paragraph 117) and there appears to be confusion as to the relationship between the different designations. All component units of internationally-designated sites are Sites of Special Scientific Interest but not all SSSIs have international designations. NNRs are always SSSIs. In this section, no mention is made of Ramsar sites, nor Local Sites (County Wildlife Sites) or Local Nature Reserves. We would suggest that the reference to ASSI – which only operate in the Isle of Man and Northern Ireland - should be removed.

6.3 Policy PODM13: Natural Environment.

We support the policy. However, given that all NNRs are also SSSIs we would suggest the reference to NNRs in the policy is superfluous and could be removed. We agree that development proposals where the principal objective is to restore or create new habitat should be supported. However we feel it may be useful to state explicitly that the creation of new habitat should not be at the detriment to other existing valuable habitats (e.g. proposals for the creation of new woodland habitat should not be supported if they are proposed on existing valuable grassland habitat). The policy refers to section 41 priority habitats, so we would suggest that for consistency the reference to priority species in the same paragraph should be “section 41 priority species”.

In the reasoned justification, reference to the national Biodiversity Action Plan should be removed, as the national BAP process has been superseded. Reference is made to local sites for geodiversity but not County Wildlife Sites which have the same status; for consistency, either both or neither should be mentioned.

Reference is made to a Norfolk Ecological Network Mapping Report which it states is in preparation. This should be explained – what is the report and who is undertaking the study?

6.4 Policy PODM8: Green Infrastructure.

We support this policy and recognise that comments that we made previously have been incorporated to the policy.

6.5 Policy PODM16: Landscape

We agree with the principles within this policy, which must be consistent across LPA boundaries.

6.6 Policy PODM19: Utilities Infrastructure Development.

In the final bullet point, should it refer to ‘priority’ habitats or ‘habitats within protected sites’ or all habitats?

6.7 **Policy POSP8: Getting around the Broads.**

We feel it would be appropriate to make reference in the Policy specifically to the England Coast Path and the Norfolk Trails that are within the Broads area.

6.8 **HRA document supporting the Local Plan:**

This is a high quality document. We have no comments to make.

6.9 Should you have any queries with the above comments please call or email David White (Senior Green Infrastructure Officer) on [REDACTED] or [REDACTED]

7.0 **Transport (Section 23)**

7.1 Policy PODM24 sets out a number of aspects that the Broads Authority considers should be assessed in relation to improvements on the Acle Straight. However, the derivation of this set of criteria is not clear to the Highways Authority; it appears to be an arbitrary, non- defined list of selective criteria. Highways England, who will make recommendations about whether to bring forward improvements, state (in their Route Strategies Approach, which details how they will do this) that government's vision for transforming the strategic road network is described in the Road Investment Strategy post 2020: Planning Ahead. This sets out that evidence will be assessed relating to five broad aims published in the Road Investment Strategy for 2015-2020: economy, network capability, integration, safety and the environment. Detailed assessment and appraisal is described in a number of technical documents and manuals published by the Department for Transport. Decisions about whether to take forward an improvement, and assessment of any impacts arising from any such proposals, will be taken in accordance with these documents. On the whole the criteria listed in the policy are requirements of the design manuals and appraisal guidance. However, these manuals provide a comprehensive list of criteria. Whilst it is recognised that the Broads Authority might have some special considerations they would like taken into account the rationale for the list set out in the policy is not clear.

7.2 The Highways Authority note that Policy PODM24 and the supporting information are on the whole focused on the presumption that the much needed road improvements on the Acle straight will have a presumptive negative impact on the local environment. The Highways Authority feel the policy and supporting text should be re written to bring a more balanced view, i.e. to consider the likely and many positive impacts a new high quality road improvement could have on the local environment. We would expect to see the positive benefits included in the policy and supporting text such as the wider socio-economic benefits.

On the point of the snail relocation trial this study is ongoing and no presumption on its success or otherwise can be made at this stage.

The Highways Authority would like clarity on the policy and the planning references stipulating the scheme requirements and criteria that need to be addressed through the design and delivery of the scheme. We also urge the Broads Authority to consult Highways England on the plan and the policies as the A47 is a trunk road.

In summary, whilst environmentally very challenging it is not unexpected given the location. A very thorough environmental assessment and provision for future

monitoring should cover all the issues raised and the local plan actually helps scope what is required. If the Broads Authority are not minded to amend Policy PODM24 as suggested above this could mean the plan is found unsound.

- 7.3 Should you have any queries with the above comments please call or email Claire Sullivan (Infrastructure and economic growth planner) on [REDACTED] or [REDACTED]

8. **Broads Economy (Section 24)**

- 8.1 It is felt that either no change to the existing policy or having a less restrictive policy would be the preferred options in relation to redundant boat yards or buildings from an economic development perspective.
- 8.2 It is felt that 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.
- 8.3 Should you have any queries with the above comments please call or email Stephen Scowen (Economic Development Partnership Officer) on [REDACTED] or [REDACTED]

9. **Sustainable Tourism (Section 25)**

- 9.1 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.
- 9.2 Should you have any queries with the above comments please call or email Stephen Scowen (Economic Development Partnership Officer) on [REDACTED] or [REDACTED]

10. **Health and Wellbeing (Section 27)**

- 10.1 Public Health welcomes the consideration to the health status and well-being of the residents of the Broads Authority area and the inclusion of information on the wider determinants of health, such as the index of multiple deprivation in the opening statements. Public Health also welcomes the inclusion of well-being within the three key themes and the attention to health and wellbeing in section 27.

In section 27 it is felt that there is an opportunity to promote the health and well-being benefits of the Broads and the connection to the natural environment, as evidenced by Newton (2007) Wellbeing and the Natural Environment, and by the RSPB report 'Natural Thinking' (Bird 2007).

- 10.2 Public Health strongly supports Policy PODM42: designing places for healthy lives. Norfolk County Council Public Health in collaboration with planning colleagues are continuing work on the shared engagement protocol and checklist for designing places for healthy lives.
- 10.3 Should you have any queries with the above comments please call or email Martin Seymour (Specialty Registrar in Public Health) on [REDACTED] or [REDACTED]

[REDACTED]

11. **Developer Contributions/Planning Obligations (Section 32)**

- 11.1 The County Council welcomes the inclusion of Policy POSP14 relating to developer contributions from new development and the different mechanisms which will be used to secure funding. This policy could be cross referenced in Policy POSP12: Residential Development where it is first identified that contributions from housing development could be sought. The County Council welcomes the explanation of the legal tests developer contributions have to fulfil (Page 160), wording could be included to explain these legal tests are required as part of Community Infrastructure Levy Regulations 122 and 123.
- 11.2 Should you have any queries with the above comments please call or email Laura Waters (Infrastructure and economic growth planner) on [REDACTED] or [REDACTED]

Broads Local Plan Preferred Options Consultation

Thank you for consulting Norfolk Wildlife Trust on the Broads Plan Preferred Options. We have not been able to comment in detail on all aspects of the preferred plan but wish to make the following comments on selected sections of the plan.

Question 2 Objectives:

We support the objectives as set out in section 8.2.

Section 9: Sustainable Development

We support the principle of policy POSP2 relating to Sustainable Development. However, in our view, the policy and supporting information in the section on nature conservation should also refer to Local Wildlife Sites (known as County Wildlife Sites in Norfolk and Suffolk). This is in line with paragraph 113 of the NPPF. A CWS assessment project was carried out by Norfolk Wildlife Trust and The Broads Authority several years ago and a number of CWS are now identified in the Broads Local Plan area. All other Norfolk planning authorities have policies which seek to protect CWS and inclusion of these sites would bring BA in line with national guidance and the policies of other Norfolk LPAs. We are aware that CWS are recognised in a separate Natural Environment Policy but take the view that they should also be referred to in this section

Section 13: Green infrastructure

We support the policy PODM8 on green infrastructure and take the view that GI is important not only for creating new areas of ecological importance but also in providing recreational opportunities close to residential areas that will help steer residents away from sensitive ecological sites.

In this context it is important that measures are put in place to ensure that funding for GI is secured through planning decisions and that a mechanism is put in place to allocate funding. A GI Strategy and Delivery Plan along with mechanisms to ensure delivery is in place within the Greater Norwich planning area and it make sense for a similar system to be established within BA area and co-ordinated with the system within Greater Norwich

Section 15: Soils

We support the policy PODM10 on peat and support the views of Suffolk Wildlife Trust with regard to terminology. We also support the view that there should be a wider policy relating to soils.

Section 17: Biodiversity

We support the policy PODM13 on Natural Environment and are pleased to see that County Wildlife Sites and Section 41 habitats are referred to in this policy.

Section 21: Light Pollution

We support the policy on light pollution, particularly the recognition that this can have adverse impacts on biodiversity.

Section 23: Transport

We fully support the inclusion of impacts on designated sites and protected species within the policy PODM24 on the Acle Straight.

Section Navigation:

We support the inclusion of wording to ensure that conservation will be maintained and enhanced within Policy POSP10 on Navigable Water Space. However, we are concerned that the wording implies that adverse impacts are acceptable and we support the views of the RSPB with regard to this policy.

Regards

John Hiskett CEnv MCIEEM
Senior Conservation Officer

North Walsham & Dilham Canal Trust

Regarding the restoration of the North Walsham & Dilham Canal I have, as requested at our meeting on the 28th Nov 2016, endeavoured to set out:

1. Our long term vision.
2. Our aspirations.
3. The benefits to the general public.
4. The areas that the Trust would look for support from the Broads Authority.
5. Short Term Aims.
6. Long Term Aims.

I have also made comments about *areas of mutual interest* between the North Walsham & Dilham Canal Trust and the Broads Authority, as set out in the draft documents available for consultation.

The two documents being:

The **Draft Broads Plan 2017** – consultation period 17/12/2016 to 30/12/2016

The **Local Plan for the Broads** – consultation period 05/12/2016 to 03/02/17

The **Local Plan for the Broads 2012 - 2036**

This document is primarily a Planning Document. The Trust is aware of the requirement for the production of a **Local Plan** under the National Planning Policy Framework, amongst other issues, to reflect local people's views about how they wish their community to develop.

The Trust believes that the restoration of the North Walsham & Dilham Canal, 4.4km of which is within the Planning Boundary of the Broads Authority, needs to be taken into account within the **Local Plan**. The Trust's Aims and Objectives for the restoration are reflected widely in the recently submitted **Draft Broads Plan Consultation Document**.

We have particular interest in the sections within the **Local Plan** document as follows:

Section 7 (p20)	Challenges and Opportunities
Section 8 (p23)	Vision, Objectives and Existing Policies
Section 12 (p48)	Water Open space / blue infrastructure
Section 13 (p49)	Green Infrastructure
Section 14 (p52)	Climate Change
Section 16 (p59)	Heritage and Historic Assets
Section 18 (p70)	Renewable Energy
Section 26 (p109)	Navigation

Our long term vision, our aspirations, the benefits to the general public, the areas that the Trust would look for support from the Broads Authority, Short Term Aims and Long Term Aims were described in the **Draft Broads Plan 2017** consultation submitted in December 2016 and are, in part, relevant to this consultation document and should be used to support comments made in the following sections:-

Section 7 (p20-22) Challenges and Opportunities

Strengths:

- Bullet point 1 The restored Canal fits in well with the statement: - *'Extensive, diverse and very highly valued landscape, habitats, flora, fauna and cultural and heritage assets'*
Whereas the Broads area is predominately flat, the North Walsham & Dilham Canal offers a unique access from the Broads to the Ant Valley which rises some 17.5 m over the entire length of 14.4km of canal via four locks.
- Bullet point 3 The restored Canal fits in well with the statements: - *'...Heritage Assets at risk'*
The North Walsham & Dilham Canal, from the entrance to the Canal above Wayford Bridge to some 20m below Ebridge Lock, is at risk of being lost together with Honing and Briggate Locks.
- Bullet point 4 The restored Canal fits in well with the statement: - *'High levels of tranquillity through much of the Broads; in particular a sense of remoteness in some parts...'*
The Canal is located within the Ant Valley and potentially gives **water** and **footpath access** from the Broads to East Ruston, Honing, Briggate, Meeting Hill, Ebridge (White Horse Common), Spa Common (North Walsham) and Swafield. These are small, quiet villages set in rural North Norfolk. The footpath network around the lower section of the Canal would be enhanced by the extension of the public footpaths Dilham nos. 7, 22, and 13 and by the reopening of the old footpath from Honing Lock to Dee Bridge.
- Bullet point 9 The restored Canal fits in well with the statement: - *'Many organisations and individuals caring for or promoting the value of various aspects of the Broads'*
The Trust would like to be recognised as an organisation which promotes the additional amenity of 14.4km of historic artificial canal navigation connecting directly to the Broads waterway network.
- Bullet point 10 The restored Canal fits in well with the statement: - *'Importance of the Broads for the identity and recreation of a much wider area'*
The top 10km of the Canal is part of the recreation available in a much wider area.
- Bullet point 11 The restored Canal fits in well with the statement: - *'Older people are often motivated, educated and experienced and play an important role in the community'*
The Trust's volunteer base is heavily skewed to the 'older generation' but they bring with them a multitude of skills learnt over a lifetime of work.

Weaknesses:

- Bullet point 1 The restored Canal fits in well with the statement: - *'Some of the protected habitats in less than optimal conditions/vulnerable to change as a result of fragmentation...'*
- The restoration of the Canal is viewed by the Trust as providing 14.4km of 'interconnected linear lakes' which pass through County Wildlife Sites and higher order sites.
- One of the County Wildlife Sites, known by the Trust as Purdy's Marsh, is in a poor condition but the Canal owner, aided by the Trust, is working to restore the area to a healthy state. Restoration of the Canal waterway will involve the removal of deposited silt - a necessity which affects the Broad's rivers if they are to be kept navigable but this can be seen as an opportunity.

Opportunities:

- Bullet point 5 The restored Canal fits in well with the statement: - *'To connect wetland habitats on a landscape scale, to enhance and buffer biodiversity rich areas'*
- Restoration of the 14.4km of canal running up the Ant Valley will do exactly this. De-silting of the Canal would supplement Natural England's South Fen marsh project. Additionally it would provide a clear water link between the wildlife marshes of South Fen and Dilham Broad Fen.
- Bullet point 7 The restored Canal fits in well with the statement: - *'Potential for complementary and mutually supportive actions and benefits across environmental, recreational, navigation and local community issues'*

Threats:

- Bullet point 2 The restored Canal fits in well with the statement: - *'Erosion of the special character of the area's landscape and built heritage through: Loss of archaeology, built/landscape and cultural heritage assets'*
- Honing Lock, a Broads industrial archaeological site, is at risk of being lost.

Section 8 (p23-25) Vision, Objectives and Existing Policies

8.1 Draft Vision for the Broads

By 2036 the Broads will be a place where... The natural environment...

The Trust agrees with the tenor of this statement – it fits in well with our Aims and Objectives.

8.2 Draft Broads Local Plan Objectives (2012 – 2036)

The Trust agrees in particular with objectives **OBJ8**, **OBJ11**, **OBJ14** and **OBJ15**.

OBJ8 The area's historic environment and cultural heritage are protected, maintained and enhanced. Local cultural traditions and skills are kept alive.

OBJ11 The Broads offers communities and visitors opportunities for a healthy and active lifestyle and a 'breathing space for the cure of souls'.

OBJ14 People enjoy the special qualities of the Broads on land and on water. Access and recreation is managed in ways that maximise opportunities for enjoyment without degrading the natural, heritage or cultural resource.

Navigation is protected, maintained and appropriately enhanced, and people enjoy the waterways safely.

OBJ15 The Broads continues to be important for the function, identity and recreation of the local community as well as over a wider area.

Section 12 (p48) Water open space/blue infrastructure

Policy PODM7: Staithes

There were several staithes on the North Walsham & Dilham Canal and it is the policy of the Trust to restore as many of these as is possible. We are therefore very supportive of the Broads Authority policy on staithes.

Early restoration work on the Honing to Briggate section of the Canal saw the restoration of the staithe at Honing. Sadly the immense amount of volunteer work put into the restoration of Honing Staithe Cut, which was used by the public for walking, picnicking and launching of canoes has been lost by our inability to maintain the staithe due to withdrawal of access by the Canal section owners.

Section 13 (p49) Green Infrastructure

Policy PODM8: Green Infrastructure

Although not a planning issue with the Canal, restoration of the Canal will fit in well with Policy PODM8.

The Canal restoration is not 'development' as such as the Canal and its structures are pre-existing but paragraph 5, 'Green infrastructure proposals should': gives five proposals (a) to (e) which are fully supported by the Trust's Aims and Objectives.

The Canal restoration project is identified within PODM8 Infrastructure typologies/components as a **Green Corridor** '...canals including their banks, hedgerows and other natural features, cycling routes, pedestrian paths, commons and public rights of way'.

There are three elements to the Policy:

The third element sets out the criteria that proposals for Green Infrastructure need to address and the benefits they can provide:

Bullet points 1, 2, 3, 5, 6, 7, 8, 9 and 11 all relate to the Canal restoration project.

Section 14 (p52) Climate Change

Policy POSP5: Climate Change

POSP5: Climate Change. ...Potential impacts will be identified... ii)

Since the early days of the Canal restoration project it was recognised that the Canal has the potential to produce renewable electricity. As the Canal is continuously fed by the feed-water and there are four locks with falls of between 2.4m and 4.6m, it has been calculated that there is potential to generate up to a total of 25kw of electricity.

Section 16 (p59) Heritage and Historic Assets

Policy POSP6: Heritage and Historic Assets

The Trust considers that the 4.4km of the North Walsham & Dilham Canal within the Broads area should be recognised as a key Heritage feature in the northern reaches of the Broads footprint.

The Canal, its bridges, spillways and locks are heritage structures over 190 years old, although not formally recognised as a 'heritage asset'.

Section 18 (p70) Renewable Energy

Policy PODM14: Renewable Energy

Our thoughts on the use of the Canal feed-water system to generate renewable energy, has been described in Section 14, Climate Change.

Section 26 (p109) Navigation

Policy POSP10: Navigation

Policy POSP10 is fully supported by the Trust. It is welcomed for its **positive approach to maintaining and increasing Navigable Water Space** – a policy which directly impacts on the North Walsham & Dilham Canal restoration project, especially the section within the Broads Authority area.

The Trust welcomes the recognition of **'opportunities for the extension or creation of navigable/recreational water space which will be promoted...'**

The Trust welcomes the policy of maintaining **'adequate water depths for safe navigation...'** **This policy is extremely important to the Canal restoration as the entrance and the first 4.4km of the Canal to Dee Bridge in Honing is within the Broads Area boundary.** This section of the Canal has been allowed to become virtually un-navigable beyond the junction with the East Ruston branch due to a failure by the Canal section owners to observe the **'no closure'** stipulation in the extant **1866 Canal Act.**

The Trust needs the support of the Broads Authority to further our Aim of re-opening the entire length of the historic North Walsham and Dilham Canal for the **public benefit**, especially as the entrance to the Canal is within the Broads Authority boundary.

Keeping it fully navigable for day boats and canoes, locally hired from Banks or the Canoe Man, boosts tourist potential. There is a need for canoe portaging facilities at Honing Lock and mooring at the north end of the East Ruston Arm, which would bring business to the village and its pub.

There is one further possible threat to navigation which could affect the access to Dilham Cut and the North Walsham & Dilham Canal. To access both from the River Ant requires passage under the A149 Wroxham to Stalham road at Wayford. The 'modern' flat steel girder bridge is now reported to have sunk on its foundations reducing the available headroom to some 7 feet (8ft 6in in 1938) with 'normal' water level – but reducing to less than 6 feet (6ft 5½in in 1939) in flood conditions. (In 1956 the original arched Canal bridges had a recorded headroom of 8ft 6in)

Answering your questions:

Q1. Duty to Cooperate

No comment.

Q2. Broads Plan and Broads Local Plan having a shared vision for the Broads

Having studied both Plans in some detail it would seem obvious that they should have a shared vision. They complement each other.

Q3a. Draft Objectives for the Broads Local Plan

Many of the Objectives have relevance to our Canal project, in particular OBJ2, OBJ8, OBJ11, OBJ14 and OBJ15.

