

# Planning Committee

19 July 2024

Agenda item number 10

## Local Plan- preparing the Publication Version

Report by Planning Policy Officer

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### Summary

This paper introduces the following papers and policy updates as the Publication version of the Local Plan is produced:

- Preferred Options comments
- New Environmental Quality policy
- Local Infrastructure Study update
- Amended peat policy
- Area to which Cantley policy applies
- Area to which HOV1 applies
- Area to which WHI1 applies

### Recommendations

- i. To note the comments received and the responses and actions. To endorse the document with comments and responses which will be published on the website and be sent to those who responded.
  - ii. To endorse the new Environmental Quality policy for inclusion in the Publication version of the Local Plan.
  - iii. To endorse the amended Local Infrastructure Study as evidence for the Local Plan.
  - iv. To endorse the amended peat policy for inclusion in the Publication version of the Local Plan.
  - v. To expand the area to which Cantley policy applies to include the area which was consulted on as part of the Preferred Options.
  - vi. To not extend the area to which HOV1 applies.
  - vii. To expand the area to which Whitlingham policy applies to include the area which was consulted on as part of the Preferred Options.
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## 1. Introduction

- 1.1. This report introduces the comments on the Preferred Options consultation, includes a new policy and some amended policies as well as an updated piece of evidence base.

## 2. Preferred Options comments

- 2.1. Over 750 comments from many varied organisations have been received. The comments have all been scrutinised and responded to. Some have resulted in changes to the Local Plan. See [Appendix 1](#).
- 2.2. It is recommended that Members note the comments received and note the responses and actions. Members are also asked to endorse the document with comments and responses which will then be published on the website and be sent to those who responded.

## 3. A new Environmental Quality policy

- 3.1. Some comments received as part of the Preferred Options consultation recommended an Environmental Quality policy. Research shows that the emerging North Norfolk and Great Yarmouth Local Plans have such policies. This draft policy addresses issues such as contaminated land and air quality. See [Appendix 2](#).
- 3.2. It is recommended that Members endorse the new Environmental Quality policy for inclusion in the Publication version of the Local Plan.

## 4. Local Infrastructure Study update

- 4.1. This has been updated to reflect the draft Anglian Water and Essex & Suffolk Water Water Resource Management Plans rather than referring to the 2019 Water Resource Management Plans. The conclusions have not changed. See [Appendix 3](#).
- 4.2. It is recommended that Members endorse the amended Local Infrastructure Study as evidence for the Local Plan.

## 5. Peat policy update

- 5.1. By way of background and history to this policy approach, a 'reduce, reuse, recycle' type policy was included in the 2019 Local Plan. This was supported by a [Guide](#) that helped expand the policy requirements.
- 5.2. The [Preferred Options version of the Local Plan included a stronger policy approach](#). This was based on an [Inspector's approach](#) to assessing the Greater Manchester Places for Everyone Joint Development Plan Document. That is to say that a site was removed from the Manchester Spatial Strategy because its advantages did not outweigh the impact on peat. The Inspector took this stance as they considered peat to be an irreplaceable habitat. The Preferred Options version of the Local Plan reflects that peat is an irreplaceable habitat.
- 5.3. On reflection, following discussions with our Ecologists, peat is not an actual habitat, but it does support priority and irreplaceable habitats like lowland fen. However, in the [Final Report](#) into the Manchester Spatial Strategy, the Inspector continues their stance on peat being an irreplaceable habitat.
- 5.4. The proposed policy for the Publication version of the Local Plan continues a stance of protecting peat. The supporting text has been expanded to explain that we consider peat to be equivalent to irreplaceable habitat given its qualities, as well as being very difficult to recreate or would take a very significant time to recreate (definition from glossary of NPPF). See [Appendix 4](#).
- 5.5. What this means is that if schemes involve the excavation of peat as a result of development, they will need to prove wholly exceptional reasons for resulting in the loss of peat. This is a high bar to reach. It may be that some schemes, such as for mooring cuts or marina extensions, cannot prove wholly exceptional reasons.
- 5.6. It is recommended that Members endorse the amended peat policy for inclusion in the Publication version of the Local Plan.

## 6. Area to which Cantley policy applies

- 6.1. British Sugar has requested that the area to which the policy applies, be extended. We asked a question about this in the Preferred Options consultation. The section of the Preferred Options can be found here: [Cantley \(broads-authority.gov.uk\)](https://cantley.broads-authority.gov.uk). The comments received relating to this proposal are as follows:

Specific Question 3: Do you have any specific comments on the extension to the area to which this policy (POCAN1) applies?

CAN1: Cantley (with proposed extension)

Scale: 1:1,500



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Name	Organisation	Comment	Response
Paul Harris	Broadland Council	The Council has no opposition to the proposal to extend the policy area for the Cantley Sugar Factory. This area is entirely within the Broads Authority area and, as stated in the supporting text, appears to be a logical extension.	Noted. We will extend the area to which the policy applies.

Name	Organisation	Comment	Response
Georgia Teague	Suffolk County Council	No comment – Cantley is located in Norfolk, and it is not strictly within SCC's remit to provide comment. However, SCC as LHA provide the following comments: The Plan outlines that the works associated with Cantley Sugar factory will lead to heavy road freight which will have negative impacts on highway safety and capacity. Consideration should be given to the extent to the impacts associated with the proposal and whether it would have a material impact upon the road network in Suffolk. The Plan states that "Cantley Sugar factory receives substantial amounts of raw material from local farms, requiring substantial amounts of HGV movements". Consideration should be given to the extent to which those movements would increase following the proposed extension and whether there are existing highway issues (within Suffolk) which could be exacerbated by the proposal.	The proposed extension is an extension to the area the policy applies to. Cantley Sugar Beat Factory already own and use the land that the extension covers. The Factory is not being extended. The area to which the policy applies is proposed to be extended. The policy does not allocate a specific use or change of uses but guides how any proposals at the factory need to be judged and implemented. Traffic is a consideration in the policy.

