

Ref	Name	Organisation	Comment	BA response	Amendments
#1	Matt Layt	Individual	I am sorry to jump onboard on someone else's email but I was recently forwarded an email which was sent to the Brundall riverside road committee regarding the broads authority consultation on dredging and reducing peat extraction on the Norfolk broads. In brief I am Norfolk born and bred and run a small business on the Norfolk broad specialising in piling and dredging. We have a good base of clients including private residents the commercial sector and even yourselves. Although our business is 75% piling the dredging side is a part of the business I would like to grow and we have recently taken delivery of our 2nd dredger. To be honest the job is hard enough with the guidelines we have to work within ie the dredging in one mechanical motion and only being able to build land up a small amount and removing dredging's off site is another mine field. Being from a family where my dad had a boatyard(brundall based) for 30 years I have seen the boatyards slowly die off one by one and riverside estate slowly turn into a series of marinas which is not a problem in anyway and can only be seen as forward step and a positive one for work and for the Norfolk broads in general. My point to which I am getting at is 30/40 years ago the vast majority of river craft were hire boats and had a draught of 2'6" to 3' maximum but with the evolution of larger private craft we now need around 4'on a low tide to accommodate around 80% of the boats moored in brundall. Other contractors don't tend to dredge brundall anymore with goodchilds not really concentrating in that area of expertise any more(Alan's words) and John bell the only other contractor and the (only) one which has a waste transfer site via grandfathers rights dating back to the may gurney days doesnt like to do much dredging now and doesn't like to come down hoborough's dyke at all. This leaves myself Broadwurx piling and dredging who is happy to do the work but has no where to put the dredgings even if I was to buy my own bit of marshland the same as John bells there is no way I can put dredgings on it as said by the broads authority. I would be interested to hear back from yourselves to see what the way forward is and how the bigger boats will use the Norfolk broads when most yards are not deep enough to accommodate and where peat diggings and silt differ in what can and can't be excavated. And to see if I could come and look at the videos mentioned in your email to the riverside committee.	This comment is about dredging. Dredging is about accumulated silt and not excavating peat. We have responded to Mr Layt separately. So if dredging an existing waterway, that should be accumulated silt. But if the work makes a mooring cut for example wider, then that could be relevant to the peat policy (if the area is peat).	No change to guide.
#2	Matt Shardlow	Individual	It's a small point but early in the Peat Guide it says that peat 'can' be developed on in the Broad. 'Can', like 'may' can have two meanings. Perhaps better to be explicit, something like - 'there are circumstances where development on peat soils in the Broad may be necessary'. Sets a clearer tone. Otherwise, it looks great - does the whole document become supplementary planning guidance when agreed with the new policy part of the Broad's planning policy?	Noted and agreed. Will amend the guide.	In the Broad, development can take place in areas where peat might be <u>on occasion may</u> be proposed that developed on, <u>can affect peat because it is</u> excavated or removed, <u>or actually developed on.</u>
#3	Sarah Luff	LLFA, Norfolk County Council	In point iv. of section 6.4.1, the guidance indicates that this is a change in the way of working for contractors and place the onus on the developer to inform the contractor. However, it is important that the Broad's Authority provides information and makes the contractors aware of this approach change as this will support the developer in requesting this new approach to be applied.	Noted. We will consider running a session for contractors. Please also note, that applicants often ask us for free pre-application advice, before they plan schemes. So this information, and other policy requirements, can be provided.	No change to guide.
#4	Sarah Luff	LLFA, Norfolk County Council	In section 6.4, the use and redistribution of peat arising is discussed. However, the preference order appears to indicate that peat should be offered to offsite organisations for agricultural reuse before exploring the potential for neighbours to use the arising. This appears to be at odds with the preferred approach of retaining and distributing the peat arisings appropriately onsite. Please could the prioritisation be re-considered or clarification provided?	Agreed.	Move 6.4.3 to before 6.4.2.
#5	Sarah Luff	LLFA, Norfolk County Council	The organisation mentioned specifically in point 'r' within the box have not previously been highlighted within the guidance.	Mentioned in para 2 of 6.4.3	No change to guide.