Q3b. Draft monitoring indicators

No comment.

Q4. How the Local Plan should address soil

No comment.

Q5. Production of a bespoke user friendly guide for the Broads

A good idea but from the Trust's point of view we think it would be a good idea to incorporate information about our Canal project. It is partly within the Broads boundary and the wherries which used to ply it for trade in the past used the Broad's rivers to and from Gt. Yarmouth.

Q6. Economy and employment needs of the Broads

No comment.

Q7. Affordable dwellings

No comment.

Q8. Removal of 5 dwelling threshold

No comment.

Q9. **Development boundary**

No comment.

Q10. **Residential mooring**

No comment.

Chris Black for the North Walsham & Dilham Canal Trust

26th January 2017

Lottie Carlton

From: Natalie Beal
Sent: 10 February 2017 09:09
To: Davison, Judith; Planning Policy Mail
Cc: Lottie Carlton
Subject: RE: Broads Local Plan - Norwich City Council response

Many thanks for the comments.

Natalie

From: Davison, Judith [REDACTED]
Sent: 09 February 2017 17:30
To: Natalie Beal; Planning Policy Mail
Cc: Nelson, Graham; Adrian Clarke
Subject: Broads Local Plan - Norwich City Council response

Dear Natalie,

Thank you for the opportunity to comment on the Preferred Options draft of the Broads Local Plan.

Overall the document is very impressive and comprehensive.

I do have a small number of comments to make as follows:

- Policy PODM15 (Renewable energy): Norwich City Council recently commissioned a study into the technical and financial feasibility of water source heat pumps in the River Wensum which concluded that this technology offers potential carbon reductions compared to conventional forms of energy generation and merits further investigation. It would therefore be beneficial to add a reference to water source heat pumps within the reasoned justification (third paragraph, first sentence) acknowledging it as a form of renewable energy that is potentially suitable within the Broads area.
- POSP10 (Navigable water space): The proposed text is helpful in understanding some of the key considerations for navigation in relation to new development but it would be useful to have some further clarification in the reasoned justification, for example an indication of what constitutes the 'importance' of the water space in question and 'levels of use'. In recent discussion with Adrian Clarke as part of the River Wensum Strategy work, we have been exploring the potential for an advice note providing information about navigation considerations which could be helpful for developers and there is potential for some of this explanation to either be added into the explanatory text for this policy or for the BA to publish an advice note (if agreed) which would be helpful for both the Broads Local Plan and River Wensum Strategy.
- PODM35 (New residential moorings): The policy focuses new residential moorings solely on marinas, mooring basins or boatyards, however it may be appropriate to encourage residential moorings in other locations for example within Norwich. The emerging River Wensum Strategy would welcome provision of residential moorings in the city subject to having the appropriate range of services and facilities. I therefore would suggest that policy PODM35 is altered in a minor way to allow for other locations. This could be done by moving criterion (a) to the end of the list of criteria, so that all other criteria come first in the policy, then amending previous criterion (a) to state that "...new residential moorings should ideally be located in a mooring basin...etc.". It would be very helpful, in drafting the RWS, to have an indication of your response to this suggestion.
- I note also the local plan topic paper on floating buildings which went to your Planning Committee on 3rd February and would support floating buildings in principle. However taking a standard approach to the nature of floating houses across the Broads Authority area may not be appropriate. The policy may need to reflect the local housing needs in different parts of the Broads Authority area, and should have regard to the housing aspirations of the settlements within this area prior to determining the final approach of the policy. In Norwich in particular good quality floating housing

may well assist with enhancing natural surveillance and help reduce anti-social behaviour, and may provide a different form of housing to broaden the offer of the local housing market.

Kind regards

Judith Davison

Planning team leader - projects
Norwich City Council



Please note my normal working days are Mondays to Thursdays

Telephone number for all enquiries



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Our Ref: 1406

Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

1st February 2017

Dear Sir/Madam

**Representation on Preferred Options Consultation of the Emerging Local Plan:
Policy POXNS12 Local Green Space and POXNS12 Local Green Space Map at Chedgrave**

On behalf of our client, Pacific Cruisers, we submit representations on the Preferred Options Consultation of the Broads Authority's Emerging Local Plan: Policy POXNS12, the proposed designation map, and the Local Green Space Assessment, all concerning the Local Green Space (LGS) at Chedgrave.

An initial objection to the proposed designation was submitted on behalf of our client by Mrs Fiona Husband submitted by email dated 13.1.17. This formal objection is further to her response.

The Site and Surroundings

The Husband Family own a number of parcels of land off Pits Lane, Chedgrave. The areas of land owned by the family in relation to this representation are shown in figure 1 below, outlined in red. They have operated and run Pacific Cruisers, which offers overnight and weekly boat hire, for 18 years. The business was purchased as a going concern.

The site comprises a large boat and equipment shed, mooring, and one building for living accommodation, an area of hard standing for boat parking, a calor gas compound, electrical sub-station, other storage, access and car parking, and an access drive, currently temporarily blocked at one end with logs and metal drums to stop users of the Chedgrave path (Public Right of Way FP4) which forms part of Wherryman's Way, running along the north bank of the Chet, from parking on private land. In addition, a field to the north of the operational boatyard area is in agricultural use. Part of the operational boatyard and the whole of the field are proposed to be designated as LGS under the Preferred Options Consultation.

The site lies within the Broads Authority Executive Area (being an area of additional special control), designated priority habitat, and outside of the existing development boundary of the village as designated by South Norfolk District Council.

The site does not lie within a Conservation Area. There are no listed buildings within close proximity, the former school and church lie to the north, within the conservation area.

Photographs of the site are attached at appendix 1.

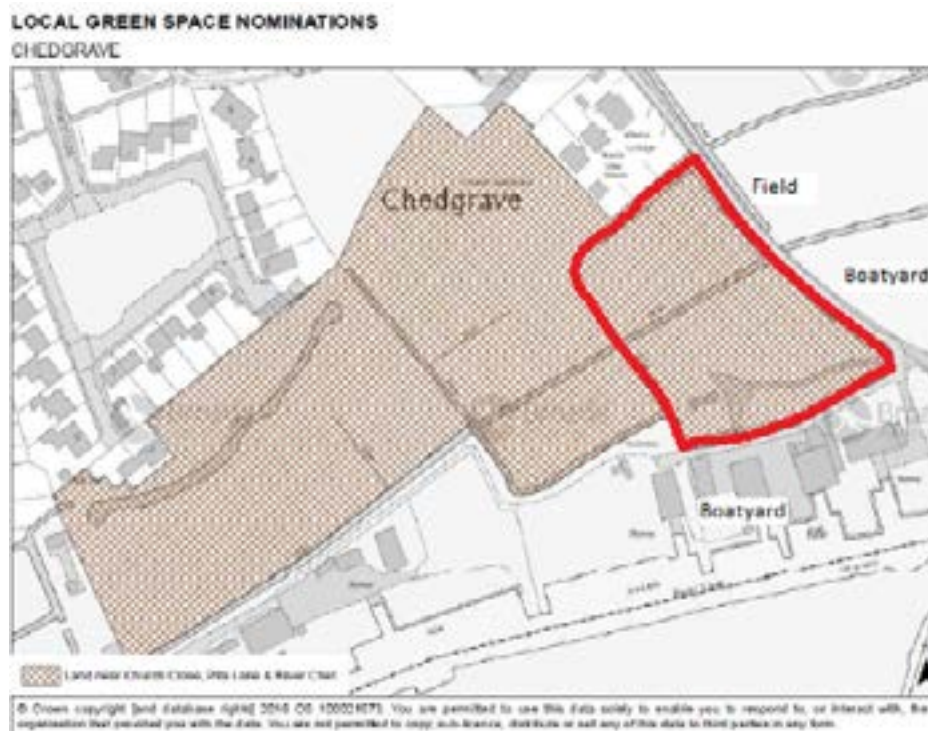


Fig. 1: The Site (Source: Broads Authority with amendments)

To the south is a shared private access drive with a permissive public path.

The field

The Broads is a man-made and man-managed landscape. The agricultural field boundaries and other vegetation were removed by the 'drainage board' in August 2016 to facilitate regrading work to the dykes/drains. Work was required to this extent as part of a regular programme of work, the Board had undertaken more minor work in previous years, but this level of work was required to ensure the health of the river network. The Board has not removed the debris. It is perhaps best to consider the field as drained rough pasture or unimproved grassland, capable of sustaining occasional or non-intensive grazing.

The field is not currently being used for grazing, but may be brought back into use in the future.

The boatyard

Pacific Cruisers operates up to 10 boats in peak times, with visitors often travelling significant distance for their Broads holiday. Tourists usually travel by car, parking their vehicles at the boatyard, north of the access

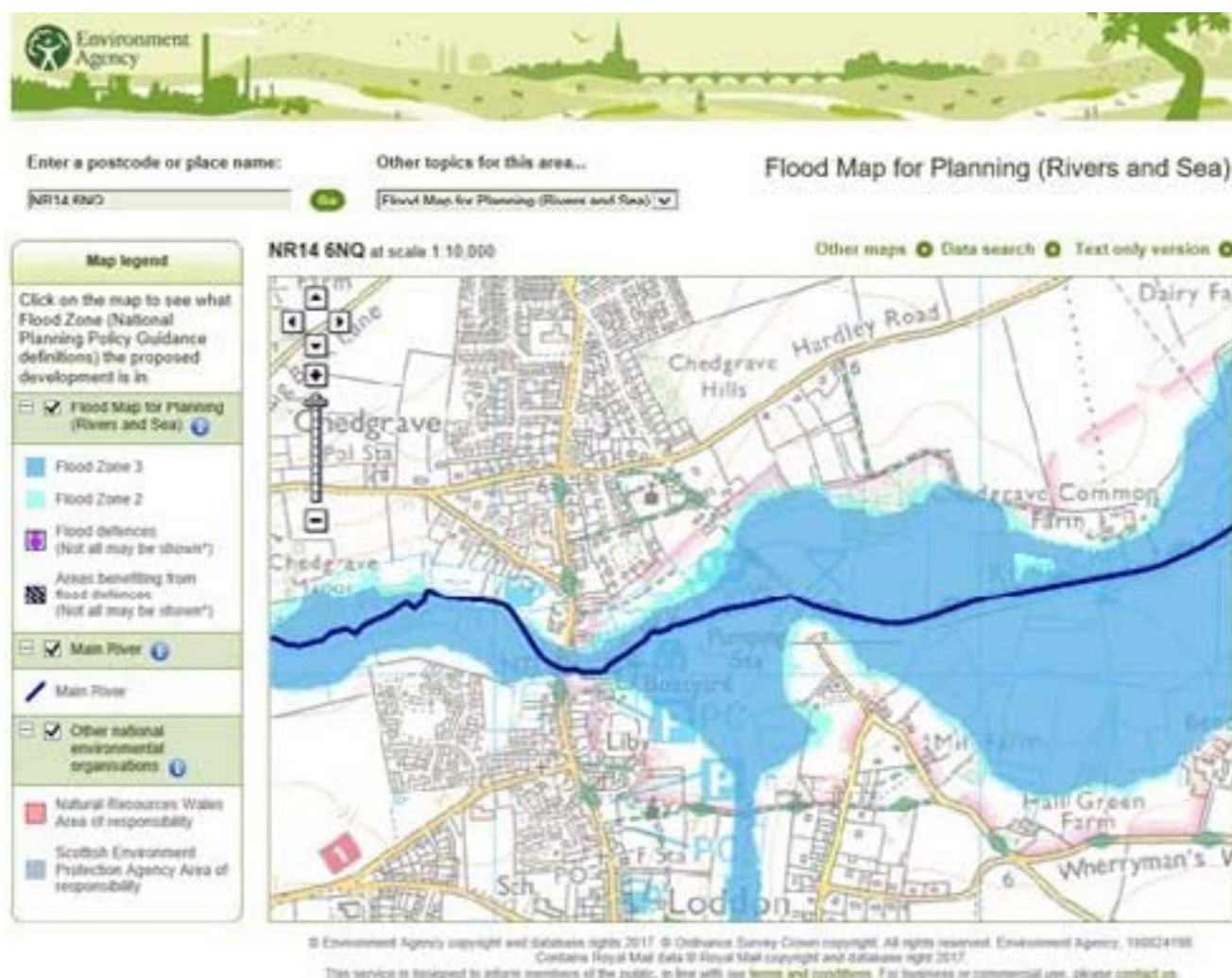


Fig. 3 Flood Mapping (Source: Environment Agency)

Historic Uses

Aerial photographs and Ordnance Survey maps of the area are an invaluable source of information for the use of the boatyard and field over time. Evidence shows that since at least 1995 the boat yard has covered not only the area to the south of the private access drive but also an area to the north. The field is shown at various stages of growth. In the past the whole of the proposed designated area would have been used for grazing. It is interesting to note that periods of clearance of the drainage dykes and growth of the trees and vegetation can also be seen over the period. Date of documents and source:

- Aerial photograph of 1946 show no development along the River Chet in the vicinity of the boatyard and field. (<http://www.historic-maps.norfolk.gov.uk/mapexplorer/>)
- Aerial photograph of 1988 shows the boatyard has not extended northward beyond the private access drive. (<http://www.historic-maps.norfolk.gov.uk/mapexplorer/>)
- 1995 AIRPIC aerial photograph clearly shows an area of hard standing to the north of the private access drive with at least three parked vehicles
- 1999 Google Earth Maps
- 2003 Google Earth Maps
- 2006 Google Earth Maps
- 2011 Google Earth Maps

National Planning Policy

Paragraph 76 and 77 of the National Planning Policy Framework (NPPF) set out the purpose and appropriateness of designation of a Local Green Space. Paragraph 78 sets out that this designation is tantamount to designating a small area of green belt, where 'The Government attaches great importance to Green Belts' resisting development:

'76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.

Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.*

78. Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.'

The purpose of and importance of green belts is set out in Section 9 of the NPPF. Paragraphs 79-81 set out the importance, purpose and opportunities for Green Belts:

'79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belt serves five purposes:

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.'

The NPPF also considers the importance and purpose of National Parks and the Broads Authority:

'115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape

and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads²⁵.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated’.

The Planning Practice Guidance Open Space, Sports and Recreation Facilities, Public Rights of Way and Local Green Space (PPG), accompanies the NPPF and at paragraphs 05-22 make specific reference to Local Green Space and are attached at appendix 2, particular attention is drawn to para 11:

‘What if land is already protected by designations such as National Park, Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area?’

‘Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.’

Proposed policy PODM13: Natural Environment concerns Priority Habitat: *‘Development that would have an adverse impact on a Local Nature Reserve, County Wildlife Site, a section 41 priority habitat identified under the Natural Environment and Rural Communities (NERC) Act 2006... will only be permitted in exceptional circumstances...’.*

Assessment Document

Section 3 of the Local Green Space Assessment Report discusses the nomination of land at Chedgrave. The site was not nominated by the community as a whole, or by a group or groups representing the community.

The proposed area was assessed on two separate occasions, the second following works to the drains/dykes. It is assumed that the assessors are specialists in landscape and ecological matters, however, this is not clear from the Report. Our client was not contacted despite being present on site (for security 24/7), a number of issues relating to the land use could have been raised at that point.

The Assessment Report fails to consider the presence of other designations of the land and does not consider detailed advice in the PPG at paragraph 11 as *‘to whether any additional local benefit would be gained by designation as Local Green Space.’*

Will the green space endure beyond 2036?

Paragraph 11 of the PPG requires that the designating authority considers *‘whether any additional local benefit would be gained by designation as Local Green Space.’* Existing planning policy in the Broads Authority is restrictive. Proposed Policy PODM13 Natural Environment only permits development on Priority Habitat in exceptional circumstances; the site is priority habitat. The Report states that the LGS designation is consistent with the Broads Authority’s purpose and that *‘unless there is a significant change in the new Broads Local Plan*

no reason to suppose there will we (sic) be any permitted development'. The land within the proposed designation is outside of the Loddon/Chedgrave development boundary set by South Norfolk District Council, and there for considered to be in the countryside. The existing and proposed controls over development are great, the proposed additional designation is not required to control significant development up to or beyond 2036.

The question of encroachment is a matter for development management decisions and potentially enforcement of unauthorised use as appropriate. It noted that there is no 'encroachment' in relation to land under our client's control, the use existing prior to their purchase 18 years ago.

The boatyard area to the north of the private drive is not green space, it is a long term functioning commercial site. It will not endure as green space beyond 2036 as it is not green space in the first instance. In addition, the land has a number of constraints, as set out above.

The field also has a number of significant constraints being priority habitat and occasionally flooded, it is unlikely to be built upon.

How far is the green space from the community it serves?

The designated space does not 'serve' the community as it is not community land, neither is it publically accessible land. A public footpath runs to the east of the proposed designated area and a permissive path runs to the south.

Prior to the clearance of the drains/dykes neither boatyard nor field was fully visible to the public, the causeway to the field and the drive access points to the boatyard offered momentary insight into each area, it is (was) the dykes, hedges and trees around each plot which are the visually attractive natural parts of the area owned by our client. The hedge and bramble to the field has been lost but is already regenerating. It is this double linked ring which could be considered to be of ecological and community interest, the green space designation cannot be applied to cover this area.

There are two areas of residents in the vicinity, Church Close have their own green central area and Pits Lane properties and others close to the River Chet, have the whole of the Chet, public picnic spot, public rights of way and environs to use for relaxing and enjoying the wildlife. The proposed designated area is not 'immediately adjacent' but is close to the residential community but does not serve it, it is not publically accessible land.

The Parish Council, representatives of the community, have objected to the designation.

Is the green space local in character?

Part of the designation is a boatyard and is not 'green space'.

The field forms part of the wider landscape of the Broads around the River Chet, and is immediately adjacent to the Chedgrave Marshes; it is not local in character, both the River and the Broads extend for many miles. The UK Biodiversity Action Plan, Priority Habitat Descriptions: Lowland Fens, from the UK Biodiversity Action Plan; Priority Habitat Descriptions, BRIG (ed. Ant Maddock) 2008 states that '*the Lowland Fen habitat is said to be the calcareous rich fen and swamp of Broadland covers an area of 3,000ha*', much of which will lie within the Broads Authority area.

The number of HGVs and other commercial vehicles servicing the four boatyards accessed by Pits Lane and the access private drive together with change over day for Pacific Cruisers and other boatyards can be very noisy with the coming and going of visitors and cars. In addition, boats are moved in and out of the water for repair

work and storage and repairs are undertaken using mechanised equipment. The proposed designated area is not a tranquil spot.

The Report states that ‘...bringing visitors to Loddon and Chedgrave’ means that the site is of value on a much wider basis than ‘local’ meaning that this is not the appropriate designation for the site.

Who/why is the local green space special/significant to the local community?

Although not highlighted on a map the nominated area was split into Area A and Area B. From the description set out the site lies in Area B ‘Marsh and Carr.’ The site is not densely vegetated across the whole, following drainage works the field is relatively barren particularly along the side of the drains/dykes, and vegetation on the boatyard area is mostly limited to the edges.

The site is not publically accessible, although the field and parts of the edges of the boatyard are visible from public or permissive paths. No access was requested to survey the land and it is not clear whether the list of wildlife enclosed within the report were seen during the site visit from publically accessible land, from historic data for the site, or data transposed from adjacent sites.

The site might be a ‘reservoir’ for local wildlife, this is not proven, but this does not necessarily mean that the local community value this site specifically for this reason, the community is likely to consider the whole of the Broads within walking distance as important to local wildlife, where they consider wildlife to be important to them.

It appears that the site, is important to a single nominator. The importance to the community has not been demonstrated in the Report, without this support the proposed designation should not be made. The Parish Council have objected to the proposal in their letter to the Broads Authority dated 13.1.17. The Broads Authority responded to the Parish Council on 19.1.17, particularly on the matter of consultation (these documents are already available to the Broads Authority and are therefore not enclosed).

Why the green space is special has not been clearly demonstrated in the Report. The site is claimed to be a wildlife ‘reservoir’ yet no ecological survey evidence has been presented with the assessment and no access to survey has been sought from our client. The assessment has not been thoroughly carried out, assumptions have been made about the use of the land, and there is a lack of identification of key constraints on the site which relate to environmental issues.