- 6.2. It is recommended that the area to which Cantley policy applies is expanded to include the area which was consulted on as part of the Preferred Options.

## 7. Area to which HOV1 applies

- 7.1. As part of the Examination into the currently adopted Local Plan, Wroxham Parish Council requested the area to which HOV1 applies be extended. We asked about this as part of the Preferred Options and the relevant section can be found here: [Hoveton and Wroxham \(broads-authority.gov.uk\)](https://www.broads-authority.gov.uk). The comments received on this proposal are as follows.

Specific Question 4: What do you think about extending the area to which this policy (POHOV1) applies to include the area of land shown on the following map?



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Name	Organisation	Comment	Response
-	Wroxham Parish Council	The Parish Council do not wish to pursue the inclusion of this area.	Comments noted.
Jenny Mickelburgh	Landamores Boat Builders	I would like formally object to the inclusion of the area around Bridge Broad being becoming Green Infrastructure, as shown on the attached maps. A large part of the area in question, land owned by Landamores Boatbuilders, is part of a working boatyard and marina and we don't believe it is suitable for inclusion. We are concerned that designating that land as Green	Concerns and objection noted.  In terms of consideration by the Planning Inspector, as is clearly stated in the consultation document, this is about when the current Local Plan, that was adopted in 2019, was examined - the Planning Inspector considered the request by Wroxham Parish



Name	Organisation	Comment	Response
		<p>Infrastructure would put unfair and unworkable restrictions on our current and/or future use of it.</p> <p>Please also note that the stretch along the railway line itself is Network Rail land and forms the embankment to the railway line. Whilst I have objection relating to that area, I can't see any benefit in its inclusion as Green Infrastructure.</p> <p>There is a comment on the website that indicates that this area has already been discounted by the Planning Inspector. However, it is still in the current document, therefore I am submitting my comments for the avoidance of doubt.</p>	Council to include the area as green infrastructure, but declined to proceed with that as a recommendation / requirement for that Local Plan, hence the question this time around.
Paul Harris	Broadland Council	The area in question appears to be a large area of established vegetation that contributes to the rural character, provides screening for the Boat Yard and the railway and is likely to have some significant biodiversity value. The Council would therefore support the inclusion of this area within the policy.	Support noted. Wroxham PC have stated that they do not wish to pursue this area being allocated.

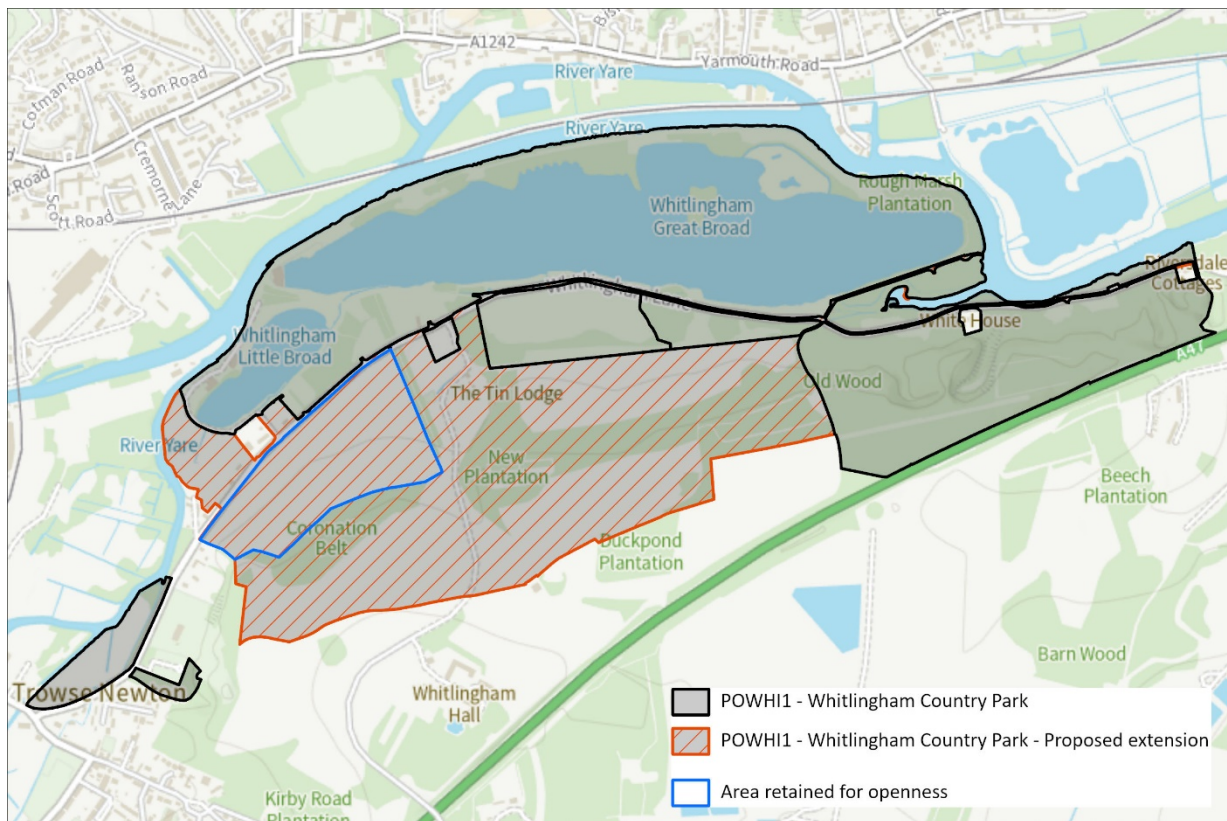
- 7.2. Taking the comments in the round and considering that Wroxham Parish Council do not wish to pursue this extension, it is recommended to not extend the area to which HOV1 applies.

