

## Broads Flood Risk SPD 2016 - Responses

### 1 Introduction

#### **BA Officer comment (SKH)**

5-8 To people not just residents flooding can also cause fear and distress to people. - visitors, people providing a service etc. Put the two sentences together: In extreme cases, flooding can lead to loss of life, but the threat of flooding.

12-13 What about lead local flood authorities?

16 Explain acronym.

17-18 Explain acronyms.

27 Are we sure of that? Suspect it should be 'will not add unnecessary financial burden' or something similar.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

#### **Environment Agency**

Line 19 – we feel this line should indicate that climate change allowances were changed in February 2016.

**Summary of response:** indicate that climate change allowances were changed in February 2016.

**Broads Authority comment:** Noted, but this part will be removed - text relevant for consultation version and not final version. No change.

#### **Great Yarmouth Borough Council**

(6) The only word I might disagree with is the word “extreme” in the first few paragraphs, talking about only the extreme flood event (risk and people’s safety); it might be more realistic to express it that people are put at “additional risk” from any type or level of flooding , as there is a residual risk from all water, especially if it is moving; (i.e. a flood, at certain velocity and above 4-6cm deep...) which would sweep people and things before it.

**Summary of response:** It might be more realistic to express it that people are put at “additional risk” from any type or level of flooding.

**Broads Authority comment:** Agreed. Will amend line to reflect comment.

#### **Norfolk County Council**

(1-29) Introduction section – while reference is made in this section to advice provided by the Environment Agency (EA) (section 10- 13), it is felt that the SPD should also refer to the statutory role of the Lead Local Flood Authority (LLFA) in this section as it provides advice on development in flood risk areas. While the LLFA is referred to later in the SPD (226) it is felt that there ought to be reference earlier in the Plan document to its advisory role alongside that of the EA.

**Summary of response:** while reference is made in this section to advice provided by the Environment Agency (EA) (section 10- 13), it is felt that the SPD should also refer to the statutory role of the Lead Local Flood Authority (LLFA) in this section as it provides advice on development in flood risk areas.

**Broads Authority comment:** Noted and amendments will be made.

### 4 Understanding Flood Risk

#### **Anglian Water**

(101) Flooding from sewers: The document mentions the possibility of flooding due to overwhelmed sewers, however it does not elaborate on this. Flood Risk Assessments which are submitted with planning applications should consider the risk of flooding from foul sewage together with other potential sources of flooding. Suggested wording: “Applicants should also assess the risk of foul sewerage flooding as part of the FRA. Anglian Water as sewerage undertaker can provide relevant information to applicants to inform preparation of FRA’s.”

**Summary of response:** Suggested wording: “Applicants should also assess the risk of foul sewerage flooding as part of the FRA. Anglian Water as sewerage undertaker can provide relevant information to applicants to inform preparation of FRA’s”.

**Broads Authority comment:** Agree. Change will be made.

Under 3.7. Other Sources of flood Risk add:

iv) Foul Sewerage Flooding

Applicants should also assess the risk of foul sewerage flooding. Anglian Water Services as sewerage undertaker can provide relevant information to applicants to inform preparation of Flood Risk Assessments.

#### **4.3 EA flood risk**

##### **BA Officer comment (SKH)**

(121) Is this really 3km<sup>3</sup>? If yes, need to alter it on line 234 where it is squared (or the other way round).

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Should be area not volume.

#### **4.4 Strategic Flood Risk Assessment**

##### **BA Officer comment (SKH)**

(132) It is unclear as to whether this is at the time of writing this SPD or whether it was at the time of writing the SFRA.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

#### **4.6 Nature of flood risk in the Broads**

##### **Ash, Mr J (BA Member)**

(171-173) In section 4.6 para 4 it states that the Broads is not subject to sea conditions. This I can agree with. However, it goes on to say that for flood risk purposes the river flooding probabilities are used in the Broads. I understand this to mean fluvial flooding. All recent large floods in the Broads since 1912 have been tidal floods and I would like to understand the rationale behind using the fluvial flood probabilities rather than the tidal flood probabilities for the Broads.

**Summary of response:** All recent large floods in the Broads since 1912 have been tidal floods and I would like to understand the rationale behind using the fluvial flood probabilities rather than the tidal flood probabilities for the Broads.