#6	Sarah Luff	LLFA, Norfolk County Council	<p>In section 6.4.1 there is guidance on the relocation of peat within the site with the preference for the use of low areas of potentially wet ground being given the priority. We would like to remind you of the need to retain flood storage areas as there is the potential for flood storage infill. Please can you include further information relating to the assessment and prevention of flood storage loss and the associated consenting process for both ordinary watercourses and main rivers? Further information on the need for ordinary watercourse consenting is available online at https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management.</p> <p>Follow up: In section 6.4.1, there is guidance on the relocation of peat within the site with the preference for the use of low areas of potentially wet ground being given the priority. We appreciate the need to keep the Peat wet and local to the point of arising and we support the good intentions that it is founded upon. However, should these “hollows” and “backfill areas” be within the 1% AEP (1 in 100 year) floodplain for the associated watercourse, then there would be an active loss of the flood storage area. The NPPF Guidance on Flood Risk and Coastal Change has emphasised that floodplain storage should be retained both on an individual and cumulative basis (See extract below from https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-risk-raised-by-minordevelopments).</p>	<p>In terms of small schemes, like moorings cuts, backfilling or filling in lower areas will not have a significant impact on flood risk. We sought advice from the EA: 'There should be compensatory flood storage provided for any deposition of peat within the flood zones. However the volumes generated from a new or extended mooring cut are relatively small compared to the large Broads floodplains. And therefore the offsite impacts are likely to be very small indeed, fractions of a millimetre increase in flood levels. Also the Broads land is often sinking, so any raising is often just reinstating what used to be present. Therefore we would not usually require compensation as the impacts are minimal. Also in the Broads it is often not possible for level for level compensation to be achieved as there is no higher land to lower. The alternative may be to remove the spoil from the floodplain, however instead we usually require it to be spread thinly and a calculation as to the offsite impacts carried out. Especially if there are negative impacts of it being removed from the floodplain as seem to be indicated. If the calculation shows very insignificant impacts then we will not object and ask the LPA to determine if it's ok, taking into account the cumulative impacts. In terms of the cumulative effect, as the impacts are usually so small you would require a lot of mooring cuts for any appreciable effects to be felt. We also feel that this is an appropriate pragmatic response for small-scale water compatible development'.</p>	<p>Make this change: 1.1.Flood risk When considering how to dispose of peat, in line with this guide, the impact on flood risk will need to be considered. For example, when backfilling or placing the peat in sunken areas, how will that affect flood storage? The EA have advised that for a smaller scheme, such as a mooring cut, the impact on flood storage will be negligible. But for larger schemes, the flood risk impact of where you dispose of the peat will need to be calculated and mitigated.</p>
#7	Sarah Luff	LLFA, Norfolk County Council	<p>This is further supported in the Environment Agency's guidance for the preparation of a Flood Risk Assessment in Flood Zone 2 or 3 (https://www.gov.uk/guidance/flood-riskassessment-in-flood-zones-2-and-3) as shown in the extract below. Furthermore, it should be noted that inappropriate development in these floodplain areas should be actively avoided unless the exception test can be suitably passed (Chapter 14 of NPPF https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf). Should a development occur in the floodplain that causes a reduction in the flood storage, then compensation on a level for level, volume for volume basis is required. This means that any loss of flood storage must be compensated for by the reduction in level of nearby ground, such that the same volume is available at every flood level before and after the works and it can freely fill and drain. In other words, in order to mirror the existing situation for a particular flood, each stage (or level) is provided with the same storage volume, cut and fill must equate on a level for level basis, i.e. at each level (say at 0.2 metre vertical intervals for example) the excavated and filled volumes are equal. The timing at which the storage effect comes into operation is significant. If this volume is reduced for any stage of a flood then the lost storage results in flood waters being diverted elsewhere, leading to third party detriment. The detriment caused by a small encroachment may not be significant, or even measurable, when taken in isolation but the cumulative effect of many such encroachments will be significant. This approach to flood storage compensation is supported by both the Environment Agency and Norfolk LLFA. Therefore, please can you include further information relating to the assessment and prevention of flood storage loss and the associated consenting process for both ordinary watercourses and main rivers.</p>	<p>For larger schemes, like a basin extension, the amount of excavated peat would be much more and disposal on site may be difficult. That is where other options like nearby land will come into consideration. Again, we asked the EA for their thoughts and they said 'In general the risk is relatively low but for these schemes, however, if there was a larger scheme which provided a greater impact (i.e. more than a couple of centimetres), it would be necessary for the Broads Authority to 'ok' the off-site impacts (if at all). This may be if you agree the benefits outweigh the impacts. It would be worth (if not already) including something in the document stating that the flood risk impacts should be calculated or mitigated (although it is difficult to mitigate due to the Geography of the Broads). The Environment Agency would happily review any calculations supplied to us on a site by site basis and would be able to advise you of the impacts further which should help with your determinations'.</p>	<p>And then this question: a.How do your plans for disposing of peat affect flood risk? What calculations and mitigation, if needed, have you produced?</p>