If the Broads Authority are concerned about the ecological value of the land in our client’s control, there are alternative designations, and policy constraints that can be applied to the land, for example proposed policy PODM13 already applies. In the case of any development proposal coming forward on either the boatyard or the field a full assessment of the ecology on the area concerned would probably be required. The proposed additional level of control is not required to protect any identified special significance of the land.

As stated above this is a working environment and hardly ever a tranquil spot.

Photographs

Only one of the photographs is clearly of the site, a photo of the field cleared, following drainage works in August.

Recommendation and Reasons

The Report fails to give any weight to existing legislative, national and local policy, in particular the Habitats Directive and the advice in the PPG in relation to existing constraints on the site and the lack of need to apply addition control to the site. It fails to undertake the relevant desk based research to look at existing constraints on the site. It fails to consult the community prior to putting forward the proposal. It fails to assess or demonstrate that assessment of species on the site has been carried out.

The boat storage area in Area A has been excluded, the boat storage area (boatyard) in Area B should also be excluded on this basis.

Inclusion of the field is not 'reasonable' given the existing constraints and lack of evidence presented.

Given the lack of actual evidence provided and lack of relevant weight applied during the assessment, the recommendation is ill-founded and is unable to lead to designation. No additional public benefit is given by the proposed designation.

Assessment Map and Proposal Map

A large area was nominated; the proposed designation is a reduced area. However, it fails to consider the existing use of our client's land, existing Broads Authority protection, flooding restrictions on land use and Priority Habitat designation, as set out above.

A yellow triangle, which marks an area to be removed from the designation has been incorrectly sized, it should include the whole of the boatyard, including the building and structures, hard standing and drives and the whole of the curtilage. The curtilage of this building is probably best described as the area within the drains to the west of Pits Lane and north of the private access drive, but not including the field which lies to the north. This area should be excluded from the proposal map.

The field should not be shown on the proposed plan as it is not green space for community enjoyment and has other constraints already in place which control development.

Policy POXNS12

Proposed Policy POXNS12 states '*Development proposals that protect or enhance Local Green Spaces and which comply with other relevant policies will be permitted. Development proposals that would have an unacceptable adverse impact on these Local Green Spaces or would involve in their loss will not be permitted other than in very special circumstances.*'

The explanatory text states:

'Local green spaces are green spaces that are demonstrably special to a local community. The preparation of local and neighbourhood development plans offers the opportunity to designate local green spaces and provide extra protection to them that rules out new development other than in very special circumstances.'

'The Broads community was asked to nominate areas to be considered as Local Green Space. Two calls for nominations were undertaken, the first as part of the Issues and Options consultation and the second via a letter to Parish Councils in early summer 2016. The nominated sites were visited and assessed against the criteria set out in the NPPF at Paragraph 77. The following table summarises the main Local Green Space Assessment Report and shows which nominations have been allocated as areas of Local Green Space.'

'Local Green Space must be reasonably close to the community it serves; have demonstrable local significance and interest; be local in character; and not cover an extensive tract of land.'

The table entry is as follows:

<i>Nomination</i>	<i>Decision</i>	<i>Reason</i>
<i>Area of land stretching from the rear of Church Close to Pits, Chedgrave</i>	<i>Allocate as Local Green Space</i>	<i>In general, the area seems a reasonable proposal for Local Green Space. However it is proposed to remove the garden area from the site as well as part of the boat storage area.</i>

The Parish Council object to the nomination of the site. Where there is a lack of community support for the designation, there is no reason to support the designation and it should be removed.

There are a number of existing constraints and the site should not be designated for the reasons set out above and below.

Implications

The implications of the designation are such that the land in effect becomes green belt, where existing designations, such as forming part of the Broads Authority area are sufficient in their own right. Placing the green belt equivalent designation on land will reduce its value.

There is no public access to the site. There have been a number of security issues in relation to the boatyards adjacent to the River Chet accessed from Pits Lane; security of the boatyard is paramount. This arrangement will not change.

The future management of the land, will rest with the owner of the land. Our client is not minded to enter into any arrangement, partnership or otherwise in relation to the management of the land.

The designation of the land as LGS may lead to its registration as an Asset of Community Value paragraph 022 of the PPG, clearly the boatyard is an operational business and not a community asset. It would not be appropriate to designate this site as LGS as the potential to designate the boatyard as a community asset would significantly devalue the business.

Early Notification

Early notification of the land owners is required under paragraph 019 of the PPG, where designations are placed on their land, without their knowledge. The nomination was made 17.6.2016, first site visit was made 18.7.16, and second visit was made 31.8.16. Our Client was only made aware through a neighbour contacting them following publication in the local paper on 8.12.16, an indirect notification which in effect took 6 months to be made. Formal notification was issued 19.12.16. Our client contacted the local MP to find out what happened, a redacted copy of the various documents is attached at appendix 3.

Conclusion

As set out above, there are strong grounds for why the proposed designation of the site as a Local Green Space is inappropriate and fails to meet the relevant tests as set out within the both the NPPF and NPPG.

If you require any further information at this stage, please do not hesitate to contact us.

Yours sincerely



Mark Philpot **MRTPI**
One Planning Ltd

CC: Mrs F Husband
Encl: Appendix 1: Photographs
Appendix 2: Policy Extracts
Appendix 3: Letter from local MP

Appendix 1: Photographs



Photo 1: View of the site from the River Chet, through the southern boatyard



Photo 2: Boatyard looking northeast from the permissive path. Parking for boats and cars.



Photo 3: 2 boats stored on boatyard, hard standing under 'grass'.



Photo 4: Gas canister storage, operational storage and raised substation, further boat. Trees shown to eastern edge of the boatyard along Pits Lane.



Photo 5: Access drive for boatyard directly from Pits Lane



Photo 6: Overgrown, naturalised area of drain/dyke of the edge of the boatyard from Pits Lane.



Photo 7: View north along Pits Lane, boatyard to left and field in the distance in front of housing.



Photo 8: View of housing to north of field, across cleared field



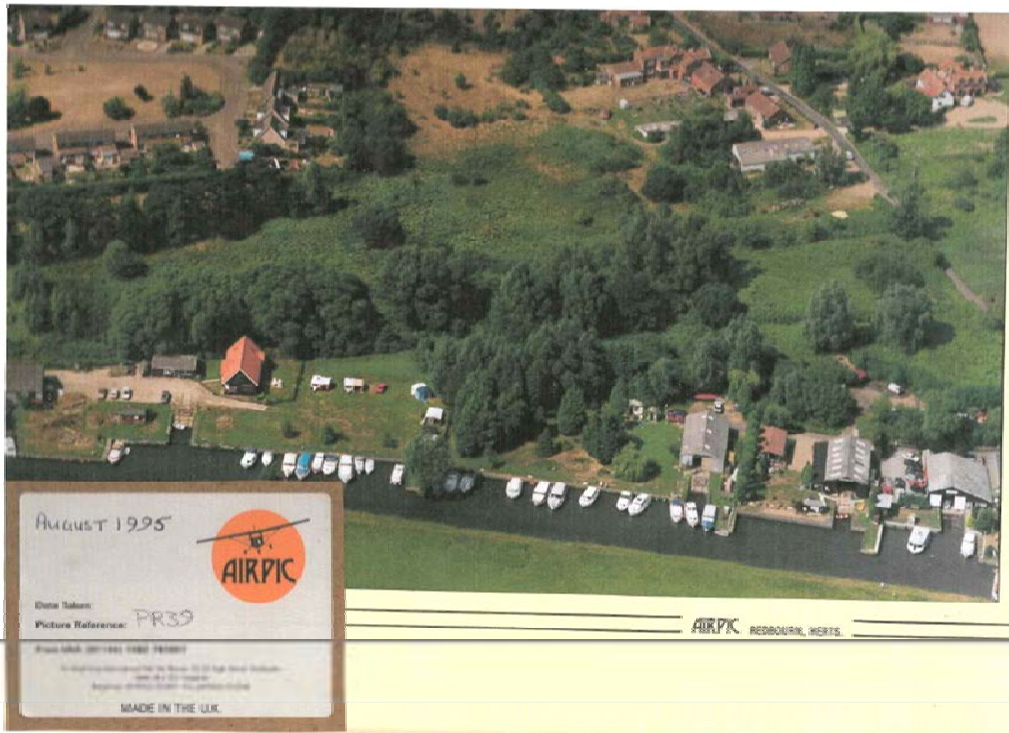
Photo 9: Cleared field from Pits Lane



Photo 10: Grazing marsh to the east and entrance gate to off road section of Wherryman's Way, off Pits Lane



Photo 11: Grazing marsh to the east and entrance gate to off road section of Wherryman's Way, off Pits Lane. Caravan park to right behind hedge.



1995 AIRPIC the site shown to right of centre.



1999 Google Earth Aerial



2003 Google Earth Aerial



January 2006 Google Earth Aerial



February 2006 Google Earth Aerial



2011 Google Earth Aerial

Appendix 2: Planning Policy

Planning Policy Guidance: Open space, sports and recreation facilities, public rights of way and local green space, 6.3.2014

Local Green Space designation

005 What is Local Green Space designation?

Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities.

006 How is land designated as Local Green Space?

Local Green Space designation is for use in [Local Plans](#) or [Neighbourhood Plans](#). These plans can identify on a map ('designate') green areas for special protection. Anyone who wants an area to be designated as Local Green Space should contact the local planning authority about the contents of its local plan or get involved in neighbourhood planning.

007 How does Local Green Space designation relate to development?

Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.

008 What if land has planning permission for development?

Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.

009 Can all communities benefit from Local Green Space?

Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.

010 What if land is already protected by Green Belt or as Metropolitan Open Land (in London)?

If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

One potential benefit in areas where protection from development is the norm (eg villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas that are of particular importance to the local community.

011 What if land is already protected by designations such as National Park, Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area?

Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

012 What about new communities?

New residential areas may include green areas that were planned as part of the development. Such green areas could be designated as Local Green Space if they are demonstrably special and hold particular local significance.

013 What types of green area can be identified as Local Green Space?

The green area will need to meet the criteria set out in [paragraph 77](#) of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

014 How close does a Local Green Space need to be to the community it serves?

The proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served.

015 How big can a Local Green Space be?

There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, [paragraph 77](#) of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.

016 Is there a minimum area?

Provided land can meet the criteria at [paragraph 77](#) of the National Planning Policy Framework there is no lower size limit for a Local Green Space.

017 What about public access?

Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty).

Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected.

018 What about public rights of way?

Areas that may be considered for designation as Local Green Space may be crossed by [public rights of way](#). There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation.

019 Does land need to be in public ownership?

A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.

020 Would designation place any restrictions or obligations on landowners?

Designating a green area as Local Green Space would give it protection consistent with that in respect of Green Belt, but otherwise there are no new restrictions or obligations on landowners.

021 Who will manage Local Green Space?

Management of land designated as Local Green Space will remain the responsibility of its owner. If the features that make a green area special and locally significant are to be conserved, how it will be managed in the future is likely to be an important consideration. Local communities can consider how, with the landowner's agreement, they might be able to get involved, perhaps in partnership with interested organisations that can provide advice or resources.

022 Can a Local Green Space be registered as an Asset of Community Value?

Land designated as Local Green Space may potentially also be nominated for listing by the local authority as an [Asset of Community Value](#). Listing gives community interest groups an opportunity to bid if the owner wants to dispose of the land.

Related policy: [paragraphs 76-78 \(NPPF\)](#)

NPPF: Section 9. Protecting Green Belt land

79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

80. Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

82. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale

development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

85. When defining boundaries, local planning authorities should:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

86. If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

90. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:

- mineral extraction;
- engineering operations;
- local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- the re-use of buildings provided that the buildings are of permanent and substantial construction; and
- development brought forward under a Community Right to Build Order.

91. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

92. Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within Community Forests in the Green Belt should be subject to the normal policies controlling development in Green Belts.

Appendix 3: Letter from Local MP

From: [REDACTED]
Sent: 19 January 2017 16:37
To: [REDACTED]
Subject: FW: Pacific Cruisers land nominated as Local Green Space!

Dear [REDACTED]

Further to my previous email, please find below the response from Cally Smith, Head of Planning at the Broads Authority.

You may wish to note Ms Smith's apology that you were not notified sooner that your land had been nominated. You will also wish to note that this is not the 'final' iteration of the Broads Local Plan and that any representation you send will be taken into account.

I trust you are reassured by this news but please do not hesitate to contact me if I can be of any further assistance.

Yours sincerely

Mike Rigby

MIKE RIGBY

Senior Researcher & Coordinator for 'How Should Norfolk Grow?'

Office of Richard Bacon MP | Member of Parliament for South Norfolk

From: Cally Smith
Sent: 19 January 2017 16:13
To: RIGBY, Mike
Cc: Natalie Beal; Andrea Long
Subject: RE: Pacific Cruisers land nominated as Local Green Space!

Dear Mike

Thanks for your email regarding the nomination of land at Chedgrave as Local Green Space and I hope the following will explain the position.

As part of the Local Plan process, a Local Planning Authority (LPA) is able to identify areas of Local Green Space which make a contribution to the setting or landscape of its area and which should be protected from development. The identification of an area as Local Green Space does not mean that it becomes public open space, just that its value to the area is recognised. Government advice, set out in The National Planning Policy Framework, is very clear in stating that local communities can put forward areas of Local Green Space that are important to them; the LPA must consider any such nominations.

In 2016, as part of the Issues and Options stage of the Broads Local Plan, the Broads Authority as LPA asked local communities to put forward any sites which are important to them as Local Green Space. We also emailed the Parish Councils again in summer 2016 asking for any nominations. A number of nominations were received, including from Chedgrave, and over the summer the sites which had been put forward were visited and assessed. You can see the result of the assessments and you can see that some nominations were not taken forward and some were: http://www.broads-authority.gov.uk/_data/assets/pdf_file/0005/827276/Appendix-L-i-Local-Green-Space-Nominations-and-Assessment3.pdf.

In June 2016 Andrew Milner, a resident of Chedgrave, put forward the site at Pacific Cruisers. This was assessed against the criteria in the guidance by officers at a site visit in July 2016 and it was concluded that the site possessed sufficient value to qualify for consideration as Local Green Space and should be taken forward for consultation at the next stage of the Broads Local Plan process. Accordingly, it was included in the Local Green Space nominations which are set out in the Preferred Options, which is the next stage of the Local Plan.

The consultation on the Preferred Options commenced on 3 December 2016, when this version of the Broads Local Plan was sent to all Parishes (and all other stakeholders on the LPA's contact database). This version of the document contains all the Local Green Space nominations which have merit and is the process of formal consultation on the Broads Local Plan and the stage at which stakeholders are informed of how the issues identified at the Issues and Options stage are proposed to be taken forward.

██████████ and then ██████████ contacted us at the start of the consultation as soon as they became aware of the nomination. We have had long discussions on the phone about the nomination and are well aware of their views. They both made the point that we could (and should) have contacted them earlier to advise that their land had been nominated. It is the case that the guidance relating to Local Green Space requires an LPA to notify a landowner whose land is nominated of that nomination and that this should be done at an early stage of the process. We identified and notified all landowners of land nominated as Local Green Space within the first 2 weeks of the 9 week consultation period and I am satisfied that this meets the requirements of the guidance. I do, however, agree that we could have notified ██████████ and ██████████ earlier, and apologise for not having done so. The important point is that they know now and can respond.

It is worth remembering that the process we are currently undertaking is a consultation and we are very pleased to receive the views of local residents, Parish Councils and others. This version of the Local Plan is not the final version - it is a further draft (a 'work in progress' as it were) and the whole purpose of consultation is so that we can hear the views of consultees and take these into account in deciding what changes should be made.

I hope the above is helpful.

Best wishes

Cally Smith
Head of Planning
Broads Authority

From: RIGBY, Mike
Sent: 19 January 2017 13:55
To: Natalie Beal
Cc: Lottie Carlton
Subject: FW: Pacific Cruisers land nominated as Local Green Space!
Importance: High

Dear Natalie

[REDACTED]

Please could I raise the matter below with you, which is that a firm at Loddon has had its land submitted to the forthcoming Broads Local Plan for Local Green Space without their knowledge or consent.

Please could you look into this matter and let me have your comments?

[REDACTED]

Many thanks & kind regards

Mike Rigby

MIKE RIGBY

Senior Researcher & Coordinator for *'How Should Norfolk Grow?'*
Office of Richard Bacon MP | Member of Parliament for South Norfolk

From: [REDACTED]
Sent: 10 January 2017 10:08
To: [REDACTED]
Subject: Pacific Cruisers land nominated as Local Green Space!
Importance: High

Dear Mr. Bacon

It has been brought to our attention from a neighbour that our land has been nominated to become Local Green Space as part of the Broads Local Plan by the Broads Authority.

I attach the link for the nomination (pages 11-15)
Link to Local Green Space Assessment: http://www.broads-authority.gov.uk/_data/assets/pdf_file/0005/827276/Appendix-L-i-Local-Green-Space-Nominations-and-Assessment3.pdf

and the Broads Plan (page 230).

The Local Green Space policy is on Page 230 of the Local Plan. http://www.broads-authority.gov.uk/_data/assets/pdf_file/0009/833976/Broads-New-Local-Plan-Preferred-Options.pdf

To date, the landowners have not been notified. Central government guidance (copy attached) does require landowners to be informed of the proposals at an early stage so that they may have the opportunity to make representations. We only have until 3 February when the consultation period ends.

It is felt that the land in question does not fit the criteria for Local Green Space. As it is presently, we would have to obtain planning permission from the parish councils, SNC & BA for anything.

As of 5 January, Chedgrave Parish Council were unaware of this nomination of land in their parish.

Also, it will mean that we wouldn't have a business as the land in question is used for our customer car parking and boat storage and has been for over 20 years.

I am hoping that you could write a letter to the planning department at the Broads Authority objecting.

Please email or telephone if you have any questions.

Many thanks and kind regards



Respondent: Pacific Cruisers

Lottie Carlton

From: Natalie Beal
Sent: 19 December 2016 08:53
To: Lottie Carlton
Subject: FW: Broads Local Plan - Preferred Options Consultation

Importance: High

From: Pacific Cruisers [REDACTED]
Sent: 17 December 2016 14:56
To: Natalie Beal; Lottie Carlton; Cally Smith
Subject: Broads Local Plan - Preferred Options Consultation
Importance: High

Please remove the Chedgrave section from the Broads Local Plan – POXNS12 Local Green Space as the landowners were not contacted at the early stage as outlined on the government's planning website.

http://planningguidance.communities.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/#paragraph_017

Does land need to be in public ownership?

A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.

Fiona Husband
Pacific Cruisers (Loddon) Ltd
www.pacificcruisers.co.uk
enquiries@pacificcruisers.co.uk
[REDACTED]



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Lottie Carlton

From: Pacific Cruisers [REDACTED]
Sent: 13 January 2017 10:55
To: Planning Policy Mail
Subject: Formal Objection - Broads Local Plan

Policy POXNS12: Local Green Space Chedgrave

I am very surprised that the Broads Authority Planning Department have proposed this totally inaccurate nomination.

It appears that this nomination has been made due to personal vested interests and not in the interests of the community or the environment.

It is totally unjustified that another layer of planning is necessary. Particularly when there is quite sufficient planning requirements currently in place.

Fiona Husband
Pacific Cruisers (Loddon) Ltd
www.pacificcruisers.co.uk
enquiries@pacificcruisers.co.uk
[REDACTED]



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Respondent: Residential Boat Owners' Association

Lottie Carlton

From: Ivor [REDACTED]
Sent: 24 January 2017 15:28
To: Natalie Beal; Planning Policy Mail
Cc: Alan Wildman; Beryl McDowall; Charles Foster
Subject: Residential Boat Owners' Association

Categories: Ack and Filed

Dear Natalie

I am responding to this consultation on behalf of the Residential Boat Owners' Association (RBOA). The RBOA is the only organisations which exclusively represents and promotes the interests of people living on boats in the British Isles. We represent those who have chosen to make a boat their home.

The RBOA is pleased to note that its comments made in response to the first stage of the Local Plan production process have been noted and are generally well represented in the second stage. We have therefore few additional comments to make.