**Broads Authority comment:** The question was discussed with the Environment Agency who have had a look at modelled flood levels and although parts of the Broads system are fluvially dominated, not all areas are. In the upstream sections, such as the Bure and Ant, EA modelling shows that the fluvial levels are higher than tidal. However, in the downstream parts of the Broads the tidal levels can be higher. As a result, any flood risk assessment should consider both the fluvial 1% (1 in 100) and tidal 0.5% (1 in 200) annual probability events. The text will be changed as follows:

‘The Broads is not subject to open sea conditions (relating to tidal range and wave action) but parts of the Broads are tidally influenced. Any flood risk assessment should therefore consider both tidal and fluvial flood risk’.

##### **BA Officer comment (SKH)**

201 x needs replacing.

202 Permeable catchment and groundwater dominated: would the public know what this means?

202-207 Very long sentence. Break here into two.

210 What is the logic that links low level of defence with slow speed of approach? Needs more explanation to make sense.

211-214 Don't believe you can say this sweeping statement. What is the evidence for this? You could say those who have worked and lived in the area for some time may have experience and be less alarmed or more prepared but vast areas have not had significant flooding within a generation or more.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

#### **Environment Agency**

Line 172 – we feel this line should also recognize that the East Broad area is covered by tidal flood zones and these should be considered in flood risk assessments (FRA).

Line 186 – This paragraph relates to the functional floodplain and would appear to be more appropriate for section 4.8 which concentrates on that subject.

Line 210 – This line states that where defences are out flanked or breached, slow water velocities may result. We feel that immediately behind or close to the breach, the flow could be greater and subsequently the risk would be higher.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly

#### **4.7 Other sources of flood risk**

##### **BA Officer comment (SKH)**

226 Explain acronym.

249 And what about Suffolk?

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly. FWMA already explained in the previous paragraph.

#### **4.9 The Coast**

##### **BA Officer comment (SKH)**

(270) This is a very sensitive aspect and rather than simplifying it to 'general approach' you ought to take note of the long debated wording actually used.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** The SPD does not intend to copy verbatim the Plan, but to refer to it. The summary has been amended to read as follows:

'The Broads Authority has a small stretch of coast in the Executive Area (Winterton/Horsey area). The Kelling to Lowestoft Ness Shoreline Management Plan unit 6.13 covers Eccles to Winterton Beach Road. The Coastal erosion is a sensitive issue and the detail of the approach for this area is included in the Management Plan. As a summary for this document, the general approach to coastal erosion along this stretch for the present day and medium term is to hold the line. This is dependent on the option continuing to be technically and economically deliverable and over time other options may be investigated such as possible managed realignment, or a retired line of defence further inland. In relation to the present day, the Plan says...'

#### **5 Making and assessing a planning application**

##### **Environment Agency**

Line 281 – We agree with the content of this paragraph but feel that the term site specific flood risk is more appropriate.

Line 293 – We feel that this section needs to confirm that as well as minimizing flood risk both on and off site, it should emphasize the need to ensure the safety of the occupants.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly. Re line 281, will still use FRA as abbreviation as we also refer to SFRA - to have SSFRA may cause confusion.

## **5.2 Land Use and Development in Areas of Flood Risk**

### **BA Officer (BH)**

(338) Is it right to say typically? To my mind this would need to be the case in a high majority of cases before the word typically can be used – the words often or can maybe more appropriate.

**Summary of response:** Replace 'typically' with 'often' or 'can maybe'.

**Broads Authority comment:** Agreed. Will change to 'often'.

### **BA Officer comment (SKH)**

309 Ideally comma between 9 and 10.

317 Environment Agency's

321 What do the asterisks relate to?

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

### **BA Officer comment (TW)**

Line 317 should read Environment Agency's

Line 362 'should also include'

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

## **5.4 Exception Test**

### **BA Officer comment (SKH)**

494 x needs to be replaced.

509 x needs to be replaced.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

## **5.5 Information for Flood Risk Assessment**

### **BA Officer comment (SKH)**

523-524 Repeating words.

527 Add 'and so at less risk'.

531 Does the source of the table need to be referenced?

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

**Environment Agency**

Line 505 – It will be the LPA’s role to determine what is considered safe in terms of access routes during flood events and whether unsafe access can be adequately managed through the submission of a flood response plan. The LPA should also consider if proposed less vulnerable developments with internal flooding would be safe and sustainable and whether flood resilient measures and flood response plans are sufficient to mitigate risk. We would suggest that this could be reflected in this section and would give context to what information would be considered to make a development safe.