## 8. Area to which WHI1 applies

- 8.1. Whitlingham Charitable Trust and Crown Point Estate has requested that the area to which the policy applies, be extended. We asked a question about this in the Preferred Options consultation. The section of the Preferred Options can be found here: [Trowse](#)

[and Whitlingham \(broads-authority.gov.uk\)](https://broads-authority.gov.uk). The comments received relating to this proposal are as follows:

Specific Question 7: Do you have any specific comments on the extension to the area to which this policy (POWHI1) applies?



Name	Organisation	Comment	Response
Paul Harris	South Norfolk Council	The Council does not object to the proposed extension to the policy area. The Council will raise however that the area is extensive and it must be considered if extending the policy area could potentially result in some recreational development that could distract from the natural and untouched nature of the area. The Council support the provision of the area where any development would be prohibited.	Noted. We will refer to not affecting the natural parts of the area.



Name	Organisation	Comment	Response
Georgia Teague	Suffolk County Council	Whitlingham is located in Norfolk, and it is not strictly within SCC's remit to provide comment. However, SCC LLFA provides the following comment: There are some areas of surface water flood risk, mostly in the 'area retained for openness' but as this appears to be just a country park extension, SCC do not believe it to have any major impacts on flood risk but the management of areas at risk of surface water flooding may need to be considered.	Noted. We will refer to flood risk in the policy.

- 8.2. The thrust of these comments can be addressed through policy wording amendments. It is recommended that the area to which the Whitlingham policy applies is extended to include the area which was consulted on as part of the Preferred Options.

## 9. Work being produced

- 9.1. The following elements of work are ongoing and are likely to come to Planning Committee over the next few months:
- Energy Topic Paper
  - Wind Topic Paper
  - Gypsy and Traveller Assessment (Great Yarmouth update and information for the rest of the Broads)
  - Viability Assessment
  - Sequential Test
- 9.2. As a reminder, the aim is for the final version of the Local Plan to come to Planning Committee and Broads Authority in November, enabling a December 2024 consultation, with the January 2025 committees being the fallback position.

Author: Natalie Beal

Date of report: 27 June 2024

Appendix 1 – [Preferred Options consultation](#)

Appendix 2 – [Proposed Environmental Protection policy](#)

Appendix 3 – [Local Infrastructure Study update](#)

Appendix 4 – [Updated Peat Soils policy](#)

Preferred Options consultation 2024 - Comments received and proposed Broads Authority responses