#8	Sarah Luff	LLFA, Norfolk County Council	<p>The mapped Peat areas within the Broads Authority's area are shown in Appendix A. It would be useful to have reference to Appendix A within the main guidance text. In addition, would the Broads Authority be willing to provide a digital copy of our information? It would be useful for the LLFA to be aware of developments that may be in these areas of Peat</p>	<p>There is already reference to Appendix A in the text. There will be licencing requirements to consider. But the BGS layer can be found here: https://mapapps.bgs.ac.uk/geologyofbritain/home.html</p>	<p>No change to guide.</p>

#9	Sarah Luff	LLFA, Norfolk County Council	<p>In relation to further information provided in Appendix A, it is indicated that further information is provided on the benefits of peat in flood risk management. Would you be able to share any further information you have or provide links to where this information can be found?</p> <p>In Appendix A, the Broads Authority has made the statement that “Water: Peaty soils help prevent flooding by absorbing and holding water like a sponge as well as filtering and purifying water. Peat can absorb large quantities of nutrient and other pollutants, although peat soils can under certain conditions release these chemicals back into the surrounding water.”</p> <p>The LLFA would like for this statement to be justified. As we are aware, peat soil naturally has a highwater content and frequently there is high groundwater, which means the void spaces within the peat soil are already saturated. If the ground is already saturated then there is very limited capacity for additional water from flood events. The LLFA is unsure of how the guidance document could reasonably state that “Peaty soils help prevent flooding by absorbing and holding water”.</p> <p>Therefore, the LLFA requests that information that supports this statement and any other information available on the benefits of peat in flood risk management at your disposal are shared so that we may support you on this matter.</p>	<p>Appendix A is taken from the Local Plan and this guide cannot change that wording.</p> <p>Peat soils in an ideal and healthy condition will be water-logged and as such form part of the floodplains natural water storage. Development and/or management that negatively affects the health and natural functioning of the peat will therefore limit this ability to store water.</p> <p>The statement in Appendix A is more about explaining why wet peat soils are important to protect.</p>	No change to guide.
#10	Mark Norman	Highways England	The proposals are unlikely to affect the Strategic Road Network in any way and therefore, we have no comments to make on the proposed guidance.	Noted.	No change to guide.
#11	Naomi Chamberlain	Norfolk CC	We advise that the SPD should include reference to paragraph 205 d) of the NPPF which states that planning permission should not be granted for peat extraction from new or extended sites.	This is not a SPD; it is a Guide. But we will make such reference.	Add to section 1: It should be noted that the NPPF refers to peat in terms of extraction, rather than development on peat. So for any schemes relating to the extraction of peat, it is important to note paragraph 205d) of the NPPF that says planning permission should not be granted for peat extraction from new or extended sites.
#12	Ian Robinson	RSPB	Introduction: In the second paragraph there needs to be a definition of what ‘organic content’ means for clarity.	Noted and we will add some explanation.	Add: organic content is partially decomposed plant matter which has carbon stored within it.
#13	Ian Robinson	RSPB	<p>Section 3: Fourth paragraph. Examples and clear definition are needed describing what kind of archaeology the guidance is referring to.</p> <p>Follow up: I don’t know what the statement ‘water-logged heritage’ means. All I was asking for was a definition to help me (and others) better understand and make a thorough, informed assessment of their proposal. An example would be if a conservation organisation wanted to create a number of small turf ponds 5sq m and no deeper than 30cm would we be damaging the water-logged heritage? If we would be, what is the nature of that heritage and how can we mitigate for the damage?</p>	Noted. We will add some wording about water-logged heritage. Regarding the specific example, see comment 33.	Add some more wording about water-logged heritage.
#14	Ian Robinson	RSPB	<p>Section 3 The final paragraph gives a false impression that peat soils are primarily important for absorbing flood water and filtering nutrients. Peat soils are most important as a medium in which protected plants and vegetation communities grow, this needs to be recognised and stated. The role of peat soils in purifying water leads to their deterioration and reduction in habitat quality as the peat soils (which in the Broads have low nutrient levels) become adversely nutrient enriched.</p> <p>Follow up: I suggest removing the text ‘as well as filtering and purifying water’ from the last paragraph of section 3. The peat soils in the Broads are characterised by low nutrient profiles – low nitrates and phosphates. This has created the unique habitats and species composition we see and which are protected by European law. Indeed 75% of the UK calcareous fen resource is found in the Broads. It may well be true that peat soils filter and purify water but if the impression given is that filtering and purifying water is a key function of peat soils in the fens then this needs amending. If peat soils capture nutrients they lose their intrinsic value and change adversely. Anything that causes these changes would be described as having a ‘likely significant effect’ on protected sites and protected species. These adverse changes would lead to deterioration of the peat soils and habitats leading to loss of swallowtail butterflies, loss of fen orchid etc.</p>	Noted. Will add some text to the end of this section to clarify.	Add: But that does not mean that peat soils should be considered as a water treatment process.