Line 532 – The table in the document relates to coastal flooding, tidal climate change does not need to be applied to Broads rivers as modelling already includes this. You may want to refer the reader to the climate change information on gov.uk which has additional guidance and will be updated periodically.

Line 550 – We would note that the use of silts and voids could act as a mitigation measure for loss of flood storage. We would suggest adding “such measures would need to be designed to ensure that water is always stored under the building and can empty after a flood. This would require intermittent boarding, no storage under the building and regular maintenance”.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Extra text relating to residual risk (line 505) added. Line 532: Table deleted. Line 550 - text added.

### **5.7 Flood response plan template**

#### **BA Officer comment (TW)**

(559)CDM Regs date looks wonky?

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

### **6 Reducing Flood Risk and Development**

#### **Environment Agency**

Line 628 – Refers to “Environmental Permitting Legislation”, this should read “Environmental Permitting Regulations”.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly

#### **Forestry Commission**

(564-705) The Broads have been identified as holding the largest area of broadleaved wet woodland in Europe and as such they are a vitally important habitat for wildlife and greatly enhance the Broadland landscape. With regard to reducing flood risk to development, it is acknowledged that trees and woody debris in rivers and other drainage channels can increase the risk of flooding. On the other hand it is also recognised that wet woodlands can store surface water and tree root systems increase soil permeability which helps reduce the retention of surface water. Furthermore, wet woodlands and the careful siting of new woodland plantings in the upper reaches of some catchment areas can help hold back flood water thereby moderating the peak flow further downstream. These positive and negative effects of woodlands in the Broads could be written into the section of the Planning Document entitled ‘ Reducing flood risk to development ‘.

**Summary of response:** The positive and negative effects of woodlands in the Broads could be written into the section of the Planning Document entitled ‘ Reducing flood risk to development ‘.

**Broads Authority comment:** The comments are noted. The aim of this section is to refer to on-site responses to flood risk. Wet woodland seems to be a more strategic response to flood risk away from a particular site. Such strategic flood risk management options is not the subject matter of this SPD. No change.

#### **Historic England**

(564-705) The one area we would like to highlight is the potential for unknown waterlogged sites, such as the Ludham log boat and the Iron Age trackway at Beccles. The Broads has a high potential for archaeological preservation and the strategies discussed in Section 6 that aim to reduce the flood risk of a potential development may alter

the direction of water flow and/or the amount of water reaching a waterlogged archaeological site, which could impact on its continued preservation. In particular, the preservation of peat that could hold valuable palaeoenvironmental evidence for changes in the landscape and environment over time. In addition to palaeoenvironmental remains, waterlogged deposits may also be present, increasing the potential for the preservation of organic remains such as wood and wooden objects. These sorts of remains are considered to be rare in an archaeological context and their presence would therefore be significant. Whilst we appreciate that Section 6 begins with the need to comply with policies of the local plan, we would expect these archaeological aspects to be highlighted within Section 6 in addition to other considerations already identified. 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.

**Summary of response:** The Broads has a high potential for archaeological preservation and the strategies discussed in Section 6 that aim to reduce the flood risk of a potential development may alter the direction of water flow and/or the amount of water reaching a waterlogged archaeological site, which could impact on its continued preservation. Whilst we appreciate that Section 6 begins with the need to comply with policies of the local plan, we would expect these archaeological aspects to be highlighted within Section 6 in addition to other considerations already identified.

**Broads Authority comment:** Comment noted. Will add to introduction to this section: The following sections discuss ways of potentially reducing flood risk to development. Historic England was keen (in their response to the consultation on this SPD) to emphasise the waterlogged archaeology in the area and that changes to the flow of water could affect preservation.

### **6.3 Raising Plot Levels**

#### **BA Officer comment (DH)**

(612-613)The final statement is a little bit weak in that it reads like little can be done. Does this mean any application that fails to provide compensation volume would be rejected? What is the positive guidance, or description of where proposals would be accepted even when compensation cannot be found. My interest in this area is things like storage of dredged material in the flood plain which can be up to 2 years, prior to reuse elsewhere; and excavation of ponds in the floodplain for conservation purposes. Neither of these examples have compensatory flood storage within the scope, and nor would they seek to. Would these types of project then fall outside the scope of the policy and be rejected if they needed to get to formal planning consent.