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
Air Quality	Sarah Morrison	Natural England	Natural England notes there is no policy in the draft Local Plan relating to air quality. The HRA identified that the Plan has the potential to increase traffic related emissions within 10km of the plan area and therefore within 200m of The Broads Special Area of Conservation (SAC), Broadland Special Protection Area (SPA) and Broadland Ramsar.	We plan to introduce an environmental quality policy.	Add an environmental quality policy.
Air Quality	Sarah Morrison	Natural England	The effects on local roads in the vicinity of the proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. Further detailed information is available in Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001.	The HRA consultants have been made aware of this comment and will consider it as they produce the next version of the HRA.	HRA consultant will consider this comment.
Air Quality	Sarah Morrison	Natural England	Regarding effects on general air quality (regional or national), we advise that in addition to assessing local air quality effects, consideration should also be given to national air quality impacts resulting from diffuse pollution over a greater area. The UK Government has international commitments to reduce national emissions of pollutants and consideration should be given to impacts that occur on a regional, national and international scale and which also contribute to background concentrations.	The HRA consultants have been made aware of this comment and will consider it as they produce the next version of the HRA.	HRA consultant will consider this comment.
Allocation policies	Tessa Saunders	Anglian Water	We support reference in the relevant policies for residential development that applications should demonstrate water efficiency and that there is adequate capacity in the water recycling centre (sewage treatment works) and the foul sewerage network to serve the proposed development. We encourage developers to undertake early engagement with Anglian Water Development Services pre-planning engagement team in terms of connections to our networks.	Noted. Add text relating to pre-planning engagement to the supporting text of DM4.	Refer to AW pre-planning engagement to supporting text of DM4.
Appendix 14	Dr Sarah Eglington	Norfolk Wildlife Trust	We welcome that NWT is listed under ‘organisations involved’ for policies on biodiversity, Trinity Broads and Upper Thurne.	Support noted.	No change to policy.
Appendix 14	Dr Sarah Eglington	Norfolk Wildlife Trust	With regards to the monitoring indicators, we recommend the addition of the following text “Applications permitted against the advice of Natural England and Norfolk Wildlife Trust” .	Agree. Add reference to both Wildlife Trusts	Add reference to both Wildlife Trusts.
Appendix 4: Climate change adaptation and resilience checklist	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend that the wording ‘just as now’ is removed from the start of section 4c, as this implies that the chances of extreme weather will remain as they currently are, when in fact, the likelihood will increase.	Agree.	Remove 'just as now'.
Appendix 6: Flood Response Plan Guidance and Structure (inc multiple chapters)	Alasdair Hain-Cole	Environment Agency	We support the inclusion of the Flood Response Plan Guidance within the appendices of the Plan. However, the current text defines Zone 3b as “This zone comprises land where water has to flow or be stored in times of flood, during a flood event with an annual probability of 1 in 20 (5%) or greater.” In accordance with the August 2022 update of the NPPG, this should be replaced with, “this zone comprises land where water has to flow or be stored in times of flood, during a flood event with an annual probability of 1 in 30 (3.3%) or greater.”	Agreed. Will replace the text.	Replace text with updated NPPG wording.
Appendix 9	Georgia Teague	Suffolk County Council	Suggested amendment as follows: 4) Restrict run-off rates to as close to the greenfield rates, or at the very minimum a betterment of at least 30% over the brownfield run-off rates. <u>Brownfield better will only be considered acceptable if greenfield rates cannot be achieved for a practical reason.</u>	Agreed. Add this text.	Add similar text to policy.
Background information	Chris Waldron	Ministry of Defence	The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.	Background information noted.	No change to Local Plan.
Background information	Chris Waldron	Ministry of Defence	Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by ‘ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’ Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up.	Background information noted.	No change to Local Plan.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
Background information	Chris Waldron	Ministry of Defence	The area covered by any Broads Authority Local Plan Review Plan period 2021 to 2041 consultation will both contain and be washed over by safeguarding zones that are designated to preserve the operation and capability of RRH Neatished and the East Wide Area Multilateration (WAM) Network.	Background information noted.	No change to Local Plan.
Background information	Chris Waldron	Ministry of Defence	Eastern WAM Network is a new technical asset, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through Broads Authority Local Plan review preferred options area of interest.	Background information noted.	No change to Local Plan.
Background information	Chris Waldron	Ministry of Defence	Copies of these relevant plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.	We will ask for these areas.	Ask MOD for the GIS files. Add to policy maps if required.
Background information	Chris Waldron	Ministry of Defence	The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.	Background information noted.	No change to Local Plan.
Background information	Chris Waldron	Ministry of Defence	To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding area of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.	Background information noted.	No change to Local Plan.
Chapter 10 Vision and Objectives	Andrew Marsh	Historic England	We support the vision and objectives. OBJ8 specifically addresses address the need to protect, maintain and enhance the historic environment, and is very much welcomed. This strong objective will help positively shape the Plan’s strategic policies. Overall the objectives demonstrate an integrated approach to the conservation of the historic environment which sees the interrelationship between conservation and other spatial planning goals recognised within several different policies rather than in isolation. For example, OBJ3 and 14 embody a wider understanding of the historic environment has helped inform these objectives which will also help deliver the conservation and enhancement of the historic environment.	Support noted.	No change to Local Plan.
Chapter 12 Sustainable Development in the Broads	Georgia Teague	Suffolk County Council	Section 12, Sustainable Development in the Broads, should state that some (major) development could be minerals and waste sites which would be determined by SCC as Minerals and Waste Authority.	Noted. The supporting text already refers to minerals and waste development.	No change to Local Plan.
Chapter 15 Flooding	Ian Robson	RSPB	Is there a need to mention impermeable surfaces and run-off? Also, the role the Broads IDB plays in maintaining water levels throughout the Broads is significant.	We have PODM8: Surface Water Run off. And there are many policies that refer to surface water run off. But we will check policies to see if they should refer to surface water run off.	Check if policies need to refer to surface water run off and impermeable surfaces.
Chapter 15 Flooding	Ian Robson	RSPB	NPPG referred to as National Planning Practice Guidance, not Policy Guidance?	NPPG stands for National Planning Practice Guidance	No change to policy.
Chapter 15 Flooding	Ian Robson	RSPB	Sentence starting ‘Section 23’ at the end add ‘and in the case of the Broads the Water Management Alliance.’	Noted. Agreed.	Weave in reference to Water Management Alliance.
Chapter 18 Soils	Ian Robson	RSPB	General point. It seems incongruous that any development which will lead to removal of peat can be deemed acceptable. Surely only development which preserves peat and optimises its degree of wetness and ability to capture carbon can be deemed viable?	Noted. And to some extent, agree - peat has many properties and the best thing to do is leave the peat unharmed and in situ. The only mention of peat in the NPPF is about extraction for use. There is no mention of peat being excavated as part of development. That is why we have tried to do something locally. It may be that our proposed policy is slightly wrong and we will be reviewing it.	Review peat policy.
Chapter 20 Natural Environment	Georgia Teague	Suffolk County Council	SCC ecologists have read the documents and agree with the policies related to the Natural Environment and Biodiversity. Regarding protected species surveys – once completed, the results of these surveys should be sent to the relevant biological records centre (Suffolk Biological Information Service and Norfolk Biological Information Service).	Agreed. Add this text.	Add similar text to supporting text.
Chapter 31 Design	Sarah Vergette	Broads Society	The Society supports the approach set out in Policies POSP16: Strategic Design Policy and PODM51: Design.	Support noted.	No change to policy.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
Chapter 33 Health and wellbeing	Georgia Teague	Suffolk County Council	SCC Health and Housing Needs Assessment for Suffolk1 has recently been published as of 21st May 2024. SCC suggest that this be considered alongside other evidence base documents as listed in the Introduction. This could also be included as a reference document at Appendix 13 Small Site Healthy Planning Checklist.	Agree. Add Assessment to introduction and also the small site healthy planning checklist.	Add reference to introduction and small site healthy planning checklist.
Chapter 37 Acle	Paul Harris	Broadland Council	The Council supports the cemetery and playing field expansion.	Support noted.	No change to policy.