#15	Ian robinson	RSPB	Question relating to Section 4 Peat Report – Page 6. The guidance needs be clear on how recent the data from peat cores sampling should be. If peat samples have already been taken across a site, will this information be acceptable and if so beyond which point in time would this data/information become inadmissible? Substantial peat cores have already been taken across the Broads and a link to this information might provide a useful appendix.	To confirm, as set out in the guide, peat coring is only required near to the edge of the BGS boundary and if there is disagreement that the site in question is on peat. Coring is not required on all occasions. Historic information would be useful, but if there has been a big change to the site, then that could affect the historic core's accuracy and relevance. All soil information is historic, compelled around 1980 for the Broads and not systematically modified, but is still relevant. This is a site specific issue.	No change to guide.
#16	Ian robinson	RSPB	Questions relating to Section 5 - Page 8... and Appendix A Page 18. From the outset there needs to be clarity and definition of what represents development. For example, is there a minimum surface area and depth, below which excavation of peat or covering peat is not classified as development? This is particularly important for conservation purposes where small, shallow turf ponds are proposed (as described in Appendix A), or for example a fence post or footings for a bridge needs installing. Do these examples qualify as development? A list of activities which are exempt would be a useful addition as an appendix.	The issue raised is just not about peat, but relates to all applications. If anyone has any queries about what is development and what needs permission, we offer a free pre-application advice. Such a list would be extremely long and may not cover all eventualities.	No change to guide.
#17	Ian robinson	RSPB	RSPB suggests clarity is provided regarding sequential planning applications to make it clear that gradual creep will not be permitted. For example, an applicant may apply to create or extend an area for car parking involving loss of peat by 10m2. The overall objective of the applicant may be to ultimately create a larger covered area and they may decide to achieve this in a piecemeal way and submit further, subsequent applications to extend the parking area, which over time may be considerably larger than the initial application. It needs to be made clear at the outset that concurrent developments which may seek to perverse the process will be refused.	Any additional development that could lead to creep would require the submission of a separate application, which would be considered on its own merits, but the site's history would be taken into account.	No change to guide.
#18	Ian robinson	RSPB	In a similar way some clarity is needed describing that peat is valuable whether a site is designated or not and there is no difference between peat on a County Wildlife Site compared to a SSSI.	Peat policy is considered regardless of land designation.	No change to guide.
#19	Ian robinson	RSPB	Clarifying Confusion Between Development for Nature Conservation and Built Development RSPB suggests a clear distinction is made between traditional built development (housing, pilings, construction) where there is a permanent loss of peat; and peat excavation as part of nature conservation where the net result is positive and both the habitat and Carbon capturing potential is enhanced.	It is important to note that the peat policy and guide are not saying that development is not allowed on peat at all. It is a reduce, re-use kind of policy. One of the key questions is justifying why the scheme needs to go where it is proposed, can it be reduced in scale and then what are you going to do with the peat that is excavated. These queries are important and can be addressed, regardless of the type of development. Planning is all about weighing up the benefits with any negative impact a scheme can have.	No change to guide.
#20	Ian robinson	RSPB	If the proposed development/work is on a SSSI and the work is consented by Natural England through a site management plan and is deemed necessary for site management and is a valid plan or project as defined in European legislation and/or is part of habitat restorative/maintenance what approach is recommended? The draft guidance isn't clear and given the potential scale of works linked to habitat and species management, the large number of potential applications clarity here would help to limit inquiries and avoid unnecessary officer time and prevent the need for conservation charities to submit unnecessary and costly planning applications.	It is important to note that the peat policy and guide are not saying that development is not allowed on peat at all. It is a reduce, re-use kind of policy. One of the key questions is justifying why the scheme needs to go where it is proposed, can it be reduced in scale and then what are you going to do with the peat that is excavated. These queries are important and can be addressed, regardless of the type of development. Planning is all about weighing up the benefits with any negative impact a scheme can have.	No change to guide.
#21	Ian robinson	RSPB	Most of the proposed work carried out on SSSI's with peat soils involves creation of shallow scrapes (10-30cm deep and up to 25m2). What is the known intelligence regarding the benefit of 'new peat' created as these shallow scrapes accrete and the ability of newly forming peat to capture carbon as compared with existing peat? If indeed 'new peat' is better able to capture carbon as well as provide habitat for a wider range of biodiversity this may provide added impetus for this type of operation, especially if the process followed to obtain planning consent is considered separate from what be described as construction or built development; and given the benefits may warrant a reduced application cost.	Regarding reduced application cost, fees are set nationally. It is important to note that the peat policy and guide are not saying that development is not allowed on peat at all. It is a reduce, re-use kind of policy. One of the key questions is justifying why the scheme needs to go where it is proposed, can it be reduced in scale and then what are you going to do with the peat that is excavated. These queries are important and can be addressed, regardless of the type of development. Planning is all about weighing up the benefits with any negative impact a scheme can have.	No change to guide.