In response to policies PODM30, moorings, mooring basins and marinas, and PODM35, new residential mooring criteria we wish to make the following additional point.

The RBOA advocates the inclusion of at least a few residential moorings at all appropriate mooring basins and marinas. This is important in supporting the viability of the businesses that may rely on income from such moorings. Boating activity naturally slows down out of the main season and this can make the sustainability of such businesses difficult. Residential moorings will sustain a demand for services and supplies throughout the year and may actually provide the income to enable business to increase the services for visiting leisure boats.

Along with this are the well established benefits of residential moorings including added security, particularly during the winter period when the management may not have a regular presence on site.

The RBOA notes the reference in the document to possible residential moorings at Brundall Riverside (POBRU 2-6) and Stalham Staithe (POSTA 1) and will be pleased to support these at the appropriate time.

The RBOA has responded separately to the issues regarding definition of houseboat and is please to note your confirmation that you are broadly in agreement with the definition used in the Housing and Planning Act 2016.

We thank you for the opportunity to respond and we would be obliged if you could notify us of future developments in the Local Plan.

Regards
Ivor

Ivor Caplan
Planning Officer,
Residential Boat Owners' Association

Respondent: River Thurne Tenants' Association

Lottie Carlton

From: diana cornell [REDACTED]
Sent: 23 January 2017 11:25
To: Natalie Beal
Cc: Cally Smith
Subject: Green Spaces/ Broads Plan

Morning Natalie and Cally,

Sorry to bother you as I know everyone your end is busy but we had an RTTA meeting last week. We discussed the Local Plan and the Green Spaces that will safeguarded at Potter.

One question please. Is there still mileage for added another Green Space to the list? Or spaces. The committee were wondering if some of the vacant mooring plots on the Martham Bank were eligible for this.

A number of plots, as you no doubt know, have been reassigned by the EA as having a 'C licence'. The Plot downriver from Sukie (plot M20B), the plot next to Reflections (Plot M10) have already been granted these licences. These plots, which were probably old bungalow plots or mooring plots, have been quay headed and one has had a caravan type floating home placed on it. Another has been tidied up and the trees, bushes etc taken down. This has annoyed some of our residents who were keen on the wildlife and trees.. not so keen on grass! Plots MR12, 13, 14 and M 22, 23, 24 have not been developed yet.

Would these spaces be eligible to earmark as Green Spaces?

Also thanks for the info on the Old Bridge Inn site, which we put forward as a Green Space but has been earmarked as a Brown Field site. This is understandable, as it is a prime site, even though at Potter! I was wondering what the Planning Dept would allow to be built there or what long term use BA would like to see of the site. Would it be possible to meet up with either yourself or Cally to discuss this. I could come to BA or the site itself. David and I are currently at our Cottage in Worstead for the winter but Potter's a short drive away, so can meet up when you are available.

The RTTA Committee are happy with the draft plan and have no other comments to make other than the additional Green Space mentioned. Thanks.

Happy Monday.. hope everything in the office is going well.

Happy New Year,

Extracts from the Broads Local Plan referred to in the draft representations from the RWT (Jan. 2017)

The vision for 2036.

[This is shared with the Broads Plan, the relevant strategic management plan, as opposed to this land use planning document, the Broads Local Plan.]

By 2036 the Broads will be a place where...

The natural environment and the beneficial goods, services and cultural values it provides, from food and energy to landscape character and recreation, are in good condition, are used fairly and sustainably, and are valued by society. In particular, the precious nature of clean, fresh water as a fundamental resource is understood and respected by all.

The past and present importance of the waterways for navigation, biodiversity and recreation is recognised and cherished, and the asset is protected, maintained and enhanced. Wildlife flourishes and habitats are maintained, restored, expanded and linked effectively to other ecological networks. Land and water are managed in an integrated way, with local and landscape scale management creating resilience and enabling flexible approaches to meet changing ecological, economic and social needs.

The living, working, 'big skies' landscape is notable for its natural beauty, distinctive local character and historic significance. People of all ages, abilities and circumstances experience and enjoy it as a place of escape, adventure, enjoyment, learning and tranquillity, and as a source of national pride and identity. Sustainable living can be seen in action and there is a buoyant rural economy. Local communities are taking an active part in decisions about their future and are known for having been pivotal in the transformation to a low carbon, 'climate-smart' society.

And finally, the Broads National Park is forever recognised as fundamental to our prosperity, health and wellbeing, and forever treasured as a special place that provides a "breathing space for the cure of souls".

Objectives

OBJ4 The rich and varied habitats and wildlife are conserved, maintained, enhanced and sustainably managed.

OBJ6 Water quality is improved and water is managed to increase capture and efficiency, prevent pollution and reduce nutrients. Flood risk to people, property and landscapes is managed effectively.

OBJ 14 People enjoy the special qualities of the Broads on land and on water. Access and recreation is managed in ways that maximise opportunities for enjoyment without degrading the natural, heritage or cultural resource. Navigation is protected, maintained and appropriately enhanced, and people enjoy the waterways safely.

Strategic policies

POSP2 (Extract)

Development and changes in land use / management must ensure that all aspects of the environmental and cultural assets of the Broads' distinctive landscape are protected, enhanced and restored. Opportunities must be taken to contribute to the sustainable development of the area. Particular attention will be paid to:

...

ix) maintaining the quality of natural resources;

...

xii) the value and integrity of nature conservation interest and objectives of European and national nature conservation designations paying attention to habitats and species including ecological networks and habitat corridors, especially linking fragmented habitats of high wildlife value;

POSP3: Air, water and waste

The environment will be protected and enhanced by ensuring all development addresses impacts on air quality, water quality, water resources and waste. Opportunities should be sought for incorporating measures to achieve resource efficiency, for re-use and recycling.

POSP4: Flood Risk

All new development will be located to minimise flood risk, mitigating any such risk through design and implementing sustainable drainage (SuDS) principles.

Development within the Environment Agency's flood risk zones will only be acceptable when it:

- i) Is compatible with national policy and when the sequential test and the exception test, where applicable have been satisfied;
- ii) a site specific Flood Risk Assessment, where required demonstrates an acceptable flood risk and/or suitable flood protection mitigation measures are incorporated into the proposals, where necessary, which can be satisfactorily implemented;
- iii) it is and will remain safe for people for the lifetime of the development'
- iv) Would not increase flood risk elsewhere and, wherever possible, is reduced;
- v) Does not undermine the integrity of existing coastal and river defences; and
- vi) Would not affect the ability for future flood alleviation projects to be undertaken.

All new development will incorporate appropriate surface water drainage mitigation measures to minimise its own risk of flooding and should not materially increase the flood risk to other areas.

Particular care will be required in relation to habitats designated as being of international importance in the area and beyond which are water sensitive, as well as habitats designated for regional or local importance.

Development proposals that would have an unacceptable adverse impact on flood risk management will be refused.

Policy POSP8: Getting around the Broads

Safe recreational access to both land and water and between the water's edge and the water will be protected and improved through:

- i) Developing the Public Rights of Way (PRoW) network in line with the recommendations of the Norfolk and Suffolk Rights of Way Improvement Plans;
 - ii) Developing and/or improving access to other areas of the Broads from land and water, where appropriate.
 - iii) Identifying and safeguarding potential crossing points of land and water;
 - iv) Protecting and improving moorings, staithes and slipways;
 - v) Creating new access to the waterside by boat (where there is good road access and provision for parking);
 - vi) Improving and maintaining launching facilities for small craft;
 - vii) Protecting and creating waterside spaces for informal recreation;
 - viii) Incorporating and developing appropriate measures for disabled people.
- Improved access will only be permitted where impacts on the natural environment have been assessed and mitigated for.

Development Management Policies

Policy PODM1: Water Quality

Development will only be permitted where it can be demonstrated that it will not have an adverse impact on waterbodies, including surface and ground water, in terms of quality and quantity. This should include the requirements of the Water Framework Directive and Habitats Regulations.

Applicants are required to demonstrate there is adequate sewage treatment provision to serve the development or that this can be made available in time for the commencement of the development and demonstrate that there is available capacity within the foul sewerage network or that capacity could be made available.

Development is required to be connected to a foul sewer unless proven not to be appropriate. If connection to a foul sewer is proven to be inappropriate, only then will other arrangements of package sewerage treatment works and septic tanks be considered and only in that order. These will only be permitted if the Authority is satisfied that these systems will work for the expected use and there would be no harmful effects on the environment.

The Authority encourages proposals to consider the use of constructed reed beds¹⁴ as a filtration system to remove nutrients before the waste water

from small sewage treatment plants, package treatment works and septic tanks enters waterbodies.

All new development and replacement buildings generating foul water and extensions increasing occupancy are required to submit a foul drainage assessment with applications.

Extensions that increase occupancy are required to improve the existing method of drainage of the entire property if appropriate.

To ensure the protection of designated sites, no new development requiring connection to the public foul drainage system within the Horning Knackers Wood Catchment, is allowed to take place until it is confirmed capacity is available within the foul sewerage network and at the Water Recycling Centre to serve the proposed development.

Policy PODM2: Boat wash down facilities

Where development is proposed for recreational boating club facilities (new, rebuild or extensions) that increase the use of the club, there will be a requirement to designate and sign a suitable area for wash-down of vessels as part of good biosecurity practice.

Where development is proposed (new, rebuild or extensions) that increases the use of existing boatyards, marinas and mooring basins or is related to maintaining or washing down boats, there will be a requirement to designate a suitable area with adequate facilities to enable the filtration of waste water from the washing of boat hulls with the ultimate aim of preventing anti fouling paint residues (including paint flakes) entering the water.

Policy PODM4: Flood Risk

All new development will be located to minimise flood risk, mitigating any such risk through design and implementing sustainable drainage (SuDS) principles.

Development will only be permitted in Environment Agency Flood Zones 2 and 3 when deemed an appropriate form of development (Table 3 para 67 NPPG) and where necessary the Sequential Test and Exceptions Test as set out in the NPPG, have been satisfied. Development proposals should be supported by a Site Specific Flood Risk Assessment.

The Flood Risk Assessment will need to meet the requirements of the NPPG and demonstrate/assess the following:

- a) That the development is safe for its lifetime taking into account the vulnerability of its users;
- b) Whether the proposed development will make a significant contribution to achieving the objectives of the Local Plan;
- c) Whether the development involves the redevelopment of previously developed land or buildings and would result in environmental improvements over the current condition of the site;

- d) Whether appropriate measures to ensure resilience to potential flooding have been incorporated into the development;
- e) Whether appropriate measures to reduce the risk of flooding (on and offsite), including sustainable drainage systems with effective attenuation of flows to adjoining land or waterways, have been incorporated;
- f) Where the proposal involves the replacement of an existing building, whether the replacement building is located and/or designed without increasing flood risk and, where possible, to reduce the risks and effects of flooding;
- g) Demonstrates an acceptable flood risk and/or suitable flood protection mitigation measures are incorporated into the proposals, where necessary, which can be satisfactorily implemented;
- h) Whether the risk of flooding is not increased elsewhere and, wherever possible, is reduced;
- i) Demonstrates that the integrity of existing coastal and river defences are not undermined;
- j) Do not reduce the potential of land used for current or future flood management;
- k) Are compatible with the appropriate Catchment Flood Management Plan or Shoreline Management Plan;
- l) Use development to reduce the risk of flooding through location, layout and design and incorporate sustainable drainage systems to minimise surface water run-off and avoid pollution (see PODM5);
- m) Applicants demonstrate that sites at little or no risk of flooding are developed in preference to areas at higher risk;
- n) Safe access and egress from the site;
- o) Management and maintenance plans for flood protection/mitigation measures, including arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime;
- p) It would not negatively impact on water quality of surface water and ground water.

The relocation of existing development to an undeveloped site with a lower probability of flooding will be permitted where:

- q) The vacated site would be reinstated as naturally functioning flood plain;
- r) The benefits of flood risk reduction outweigh the benefits of leaving the new site undeveloped; and
- s) The development of the new site is appropriate when considered against the other policies of the Local Plan.

Where, as a result of applying the sequential test, a development is approved on an exceptions basis, planning agreements or developer contributions will be sought to ensure that the development is protected from flooding to the appropriate standard throughout its lifetime. Any required additional or enhanced flood defences should not conflict with the purposes and special qualities of the Broads.

Particular care will be required in relation to habitats designated as being of international importance in the area and beyond which are water sensitive, as well as habitats designated of regional or local importance. Surface water

run-off proposals should address the requirements of the Flood and Water Management Act 2010.

Policy PODM5: Surface water run-off

With the exception of minor developments all developments will demonstrate that they have incorporated measures to attenuate surface water run-off which are appropriate to the Broads in accordance with a drainage hierarchy for rainwater so that, in order of priority, they:

- a) continue natural discharge processes;
- b) store water for later use;
- c) adopt infiltration techniques in areas of suitable porosity;
- d) store water in open water features for gradual release to a watercourse;
- e) store water in sealed water features for gradual release to a watercourse;
- f) discharge direct to a watercourse;
- g) discharge direct to a surface water drain;
- h) discharge direct to a combined sewer.

Sustainable Drainage Systems (SuDS) shall be used unless, following adequate assessment, soil conditions and/or engineering feasibility dictate otherwise.

Proposals to address surface water must be considered at an early stage of the scheme design process:

- i) Taking natural site drainage and topography into account;
- ii) Effectively manage water including maintenance of and, where possible improvement to water quality; and
- iii) Provide amenity for local residents whilst ensuring a safe environment.

Where SuDS via ground infiltration is feasible, in order to ensure that SuDS discharge water from the development at the same or lesser rate as prior to construction, developers must undertake groundwater monitoring within the winter period and winter percolation testing in accordance with the current procedure²³.

Minor developments are encouraged to incorporate mitigation measures to reduce surface water runoff, manage surface water flood risk to the development itself and to others, maximise the use of permeable materials to increase infiltration capacity, incorporate on-site water storage and make use of green roofs and walls wherever reasonably practicable.

Within the critical drainage catchments as identified by the Lead Local Flood Authority and in other areas where the best available evidence indicates that a serious and exceptional risk of surface water flooding exists, all development proposals involving new buildings, extensions and additional areas of hard surfacing shall ensure that adequate and appropriate consideration has been given to mitigating surface water flood risk.

Schemes that involve SuDS will be required to provide details of the management regime to ensure effective operation of the type of SuDS delivered.

Policy PODM13: Natural Environment

All development shall:

- a) Protect biodiversity value and minimise the fragmentation of habitats;
- b) Maximise opportunities for restoration and enhancement of natural habitats;
- c) Incorporate beneficial biodiversity and geological conservation features where appropriate; and
- d) Include green infrastructure where appropriate.

Proposals on previously developed/brownfield land may require surveys to determine if the site has open mosaic habitat on previously developed land. If the assessment then concludes that the site is of high environmental value, the design of the scheme is required to protect and enhance these areas and/or design appropriate compensation and off site mitigation measures.

Development proposals where the principal objective is to restore or create new habitat will be supported.

Any proposal which would adversely impact a European site, or cause significant harm to a SSSI will not normally be granted permission. Development should firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity and geodiversity.

Where it is anticipated that a development could affect the integrity of a Special Protection Area (SPA), Special Area of Conservation (SAC) or Ramsar Site, either individually or cumulatively with other development, a Habitat Regulation Assessment under the Habitats Regulations, will be undertaken. If adverse impacts on the integrity of the site and its qualifying features are predicted, measures to mitigate for these effects will be implemented. If it is not possible to mitigate satisfactorily for adverse effects, the development will not be permitted. If there is no alternative solution, the consideration of imperative reasons of overriding public interest, despite a potentially negative effect on site integrity can be considered.

Development that may affect the special interest of a Site of Special Scientific Interest (SSSI) (which is not also subject to an international designation) or a National Nature Reserve will only be permitted in exceptional circumstances where:

- e) There is no significant harm to the features of the site
- f) The benefits of the development clearly outweigh the impact of the development on the features of the designated site and the contribution that the designated site makes to the network of habitats and/or geological features in England; and
- g) The detrimental impact of the proposal on biodiversity interest and/or geodiversity has been minimised through the use of all practicable prevention, mitigation and compensation measures.

Development that would have an adverse impact on a Local Nature Reserve, County Wildlife Site, a section 41 priority habitat identified under the

Natural Environment and Rural Communities (NERC) Act 2006, or a local site of geodiversity, including peat soils, will only be permitted in exceptional circumstances, having regard to the international, national, regional and local importance of the site in terms of its contribution to biodiversity, scientific and educational interest, geodiversity, visual amenity and recreational value.

Development that would be likely to have an adverse impact on a legally Protected Species or Priority Species will only be permitted where mitigation measures are implemented to maintain the population level of the species at a favourable conservation status within its natural range. Habitat and species enhancement will be required. Where the proposed development would impact upon European Protected Species or habitats it must also be demonstrated that:

- h) The development is necessary for reasons of overriding public interest; and
- i) There are no satisfactory alternatives, in terms of the form of, or location for, the development, that would have a lesser impact on the species or habitats.

Policy PODM28: Access to the Water

Developments that support and encourage the use of waterways, including the provision of supporting infrastructure for navigation, such as the construction of moorings, jetties and walkways and the provision of electric hook up points, will be permitted provided that they:

- a) Would not adversely impact navigation
- b) Would not result in hazardous boat movements;
- c) Would not compromise opportunities for access to, and along, the waterside, access to and use of staithes, or for waterway restoration; and
- d) Are consistent with the objectives of protecting and conserving the Broads landscape and ecology, including the objectives of the Water Framework Directive;
- e) Would not prejudice the current or future use of adjoining land or buildings.

Proposals incorporating staithes or slipways will be permitted where:

- f) The use of the slipway and any associated uses or facilities, including car parking, would not have an adverse effect on either the waterway or the adjacent riverside, including ecological, biodiversity or flood risk effects; and
- g) Access and other highway requirements for cars and trailers would be adequately provided for (in line with transport policies).

Development proposals for new freight wharves and for the provision of freight interchange on brownfield sites adjacent to the navigation will be permitted where these are in accordance with the other policies of the Local Plan.

Lottie Carlton

From: Lottie Carlton
Sent: 09 January 2017 12:09
To: Geoff Doggett
Subject: River Waveney Trust

Categories: Ack and Filed

Dear Geoff Doggett

Thank you for submitting a response to the Broads Local Plan Preferred Options consultation on behalf of the River Waveney Trust. Please treat this email as acknowledgement of receipt.

Kind regards

Lottie Carlton
Administrative Officer
01603 756044

From: [REDACTED] **On Behalf Of** Geoff Doggett
Sent: 09 January 2017 07:48
To: Planning Policy Mail
Cc: Clare Mackney
Subject: Local Plan consultation response from River Waveney Trust

Dear Sirs.

The River Waveney Trust (RWT) cares for the Waveney, its ecology, water quality and environment, and is committed to public enjoyment of the river, education and working with our local communities.

RWT welcomes the particular emphasis given in the Broads Local Plan 'Vision for 2036' to 'the precious nature of clean, fresh water as a fundamental resource' (p.23) and the recognition of declining water quality as a continuing problem (p.20). RWT especially welcomes objectives that aim to enhance, and not simply maintain, local habitats (OBJ4) and water quality (OBJ6), and their associated Strategic and Development Management policies, specifically:

POSP 3 (Air, water, waste; enhancement and protection of the environment) together with PODM1 (Water quality), PODM2 (Boat wash down facilities);

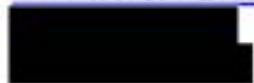
POSP4 (Flood risk), with PODM4 (Flood risk) and PODM5 (Surface water run-off).

The Trust strongly supports PODM13, which sets out the criteria for assessing the impact of proposals on the natural development, but notes that despite OBJ4 on the enhancement of habitats, this matter is only dealt with briefly at strategic policy level in POSP2; RWT considers that protection and promotion of biodiversity is worthy of fuller and more explicit strategic policy support.

The RWT also supports POSP8 (Getting around the Broads) and notes that projects such as its pocket parks at Scole and Homersfield help implement these strategic aims.