Chapter 38 Brundall	Paul Harris	Broadland Council	The Council supports the approach to retaining the recreational appeal of the Brundall Riverside whilst protecting the sensitive natural environment of the local area and allowing some limited amount of potential residential mooring.	Support noted.	No change to policy.
Chapter 38 Brundall	Sarah Vergette	Broads Society	Although the proposed Local Plan does not specifically allocate the Brundall Riverside area as a positive area for change, there are a number of specific policies relating to the area i.e. Policies POBRU1 – POBRU6 which the Society generally supports. The Society, however, still has concerns about the potential stagnation and degradation of the area that is likely to occur if the current highway situation is not addressed. The problem of access via Station Road has inhibited the development potential of the area for decades – a situation which Norfolk County Council has failed to address. Given that the carriageway is unlikely to be widened, the Society would encourage the Broads Authority to enter into dialogue with the County Council to try and put in place a traffic management scheme which would allow more diversification within the estate. Without this, a number of boatyards are likely to fail and the area eventually degrade.	We have spoken to Norfolk County Council in the past about the issues here. We sent your comment to them and this is their response: The Highway Authority is aware of the constrained nature of the highway at Station Road and there are no current plans for its improvement. As you know it is for site promoters to propose suitable mitigation as part of any application for planning consent	No change to policy.
Chapter 39 Cantley	Paul Harris	Broadland Council	The Council supports the approach to retaining the employment opportunities at Cantley Sugar Factory.	Support noted.	No change to policy.
Chapter 47 Hoveton and Wroxham	Paul Harris	Broadland Council	The Council supports the approach in Wroxham and Hoveton.	Support noted.	No change to Local Plan.
Chapter 48 Loddon	Paul Harris	South Norfolk Council	The Council supports the approach to limited residential moorings in Loddon.	Support noted. Although the landowner has asked the allocation be removed.	Policy will be removed.
Chapter 57 Thorpe St Andrew	Paul Harris	Broadland Council	The Council supports the approach to protecting the natural environment and boat moorings in Thorpe St Andrew.	Support noted.	No change to Local Plan.
Chapter 59 Trowse and Whitlingham	Paul Harris	South Norfolk Council	The Council generally supports the approach taken in Trowse and Whitlingham.	Support noted.	No change to Local Plan.
Chapter 6: Policy Context	Georgia Teague	Suffolk County Council	Reference should be made to the Minerals and Waste Local Plan 2020 in section 6, policy context, as a specific section to highlight that both Norfolk and Suffolk Minerals and Waste policy applies to the Broads. Reference to SCC as the Minerals and Waste Authority for Suffolk is welcomed.	Noted. The Minerals and Waste policy documents are already referred to.	No change to Local Plan.
Chapter 60 Non Settlement Based Policies	Paul Harris	Broadland Council	The Council supports the approach in this section with no specific comments to make at this time with the exception of Policy POSSA47: Road schemes on the Acle Straight (A47T).	Noted.	No change to Local Plan.
Chapter 7 About the Broads	Andrew Marsh	Historic England	We support Chapter 7 which is locally specific to the Broads and describes the pattern of settlements and changing local vernacular. Paragraph 7.8 in particular outlines the numbers of different types of designated heritage assets within the Broads as well as addressing non-designated heritage assets. We particularly welcome the reference to the presence of waterlogged heritage.	Support noted.	No change to Local Plan.
Chapter 7 About the Broads	Sarah Vergette	Broads Society	The ‘About the Broads’ section of the current consultation has included some of the text that the Society put forward in its response. The Society generally supports this section of the Local Plan.	Support noted.	No change to policy.
Chapter 8 – Duty to Cooperate	Paul Harris	Broadland Council	Broadland District Council supports the Broads Authority in their continued engagement and participation with the Norfolk Strategic Planning Framework relating to cross-boundary planning issues and co-operation.	Support noted.	No change to Local Plan.
Chapter 42 Ditchingham Dam	Paul Harris	South Norfolk Council	The Council supports the approach to protecting the sport facilities and open space currently located at Ditchingham.	Support noted.	No change to policy.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
Design Guide	Paul Harris	Broadland and South Norfolk Councils	A number of policies throughout the plan refer to the Design Guide as being of relevance when applying them. However, at the time of the consultation the Design Guide is still being drafted. Therefore, while the Council has provided comments on some of these policies, to fully establish the potential of them the Council would also need to review the Design Guide. The Council would recommend that the Design Guide is published in the future, either by itself or with a future version of the Local Plan, in order for the policies to be considered in their entirety. The Council reserve the right to provide comments on policies in the future based on this.	The plan is for the emerging Design Guide to be consulted on at the same time as the next version of the Local Plan. We are still deciding where it will be a Guide or part of the Local Plan.	No change to Local Plan.
Development Boundary Topic Paper	Sam Hubbard	Great Yarmouth Borough Council	The preferred approach of not identifying any development boundaries within the Broads area of the Borough and the development limits topic paper that forms part of the evidence base is noted. Whilst the Borough Council considers this approach to largely be consistent with Borough Council's approach to development boundaries in settlements which straddle the shared planning boundary, it is not clear why development boundaries have not been defined within the area west of Thrigby Road in Filby or surrounding River Walk within Great Yarmouth. Whilst parts of these areas are within flood zone 3, the currently adopted Great Yarmouth Local Plan identifies development limits within similar areas of flood risk. It may be more appropriate to include such areas within development boundaries and rely upon the completion of the flood risk sequential and exception tests where applicable.	We will look into a development boundary and send it to the Parish Council to see what their thoughts are. As for River Walk in Great Yarmouth, we already have permitted dwellings at Marina Quays and there is only a small area near that which a boundary could be drawn around and the benefits are not clear.	Draft a development boundary for Filby and consult with Parish Council.
Development Boundary Topic Paper	Sam Hubbard	Great Yarmouth Borough Council	Appendix 2 of the development limits topic paper does not appear to have taken into account the neighbouring development limit for Filby (to the east of Thrigby Road), as has been mapped in other areas.	Noted. We will add that to the map.	Add GYBC development boundary to Filby map in Appendix 2.
Education	Georgia Teague	Suffolk County Council	As the dwelling numbers are below 10 then any pupil demand arising would be accounted for in terms of our strategic planning for school places being based on 95% capacity, so development like this would be subsumed in the remaining 5%.	Noted.	No change to Local Plan.
General comment	Alice Lawman	National Highways	<p>Thank you for the opportunity to provide comments on the review of the Broads Authority Local Plan – Preferred Options Consultation.</p> <p>National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN), which within the area this includes the A47.</p> <p>National Highways' wishes to continue to be involved through the production of the Plan, in particular to issues and proposed allocation sites relating to Transport issues and the Strategic Road Network in the area. It has been noted that once adopted, the Plan will become a material consideration in the determination of planning applications within the Broads Authority area . Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p>	Noted.	No further action.
General comment	Andrew Marsh	Historic England	Please note that owing to a lack of capacity, we have been unable to review every policy in detail, and instead have focused our attention on those with the most obvious relationship to the historic environment.	Noted.	No change to Local Plan.
General comment	Andrew Marsh	Historic England	Historic England strongly advises that the local authority conservation teams and archaeological advisors be closely involved throughout the preparation of the assessment of this Plan. They are best placed to advise on local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER - formerly Sites and Monuments Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.	Noted. Suffolk and Norfolk County Councils have been consulted and the Broads Authority's Historic Environment Manager has been involved in the preparation of the Local Plan.	No change to Local Plan.
General comment	Andrew Marsh	Historic England	Finally, we should like to stress that this response 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 as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.	Noted.	No change to Local Plan.
General comment	Chris Waldron	Ministry of Defence	The MOD Safeguarding team would welcome being listed as a consultation body of the Broads Authority Local Plan and will provide representations as and when appropriate in the drafting and consultation stages.	Noted.	No change to Local Plan.
General comment	Dickon Povey	East Suffolk Council	Using numbers for both paragraphs and criteria in the policies makes referencing them more difficult. Using numbers for one and letters for the other, for example, makes it easier to reference specific parts of a policy.	Agree. We are new to HTML versions and will try to amend that.	Ensure numbering is consistent between PDF and HTML version