#22	Ian robinson	RSPB	<p>☒ If the development involves removing invading primarily willow and alder scrub and lifting and removing root plates to encourage and promote restoration of the fen, and which disturbs/removes some of the surface peat does this activity constitute removal of peat, require assessment and provision of information provided as part of a proposal/application?</p>	It is unlikely that this activity of essentially short-term disturbance and removal of scrub would be included.	No change to guide.
#23	Ian robinson	RSPB	<p>The opening comments in these sections of the document are contradictory and serve only to confuse. In 6.4.1 the direction given is that peat needs to be kept wet because drying peat releases Carbon and confirms the sentence in Section 3 which states 'The protection of peat soils is therefore critical to help address climate change.' In 6.4.2 this position regarding protection of peat soils and the need to keep them wet is completely eroded by saying that 'in some cases' it may not be possible to keep peat soils wet and then goes on to provide a list of several alternative uses for excavated peat all of which will release Carbon. Either peat needs to be kept wet or not. RSPB suggests any developments which cannot be completed in such a way that excavated peat soils are kept wet either at the parent site or at a donor site are refused. The guidance also needs to state what level of wetness needs to be achieved/maintained and whether this needs to be constant i.e. is periodic drying out OK or does the peat need to be perpetually waterlogged.</p> <p>Follow up: Following on from the above comment there may be opportunities where it is deemed ecologically, environmentally and archaeologically sound to excavate and transport peat to a donor site to reinstate peatland habitats lost to recent and historical land management practices, and where the transported peat will remain wet. Consideration needs to be taken that in order to maintain peat soils in a wet state will likely dramatically increase costs of maintaining the quality of some of the most biodiverse sites in the Broads. Some form of compromise regarding degree of wetness of peat needs to be made otherwise the new development guidance might lead to unreasonable management costs resulting in deterioration of the common, scarce and rare habitats and species for which the Broads is special.</p>	<p>There seems to be two points to this comment.</p> <p>The first is on the issue of keeping the peat wet and if the scheme cannot commit to this, why allow another option. The preference in the guide and policy is to keep the peat wet to ensure the carbon stays locked in. But we need to remember that this policy and guide are local approaches to protecting peat and its qualities and there is no national approach. To give the only option as keeping peat wet is restrictive and may be contrary to various planning rules and policies. The policy approach is not a stop of development on peat, but a reduce/re-use type approach. As such, the Authority is trying to be pragmatic and seek benefits from the peat if it cannot be kept wet. This policy approach is quite a step change in thinking about development on peat and given the national commitments to carbon dioxide and climate change, it may be that peat is addressed nationally or there is scope to go further as we produce the next local plan.</p> <p>The second point is asking how wet the peat should be kept. This is site specific. Ideally, for it not to waste, needs to be completely saturated for the majority of the year.</p>	<p>Add some text about the peat needing to be saturated for most of the year to the guide: In terms of keeping the peat wet, it will need to be somewhere so it is saturated for most of the year.</p>
#24	Ian robinson	RSPB	<p>Following on from the above comment there may be opportunities where it is deemed ecologically, environmentally and archaeologically sound to excavate and transport peat to a donor site to reinstate peatland habitats lost to recent and historical land management practices, and where the transported peat will remain wet.</p>	Noted. This will be considered on a case by case basis	No change to guide.
#25	Ian robinson	RSPB	<p>Consideration needs to be taken that in order to maintain peat soils in a wet state will likely dramatically increase costs of maintaining the quality of some of the most biodiverse sites in the Broads. Some form of compromise regarding degree of wetness of peat needs to be made otherwise the new development guidance might lead to unreasonable management costs resulting in deterioration of the common, scarce and rare habitats and species for which the Broads is special.</p>	<p>The policy is not saying no development on peat. See previous comments. We are taking a pragmatic approach to using peat excavated.</p>	No change to guide.
#26	Ian robinson	RSPB	<p>Thoughts on how to dispose of excavated peat:</p> <ul style="list-style-type: none"> • Shred excavated peat then spread/blow across site – in a similar way to how a spoil or muck spreader broadcasts soils? Would this be acceptable on SSSI's? 	Noted. This is the sort of discssion we would have to have at time of application.	No change to guide.
#27	Ian robinson	RSPB	<ul style="list-style-type: none"> • Create discreet sections of revetment along ditch edges (plastic piling or brushwood with biodegradable membrane) especially where ditches have been over-widened. 	Noted. This is the sort of discssion we would have to have at time of application.	No change to guide.