Clare Mackney (Planning consultant) on behalf of:

Geoff Doggett
Founding Trustee - River Waveney Trust
www.riverwaveneytrust.org





Ms Beal
Planning Policy Officer
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

03 February 2017

Dear Ms Beal

Broads Local Plan Preferred Options Consultation

Thank you for the opportunity to comment on the Preferred Options for the Broads Local Plan. We are encouraged by the draft policies and consider that, overall, they provide a comprehensive and robust approach to ensuring development can take place without adversely affecting the important habitats and species which contribute to making the Broads such a special place. The evidence base for the Broads Plan demonstrates that there remains a lot to be done to protect and restore habitats within the Broads (44.1% SSSIs in Unfavourable condition and only 1 river achieving Good ecological status). These data demonstrate the need for robust policies that supports work to prevent further deterioration and deliver restoration and enhancements. Through protecting and enhancing the Broads habitats and species considerable added value is gained through the wider natural capital benefits for both residents and tourists that are also protected and enhanced.

Whilst we are impressed by the approach to policy development and the content of the Local Plan preferred options, we do have some comments on the current document and supporting assessments. Our detailed comments are provided in Appendix 1. In summary, our comments are:

- A number of policies do not accurately reflect the tests set out in the Habitats Regulations (PODM1: Water Quality Policy; PODM15: Renewable Energy; Policy PODM17: Land Raising Policy; Policy PODM19: Utilities Infrastructure Development; Policy PODM26: Sustainable Tourism and Recreation Development; PODM34: Gypsy, Traveller and Travelling Show People). This is typically highlighted through the use of the phrase “unacceptable adverse effect”. Under the Habitats Regulations, an impact is either adverse or not and the additional qualification in the phrase above does not reflect the thresholds that have been set to ensure damaging activities around the best areas for habitats and species are prevented.
- A number of policies promote the protection, creation and enhancement of green infrastructure (PODM1: Water Quality; PODM5: Surface water run-off; Policy PODM8: Green Infrastructure; Policy PODM23: Transport, highways and access; Policy POSP14: Developer Contributions). Whilst the RSPB supports this requirement for the range of environmental and societal benefits that this can deliver, it is unclear how such green infrastructure will be effectively managed in perpetuity. The Land Trust has a number of examples of how funding mechanisms can be implemented

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working to give nature a home around the world.

effectively. We recommend that the policy highlight green infrastructure needs to function for the life of the development and that appropriate options for ensuring ongoing management are outlined. This is important given the limitations in delivery of green infrastructure projects utilising S106 and Community Infrastructure Levy funding alone. An example of an approach to policy on the need for “unambiguous and clear management and maintenance plans” to be in place for new development can be found in the Exeter Residential Design Supplementary Planning Document (SPD; p.29) (available at: <https://exeter.gov.uk/planning-services/planning-policy/supplementary-planning-documents/residential-design-guide-spd/>).

- Update of the Sustainability Appraisal to reflect the Habitats Regulations Process correctly.
- Update of the Habitats Regulations Assessment (HRA) to consider the impact of proposals on the revised boundary of the proposed extension to the Outer Thames Estuary pSPA. There are also some policies that do not appear to have been considered in the HRA (PODM15 (Renewable Energy) and POSP10 (Navigable Water Space)). It is essential that these policies be screened now to identify any modifications that might be required to ensure they are acceptable at the submission stage.

The RSPB has also reviewed the ten questions that have been posed in the preferred option consultation. Our responses to relevant questions are set out below:

Question 2: Do you have any thoughts on the Broads Plan and the Broads Local Plan having a shared Vision for the Broads?

The RSPB agrees that a common vision between both the Broads Plan and Broads Local Plan would be sensible. This vision should be a vision for the Broads and should capture both the management issues and planning issues that need to be addressed. Planning for the built and non-built elements within the Broads should be as joined up as possible and a common vision would help ensure this happens.

Question 4: Do you have any thoughts on how the Local Plan should address soil?

The RSPB supports the approach to protecting peat soils. However, many of the issues affecting the Broads habitats and species relate to the need to conserving soils in general. This is particularly important to reduce sedimentation of watercourses and waterbodies and limit nutrient inputs through surface run-off. The RSPB considers a separate policy for soils may be appropriate for the reasons set out by Natural England. This is a topic related to land management which should be covered within the Broads Plan, but could also be affected by development. The RSPB, therefore, supports Option 2 of the ways to “*address soil in the Local Plan.*”

Question 5: The Authority is considering producing a bespoke, user friendly guide for development in the Broads. Do you have any thoughts on this?

The RSPB has highlighted in our comments on the Broads Plan that living within environmental limits is an intrinsic requirement of sustainable development, important for biodiversity in its own right and also for the health and wellbeing of communities. We recognise the positive work that has been done to produce planning guidance documents and support the production of the “Broads Authority biodiversity enhancements planning guidance” that was produced in November 2016. The guidance highlights a range of measures that should be considered to incorporate habitats and species into new development and is probably sufficient for this topic.

A guide for development, however, should consider wider issues, especially how development and the environment can be integrated. The Exeter Residential Design Supplementary Planning

Document (SPD) (available at: <https://exeter.gov.uk/planning-services/planning-policy/supplementary-planning-documents/residential-design-guide-spd/>) is an excellent example of how this can be done with core principles of this SPD being:

- Sustainable Design (e.g. *maximise the potential for biodiversity and green infrastructure*);
- Integrated landscape design (e.g. planting);
- Integrated biodiversity (e.g. *the design and layout of new residential development will protect and enhance biodiversity on the site, and enhance connections between ecological features within and across the site. Existing areas and features of biodiversity value should be incorporated into the design and layout and wherever reasonably possible enhanced*);
- Making connections (e.g. good pedestrian, cycle and public transport links);
- Services (e.g. *service corridors identified at the start of the design process to avoid conflicts between existing and proposed trees*).
- Energy and drainage (e.g. *Sustainable Urban Drainage Systems (SUDS) must be integrated into the layout at the start of the design process*).

A bespoke guide would also have the opportunity to set out concisely and clearly the planning processes that need to be considered for different development requirements, for example, the Habitats Regulations, protected species and flood risk.

The key point is that whatever guidance is produced is user friendly. A single reference document that combines all relevant guidance into one place would be a starting point. It would also allow for consideration of formats that such information could be distributed, for example, the use of web based platforms.

Electronic copies of relevant reports that have been referenced are provided alongside this letter.

If you have any queries regarding our comments, please do not hesitate to contact me. We would be happy to meet to discuss our comments prior to the submission stage if that would be helpful.

Yours sincerely,



Philip Pearson (Dr)
Senior Conservation Officer
RSPB Eastern England Regional Office

Appendix 1: Detailed comments on the Broads Local Plan Preferred Options.

Ref	Section	Page	Comment
1	4.5 The Biodiversity of the Broads	11	It is assumed that the second sentence of the first paragraph is intended to read “...a predominantly freshwater ecosystem...”
2	8.2 Draft Local Plan Objectives (2012-2036)	23-24	<p>We recommend that the text for Objective 5 replaces “balanced way” with “beneficial and integrated way”, which would be consistent with recommendations for policies made in the Habitats Regulations Assessment.</p> <p>The text for Objective 6 should also be amended to “water quality is improved, with appropriate measures implemented to increase capture and efficiency, prevent pollution and reduce nutrients...” Managing water alone will not help to prevent pollution or reduce nutrients, this can only be achieved through appropriate land management and measures to control inputs/discharges to watercourses/bodies.</p>
3	POSP1: DCLG/PINS Model Policy	26-27	<p>The RSPB notes that the supporting text highlights that the presumption in favour of sustainable development proposals does not apply when a Likely Significant Effect on a Natura 2000 sites is identified. This is consistent with paragraph 119 of the National Planning Policy Framework:</p> <p><i>“119. The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.”</i></p> <p>However, we suggest including this statement within the actual policy text would be stronger.</p>
4	POSP2: Sustainable Development in the Broads	27-30	The RSPB recommends that recognition of the importance of local wildlife is included within consideration (xii).
5	PODM1: Water Quality	33-35	<p>Whilst the use of reedbeds to filter waste water is encouraged, consideration will need to be given to the management of such measures to ensure they continue to function. Production of a management plan will be required to demonstrate they will continue to function as intended in perpetuity.</p> <p>The text for the Knackers Wood Water Recycling Centre indicates the monitoring should have been completed last year to understand the capacity issues and whether they have been resolved. Clarity on the current situation should be provided for the final iteration of the Local Plan.</p>
6	POSP4: Flood Risk	38-39	The penultimate paragraph/sentence of the policy text needs to be amended to state “...habitats of national or local importance.” There are no site designations of regional importance and the policy should accurately reflect the hierarchy for protected areas: international, European, national and local sites of importance.
7	PODM4: Flood Risk	39-42	The penultimate paragraph/sentence of the policy text needs to be amended to state “...habitats of national or local importance.” There are no site designations of regional importance and the policy should accurately reflect the hierarchy for protected areas: international, European, national and local sites of importance.

8	PODM5: Surface water run-off	42- 44	<p>It is unclear in the supporting text (p.44) why management of the SuDS “...during construction phase” only is required to ensure they operate effectively. Once constructed a management plan should be in place, along with appropriate resources, to ensure they continue to operate in perpetuity. Management during construction only is inadequate and the text needs to be strengthened. Planning for management of such features into the future will also help maximise the full range of benefits that SuDS can provide, for example, habitat and biodiversity enhancement.</p> <p>Good examples of how development can be planned to manage water and deliver multiple benefits effectively are outlined in the RSPB/WWT report ‘Sustainable drainage systems: maximising the potential for people and wildlife – A guide for local authorities and developers’ (available at https://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf).</p>
9	Policy PODM8: Green Infrastructure	49- 51	<p>The green infrastructure typologies appear to have been taken from Natural England’s Green Infrastructure Guidance (2009). The habitat types listed are intended to cover the whole of England. It would be appropriate to tailor the habitat examples provided to fit with the Broads and it is recommended that reference to ‘downland’ and ‘moor’ be removed.</p> <p>The RSPB recognises the extra information on biodiversity enhancements contained within the standalone guide produced by the Broads Authority in 2016. We support the reference to this guide to ensure it is given appropriate consideration in the decision-making process.</p>
10	Policy PODM10: Peat	55- 58	<p>This is comprehensive, well thought through and if properly implemented, should go a good way to protecting peat in the Broads and supporting sustainable development.</p> <p>Whilst supportive of the policy, the first sentence should be amended to “Peat soils”. This more accurately reflects that the policy is seeking protection for this soil type across the Broads rather than a few specific locations.</p> <p>The supporting text needs amending to accurately describe the habitat type that is affected in the Broads; the currently used term “lowland peat bog” is inaccurate. The peat forming habitat of the Broads should be defined as lowland fen, the majority of which is calcareous in nature. The JNCC website defines this particular habitat in more detail (emphasis added):</p> <p><i>“Lowland fens are minerotrophic peatlands (i.e. their nutrients come from ground water as well as rain water), that are at least periodically waterlogged. Although they are underlain by peat, decomposition tends to be relatively high and so the peat depth is shallow and there is no peat dome (as with raised bogs). Fens are complex and dynamic systems; they frequently form complex mosaics with a number of associated habitat types, including wet woodland (fen carr), reedbed, lowland heathland and lowland meadow.</i></p> <p>The predominant European habitat types of importance to the Broads are set out in the citation for The Broads Special Area of Conservation (SAC)¹ (broad habitat and priority habitat category types added in bold)^{2,3}:</p>

¹ JNCC (undated) Site account of The Broads Special Area of Conservation. Accessed from web page 16 January 2017.

² Information taken from <http://jncc.defra.gov.uk/page-5706>. Accessed from web page 16 January 2017.

			<ul style="list-style-type: none"> • 3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp. [UK standing water habitat – Oligotrophic & Dystrophic Lakes] • 3150 <i>Natural eutrophic lakes with Magnopotamion or Hydrocharition</i> - type vegetation [UK standing water habitat – Eutrophic Standing Waters] • 7140 Transition mires and quaking bogs [UK Fen, Marsh & Swamp - lowland fen habitat] • 7210 Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>*⁴ [UK Fen, Marsh & Swamp - lowland fen habitat] • 7230 Alkaline fens [UK Fen, Marsh & Swamp - lowland fen habitat] • 91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, <i>Alnion incanae</i>, <i>Salicion albae</i>)*² [UK broadleaved and mixed woodland habitat – Wet Woodland] • 6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinion caeruleae</i>)⁵ [UK Fen, Marsh & Swamp - lowland fen habitat] <p>Based on the SAC citation the features of importance justify the need to amend the broad peat-forming habitat type used in the Local Plan as 'lowland fen'.</p>
11	Policy PODM13: Natural Environment	66-69	<p>The RSPB fully supports this policy. This provides a robust approach to ensuring development is appropriate and will not only protect and maintain habitats and species but also seek enhancements. This reflects the approach to sustainable development set out in the National planning policy Framework (NPPF).</p> <p>However, some amendment is needed to clarify the Habitats Regulations approach to identifying Imperative Reasons of Overriding Public Interest. In the supporting text the paragraph split between pages 67 and 68 outlines what factors may constitute “public interest.” It should be clearly stated that for Special Areas of Conservation, where ‘priority’^{2,6} habitats and species will be affected, only factors relating to public health, public safety and beneficial consequence of primary importance to the environment would constitute IROPI. It should also be clearly stated that the IROPI test can only be considered once all alternative solutions that would be less environmentally damaging have been assessed. Developments for which IROPI could apply will be exceptional.</p> <p>It is helpful to see that the condition of SSSIs within the Broads has been assessed. However, this highlights that there remains a lot of work to be done</p>

³ Information taken from <http://jncc.defra.gov.uk/page-3526>. Accessed 16 January 2017

⁴ The JNCC website regarding ‘priority natural habitat types’ under the EU Habitats Directive states: *A sub-set of the Annex I habitat types are defined as being ‘priority’ because they are considered to be particularly vulnerable and are mainly, or exclusively, found within the European Union (Article 1d). The importance of these priority habitat types is emphasised at several places in the Directive (Articles 4 and 5 and Annex II), not only in terms of the selection of sites, but also in the measures required for site protection (Article 6) and surveillance (Article 11). Such ‘priority’ habitats are denoted with an asterisk.*

⁵ Annex I habitat present as a qualifying feature, but not a primary reason for selection of this site.

⁶ “i.e...Habitats legislation differentiates between “priority” habitats and species and other protected habitats and species, with the former receiving a higher level of protection.” Taken from: Defra (2012) Habitats and Wild Birds Directives: guidance on the application of article 6(4) Alternative solutions, imperative reasons of overriding public interest (IROPI) and compensatory measures. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69622/pb13840-habitats-iropi-guide-20121211.pdf

			to restore and protect such sites which are identified for their national importance for habitats and species. Of particular concern is that the proportion of sites <i>“in an ‘unfavourable condition’ is significantly above the national average.”</i> This justifies the need for strong policies to protect the Broads environment for its own sake and the additional natural capital benefits that it provides.
12	Policy PODM15: Renewable Energy	71-73	<p>The RSPB recommends that the term “unacceptable impact” be amended to “adverse effect”. This would provide consistency with other policies. It is also suggested that the supporting text be strengthened to include avoidance of adverse effects on SSSIs and local sites as well as international sites to ensure consistency with the whole of Policy PODM13 (Natural Environment).</p> <p>This change would be consistent with the HRA recommendation for Policy POSP9 (Sustainable Tourism).</p>
13	Policy PODM17: Land Raising	76-77	<p>The RSPB recommends that the term “unacceptable adverse impacts” be amended to “adverse effects”. This is necessary as the current wording indicates that some level of adverse effect would be acceptable, which clearly is not the case, for example, when compared to the Habitats Regulations process. This would also ensure consistency with other policies, for example, the approach taken in Policy PODM13 (Natural Environment).</p> <p>Subject to the factors that must not be adversely affected, some land raising may be necessary for habitat creation/restoration. The positive benefits that can be derived from land raising should not be prevented.</p>
14	Policy PODM19: Utilities Infrastructure Development	78-80	The RSPB recommends that the term “unacceptable impact” be amended to “adverse effect”. This would provide consistency with other policies.
15	Policy POSP8: Getting around the Broads	90-91	The RSPB recommends that the final sentence of the policy be amended to <i>“...assessed and appropriately mitigated.”</i> This will help with clarity on the need for mitigation to be of a suitable scale and type to address impacts.
16	Policy PODM23: Transport, highways and access	91-93	The RSPB supports measures to encourage people to explore and enjoy the Broads environment in ways that are appropriate to the sensitivities of particular locations. Where appropriate, improved access could be positive. However, it is unclear who will have responsibility for managing any enhanced Public Right of Way network. It is one thing to designate a route, but another to maintain management that allows it to be used. Further detail should be provided on future management, specifically the role of landowners/managers.
17	Policy PODM26: Sustainable Tourism and Recreation Development	104-106	<p>The RSPB recommends that in bullet point (ix) the term “unacceptable adverse impacts” be amended to “adverse effects”. This is necessary as the current wording indicates that some level of adverse effect would be acceptable, which clearly is not the case, for example, when compared to the Habitats Regulations process. This would also ensure consistency with other policies, for example, the approach taken in Policy PODM13 (Natural Environment).</p> <p>This change would be consistent with the HRA recommendation for Policy POSP9 (Sustainable Tourism).</p>

18	Policy POSP10: Navigable Water Space	109- 110	<p>It is recommended that the first sentence of the final policy paragraph be amended to read: “...<i>carried out in ways that avoid adverse effects on the environment, with appropriate mitigation measures implemented as required.</i>” This is necessary as the current wording indicates that some level of adverse effect would be acceptable, which clearly is not the case when compared to the Habitats Regulations process. It is also essential that the policy is consistent with processes set out in other policies, for example, the Habitats Regulations approach set out in Policy PODM13 (Natural Environment).</p> <p>In order to ensure that dredged material is appropriately disposed of the Broads Authority has followed its sediment management strategy. However, it appears that the current strategy is several years old and would benefit from a revision. It is recommended that the supporting text refer to keeping the sediment management plan updated. This will be important in ensuring the delivery of Policy POSP10 and that the work is appropriately coordinated and conducted in accordance with all necessary consents processes.</p>
19	Policy PODM34: Gypsy, Traveller and Travelling Show People	130- 132	<p>The RSPB recommends the term “unacceptable adverse impacts” be amended to “adverse effects”. This is necessary as the current wording indicates that some level of adverse effect would be acceptable, which clearly is not the case, for example, when compared to the Habitats Regulations process. This would also ensure consistency with other policies, for example, the approach taken in Policy PODM13 (Natural Environment).</p> <p>This change would be consistent with the HRA recommendation for Policy POSP9 (Sustainable Tourism).</p>
20	Policy POSP14: Developer Contributions	159- 161	<p>The RSPB recommends that the policy and/or supporting text is strengthened to highlight that not only will measures such as green infrastructure be secured and created, but that, depending on the mechanism adopted, an appropriate management and maintenance plan will be in place and resourced to ensure the site is managed effectively into the future. Any measures implemented as mitigation must be maintained to ensure that they continue to function for the life of the development.</p>
21	Site Specific Policies	167- 231	<p>As per Policy POBRU6 (Brundall Gardens), it is recommended that the specific Natura 2000 site, Ramsar site or SSSI name be given for clarity in the “constraints and features” section of the supporting text for the site specific policies.</p> <p>It is also recommended that policies that will allow some development to take place in areas that could affect Natura 2000 and Ramsar sites will be required to undertake a Habitats Regulations Assessment. This is a requirement of all plans and projects. This would ensure conformity with Policy PODM13 and other relevant policies. Policies where this would be appropriate include: POBRU4: Brundall Marina POBRU6: Brundall Gardens POFLE1: Broadland Sports Club POORM1: Ormesby waterworks POXNS1: Trinity Broads POXNS4: Main road network POXNS11: Former rail trackways</p>
22	Policy POGTY1: Marina Quays	186- 187	<p>This policy needs to be strengthened to ensure that impacts on protected areas are avoided. It should particularly acknowledge that the extended Outer</p>