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General comment	Dickon Povey	East Suffolk Council	There are a few instances where the policy numbering differs between the online version of the plan and the pdf version. The errors seem to lie with the online version.	Agree. We are new to HTML versions and will try to amend that.	Ensure numbering is consistent between PDF and HTML version
General comment	Dickon Povey	East Suffolk Council	As a minor point, some of the links to policies from the interactive policies map are broken, e.g. the Trinity Broads policy link.	Links will be checked.	Ensure links are checked.
General comment	Eleanor Roberts	Water Management Alliance	Recommendation to include reference to Risk Management Authorities. I recommend that the Plan includes reference to the relevant regulators for drainage and flood risk (such as the Internal Drainage Boards, the Environment Agency and the Lead Local Flood Authority). These agencies are in place to support the provision of sustainable development and reducing flood risk. As outlined above, works to watercourses (such as surface water discharges and/or any alterations of said watercourses) will require consent from the relevant regulatory body, therefore it would be beneficial for the regulators to be included in the plan.	In liaison with Eleanor, SP2 will be amended.	We will add reference to the risk management authorities.
General comment	Eleanor Roberts	Water Management Alliance	Please see the list overleaf of the proposed sites for development which we consider may impact a Board's area. The Board would seek to comment on these should they come forward for planning permission, alongside an explanation of any potentially required consents should these sites be developed. Please note that this list is not exhaustive and the Board may or may not choose to comment on additional site allocations if and when more information is presented.	WMA receive the weekly list of planning applications so they can comment on ones they think are relevant. DM colleagues will check their processes regarding when to consult the WMA and may be in touch to clarify.	No change to Local Plan.
General comment	Helen Binns	Walsingham Planning on behalf of Greene King	The new Local Plan sets out a series of development management policies related to promoting sustainable development, protecting biodiversity, managing the impacts of climate change and protecting and using resources efficiently. GK support the overarching intent of these policies but is concerned about their impact, when taken in combination, on the viability of development, particularly more modest sized brownfield development schemes.	Comments noted. See responses to individual comments below. The Authority has commissioned consultants to assess the viability of the plan.	See individual comments that follow.
General comment	Helen Binns	Walsingham Planning on behalf of Greene King	The following policies have been identified as being of particular concern and likely to have a significant impact on the viability of development. GK consider that many developments that would otherwise have been viable will not be viable if they have to comply with all of the requirements set out within these policies:	Comments noted. See responses to individual comments below. The Authority has commissioned consultants to assess the viability of the plan.	See individual comments that follow.
General comment	Helen Binns	Walsingham Planning on behalf of Greene King	Whilst it is clearly important that new development is sustainable, efficient, protects biodiversity and considers the impacts of climate change, development has to be viable. GK is concerned that insufficient consideration has been given to the combined effect of these policies on future development and that development will be rendered unviable as a consequence of these very onerous requirements. At a minimum these policies should make it explicit that the requirements are encouraged rather than explicitly required and that any specific requirements are subject to viability considerations and the individual circumstances of the scheme.	Comment noted. See response to individual comments. The Authority is producing a whole-plan viability assessment and the next version of the Local Plan will reflect recommendations from that study. Furthermore, as noted in the individual comments, the various policy criteria address issues in society that we all experience or will experience and also there is the potential for some aspects to save money for the end user. Furthermore, the driver for some policies is national policy such as BNG.	We await the viability assessment.
General comment	Helen Binns	Walsingham Planning on behalf of Greene King	A number of the policies relate to matters covered by Building Regulations or other legislation. GK considers these policies unnecessary and unjustified and therefore should be deleted.	Noted. See response to specific comments.	See response to specific comments.
General comment	Helen Binns	Walsingham Planning on behalf of Greene King	GK also consider that the Authority should avoid introducing policies that require yet more reports, checklists and documents that do not add anything meaningful or helpful to the decision-making process and amount to nothing more than a 'tick box'. GK are concerned that the Authority does not fully appreciate the additional time, resources and cost that preparation of such information adds to the planning application process, which is already overburdened and requires excessive amount of information.	Noted. The various policy criteria and related checklists or templates address issues in society that we all experience or will experience and also there is the potential for some aspects to save money for the end user. The provision of the templates is trying to aid applicants.	See response to specific comments.
General comment	Helen Binns	Walsingham Planning on behalf of Greene King	Having regard to the information set out above, GK consider the Local Plan as drafted to not be sound as there are certain policies that are not justified and are inconsistent with national policy contained in the National Planning Policy Framework. They therefore consider that changes need to be made to the plan.	Noted. See response to specific comments.	See response to specific comments.
General comment	Helen Binns	Walsingham Planning on behalf of Greene King	GK also consider that the combined effect of various development management policies, although well intended and commendable, will place very onerous design and financial burdens on new development, particularly where buildings are being converted, rendering development unviable.	Noted. We await the viability assessment.	Await the viability assessment.