**Summary of response:** Does this mean any application that fails to provide compensation volume would be rejected? What is the positive guidance, or description of where proposals would be accepted even when compensation cannot be found.

**Broads Authority comment:** This comment relates to: 'Compensatory floodplain storage may be required as a mitigation measure, but this can be difficult to achieve on small plots and the impact off-site would always need to be assessed.' This has been rolled forward from the current SPD. The SPD does not intend to refer to the examples used. The SPD refers mainly to the activity associated with raising plot levels to reduce flood risk to that site not for the storage of material on a temporary basis. No change.

### **6.4 Bunds or Flood Walls**

#### **BA Officer (DH)**

(621-622) Bunds are frequently used for storage of wet sediment and given the non-permanent nature of the engineering works (though may be up to 4 years), the strong statement "will be a requirement" leaves me thinking that some of these types of sediment reuse projects will need to meet this requirement.

**Summary of response:** Bunds are frequently used for storage of wet sediment and given the non-permanent nature of the engineering works (though may be up to 4 years), the strong statement "will be a requirement" leaves me thinking that some of these types of sediment reuse projects will need to meet this requirement.

**Broads Authority comment:** This comment refers to the line 'The provision of alternative flood storage capacity in the drainage compartment will be a requirement in the use of this technique'. This has been rolled forward from the current SPD. Add the following sentence 'This requirement may not apply to the use of bunds to create a

temporary storage area or to provide pollution prevention but the potential to increase flood risk elsewhere may need to be considered.'. The wet sediment could have arisen from dredging which increased water depth and therefore likely increases water storage capacity within the waterbody itself. It could be that pollution prevention is deemed to outweigh the risk of flood risk being increased elsewhere.

### **6.5 Floating/Amphibious Structures**

#### **BA Officer (BH)**

(640-641)Is this still the case bearing in mind our recent discussions.

**Summary of response:** Is this still the case bearing in mind recent internal discussions relating to floating buildings in the Broads.

**Broads Authority comment:** Agreed. The last sentence will be removed as the Local Plan will not specifically address floating buildings on this occasion.

#### **BA Officer comment (SKH)**

(666)Change to sentence case.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

### **6.7 Sustainable Drainage Systems (SUDS)**

#### **Anglian Water**

(669-705)We support the inclusion of SuDS, it may be useful to refer to part H of Building Regulations which states that disposal to a surface water sewer is a last resort. A paragraph could be added which stipulates that “evidence should be provided to the LPA and sewerage undertaker to demonstrate that it is not possible to discharge surface water via infiltration or to a watercourse in accordance with Part H of Building Regulations.”

**Summary of response:** it may be useful to refer to part H of Building Regulations which states that disposal to a surface water sewer is a last resort. A paragraph could be added which stipulates that “evidence should be provided to the LPA and sewerage undertaker to demonstrate that it is not possible to discharge surface water via infiltration or to a watercourse in accordance with Part H of Building Regulations.”

**Broads Authority comment:** Agree. Add: Evidence is required to be provided to the Broads Authority and sewerage undertaker in relevant situations to demonstrate that it is not possible to discharge surface water via infiltration or to a watercourse in accordance with Part H of Building Regulations.

#### **BA Officer (BH)**

(678) “to” transpired? or “to be” transpired

**Summary of response:** “to” transpired? or “to be” transpired

**Broads Authority comment:** Change to 'transpire'.

#### **Environment Agency**

(669-686) We recognize that SuDS not only provide an effective method for dealing with surface water but can be used to enhance the biodiversity of a development. However we feel this section needs to emphasize the importance of SuDS including sufficient treatment steps to ensure water quality is protected. Further guidance on this is available in the SuDS manual as referenced in your footnotes.

Line 686 – Relates to the use of deep infiltration. Whilst this method of drainage is at the bottom of the hierarchy of SuDS you have identified, we would have concerns with regard to groundwater protection if this method is used. We suggest that additional text is added to highlight that “deep infiltration systems can pose a risk to groundwater quality and are not usually supported”

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly

### **Natural England**

(669-705) We support the need for all new major developments to incorporate Sustainable Drainage (SuDS) to manage surface water runoff.

**Summary of response:** We support the need for all new major developments to incorporate Sustainable Drainage (SuDS) to manage surface water runoff.

**Broads Authority comment:** Support noted.

### **7.3 Consents**

#### **BA Officer (BH)**

(736)Doesn't make sense.