	(Port of Yarmouth Marina)		Thames Estuary pSPA proposed boundary will be adjacent to this site. Any development will therefore need to consider impacts on foraging terns (which are already a feature of the nearby Breydon Water SPA). Given that this site could be developed, it is recommended that <i>“A project level Habitats Regulations Assessment may be required to support proposals”</i> be added to the policy text, which would be consistent with Policies PONOR1 (Utilities Site), POOUL3 (Oulton Broad – Former Pegasus/Hamptons Site) and POTHU1 (Tourism development at Hedera House, Thurne). The <i>“Constraints and features”</i> should be updated to include the extended Outer Thames Estuary pSPA.
23	Sustainability Appraisal: Appropriate Assessment	6	<p>The text regarding the Habitats Regulations process is incorrect. The inaccuracies relate to:</p> <ul style="list-style-type: none"> • The Habitats Regulations transpose both the European Commission Birds Directive and Habitats Directive into UK law under the Conservation of Habitats and Species Regulations 2010. • Appropriate Assessment is a stage within the Habitats Regulations Assessment. • The process requires screening for Likely Significant Effects (LSE) from plans and projects on Natura 2000 sites and Ramsar sites. • Where the potential for LSE to occur is identified then an Appropriate Assessment is undertaken to demonstrate that there will be no adverse effects on integrity (AEOI) of Natura 2000 sites and Ramsar sites from plans or projects. It is at this stage that mitigation measures will be considered to demonstrate that impacts will be effectively managed such that adverse effects are avoided in the first instance, or minimised to such a point that AEOI can be ruled out. • Alternative options will be considered where mitigation measures are considered insufficient to minimise impacts such that a conclusion of no AEOI can be reached. • The current wording of “significant adverse effect” is not consistent with the Habitats Regulations, as it indicates that some level of adverse effect would be acceptable. <p>A revised section based on Section 1.3 (p.4) of the draft Local Plan or the process set out in more detail in paragraphs 1.6-1.12 (p.7) of the Habitats Regulations Assessment of the draft Local Plan would be appropriate.</p>
24	HRA: Map 2	19	The map of selected SPAs should be updated to include the proposed extended boundary of the Outer Thames Estuary pSPA. This is pertinent to the Broads as the boundary extension covers the lower reaches of the River Bure. The extension is proposed to protect areas used by foraging common tern.
25	HRA: Table 2	31-44	<p>The RSPB supports the conclusions of the screening assessment set out in the HRA.</p> <p>It is noted that Policies PODM15 (Renewable Energy) and POSP10 (Navigable Water Space) have been missed off Table 2. It is essential that these policies be screened now to identify any modifications that might be required to ensure they are acceptable at the submission stage.</p>

26	HRA: Appendix 2 – European Site Information	60- 61	Paragraphs 7.30-7.35 and Table 5 need to be updated to reflect the proposed extended Outer Thames Estuary pSPA boundary and features changes. This would see the boundary extended up the lower reaches of the River Bure and foraging little tern and common tern added as features. Red-throated diver remains as a wintering feature. This is necessary for accuracy and to ensure the full effects of any policies have been assessed. This approach reflects the requirements of paragraph 118 of the National Planning Policy Framework, as set out in paragraph 6.6 (p.50) of the HRA of the Local Plan.
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Respondent: Smythe, S and T

Stanley and Tracey Smythe,

Local Green Space Nomination: POXNS12- Chedgrave

To whom it may concern,

Dear Madam/Sir,

We hereby reject the proposal of our organic smallholding as a Green Space nomination, comprising largely of our garden, as it is already a greenspace.

We have been living there for two years and have since improved the overall ecological footprint of the area. We are concerned that this vague proposal from a singular individual was accepted without any prior communications to those it involved before the nomination was handed in.

We are also concerned about the maps being unclear and hard to interpret.

We have cooperated with the periodic maintenance of the Broads Authority and the Internal Drainage Board.

We have a Small holder's license and we are grazing the area in question, currently with geese.

We have removed some of the profuse bramble that was overgrowing the marshes for years, which will now allow and encourage fresh growth to occur. Being aware of the nesting habits of some small bird species and their need for food we have kept a considerable bramble patch. We opened up the flow in the dyke by connecting the top part of the dyke back to the system, enabling species to colonize it once again. All the work we undertook is invoiced.

We have also left some of the old trees standing and those trees infected with honey fungus and deemed unsafe were taken down by the IDB and piled up.

Since we arrived we had to put up a fence to stop green waste of all description, as well as dog faeces being dumped on our land.

What we have done to increase diversity and the ecology

- We have planted a further 15 Fruit trees, 3 Oak, 2 Hazel, 1 Chestnut adding to our already established orchard.
- We keep chickens, geese and ducks. We are also planning to get more livestock in the very near future.
- The organic garden is planted in rotation.
- We have two bee hives increasing the overall pollination of fruit trees and flowering marsh species.

We moved here to have a large garden and some animals, which was impossible in our previous property. The chance to be self-sufficient is what we were looking for in a new home. This is why we installed a polytunnel to grow food and improved the overgrown thickets at great costs and hard work.

Our future plans for the area

We are planning to put up a shed for equipment and increase the overall diversity of the ecology some more. We are nature orientated and have no plans to commercialise our gardens in any way.

In conclusion, the main reason we bought this property was because of the large garden area, which could be used to be self-sufficient and keep livestock. This was a lifelong dream for us both and now that we have achieved this we are not willing to nominate our garden for the Local Green Space.

Kind Regards,

Stanley & Tracey Smythe

Respondent: Somerton Parish Council

Broads Local Plan Consultation - Response from Somerton Parish Council

Somerton Parish Council discussed the plan on the 3rd January 2017 and agreed to make the following response;

Another disappointing long, detailed plan which we feel will achieve very little benefit or improvements to The Broads and the local population. The Authority's approach to Duty to Cooperate (Question 1) is far from satisfactory. For many local people, the Broads Authority remains a somewhat remote, city based body which has no real or acceptable democratic credentials. The Broads population cannot engage constructively and actively on an ongoing basis. An example of this is the Broads Forum which is suppose to give interest groups a voice and an opportunity to comment on policies, plans etc. During 2016, 2 of the 4 Broads Forum meetings were cancelled. Worse still is the Authority's Broads Climate Partnership which meets in secret since members of the public are not allowed to attend meetings and even the minutes of the meetings are not readily available (not available on the Authority's website).

We cannot identify with the vision statement in the plan. Without fundamental changes to address the democratic deficiency the vision statement should read "Local communities continue not to have any active part in discussions about their future etc etc".

It may have helped if there had been some independent input in preparing the local plan. A condition report on the area combined with some research and investigation as to what concerns local people could have helped shape a more inclusive plan which people can identify with. There is very little in this draft which stands out as something offering benefit and improvement yet alone hope.

The worse possible example is Policy PODM7 Staithes. Somerton, like many villages in the Broads, has a Parish Staithe and therefore any new policy on staithes may have importance for this village. The Local Plan's policy for staithes is based on the "Evidence" from the Broads Authority commissioned report "The Public Staithes of the Broads: a History and Assessment (2016). This report has not, todate, been made available to the public and therefore the information contained in the report cannot be accessed for the full period of this consultation.

As this Parish Council meets every 2 months, we will not be able to comment on this policy which may or may not have important implications for Somerton. It appears some individuals and Broads Authority Staff members have been able to access (read) the report but for this Parish Council and for the residents

of Somerton, it remains yet another example of the Authority's selective secrecy.

We therefore formally object to this Policy on the grounds that the evidence report has not been made available for public inspection/comment. For this reason alone, the Broads Local Plan should be judged unsound as background papers have not been made available for the full period of the consultation. Likewise, we cannot comment on the references to Climate Change since these have been formulated in secret by the Broads Climate Partnership at meetings where the public are unable to attend. The minutes of these meetings are not readily available and should be posted on the Broads Authority's website. We are therefore unable to access any background papers or information related to Climate Change in the draft plan. Can we suggest that the plan includes accurate references in Policy POXNS3: The Coast regarding the agreed shoreline management plan for the relatively small section of coast which falls within the Broads Authority Area (the Horsey to Winterton frontage). This is included in Policy Unit Reference 6.13 of the current Shoreline Management Plan. This plan policy for the time period "By 2055" is to 'Hold the Line' with predicted implications of "No loss of property or land behind the existing defences".

The Broads Draft Plan references in Policy POXNS3: The Coast "in view of the high flood and tidal inundation risk to the area" are exaggerated, alarmist and do not reflect the fact that the sea defences and dune system are currently in a good state of repairs and well maintained by the Environment Agency.

Policy PODM22 (reference to addressing potential light pollution in the Upper Thurne area) may have reasonable intentions but the Broads Authority could achieve better results by entering into discussions with the District Councils in whose areas the overwhelming majority of light pollution originates. This is particularly important in Somerton where 90%+ of the light pollution originates from the 'high ground' to the south and in particular from Martham and Hemsby.

Many of the policies in the draft plan relate to development. On the one hand we agree for the need for responsible, effective, reasonable and fair planning controls but we feel in the Broads the balance has now been tipped against the local population. The process has become arduous and expensive for many who seek to improve their properties. This imbalance has slowly led to the gentrification of the Broads and is responsible for the younger generation having little chance of securing housing in the area. Facts speak for themselves and planning policies covering affordable housing remain ineffective.

Somerton Parish Council received the staithe report which was used as evidence for the proposed Policy PODM7 Staithe in the Broads Local Plan, on the 9th January 2017. This was 6 days after our meeting on the 3rd January 2017 when we agreed the Parish Council's responses to the Broads Local Plan. In our initial response, the Parish Council was unable to comment on Policy PODM7 as the report had not been made available to the public. Having now received the report, the Parish Council wishes to make the following addendum to our original response.

The staithe report was completed without any consultation with Somerton Parish Council or Somerton Staithe & Boat Dyke Charity Trustees, the body who administer our staithe on behalf of the Parish Council. The report acknowledges that the staithe at Somerton belonged to the Drainage Commissioners in 1841 but, by 1910, it was considered the property of the Parish Council. Unfortunately, the reference at the end of the section covering Somerton Staithe is incorrect. It would have been ideal to have included a map clearly showing the areas owned by the Parish and the separate section of nearby riverbank used as 24hours Broads Authority moorings.

Can we first suggest that the report be corrected to read;

" The Parish Staithe at Somerton is now administered by the Somerton Staithe and Boat Dyke Charity (Reg.No.801536) on behalf of Somerton Parish Council. The Charity was established with a Charity Commission scheme sealed on the 8th July 1988. The mooring and launching of boats is restricted for the owners of properties in West & East Somerton and Winterton-on-Sea.

The nearby Broads Authority 24hrs moorings are not owned by Somerton Parish Council.

The Parish Council strongly objects to any proposal in Policy PODM7 to change the existing mooring and boat access arrangements at Somerton Staithe which could be included in the policy statement "Their access being obstructed".

The Broads Authority should clarify just what this statement refers to and whether it includes boats owned by the general public or not. Access for and moorings for boats at Somerton Parish Staithe remains limited and is not open to the general public.

Somerton Parish Council further suggests that all Parishes mentioned in the Staithe report have the opportunity to access the report and comment on it's contents before Policy PODM7 is formulated.

**Attn Mr John Packman,
Broads Authority,
Yare House,
62-64 Thorpe Road.
Norwich NR1 1RY**

19th January 2017

Broads Staithe Survey

Dear Mr Packman,

We feel obliged to respond to the above survey with the following comments:

West Somerton Staithe p21/p22/p58

1) "Public Staithe, with 24 hour Broads Authority moorings, owned by Somerton Parish Council".

Somerton Staithe is a Parish Staithe, with moorings restricted, via a waiting list, to residents of Somerton and Winterton.

Beyond the parish Staithe, where the dyke joins the main river, are the Broads Authority free 24 hour moorings.

These are quite separate from the restricted moorings by the Staithe, and are NOT owned by Somerton Parish Council, or managed by the Somerton Staithe and Boat Dyke Trust

2) We feel your whole conclusion that, despite Somerton Council having ownership of the staithe, and the surrounding land, registered with the Land Registry, the public should have free access, "and as one for vehicles, not just on foot", including mooring as "a right independent of ownership", is unrealistic. Are you suggesting that anyone who owns property with access to the river should allow unlimited access to the public including mooring and vehicles, and only be trustee owners?

3) We have allocated moorings for Somerton and Winterton parishioners with no free spaces for visitors. The slipway is restricted to those parishioners too.

We allow free access to the river and footpaths for walkers and anglers, and free parking on the very limited space available in the car park we own. something not readily found elsewhere in the Broads Authority area.


4) We would question whether your conclusions on "rights" here are based on any aspect of law, or just your opinion with some ulterior motive not explained.

5) For all the reasons stated, the Somerton Staithe & Boat Dyke Charity Trustees object to proposed policy PODM7: Staithes of the Broads Local Plan

Yours sincerely,

Mrs Judy Clift, Chair, Somerton Staithe and Boat Dyke Charity

SOMERTON STAITHE TRUSTEES
Registered Charity Number 801536 ----19th May 1989
Chair, Mrs Judy Clift, Secretary Mr Brian Barker



BROADS LOCAL PLAN – PREFERRED OPTIONS CONSULTATION

SOUTH NORFOLK COUNCIL RESPONSE – FEBRUARY 2017

As an authority whose district is partly within the Broads Authority Executive Area South Norfolk Council are broadly supportive of the Broads Local Plan Preferred Options consultation document.

The Council have the following comments to make on the document, set out by section/policy number/question:

Section 1: Introduction

No comments

Section 2: Overview of Document

No comments

Section 3: About this consultation

- Please note change of address of South Norfolk Council offices from Swan Lane to Cygnet Court. The remainder of the address is unchanged.

Section 4: About the Broads – Spatial Portrait

- South Norfolk Council supports the comment in the second paragraph under 4.1 that the Broads does not sit in isolation and there are important linkages with neighbouring areas in terms of community and economy.
- First paragraph under 4.5 – ‘an’ needs to be added between the words predominantly and ecosystem on the second line.

Section 5: Policy Context

No comments

Section 6: Duty to Cooperate

Question 1

Do you have any thoughts on the Authority’s approach to Duty to Cooperate?

South Norfolk Council welcomes the Broads Authority’s continued commitment to engage through the Duty to Cooperate and look to continue this through the production of the Greater Norwich Local Plan, the Norfolk Strategic Framework and other initiatives and pieces of work as appropriate.

Section 7: Challenges and Opportunities

No comments

Section 8: Vision, Objectives and Existing Policies

Question 2

Do you have any thoughts on the Broads Plan and the Broads Local Plan having a shared Vision for the Broads?

South Norfolk Council supports the Broads Plan and the Broads Local Plan having a shared Vision for the Broads as this will be beneficial for integrated planning.

Question 3a

Do you have any thoughts on the draft Objectives for the Broads Local Plan?

South Norfolk Council supports the draft Objectives for the Broads Local Plan as they appear to strike a good balance between the environmental, social and economic aspects of the Broads. Particular support for OBJ9 – to ensure that the housing needs of the community are met and OBJ10 – to ensure that the Broads Authority maintains close cooperation with the Local Planning Authorities adjoining its executive area.

Question 3b

Do you have any comments on the draft monitoring indicators?

No specific comments but monitoring indicators should be clear, meaningful and easy to collect and analysis, and where possible use information that already exists. For ease it would be useful to see all the monitoring indicators together in one table in the final version of the Plan.

Section 9: Sustainable Development in the Broads

POSP2: Sustainable Development in the Broads

- The policy could include mention of the sustainability of local/service centres that serve the Broads e.g. Loddon

Section 10: Water and flooding

No comments

Section 11: Open Space (land), Play and Allotments

Policy PODM6: Open Space on land, play, sports fields and allotments

- Under clause i) South Norfolk Council supports the statement that refers to there being an excess of recreational or amenity open space in the entire settlement (in and out of the Broads).
- Under b) and c), South Norfolk Council supports the statement that defers to the standards set by relevant constituent district councils. For information South Norfolk Council is currently updating its Recreational Open Space SPG into an SPD. With regard to maintenance, the Council will, from later in 2017, no longer take on responsibility for the management of open spaces; in future developers will need to ensure that this maintenance is carried out either by the parish council or a management Company
- Does the statement under b) which states that 'All residential development (other than householder development) is expected to provide a contribution towards outdoor playing space' mean that even a scheme for one dwelling will have to make a contribution? If so, is this a realistic aim?

Section 12: Water open space/blue infrastructure

No comments

Section 13: Green Infrastructure

Policy PODM8: Green Infrastructure

- South Norfolk Council supports the aim of the policy to contribute to the delivery and management of green infrastructure that meets the needs of communities and biodiversity both within and beyond the proposal boundaries.
- The Council also supports the statement in the policy that relates to the delivery of Green Infrastructure strategies and complying with the findings of relevant studies of the Broads Authority's constituent districts as this represents a joined up and coordinated approach to the provision of green infrastructure.

Section 14: Climate Change

No comments

Section 15: Soils

No comment

Section 16: Heritage and Historic Assets

- Support for **PODM11: Historic Environment** and **PODM12: Reuse of Historic Buildings** as both broadly in line with equivalent South Norfolk Council policies

Section 17: Biodiversity

No comments

Section 18: Renewable Energy

No comments

Section 19: Landscape Character

- South Norfolk Council supports the inclusion of a general landscape policy but it is important that there is consistency across Local Planning Authority boundaries to ensure a joined up approach.

Section 20: Amenity

No comments

Section 21: Light Pollution

Question 5

The Authority is considering producing a bespoke, user friendly guide for development in the Broads. Do you have any thoughts on this?

It may be appropriate to produce a guidance note to address light pollution in the Broads as there may need to be different approaches to light pollution depending upon location e.g. the edge of Norwich compared to the rural Broads. There may be safety issues relating to a lack of light in certain areas and a cost implication of imposing specific types of lighting on developers – link to S106 agreements. Overall a bespoke guide for lighting proposals on development would be welcomed and may be of use for adjoining parishes in South Norfolk.

Section 22: Retail

- In general South Norfolk Council would support the inclusion of a retail policy in the Broads Local Plan. The Council would be keen to work with the Broads Authority to develop a retail policy for inclusion in the publication version of the plan because although South Norfolk does not have any areas identified in the Preferred Options document such as those in North Norfolk and Waveney there is retail provision in South Norfolk close to the Broads at

Loddon and any policy needs to protect retail centres outside the Broads Local Plan area.

Section 23: Transport

PODM24: Changes to the Acle Straight (A47T)

- South Norfolk Council supports the dualling of the Acle Straight and would give general support to the criteria based policy as proposed.

Section 24: The Broads Economy

Question 6

Do you have any further thoughts on the economy and employment needs of the Broads?

South Norfolk Council would support the retention of redundant boatyards or boatyard buildings for commercial/employment use before the consideration of alternative uses with a hierarchy of acceptable uses with boat related employment as the preferred use. This acknowledges that boatyards are part of the unique culture of the Broads and should be retained where possible but recognising that a less restrictive policy may see such buildings brought back into life for other commercial uses more quickly.

South Norfolk Council would suggest that if any allocations for employment land are needed then these should be directed to sustainable locations, working with neighbouring authorities to ensure that no conflicts arise.

South Norfolk would welcome the commissioning of work to better understand the economy and employment needs of the Broads and would be keen to work with the Broads Authority in developing any economic policy for the publication version of the plan to ensure that any cross boundary issues are addressed.

Section 25: Sustainable Tourism

Policy POSP9: Sustainable Tourism

- South Norfolk Council would offer general support for the encouragement of sustainable tourism in the Broads as it will also have benefits for the wider economy of South Norfolk. It is important to consider the potential impact of tourism on service centres and village that serve the Broads but are outside the Broads Authority Executive Area.

Section 26: Navigation

No comments

Section 27: Housing

In general the Housing section is well constructed and appropriate to the Broads context. The Council would suggest in terms of monitoring that the Plan should be explicit that monitoring is at the dwelling level and more precision is needed than just 'permitted' and 'delivered'.

POSP12: Residential development

- General support for this policy which seeks to achieve sustainable patterns of development.
- Should there be a definition of what is meant by "local facilities" or "high levels of accessibility"?