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General comment	Michelle Golding	Member of public	There was an awful lot to take in, and a great deal of reading involved, with only a few illustrations. An 'easy read format' would have made it more accessible and better publicity about the event at existing Broads Authority sites, such as the Quay, where there are numerous noticeboards, the harbour masters office and local tourist accommodation, may well have improved the turn out and therefore given a better consultation experience.	There was a PDF version and a HTML version. Yes, it is a lot to read, but that is the nature of Local Plans - no matter where you are, they are generally long and wordy. We did come up with a summary of each policy and that is available on the website. We did ask Parish Councils to place a poster on notice boards. We do advertise the Local Plan far and wide.	Consider these ideas for the next stage of consultation.
General comment	Michelle Golding	Member of public	All the policy statements presented were very laudable and appropriate for the 21st century, but they, will need to be monitored and enforced in order to be effective.	Comment noted. The Local Plan policies will be material consideration when the Local Plan is adopted. And we do monitor policies.	No change to Local Plan.
General comment	Michelle Golding	Member of public	In addition it is essential to have a good 'communications policy' in place, to ensure better working with potentially overlapping organisations such as 'Visit the Broads', local authorities, Sustrans etc, that will lead to a less confusing experience for the public, trying to access information.	Thank you for your comment, we have reviewed and amended the website content as appropriate. The website is managed on limited resources by the Authority and depends on information supplied from external sources so we are always looking to improve accuracy so that visitors can access reliable information. We will review how we can make further improvements	No change to Local Plan.
General comment	Michelle Golding	Member of public	<p>With reference to 2 of the policies put forward, namely 'Transport' and ' Heritage and Historical assets'</p> <p>My particular concerns for 'Northgate' in Beccles, the western side of which falls within the Broads Authority jurisdiction, and the remainder of which lies in very close proximity, providing the main pedestrian and cycle access between the Broads and the town, are:</p> <p>1) the current weight restriction (put in place on 2nd June 1985, to preserve and enhance the amenity) needs to be reviewed, to include the size and number of buses which use the route damaging property and endangering lives</p> <p>2) The Beccles conservation area report, 2014 also needs to be reviewed, in particular with respect to the 'management plan' 'Traffic domination and congestion', now that the Southern relief Rd has been operational for several years.</p>	Comment noted. We have emailed Suffolk County Council and East Suffolk Council to pass on the concerns.	No change to Local Plan.
General comment	Penny Turner	Designing Out Crime Officer, Norfolk Police	No further comment is submitted for the Local Plan Review.	Comment noted.	No further action.
General comment	Rupert Masefield	Suffolk Wildlife Trust	Suffolk Wildlife Trust is not providing detailed comments on the Preferred Options for the Broads Local Plan, but we support the representation submitted by Norfolk Wildlife Trust, including their advocacy and evidence to support the case for adopting a policy that would require development to deliver the higher level of 20% Biodiversity Net Gain which The Wildlife Trusts and other nature conservation organisations have assessed is needed to deliver genuine and meaningful biodiversity uplift and contribute to nature recovery.	Noted. We are looking into a higher than 10% BNG.	No change to Local Plan.
General comment	Sam Hubbard	Great Yarmouth Borough Council	Reference is made throughout the plan to relevant 'district' councils. we would request explicit clarification within the plan that 'constituent district councils' includes Great Yarmouth Borough Council	Agree. We will weave that in.	Ensure it is clear that where we say 'districts' we mean districts, borough and city.
General comment	Sam Hubbard	Great Yarmouth Borough Council	References to the Norfolk Coast Area of Outstanding Natural Beauty (AONB) (such as within Policy POSSCOAST) should be replaced within Norfolk Coast National Landscape as of November 2023.	Noted. We will update.	Ensure AONB is replaced by National Landscape.