#28	Ian Robinson	RSPB	<ul style="list-style-type: none"> RSPB disagrees with the suggestion that incorporation of peat into agricultural soils can be a route for disposal of peat soils and feel undue focus is placed on providing 'acceptable' locations. Surely the primary aim is to keep peat wet and any soil improvement options are an absolute last resort. <p>Follow up: 1. The hard line would be - if peat is such an important resource as a substrate and has critically important properties in mitigating for climate change in capturing carbon then any proposed development which is unable to ensure excavated peat will be kept wet, will not be permitted. The guidance states in 6.4 that in order to retain its important qualities peat needs to be kept wet. If peat isn't kept wet it loses its ability to retain carbon and actually releases carbon as it oxidises.</p> <p>2. What are the exceptional circumstances which over-ride the need to keep peat wet and consign the substrate to 'soil improver' status? In essence is it more important to allow development or to capture and retain carbon? If there genuinely are cases where development must take place it might help to provide guidance perhaps with an example such as 'replacement of riverside revetment to protect property with peat disturbance and maximum loss of 2cu m' is acceptable, but extending a parking area or mooring area which proposes disturbing previously untouched peat would be unacceptable.</p>	<p>The Guide and policy are clear that the ultimate aim is to reduce the volume of peat excavated. If the peat is to be excavated, then again, the guide is clear that it should be kept wet in order to preserve the carbon held within it. But we also need to be pragmatic - that on occasions, not all the peat will be able to be kept wet. And that is when we discuss other ways to make the most of the peat that is being excavated.</p> <p>We do agree this is a last resort and needs to be acceptable with regards to EA permissions. However, in principle, increasing soil organic matter can be beneficial for retaining water, fertiliser and chemicals on agricultural land rather than these leaching into groundwater that supplies rivers and wetlands.</p> <p>As part of the hierarchy of decisions of what to do with peat arising from developments, if peat were added to agricultural land which is adjacent wetland sites, this could provide offering services to wetland sites.</p> <p>It is important to note that this policy was never a prevention policy. That is to say that it is not the intention of the policy to stop development on peat. It is considered that to do so would be contrary to the economic objectives of national policy. Furthermore, this is a step change in the approach to considering schemes that will excavate peat.</p>	No change to guide
#29	Ian Robinson	RSPB	Broads Authority need to provide acceptable locations, consented by Natural England with permissions obtained from Environment Agency indicating suitable, waste regulation compliant deposition areas.	Comment noted. The Guide does give suggestions about what to do with peat if it needs to be disposed off elsewhere and highlights what permits or licencing might be needed. But it is not our role to provide acceptable locations and get these consented - it is the role of the applicant and their agent.	No change to guide.
#30	Ian Robinson	RSPB	<ul style="list-style-type: none"> Moving peat offsite might require an environmental permit. The planning guide needs to clearly state examples of when this would normally be the case rather than leaving this as an open-ended statement! 	Noted. But this text was provided by the Environment Agency.	No change to guide.
#31	Ian Robinson	RSPB	<ul style="list-style-type: none"> The planning guidance needs to make clear that completion of a risk assessment is essential when moving soils to ensure biosecurity issues have been mitigated for. <p>Follow up: Section 6.6 says 'When moving material, such as peat soils and associated vegetation from site to site, an assessment of the risk to spreading disease and non-native species and their propagules (such as seeds and roots) needs to be considered.' It doesn't describe how to go about assessing that risk and the information in the guidance is suggestive using statements such as 'you could do this.' Given the cost involved in dealing with INNS I suggest it better to be directive and offer guidance which states 'Before considering moving peat undertake a vegetation survey to determine whether there is visible evidence of INNS.'</p> <p>My suggestion of carrying out a risk assessment should be mandatory and to:</p> <ul style="list-style-type: none"> Identify the hazard Evaluate the risk Put in place control measures Write it down Communicate to all concerned <p>Providing a simple template to enable those proposing development to assess risk would smooth the process.</p> <p>The link on Gov.UK suggests spraying with chemicals is acceptable! This may not be the right way to go and often spraying with chemicals is of limited effectiveness.</p>	Comment noted. Chemical treatment is not always effective but it is an option. We would however encourage other ways to be considered. We agree it would be helpful to come up with something to help people regarding invasive species.	Include some guidance relating to ensuring biosecurity issues have been considered and addressed.

#32	Ian robinson	RSPB	<p>Reasoned Justification Page 17/18. Climate Change. Correct management and restoration could lead to enhanced storage of carbon and other greenhouse gases in these soils, while mis-management or neglect could lead to these carbon sinks becoming net sources of greenhouse gases.'</p> <p>Follow up: Comment is to qualify what correct management and restoration means, either in the document or making it clear this can be provided as advice from BA or other organisations. This advice need not necessarily be linked to development, may be part of an agri-environment agreement, could be gleaned from publications such as the 'Fen Management Handbook.' One specific element to consider is achieving correct water levels and flows and a description of what that statement means, namely to achieve near natural groundwater inputs and restriction of nutrient loaded surface water inputs, combined with appropriate management of vegetation growing on peat soils as described in the Fen Management Strategy and Natural England Site Improvement Programme statements and favourable condition assessments.</p>	<p>Many factors combine to vary emissions of GHG from soils and this is an emerging areas of academic research. It is not the place of this guide to simplify this complexity and we would expect correct management for GHG exchange to reference this (below) and other relevant literature</p> <p>http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=17584</p>	No change to guide.