**Summary of response:** Doesn't make sense.

**Broads Authority comment:** Agreed. Amend sentence to say: It should be noted that the Broads Authority tries to avoid the use of culverts. Consent for such works will not normally be granted in watercourses due to the adverse impacts on ecology and the potential for an increase in flood risk, except when used as part of water control structures within drainage systems on marshes or fen sites and occasionally for access for equipment over marsh drainage dykes.

#### **BA Officer comment (SKH)**

(736)Should word watercourses be there? Not sure of sense of sentence.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

### **7.4 Flood Warnings**

#### **Environment Agency**

Line 756 – We suggest adding that the fluvial flood warning notice period is 2 hours.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly

### **8 Summary and Conclusion**

#### **Environment Agency**

Line 799 – Should also acknowledge climate change allowances were revised in February 2016.

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** As before, whilst we agree, this text will be removed as it was used for the consultation version.

### **Appendix A: Glossary and Abbreviations**

#### **BA Officer comment (SKH)**

814-815 Think this can be better worded. 'Climate refers to the weather over a period of time (at least a decade and probably nearer 30 years) and takes account of natural variability. Climate change refers to the current more rapid change of conditions that is being driven by increased greenhouse gas emission primarily from fossil fuels altering the gas levels in the atmosphere. This in turn alters the main weather processes and creates conditions that are unlike normal patterns.

837-838 Although not mentioned in the SPD should there be mention of Flood RE as it will relate to getting insurance for at risk properties?

852-855 Switch round the order of this and the next?

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

#### **Appendix B: The Broads Planning Policy Context**

##### **BA Officer comment (SKH)**

(1010) Have been instead of were?

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

#### **Appendix D: Flood Response Plan and Guidance Structure**

##### **BA Officer comment (SKH)**

1206 There is a growing belief that sandbags are not worth considering - fairly in effectual and a problem when contaminated. check with DCs /NRF and see if this advice is supported.

1211-1212 How? Where would they be? Who would know?

**Summary of response:** General clarification to some parts of the SPD needed.

**Broads Authority comment:** Noted and will amend accordingly.

#### **NHS Public Health and Clinical Commissioning Groups**

Perhaps a reference on Appendix D would be useful.

The Norfolk Resilience Forum (NRF) plans are written in a multi-agency environment with all of the appropriate partners. These plans are designed to develop an individual's ability to contribute effectively to the coordination of response in an emergency. It will enhance their skills, knowledge and confidence to represent their organisation in this context. All NRF plans are based on the very high and high risks identified in the Community Risk Register. The NRF Strategic and Tactical Flood Plans can be found here: <http://www.norfolkprepared.gov.uk/local-risks/plans/>

**Summary of response:** The NRF Strategic and Tactical Flood Plans can be found here: <http://www.norfolkprepared.gov.uk/local-risks/plans/>

**Broads Authority comment:** Will make reference as suggested.

#### **General comment**

##### **BA Officer comment (TW)**

Having now read this document I feel more informed about the issues - on occasion it seems a bit repetitive but overall is very thorough.

**Summary of response:** Having now read this document I feel more informed about the issues - on occasion it seems a bit repetitive but overall is very thorough.

**Broads Authority comment:** Noted.

#### **Beccles Society**

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.

**Summary of response:** Beccles Society have considered the above document and concur with the aims and objectives set out.

**Broads Authority comment:** Noted.

#### **Broads Reed and Sedge Cutters Association**

It is pointless commenting on this document as the Broads Authority has a very poor record on flood management related issues. There is a refusal to state the truth when referring to the Eccles to Winterton Beach Road, unit 6.13 section of the current Shoreline Management Plan which clearly states "Hold the Line up to 2055 then review". Why is it so difficult for you to mention the year 2055 in this document? The Broads Climate Partnership meetings were not attended by any of our elected representatives and members of the public were not allowed to attend. This together with the fact that 2 of the 4 Broads Forum meetings have been cancelled this year clearly demonstrates the poor record of "community engagement" for the Broads interest groups and the public on this and other Broads related issues. It is obvious that there needs to be some form of planning guidance for floodplains and areas at risk from flooding. A simple and cost effective process would be welcome but the proposals in this document will further add to the lengthy, difficult and expensive planning process which already exists in the Broads. For low income groups and those 'Just About Managing', this will be seen as yet another step towards the gentrification of the Broads with younger persons having no choice but to continue to move out of the Broads area for their housing needs.