PODM31: New housing in the Broads Authority Executive Area

- South Norfolk Council is supportive of the Broads Authority allocating land in the Local Plan to endeavour to meet its objectively assessed housing need

Policy PODM32: Affordable Housing and Question 7

- Under a) there are some doubts about the expression 'Most of the proposed dwellings would be affordable', however the possibility of uncertainty is removed when reading the reasoned justification which states 'The market element of rural exception sites is to enable the development of affordable houses. Applications need to fully justify the proposed market element (the split between market and affordable) of rural exception site schemes via an assessment'. On this basis the proposed wording can be considered appropriate.
- Under d) ix and x, suggest more certainty is needed here. Under ix) suitable body should be a body approved by the Authority. Under x) 'restricted to' is unenforceable. No Registered Provider will acquire an affordable home without a full eligibility cascade (usually ending with 'any other person'). Suggest changing 'restricted to' to 'prioritised for'. Also under x) 'need' and 'immediate area' are both undefined and potentially open to challenge. The text in the reasoned justification under 'Using planning obligations' also uses these expressions and consideration should be given to updating.

Policy PODM33: Residential Development within Defined Development Boundaries and Question 8

- Support for removing the 5 dwelling threshold as this seems to be an artificial restriction. The policy as worded is considered sufficient to ensure development of a scale suitable and appropriate to individual settlements.

Housing for Older People

- Norfolk County Council may no longer be producing a 'Housing Strategy Framework', although cross-county work on the scale of future need for elderly people's accommodation is in progress. Suggest the Broads Authority checks and if necessary deletes this paragraph.

Policy PODM39: Custom/self build

- Should the policy say anything about requiring an actual proportion of development on multi-dwelling sites to be set aside for custom/self build plots?

Section 28: Design

No comments

Section 29: Sport and Recreation Venues/Buildings

Policy DM41: Visitor and Community Facilities and Services

- South Norfolk Council supports this policy to retain community facilities and services which are particularly important in villages and rural communities such as those in the Broads Authority Area.
- Should 'shops' be added to the list of community facilities in the reasoned justification?

Section 30: Health and Wellbeing

Policy PODM42: Designing Places for Healthy Lives

- South Norfolk Council would support a policy to promote the health and wellbeing agenda.
- The Issues and Options suggested the potential for a checklist which is not mentioned in this Preferred Options document. If this idea were to be pursued then South Norfolk Council would like to reiterate their keenness to work with the Broads Authority to develop this.

Section 31: Safety by the Water

No comments

Section 32: Developer Contributions/Planning Obligations

No comments

Section 33: Other Development Management Policies

Policy PODM45: Conversion of Buildings

- This policy is similar to the South Norfolk Council conversion policy other than criterion i) requiring buildings outside development boundaries to be in sustainable locations with adequate access to services and facilities. Concern that this could lead to a situation where proposals to convert a redundant building worthy of retention would be contrary to policy due to its location.

Section 34: Site Specific Policies

- South Norfolk Council supports the following site specific policies with links to the South Norfolk district:

PODIT2 – Maltings Meadow Sports Ground, Ditchingham

PODIT3 – Ditchingham Maltings Open Space – Habitat Area and Alma Beck

PONOR1 – Utilities Site

PONOR2 – Riverside walk and cycle path

(Important to deliver strategic growth and connectivity in the South East Norwich/Trowse area)

POWHI1 – Whitlingham Country Park

(Important to maintain and enhance important recreation facility within the district at Whitlingham)

- South Norfolk Council supports the following non site specific policies with links to the South Norfolk district:

POXNS4 – Main road network

POXNS6 – Waterside Pubs Network (support protection of pubs located in South Norfolk on the Yare and Waveney)

POXNS10 – Railway stations/halts (support protection of railway halt at Haddiscoe)

POXNS11 – Former Rail Trackways

This policy includes Haddiscoe to Beccles which was safeguarded in the 2003 South Norfolk Local Plan but not in any of the current adopted documents. It also includes Beccles to Ditchingham which was not safeguarded in either the 2003 South Norfolk Local Plan or the currently adopted documents. The consultation document mentions Local Planning Authorities considering protection of these routes in their plans and for South Norfolk this would now need to be considered through the Greater Norwich Local Plan review.

- South Norfolk Council **objects** to some of the details and process of **Policy POXNS12 – Local Green Space**

The “tests” for a Local Green Space designation set out in paragraph 77 of the NPPF have been applied by the Broads Authority to those sites proposed for LGS designation. However, in some cases it seems that land has been proposed for LGS designation by a single individual, and the analysis of potential LGS sites does not appear to show clearly that they are all “demonstrably special to a local community”, attractive and valued no doubt they are to some residents. It seems to South Norfolk Council that a tougher test of “demonstrably special to a local community” should be applied, involving a parish council or community group proposing an LGS site, or at the very least more than one individual proposing a site.

More significantly, it appears that the strictures of paragraph 76 of the NPPF have not been followed. This states that: “...*Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services...*”. Regrettably, there does not seem to be any analysis whatsoever of the potential economic effects that a LGS designation could cause by “preventing” or hindering many normal forms of development from taking place. In this regard, the wider importance that boating/navigation and tourism has to the Broads economy specifically (and indeed form two of the Broads Authority’s three key over-arching objectives), and Norfolk more generally, is clearly very significant indeed. This appears to be a significant failure and South Norfolk Council would wish to see a much more rigorous approach to assessing the potential economic impacts of LGSs not just on the immediate Broads Authority Executive Area, but also the relevant district(s).

South Norfolk Council specifically **objects** to the proposed LGS allocation at Chedgrave. At South Norfolk Council’s Cabinet meeting on 6th February, which discussed the Council’s response to the Preferred Options document, several landowners/business owners with interests at the site claimed that they had not been informed directly by the Broads Authority in advance of the assessment of their land within the LGS. Whilst such landowners and interested parties obviously have the opportunity to make representations directly to the Broads Authority during the consultation period on the Preferred Options, if this lack of notification is true, it would clearly have been better to have informed them at an earlier stage so that they could have had appropriate notification of the proposal and the assessment process.

Chedgrave and Loddon are very important parts of the southern area of the Broads. The settlements (and the surrounding villages) have a wealth of pubs, restaurants, tea rooms and the like that support the wider Norfolk visitor

economy, whilst adding considerably to the vitality and viability of the area itself. South Norfolk Council, through its Market Towns Initiative project, has invested significant sums in the last few years to refurbish the toilets and install hot showers to help extend the boating season in this part of the Broads. The area of the proposed LGS includes space where boats are stored, and a consequence of the allocation might be to undermine the viability of the boatyards there. Although it might be that boat storage would be a fully appropriate use within a LGS, some forms of ancillary development might not – and the additional uncertainty could hinder decisions on business investment at best (by adding cost and delays), and might at worst possibly even cause a business to close, with consequent wider impacts on the local economy.

South Norfolk Council therefore **objects** strongly to the proposed LGS allocation at Chedgrave, and requests that it be removed from the Local Plan

From: Philip Raiswell [REDACTED]
Sent: 02 February 2017 11:32
To: Planning Policy Mail
Subject: Sport England

Categories: Ack and Filed

Thank you for consulting Sport England on the above document. We would like to comment on the following draft policies:

Policy PODM06 – Open Space on Land, Play, Sports Fields and Allotments

Sport England OBJECTS to this policy, which applies to playing fields as well as other types of public open space, as it conflicts with Sport England's policy 'A sporting Future for the Playing Fields of England' and Para 74 of the NPPF. Our particular concern is criteria (ii) which appears to advocate 'enabling development' on part of the existing open space as a means of enhancing the remaining facility. Playing fields should not be lost unless there is a proven surplus of provision in the catchment area, as evidenced in a robust local assessment. Sport England would not object to appropriate ancillary development on playing fields which enhances the main use of the site, for example pavilions, changing rooms, car parking etc. However, it is not clear from the wording of the policy whether 'development' refers to enabling development (e.g. housing) or appropriate ancillary development.

In addition, criteria (i) should refer to a surplus of provision in the 'catchment area' rather than the 'settlement', as facilities such as playing fields often serve users beyond the immediate settlement they are located in.

With regard to criteria (iii), the wording should more closely reflect exception E4 of Sport England's playing fields policy (and NPPF Para 74), which states:

'The playing field or playing fields, which would be lost as a result of the proposed development, would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development'.

For reference, Sport England's full policy in relation to playing fields can be accessed here:

<https://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/>

Policy PODM41 – Visitor and Community Facilities and Services

Sport England supports this policy as it has been amended to include criteria to assess new proposals for community buildings, including new sports facilities.

Policy PODM42 – Designing Places for Healthy Lives

Sport England supports this policy, especially the reference to active lifestyles, including access to green space and active travel.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process

for new residential developments, and a reference to it in planning policies promoting active lifestyles through urban design. The document can be downloaded via the following link: <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/>

Policy PODM44 – Developer Contributions

Sport England supports this policy as it includes sports facilities and open space as types of development that can benefit from financial contributions secured as part of a planning consent.

I hope the above comments can be given full consideration. Please feel free to contact me if you wish to discuss the contents of this letter in more detail.

Kind Regards,

Philip Raiswell
Planning Manager



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Respondent: Stokesby Parish Council

Mr. S.A. Ward.



Broad Authority,
Yare House,
62-64 Thorpe Road,
Norwich,
NR1 1RY

Dated 20th January 2017

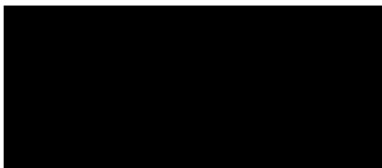
Dear Sir / Madam,

I thank you for the opportunity to discuss planning issues and Broads Local Plan, with staff at the Loddon and Chedgrave Jubilee Hall on Thursday 19th January.

I think that we are all of the same mind that the broad's are a special an unique are of the country, that need to be protected for future generations, who will work and spend their leisure time enjoying the this special place.

With this in mind we also so need to consider the sustainability of the area especially some of the rural villages, for any thing to be sustainable there need to be some growth.

Some considerate developments in villages that support and add to the community must be a good thing, we do not want to see large housing estates tacked onto the edge of our village but if there are some parcels of land that lend them self's to such development these should be identified for possible housing.



S. A. Ward.

Respondent: Suffolk County Council

Broads Local Plan Preferred Options
Date: 24th January 2017
Enquiries to: Cameron Clow
Tel: 01473 7200171
Email: cameron.clow@suffolk.gov.uk



Natalie Beal
The Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

Dear Ms Beal,

Broads Local Plan - Preferred Options Consultation

Suffolk County Council welcomes the opportunity to comment on these draft policies. In doing so, we make our comments in the interest in delivering key public services throughout the county and wider policy fields.

Our key interests in relation to this consultation include:

- Landscape Character
- Archaeology
- Fire and Rescue

Our comments refer only to those policies which cover Suffolk and are as follows:

Landscape Character

The plan effectively articulates what is important in this protected landscape and how it will be conserved and enhanced as part of the development management process. In addition, it is notable and important that the plan identifies that the landscapes of the Broads is rooted in particular economic activity such that it is; *"the economies, practices and ways of life that generated and sustained those landscapes."*

And furthermore it goes on to say that, *"While protection is recognised as important, the needs of a 'living landscape', which will involve permitting development necessary to support local communities and the economy, are recognised, subject to criteria that protect and enhance the essential qualities of the landscape, since it is that landscape which provides the basis of their livelihoods."*

And that the Broads Authority will; *"explore the future in innovative ways that are compatible with the local heritage and culture as well as potentially stimulating the local economy"*.

Recognition that the character and special qualities of the landscape is rooted in local economic and cultural activities, and that a sustainable and functional economic future is needed to protect the unique landscape of the Broads is welcome.

Archaeology

Policy POSP2: Sustainable Development in the Broads

We recommend that a reference to undesignated heritage assets be included in the 'Reasoned Justification' of this policy under Historic and Cultural Environment (page 29).

Policy POBEC1: Former Loaves and Fishes, Beccles

The policy seeks the retention of the building and resumption of its use. The Broads Authority should also be aware that there is high potential for encountering archaeological remains at this location.

Any groundworks associated with development, or redevelopment, in these areas have the potential to cause significant damage or destruction to any archaeological deposits that exist. In accordance with Paragraph 141 of the NPPF, if groundwork is to take place any permission granted for these areas may be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

Policy POOUL3: Oulton Broad - Former Pegasus/Hamptons Site

We note that the plan states archaeological survey may be required in advance of any grant of planning permission at this site. Archaeological evaluation and borehole survey was carried out under consent of planning applications BA/2012/0271, so explanatory notes could be amended to state there may be need for archaeological survey 'in advance of development if significantly different and substantial groundworks are proposed.'

Fire and Rescue

Suffolk Fire & Rescue Service has considered the plan and are of the opinion given the level of growth proposed and do not envisage additional service provision will need to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change. As always SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but in incorporated into the design/build stage it is extremely cost effective/efficient. SFRS will not have any objection with regard to access, as long as access is in accordance with building regulation guidance. We will of course wish to have included adequate water supplies and hardstanding for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.

Yours sincerely,

Cameron Clow
Career Grade Planner
Planning Officer
Suffolk County Council



Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

Natalie Beal
Broads Authority
Yare House
62-64 Thorpe Road
Norwich NR1 1RY

03/02/2017

Dear Natalie,

RE: Broads Local Plan (2012 to 2036) Preferred Options Consultation

Thank you for sending us details of this consultation, we have the following comments:

Vision, Objectives and Existing Policies

Question 2 – We think that the Broads Local Plan and Broads Plan should have a shared Vision for the Broads. Both documents should be seeking to deliver the same vision to ensure that the area is managed and developed in a holistic way.

We support the objectives set out in section 8.2 of the preferred options document, in particular OBJ2, OBJ3, OBJ4, OBJ5, OBJ6, OBJ7, OBJ10, OBJ11, OBJ14 and OBJ16.

Sustainable Development

We support the principle of Policy POSP2 (Sustainable Development in the Broads), however we consider that both criterion xii of the policy and the Nature Conservation section of the justification text should include reference to non-statutory designated sites (County Wildlife Sites) in accordance with the requirements of the National Planning Policy Framework (NPPF) (paragraph 113).

As part of the Broads Authority area lies within Suffolk, we also recommend that the final paragraph of the Nature Conservation section of the justification text should be amended to include reference to the Suffolk Biodiversity Action Plan BAP) and Suffolk Priority Habitats and Species, alongside the Norfolk BAP.

Green Infrastructure

In principle, we support Policy PODM8 (Green Infrastructure), in particular criterion (a) and the reference to protecting and enhancing natural environments. However, we query whether the policy could be enhanced by the inclusion of measures to secure the long term beneficial management of new green infrastructure. Green infrastructure has an important role to play in both securing and enhancing biodiversity and in enhancing places for people, however, the quality of this provision relies on long term appropriate management. Failure to secure such management, including the relevant financial contributions required to deliver it, for the life of the development, will result in significantly less effective green infrastructure be delivered.

Peat

We support policy PODM10 (Peat), although it should use the term 'peat soils' rather than 'peat'. In the justification text the habitat type should be 'lowland fen' rather than 'lowland peat bog'.

Soils

Question 4 – We consider that the absence of a specific policy relating to soils (other than peat) has the potential to leave a policy gap if there are found to be any differences between high level national policy and conditions specific to the Broads. The inclusion of a soil policy within the Local Plan would allow for the consideration of protecting soils from a number of issues, including prevention of development which increase sedimentation or eutrophication of watercourses.

Biodiversity

We support Policy PODM13 (Natural Environment).

Light Pollution

Question 5 – Badly designed or insensitive lighting can have a significant adverse impact of biodiversity, we would therefore support a bespoke, user friendly guide. Such a guide should include links to other existing, related guidance such as the Biodiversity Enhancements Guide.

Navigation (POSP10)

We support the requirement in Policy POSP10 (Navigable Water Space) for the beneficial use of dredgings where they will help deliver ecological gain, as identified in the Reasoned Justification. We would recommend that the policy is expanded ensure that the use of innovative techniques, as are already underway in the Broads, are promoted to maximise the beneficial uses of such material.

Sustainability Appraisal and Habitats Regulations Assessment (HRA)

We note that the text relating to Habitats Regulations on page 6 of the Sustainability Appraisal document appears to incorrectly set out the process. We recommend that this revised to correctly set out the required HRA process, in accordance with paragraphs 1.6 to 1.12 of the HRA Report.

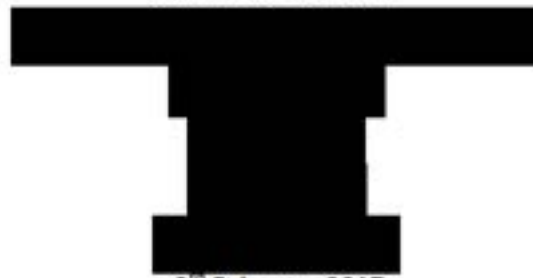
With regard to the HRA Report, Map 2 should be updated to reflect the proposed changes to the Outer Thames Estuary Special Protection Area (SPA) including the relevant boundary extensions. The information and assessment relating to the Outer Thames Estuary SPA should also be updated to reflect the proposed amendments.

We would be happy to discuss the points raised above further, as required. If you require any further information, please do not hesitate to contact us.

Yours sincerely

James Meyer
Senior Conservation Planner

JAMES TUBBY



3rd February 2017

Attn Natalie Beal

Planning Policy Officer

Broads Authority

Yare House, 62-64 Thorpe Road

Norwich, NR1 1RY.

Ref: POXN12 Local Green Space

Dear Ms Beal

I wish to strongly object to the above reference nomination for a local green space. My reasons are as follows:

The middle of the area in an east west direction has a 11-33kva electricity board underground cable running through its entirety and will be subject any emergency repairs at any time that are deemed necessary. Also as recently witnessed the entire area is subject to maintenance from the drainage board who have the right to access and clean the ditches as necessary even if it means removing or damaging trees and plants.

The area belonging to the old school house is their garden and as such has no public access or indeed can be seen from any public used paths, therefore this area should be excluded from the local greenspace nomination.

That leaves the boatyard areas which are required for seasonal car parking and boat and general storage applicable to their businesses. To have these areas in a LGC would restrict their businesses and possibly affect their future viability.

In my view the aims of the nominee have not been met, therefore I request that you dismiss this nomination.

Yours Sincerely

James Tubby

Respondent: Walkin-Smith, K and M

Lottie Carlton

From: Lottie Carlton
Sent: 19 January 2017 14:32
To: Karen Walklin-Smith
Subject: Walkin-Smith, Mrs K & Mr M

Categories: Ack and Filed

Dear Mrs Karen Walklin-Smith and Mr Mark Walklin-Smith

Thank you for submitting a response to the Broads Local Plan Preferred Options consultation. Please treat this email as acknowledgement of receipt.

Kind regards

Lottie Carlton
Administrative Officer
[REDACTED]

From: Karen Walklin-Smith [REDACTED]
Sent: 13 January 2017 12:07
To: Planning Policy Mail
Subject: Policy POXNS12: Local Green Space Chedgrave - OBJECTION
Importance: High

Dear Sirs

Policy POXNS12: Local Green Space Chedgrave - OBJECTION

Tourism is vital to our village. People are brought into the area in a number of ways including boat hire and private moorings which flourishes in the summer months, together with people visiting/working on their boats whilst stored on land usually during the winter months. I see from the Broads Authority plans land owned and used commercially for boat storage and parking by the boat yards in Chedgrave has been nominated to become Local Green Space. With other suggested land being private garden.

Changing the status of the land will not only seriously damage the income generated by the boat yard business owners, but also the local shops, pubs and cafes in both Chedgrave and the neighbouring village of Loddon which are supported by their customers.

From my memory the current use of these sites has not changed for in excess of 15-20 years, all of which are well screen by trees. Therefore not easily visible from Pitts Lane and can not be seen from the river bank. They are certainly not a blot on the landscape, and are no a threat to nature. Therefore I consider only damage would be done to the community by changing the status of the land to Local Green Space.

As a parishioner of Chedgrave I urge you to **OBJECT** to the nomination of this land, ensure the status quo is maintained, and protect the economy and facilities of our village, which we all enjoy.

Thanking your for your consideration, I look forward a satisfactory conclusion being achieved.