#33	Ian robinson	RSPB	<p>Reasoned Justification Page 17/18. Archaeology Page 18- Question. At what depth are archaeological features found? Is the surface 30cm devoid of features and if so, does the enable turf pond creation to proceed without cost of employing an archaeologist?</p>	<p>SCCAS were asked and responded saying:</p> <ul style="list-style-type: none"> • Specifying 30cm is risky as the depths of remains vary. • Having said this if works are minimal such as turf removal we don't need consulting. • If there is any uncertainty we suggest contacting SCCAS at the earliest opportunity for free preapp advice. 	<p>Make reference to this advice in the guide: It should be noted that the depths that archaeology may be present varies. SCCAS advised that if works are minimal such as turf removal, the Records Service may not need consultation. However, if there is any uncertainty they suggest contacting them at the earliest opportunity for free pre-application advice.</p>
#34	Jessica Nobbs	Water Management Alliance	No comment	Noted.	No change to guide.
#35	Georgia Teague	Suffolk CC	<p>We welcome the inclusions of consideration for archaeology.</p> <p>The following minor suggestions are proposed, re contact details on page 9:</p> <ul style="list-style-type: none"> • The Suffolk Historic Environment Record is a collection of information about the nature and location of archaeological sites in Suffolk. The online public version can be found on the Suffolk Heritage Explorer: https://heritage.suffolk.gov.uk/simple-search • Details of the Suffolk Archaeological Service can be found here: https://www.suffolk.gov.uk/index.php/culture-heritage-and-leisure/suffolk-archaeological-service/about-the-suffolk-archaeological-service/ 	Noted and agree. Will amend text.	Make suggested amendments.
#36	Georgia Teague	Suffolk CC	<p>From a minerals and waste perspective, it is understood that the removal and relocation of peat referred to is ancillary to other types of built development. However, if this happened on a large scale, we believe that it would constitute minerals and waste development and could require planning permission from the County Council. A parallel already exists in respect of reservoir creation where if the sand and gravel is removed from the site to create the reservoir then it is minerals extraction.</p> <p>Follow up: I would suggest a cumulative area of 1 hectare or above would constitute a suitable threshold at or above which SCC would require a separate planning application.</p> <p>100m x 100m = 10,000 sq. m (1 ha) Assume 2m depth = 20,000 cubic m Therefore I suggest 1 ha or 20,000 cubic m</p>	<p>A meeting was held with Norfolk CC and Suffolk CC Minerals and Waste teams to discuss this. It was agreed that for schemes of 1ha in area or 20,000 cubic metres in volume or more, that the BA will consult the relevant Minerals and Waste Team. It is acknowledged that not many, if any schemes, of this scale will come forward.</p>	Add wording about consulting Minerals and Waste Teams for schemes above a certain threshold.
#37	Georgia Teague	Suffolk CC	<p>SCC is concerned that the references to landscape in the peat soils guide is somewhat limited. The guide (and policy) focuses on the ecological and climate change concern.</p>	<p>The guide refers to the qualities of the peat itself. Landscape is addressed through the landscape section of the Local Plan, by consulting our Landscape Architect Consultant as appropriate and by using our landscape guide.</p>	No change to guide.
#38	Georgia Teague	Suffolk CC	<p>SCC believes that, the potential impact on landscape character is somewhat underrated and left out/ of this document. Fens, fen meadows and reedbeds are landscapes that are potentially quite susceptible to change by development. It is hoped that the landscape and visual amenity concerns may be already addressed elsewhere.</p>	<p>The guide refers to the qualities of the peat itself. Landscape is addressed through the landscape section of the Local Plan, by consulting our Landscape Architect Consultant as appropriate and by using our landscape guide.</p>	No change to guide.
#39	Georgia Teague	Suffolk CC	<p>SCC would like to note that on page 10 (just before the box j.), the sentence is a little hard to read/understand, and the following amendment is suggested in order to provide ease of reading: "The usual planning process will be followed, in terms of including habitat surveys, and seeking biodiversity net gain through appropriate biodiversity enhancements. and, when the details are finalised, any requirement of biodiversity net gain."</p>	Agree that some amendments to the text would be beneficial.	Amend text in line with comment.

#40	Georgia Teague	Suffolk CC	It is recommended that this guide should add a reference at Paragraph 6.3 "Biodiversity" (Page 9), something that refers the reader to Suffolk Biodiversity Information Service and Norfolk Biodiversity Information Service (as is the case with heritage). Further, although NERC Act 2006 has been referred to, similar duties towards the conservation of biodiversity are also set out in the NPPF.	Noted and will amend text.	Amend text in line with comment.