**Summary of response:**

1: There is a refusal to state the truth when referring to the Eccles to Winterton Beach Road, unit 6.13 section of the current Shoreline Management Plan which clearly states "Hold the Line up to 2055 then review". Why is it so difficult for you to mention the year 2055 in this document?

2: The Broads Climate Partnership meetings were not attended by any of our elected representatives and members of the public were not allowed to attend.

3: This together with the fact that 2 of the 4 Broads Forum meetings have been cancelled this year clearly demonstrates the poor record of "community engagement" for the Broads interest groups and the public on this and other Broads related issues.

4: A simple and cost effective process would be welcome but the proposals in this document will further add to the lengthy, difficult and expensive planning process which already exists in the Broads.

5: For low income groups and those 'Just About Managing', this will be seen as yet another step towards the gentrification of the Broads with younger persons having no choice but to continue to move out of the Broads area for their housing needs.

**Broads Authority comment:**

1: the author of this comment was spoken to on the phone and it has been agreed to add 2055.

2 and 3: Outside of scope of SPD. Comment passed to relevant officer.

4: The Planning process in the Broads is not different to anywhere else. It cannot be as planning is heavily regulated by Government. There are aspects such as Permitted Development Rights which may be different in the Broads and this is set by Government to reflect the special qualities of the Broads. Some local policies may be different or not covered in Government guidance, but this reflects local circumstances. All policies are assessed by an independent Planning Inspector when examined and they will recommend changes to make the plan sound and the Authority will take on board these recommendations so any plan meets the tests set out by Government. The Author was asked to clarify the particulars that are different in the Broads and to submit representations to the Local Plan consultation. Finally, the SPD elaborates on adopted local and Government policy and does not add financial burden - it gives guidance and templates to help would-be applicants.

5: Outside the scope of this SPD. Author asked to send representatives to the Local Plan which is out for consultation. Author also invited for a meeting but refused.

**Environment Agency**

We have reviewed the document and overall agree with the contents of the document. We have included our detailed comments where we feel alterations could be made to enhance the document.

**Summary of response:** We have reviewed the document and overall agree with the contents of the document. We have included our detailed comments where we feel alterations could be made to enhance the document.

**Broads Authority comment:** Noted.

**Natural England**

Natural England welcomes the production of the Broads Flood Risk Supplementary Planning Document. It provides clear guidance in relation to how new development can reduce flood risks within The Broads, and how development needs to take into account the impacts of climate change and the need for new developments to be able to adapt to this.

**Summary of response:** Natural England welcomes the production of the Broads Flood Risk Supplementary Planning Document.

**Broads Authority comment:** Support noted.

**NFU East Anglia**

The NFU is broadly supportive of the document and has no specific comments to make on the detail.

**Summary of response:** The NFU is broadly supportive of the document and has no specific comments to make on the detail.

**Broads Authority comment:** Support noted.

**NHS Great Yarmouth and Waveney Clinical Commissioning Group**

At present we have no comment on this well written documents. We are happy to support and be apart of any further developments as they occur.

**Summary of response:** At present we have no comment on this well written documents. We are happy to support and be apart of any further developments as they occur.

**Broads Authority comment:** Support noted.

**Norfolk Constabulary (Architectural Liaison Team)**

Having assessed the content of the Draft Broads Flood Risk SPD, the Architectural Liaison Officer team have no comments to make on this occasion.

**Summary of response:** Having assessed the content of the Draft Broads Flood Risk SPD, the Architectural Liaison Officer team have no comments to make on this occasion.

**Broads Authority comment:** Noted.

**Norfolk County Council**

The County Council welcomes the updating of the Flood Risk SPD which takes into account more up-to-date legislation and guidance on Planning and Flood Risk (i.e. The NPPF & NPPG as well as the Flood and Water Management Act 2010).

**Summary of response:** The County Council welcomes the updating of the Flood Risk SPD which takes into account more up-to-date legislation and guidance on Planning and Flood Risk

**Broads Authority comment:** Noted.

**Springall, Mr K (Ward Councillor - Wainford)**

This looks like a very well written professional document to me (in my completely unqualified opinion) and I'm happy to support it.

**Summary of response:** This looks like a very well written professional document to me (in my completely unqualified opinion) and I'm happy to support it.

**Broads Authority comment:** Support noted.