Yours faithfully

Mrs Karen Walklin-Smith & Mr Mark Walklin-Smith
[REDACTED]

Walklin Cruisers



27th January 2017

Broads Authority
Yare House
62-64 Thorpe Road
Norwich NR1 1RY

FAO Planning Department – Broads Local Plan

Dear Sirs

Policy POXNS12: Local Green Space Chedgrave - OBJECTION

I am disappointed to discover, rather than be informed by the Broads Authority, an area of land running behind the boatyards in Chedgrave has been nominated as Local Green Space, to which I strongly object.

Points of Objection:-

Due to the location of the land and the fact it is outside the development boundary it is already protected, therefore no additional local benefit would be gained by designation as Local Green Space.

<i>Local Green Space Designation should only be used:-</i>	Nominated Area
<i>Where the green space is in reasonably close proximity to the community it serves</i>	A series of islands bordered by drainage dykes, located behind the boatyards. Much of this land can not be seen from areas of public access.
<i>Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife</i>	<p>Access to the nominated land is required by the drainage board to enable dredging and maintenance of the series of drainage dykes, which are part of, and essential to, the local flood defence. This important work results in disturbance of the character of the land as a habitat.</p> <p>The land is not adjacent to the River Chet, and is largely screened by trees and blackberry bushes. Thus not fully visible from either the Chedgrave or Loddon river bank.</p> <p>This area has no historical significance, nor potential as a recreational facility.</p> <p>Therefore it is not clearly apparent this area is special to the local community.</p>
<i>Where the green area concerned is local in character and is not an extensive tract of land</i>	Marshland the same as thousands of acres found around the Broads area.

Walklin Cruisers



27th January 2017

Broads Authority
Yare House
62-64 Thorpe Road
Norwich NR1 1RY

FAO Planning Department – Broads Local Plan

Dear Sirs

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<i>Where the green area concerned is local in character and is not an extensive tract of land</i>	Marshland the same as thousands of acres found around the Broads area.

Lottie Carlton

From: Peter Warner [REDACTED]
Sent: 01 February 2017 16:32
To: Planning Policy Mail
Subject: Warner, Mr P

Categories: Ack and Filed

Dear Planning Policy Team,

Herewith my comments on what I consider to be an excellent document.

The comments are 'selective' and comparatively minor and trust that you will find them helpful.

I have placed them in the order in which they appear in the consultation draft:

7. Challenges / Opportunites / Threats Etc

In both short and long term is not the vulnerability of subsidised public transport services within the broads (bus and rail) a potential challenge and threat??

Policy PODM19

This deals with development by utilities BUT should you not ought to include development by statutory undertakings (where pp is required) within this policy category as well?

Policy POSP7

Should not this read 'the promotion of access to enjoy the built, historic, cultural *and natural*....

Policy PODM40

This policy presents a largely residential design code. Is there/ should there be a similar policy (in terms of detailed requirements / criteria) specifically for the design of new structures and utility works in the broads (eg over and under bridges)?

Policy PODM46

The policy where it refers to safety on land and water should have the additional qualification as suggested below:

' safety on land, water or *on the operational safety of the highway, railway and waterway networks.*

(For example, a red flashing neon advert is not generally acceptable facing a railway line, as it could get confused with a danger signal).

Policy POXN10

A welcome policy - is Brundall Station southern platform in the Broad's area? I couldn't be 100% certain from the map(s).

Your acknowledgement of receipt would be appreciated.

Peter

Peter Warner
[Broads Authority Member]



Your ref n/a

Our ref n/a

Date 23/01/2016

Please ask for Samuel Hubbard

Direct dial

Email

Ms Natalie Beal
Broads Authority
Yare House
62-64 Thorpe Road
Norwich
NR1 1RY

Dear Ms Beal

Broads Local Plan – Preferred Options Consultation

Thank you for consulting Waveney District Council on the Broads Local Plan Preferred Options. The Broads Authority has a good working relationship with Waveney District Council and the Council supports the ongoing approach to joint working on the preparation of Local Plans. The Council's response has been structured into two sections, the first focussed on cross boundary strategic matters in line with the Duty to Cooperate, the second covering other non-strategic matters. The Council would like to commend the Broads Authority on a well written and presented plan which is comprehensive and easy to follow.

Cross-Border Strategic Matters (Duty to Co-operate)

Policy PODM31: New housing in the Broads Authority Executive Area

It is uncertain why this policy is not considered a strategic policy given it sets out the Broad's strategic approach to the distribution and delivery of housing. It is also questioned why this policy is not the first policy in the housing section given its important, strategic nature.

The Council supports the policy approach and the approach to housing numbers. The Council supports the position that the Waveney element of the Broad's Objectively Assessed Need also forms part of Waveney's Housing Market Area objectively assessed need. The Council considers that housing completions in the Broads Authority area count towards both Waveney District Council's objectively assessed need and the Broads Authority's objectively assessed need.

The table on Page 118 outlines the progress of Strategic Housing Market Assessments (SHMA). The SHMA for Waveney is expected to be completed in early March.

Other Matters

Policy POSP4: Flood Risk and PODM4 Flood Risk

The Council supports the policy but questions whether it ought to apply to all areas with at least a 1 in 1000 year risk of flooding. The Environment Agency's flood zones only show the extent of flood risk today. Flood risk identified in a Strategic Flood Risk Assessment to support a Local Plan should consider the future risk of flood risk over the lifetime of a development taking into account climate change. The extent of areas of flood risk once climate change has been modelled can vary significantly from the Environment Agency's flood zones.

Waveney District Council has commissioned a Strategic Flood Risk Assessment which will cover the River Waveney. It is expected that this work will be complete in Summer 2017.

Policy POSP 7: Getting to the Broads

The Council supports this Policy and draws attention to the Waveney Cycle Strategy 2016 (<http://www.eastsuffolk.gov.uk/planning/local-plans/waveney-local-plan/existing-waveney-local-plan/background-studies/culture-tourism-and-leisure/waveney-cycle-strategy/>), which could help in meeting the objectives of this policy. It should be noted that the A12 between Great Yarmouth and Lowestoft is soon to be named the A47. The supporting text could also mention the planned third crossing over Lake Lothing in Lowestoft and improvements which will help address congestion issues in the town and as such make access to the southern end of the Broads more efficient. Suffolk authorities are also promoting improvements to the A12 south of Lowestoft which will further aid access to the Broads.

Policy PODM6: Open Space on land, play, sports fields and allotments

Waveney District Council has not yet concluded on how it will address open space requirements in the emerging Local Plan. Policy DM25 of the Council's Development Management Policies which forms part of the Local Plan sets guidelines for approximately 53m² per dwelling dependant on density. The Council may not continue with these guidelines in the new Local Plan, and may not set a quantitative standard.

Policy PODM24: Changes to the Acle Straight (A47T)

Waveney District Council supports proposals to improve and specifically dual the Acle Straight and believe that there are compelling reasons in the interests of safety and economic growth for improvements to be made to this stretch of the trunk road network.

Policy POSP9: Sustainable Tourism

Tourism is of significant importance to the Waveney economy and the Council support this policy which promotes sustainable tourism growth of the Broads area. Lowestoft and Beccles provide sustainable access points to the Broads, with good public transport links including regional bus links and train lines.

Policy PODM33: Residential Development within Defined Development Boundaries

The Council supports this approach and the proposed development boundary for Oulton Broad. The Council also supports not having development boundaries in the Broads part of Beccles and Bungay for the reasons relating to character and flood risk as set out in the Broads Authority Development Boundary Topic Paper.

Retail

The Council supports the proposed consistent policy approach to the District Centre in Oulton Broad.

The Council hopes that the above comments are helpful. If there are any questions regarding the comments above please contact Sam Hubbard in the Planning Policy and Delivery Team

Yours sincerely,



Cllr David Ritchie

Deputy Leader of the Council and Cabinet Member for Planning and Coastal Management

Respondent: Weymouth, S

Broads Local Plan Consultation – Shirley Weymouth Borough Councillor

I feel there should have been a summary because the document was over 300 long.

What is hoped the detailed plan will achieve, the cost must have been immense.

As I see it there will be very little benefit or improvements to The Broads and the local population.

For me the Broads Authority is very remote local people do not have an understanding what role you have.

The Broads population cannot engage constructively and actively on an ongoing basis.

The Broads Forum years ago met on a regular basis to give interest groups a voice and an opportunity to comment on policies, plans etc. But they only had 2 meetings instead of 4, what message is that sending out.

Broads Climate Partnership I would be interested to see the constitution of that Group because no Minutes appear anywhere or an Agenda item on the BA meetings so is it just a talking shop – how expensive is that.

Vision statement without changes to address the democratic deficiency local communities continue not to have any active part in discussions about their future etc. etc".

It would appear there was no 'local' input in preparing the local plan.

For me there is very little in this draft which stands out as something offering benefit and improvement yet alone hope.

Policy PODM7 Staithe. Somerton has a Parish Staithe and therefore any new policy on staithe may have importance for this village. As I understand The Somerton Staithe & Boat Dyke Trustees were not approached to give their views, surely this should have been the first port of call, likewise all areas with a public staithe the Parish Council's should have been contacted for their views before deciding on 'policies' it is closed shop.

Has the Plan been publicised so that members of the public can have an input. Most small Parish Councils only meet bi-monthly and consideration should have been given to this.

With such a large document hard copies should have been sent out to the consultees, it is totally unacceptable to expect people to read it online.

This would have then enabled more people an opportunity to read it and with small villages the message could have got out in newsletters that a hardcopy is available.

Somerton Parish Council are formally object to this Policy on the grounds that the evidence report has not been made available for public

inspection/comment. For this reason alone, the Broads Local Plan should be judged unsound as background papers have not been made available for the full period of the consultation.

Likewise, we cannot comment on the references to Climate Change since these have been formulated in secret by the Broads Climate Partnership at meetings where the public are unable to attend. The minutes of these meetings are not readily available and should be posted on the Broads Authority's website. We are therefore unable to access any background papers or information related to Climate Change in the draft plan. Can we suggest that the plan includes accurate references in Policy POXNS3: The Coast regarding the agreed shoreline management plan for the relatively small section of coast which falls within the Broads Authority Area (the Horsey to Winterton frontage). This is included in Policy Unit Reference 6.13 of the current Shoreline Management Plan. This plan policy for the time period "By 2055" is to 'Hold the Line' with predicted implications of "No loss of property or land behind the existing defences".

The Broads Draft Plan references in Policy POXNS3:The Coast "in view of the high flood and tidal inundation risk to the area" are exaggerated, alarmist and do not reflect the fact that the sea defences and dune system are currently in a good state of repairs and well maintained by the Environment Agency.

Policy PODM22(reference to addressing potential light pollution in the Upper Thurne area) may have reasonable intentions but the Broads Authority could achieve better results by entering into discussions with the District Councils in whose areas the overwhelming majority of light pollution originates. This is particularly important in Somerton where 90%+ of the light pollution originates from the 'high ground' to the south and in particular from Martham and Hemsby.

Many of the policies in the draft plan relate to development. On the one hand we agree for the need for responsible, effective, reasonable and fair planning controls but we feel in the Broads the balance has now been tipped against the local population. The process has become arduous and expensive for many who seek to improve their properties. This imbalance has slowly led to the gentrification of the Broads and is responsible for the younger generation having little chance of securing housing in the area. Facts speak for themselves and planning policies covering affordable housing remain ineffective.

I totally agree with the Somerton Parish Councils objections and I would like to object on the same grounds.

Lottie Carlton

From: Martin Shaw [REDACTED]
Sent: 01 February 2017 12:19
To: Planning Policy Mail
Cc: Rob Bennett; Fiona Sarson; David Harris; Lottie Carlton
Subject: Broads Local Plan

Categories: Ack and Filed

Dear Team

I am responding to the Preferred Options Consultation on behalf of Whitlingham Charitable Trust. I have two comments relating to **Policy POWHI1: Whitlingham Country Park**.

1. The Trust endorses the main thrust of Policy POWHI1 which appears to be consistent with the Trust's Long Term Strategic Plan. My only comment on the detail is that the final statement could be deleted since the same point is made on page 217 (6th para, last sentence).

2. I can see no reference in the Plan to the impact on the Park of adjoining developments. This is a matter of concern to the Trust since neighbouring developments could well be the major determinant of future demands on the Park. While I appreciate that such developments may well lie outside the Broads Authority's jurisdiction it would be unreasonable if the Park suffered from the arbitrariness of planning authority boundaries. In this context, during consultation on the Deal Ground/May Gurney application the Trust sought acceptance of the principle that the developers should assess and take account of the consequences of their proposals for the Park. Unfortunately this was not reflected in any of the planning conditions on the permitted development. Hence the Trust would like to see some reference in the Plan requiring applicants for such developments (on which the Authority would normally be consulted), for example:

“to assess and take account of additional pressures on the Park associated with development proposals adjoining or close to the Park”. The justification for this would be the increased resource needed to enable the Trust to cope with extra visitor pressures.

Yours sincerely

J Martin Shaw OBE
Chair, Whitlingham Charitable Trust

Respondent: Willis, A

Lottie Carlton

From: Natalie Beal
Sent: 18 January 2017 11:30
To: alex willis
Cc: Lottie Carlton; Planning Policy Mail
Subject: RE: Local Green Space Nominations and Assessments Pits Lane Chedgrave

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr Wills

Many thanks for your email.

We will log it with the other responses to the Local Plan.

Yours sincerely

Natalie Beal

From: alex willis [REDACTED]
Sent: 16 January 2017 09:41
To: Planning Policy Mail
Subject: Local Green Space Nominations and Assessments Pits Lane Chedgrave

Dear Sir / Madam

When I first heard of the proposal I had to check my diary it was not April the 1st? What a complete JOKE!!!!

Has anyone at the Broads Authority actually wasted their time conducting this assessment, if so I question the capability of this government funded (by myself as a tax payer) organisation what a complete waste of time and resources!

Its well known if you actually have anything to do with the community not sit in an ivory tower in Norwich that the person making the nomination has a vested interest in making such a proposal as to deflect attention away from their own planning issue.

If the Broads Authority actually had any respect whatsoever in the community and had actually taken time to actually speak to anyone in the community rather than hide in their Ivory Tower in Norwich, they would know that this proposal is based on a catalogue of miss truths! I would love to know who has fed the Broads Authority this act of fiction 'Akin to Lord of the Rings' complete fantasy! I hope the Broads Authority persue the person making the nomination to recover their costs due to completely wasting their time. I also note the Broads Authority hold the entire community in such contempt they dont even bother to consult with the community, what does that do to harbour a good and trusting relationship, the damage this proposal has and will do (as it becomes more public knowledge) maybe unrepairable.

Reading the nomination, alledgedly the path behind the boatyards in pits lane is used by "many local walkers" really? so the Broads Authority have done an assessment and count of these numbers? if they have i would love to see the results, Personally on the rare occasions anyone other than a resident uses this path it is somewhat of a shock! it certainly isnt many, if any, so where the word 'many' comes from. Personally i would use the accurate wording "hardly any local walkers if any" use this path. Its a complete joke that anyone says otherwise. Following the recent works on the nearby pathways, and the closure of parts of the wherrymans way (well publicised) im unsure how many if any walkers are choosing to use a path / walk that in reality they cant use, perhaps the person making this application has a jet pack so they can negotiate the closed sections, personally i dont see many walkers carrying jet packs.

Alledgedly It is again the an attractive backdrop to the boatyards and is fully visable from the Loddon Bank of the River Chet, which is used by locals and visitors to access Pyes Mill and the picnic site, now im 6ft 3" tall I personally walked down there yesterday, with three friends there is no way you can call this view attractive backdrop and infact at my height most of it is hidden, I spoke to a lady in her late 60s who visits the broads

annually and has every year since her 6th Birthday, is apparently an active photographer and noted she had never taken a picture of that area (perhaps the Broads Authority should try this method 'speaking to people'). So it is hardly of any attraction. It is infact un-noticable and non descript if we were being honest, not living in a fantasy.

Finally it is again alledged the area is a haven for wildlife, pure fantasy! obviously a Broads Authority wildlife representatives have conducted an assessment of the area and have records of such, surely the Broads Authority havent just taken the words of the applicant? Alledgedly there are Bats, water vole, birds an insects using this as a haven, complete nonscence!!! there are creatures in there as there are in any other part / element of the planet, im sure there are as many inhabitants in the applicants garden as their are in this proposed area, to describe it as a haven and resevoir is a complete joke and i would go as far to say lie.

By even considering this proposal the Broads Authority have to me lost a considerable ammount of credibility, I'm confident once this hits public domain the severe damage done maybe beyond repair.

Regards

AJ Wilis

Lottie Carlton

From: Chris Woods [REDACTED]
Sent: 04 December 2016 09:07
To: Planning Policy Mail
Cc: Julia Bower; Rachel Card; Clive EDWARDS
Subject: Broads Local Plan – Preferred Options Consultation, Comment

Good morning,

Broads Local Plan – Preferred Options Consultation

<http://www.broads-authority.gov.uk/broadsconsultations>.

Further to the invitation for comments on this Plan, as received from Lottie.Carlton@broads-authority.gov.uk

I would like to offer two important points which should be considered:

1. WASTE

The recent removal of free waste collection facilities from various waterside moorings is introducing a serious Health Hazard.

I understand this is an attempt to save costs by declaring all boat users' waste be classed as 'Industrial Waste', and to be paid for accordingly, on the weak argument that waste produced by people using hire boats can, with a stretch of the imagination, be described as 'industrial'.

Well - your removal of free disposal facilities will without doubt encourage waste to be deposited on the river side or in the water, with all the problems this will create, on the health of people living and holidaying in the area, for the environment and for discouraging further visits to the Broads by holiday makers.

Does the Broads Authority really want turn this their bailiwick into a floating sewer?

I suspect the British Tourist Board will be less than impressed.

It also does not take into account the many private boat users on the Broads, for whom these free waste disposal facilities had been provided as part of their Annual Toll charge.

If it is a question of cost, I am sure the boat hire association will appreciate an additional Industrial Waste Disposal Tax.

2. SAFETY

The B.A. Safety Video and it's free web advise which I had long asked for, are excellent as far as they go and I full applaud the time and effort in its production.

It is a pity that not all local Boat Hire companies promote or give free copies of your video to first time visitors before they arrive on holiday, as originally envisaged,.

I believe this should be strongly encouraged by the B.A.'s Safety Team

No account appears to have been taken in this Broads Local Plan, of various organisations which can offer support regarding the safety of visitors afloat on the Broads.

I believe there is a place for such groups as the R.Y.A., and the Merchant Navy Association's Boat Club with its Safety Afloat project, to offer experience and support for the Broads Rangers in their dealing with inexperienced holiday makers afloat.

Our own Safety Afloat notes are available to your Safety Team and all organisations involved in training etc.

<http://www.seafarersafloat.com/seavue%20home.htm>

Regards,

Chris Woods

Capt. M. N., retired, Norfolk

Governor, R.N.L.I.

Member N.S.B.A.

MNA Boat Club member and local (Broads) liaison officer

Private boat owner, The Broads, for several decades

Respondent: Yallop, L

Lottie Carlton

From: Louisa Yallop (Headspace Accountancy) [REDACTED]
Sent: 11 January 2017 10:44
To: Planning Policy Mail
Subject: Yallop, L (Headspace Accountancy)

Categories: Ack and Filed

Good morning

I am writing to object to the designation of land at Chedgrave as "Green space".

I understand the area includes access to some of the boatyards there. Broads tourism is a big reason Loddon and Chedgrave can support so many small businesses. Anything which stifles our businesses threatens our thriving community.

This area is great for wildlife and the boatyards affected are not doing anything to harm the environment as far as I am aware.

The main area of concern locally is keeping the Wherryman's Way open.

Best wishes
Louisa Yallop

Resident and business owner, Loddon

Headspace Accountancy Ltd

Director: Louisa Yallop FCA, CTA. Telephone [REDACTED] Mondays and Wednesdays.

Mobile [REDACTED] www.headspaceaccountancy.co.uk

Registered Office: 38 Bridge Street, Loddon, Norfolk, NR14 6EZ

Registered in England and Wales number 07936555

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