#41	Paul Harris	South Norfolk DC	The Council does not wish to offer any comments on this document.	Noted.	No change to guide.
#42	Paul Harris	South Norfolk DC	The Council does not wish to offer any comments on this document.	Noted.	No change to guide.
#43	Penny Turner	Norfolk Police	As the Designing Out Crime Officer, I shall be submitting no comment on behalf of Norfolk Police in this instance.	Noted.	No change to guide.
#44	Martin Dade	-	<p>differences between un-disturbed peat in locality and areas of housing, where dredgings and dried peat has previously been deposited.</p> <p>Areas like Horning and Wroxham - we have not encountered un-disturbed peat in dredging works for many years, but there is likely to be dried peat dredgings on reinstated eroded ground, so the requirement for coring should be in comparative to application - which I assume the 300mm depth refers to.</p> <p>Locality - meaning in-situ, as created, ie reed beds, un-disturbed garden areas</p> <p>Dredging would be removing silted existing river/mooring areas - most moorings and river areas near properties have been extensively excavated of peat to depths of 3.6m previously, so this peat would have been placed on adjacent banks and allowed to dry out, thus the need to recognise dried peat in the policy.</p>	Dredging focuses on removing accumulated sediment rather than unexcavated peat so there shouldn't be a conflict. If an area is being excavated that has received peat arisings previously, the question would be whether unexcavated peat is in situ at lower levels and/or whether the previously deposited peat had been kept wet and so retains structure and optimal value. Past use of the site and potentially cores to determine amount and condition of peat would guide each application.	No change to guide.
#45	Tom Holt-Wilson	Norfolk Geodiversity Partnership	The Norfolk Geodiversity Partnership approves this document. It recognises the palaeo-environmental significance of peat deposits (Appendix A) and acknowledges that the NGP is an interested organisation (section 6.2).	Support noted.	No change to guide.
#46	Rachel Bowden	Natural England	Natural England has no comments to make regarding the consultation on these guides.	Noted.	No change to guide.
#47	Rachel Bowden	Natural England	<p>Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.</p> <p>Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.</p> <p>The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.</p> <p>We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice</p>	Noted. This seems to be generic advice. It does not seem to be seeking changes to the document.	No change to guide.
#48	Liam Robson	Environment Agency	We have no comments on the peat guide	Noted	No change to guide.
#49	Rob Wise	NFU East Anglia	Section 4.6 refers to the Authority producing it's own peat mapping which is to be applauded and would be a more accurate and therefore better alternative to the BGS peat layer. Similarly other resources are available and being updated more regularly than the BGS layer, notably the Landis data set of Cranfield University. Developers should have the opportunity to use this and it should be referenced in both Section 4.1 and Section 4.6.	Noted and agree. Other sources of information would be relevant and used as and when available. Will add reference to this to 4.1 and 4.6.	Bring 4.6 to join 4.1 and refer to the Cranfield dataset.
#50	Rob Wise	NFU East Anglia	Section 6.4.2 references the National Farmers Union (East Anglia) as a potential point of contact. We would prefer the following wording: "If you have been unable to contact adjacent farmers for possible re-use application to agricultural land, and the quantities involved are large enough to warrant field scale spreading, get in touch with the NFU to see if they can help locate a suitable recipient farm.	Noted and agree. Will amend text.	Will add this text.
#51	Hannah Cutter	Suffolk County Council Archaeological	Please refer to us as Suffolk County Council Archaeological Service	Noted and agree. Will amend text.	Will add this text.

#52	Hannah Cutter	Suffolk County Council Archaeological	Please include: SCCAS are happy to discuss the archaeological potential of any proposed developments and provide free advice on the archaeological requirements for projects. We recommend consultation with SCCAS before a planning application is submitted.	Noted and agree. Will amend text.	Will add this text but also include Norfolk' services in the text.
#53	Hannah Cutter	Suffolk County Council Archaeological	Link to this page https://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/archaeological-planning-and-countryside-advice/	Noted and agree. Will amend text.	Will add this link.
#54	Hannah Cutter	Suffolk County Council Archaeological	The Suffolk Heritage Explorer is for personal interest/research, it is not suitable for planning applications.	Noted and agree. Will amend text.	Will add this caveat.
#55	Hannah Cutter	Suffolk County Council Archaeological	The final bullet point linking to our page on how the SHER works/what it is for, does not require changing.	Noted.	No change to guide.
#56	Fleur Bradnock	-	Thank you for the opportunity to read the draft Peat Guide which I have found of great interest. I was particularly happy to see that the Authority's preference is not to develop on, excavate or remove peat, rightly so, for all the reasons detailed and I hope that this aim will be achieved by the guide	Support noted.	No change to guide.