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General comment	Sarah Vergette	Broads Society	The Society still considers that It is impossible to react to ‘Tensions between tourism and sustainability’ with an approach of non- approval of planning, of limiting visitors to the area for fear of increased traffic movements, of stopping businesses adapting to market conditions and market requirements. Instead, the approach should be collaborative, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.	Comments noted. Planning applications are considered in the round, taking into account numerous considerations such as National Policy, Local Policy, understanding the context and impact of a proposal as well as taking into consideration consultee responses. Taking these into consideration, if a scheme is deemed acceptable, then it is likely to be permitted. Indeed, as can be seen in our approval rate of the applications submitted each year, it tends to be over 85%. So the message is, if a scheme is in the right place, of the right design and going to put in place in the right way then it is likely to get permission. Indeed, we would likely welcome well designed and well located ev charging points and water etc pumps for example.	In the absence of specific proposed changes to the Local Plan, no change.
General comment	Tessa Saunders	Anglian Water	Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.	Background information noted.	No change to Local Plan.
General comment	Tessa Saunders	Anglian Water	Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.	Background information noted.	No change to Local Plan.
General comment	Tessa Saunders	Anglian Water	Anglian Water is the statutory water and sewerage undertaker for The Broads Executive Area and a statutory consultee under The Town and Country Planning (Local Planning) (England) Regulations 2012. Anglian Water wants to proactively engage with the local plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. As a purpose-led company, we are committed to seeking positive environmental and social outcomes for our region.	Background information noted.	No change to Local Plan.
General comment	Tessa Saunders	Anglian Water	Anglian Water is generally supportive of The Broads Preferred Options Local Plan, and we recognise the challenges of delivering sustainable and resilient growth over the longer term given the special qualities, designations, and vulnerabilities of the area. We will continue to engage with the Authority to underpin any specific policy areas where we are able to suitable provide supporting evidence.	Support noted.	No change to Local Plan.
General comment	Yvonne Wonnacott	Bramerton Parish Council	Thank you for including Bramerton Parish Council in your representation for the two consultations; The Local Plan for the Broads - Preferred Options and Validation Checklist. Unfortunately, the Parish Council does not have the resources to respond in detail to these consultations.	Comments noted.	No change to policy.
Groundwater and Contaminated Land	Alasdair Hain-Cole	Environment Agency	We welcome the continued preference for brownfield development over greenfield development in line with the NPPF. Appropriate management of land contamination through the planning process will be needed for brownfield sites throughout the Broads area.	Noted. We refer to contaminated land in the Local Plan.	Produce new policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.
Groundwater and Contaminated Land	Alasdair Hain-Cole	Environment Agency	The importance of groundwater in the Broads has not been demonstrated. We recommend revisions to reflect the following comments in relation to aquifers and source protection. The Broads are underlain by the Crag Group, which is designated as Principal Aquifer, and overlain by superficial deposits of Secondary A aquifers in parts of the district. The groundwater is important for public water supply and a number of Source Protection Zones (SPZs) have been delineated to protect water resources in the district. SPZs show the level of risk to the protected source from contamination and contaminative activities and are used to guide decisions about the acceptability of potentially polluting development scenarios. The aquifers that underly the area also support abstractions for agricultural, industrial, commercial, public services and private/domestic water supply. The groundwater resource is therefore of high value.	Noted. We will produce a policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.	Produce new policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.
Groundwater and Contaminated Land	Alasdair Hain-Cole	Environment Agency	We recommend that the following guidance be referenced: <ul style="list-style-type: none"> <li>• The Groundwater Protection guidance on gov.uk which includes the Protect Groundwater and Prevent Groundwater Pollution guidance and The Environment Agency's Approach to Groundwater Protection;</li> <li>• The Groundwater Source Protection Zones (SPZ) guidance on gov.uk.</li> </ul>	Noted. We will produce a policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.	Produce new policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.

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Groundwater and Contaminated Land	Alasdair Hain-Cole	Environment Agency	While the Plan does mention issues of Contaminated Land (such as in Policy POSP3: Soils), we consider an overall policy for dealing with land contamination should also be included. We recommend that the following guidance be referenced: <ul style="list-style-type: none"> <li>• Paragraphs 124, 146, 180, 189 and 190 within the National Planning Policy Framework (NPPF);</li> <li>• Part IIA of the Environmental Protection Act 1990;</li> <li>• The Land Contamination Technical Guidance on gov.uk, including the Land Contamination Risk Management (LCRM) guidance.</li> </ul> Environment Agency guidance is regularly revised, meaning the most recent version or replacement guidance for superseded versions should be consulted throughout the Plan's duration.	Noted. We will produce a policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.	Produce new policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.
Habitats Regulation Assessment	Dr Sarah Eglington	Norfolk Wildlife Trust	Use of AADT thresholds as a trigger for further investigation. We are concerned that in sections 3.4.7 and 3.4.8 there is reference to the proposed use of AADT thresholds as a trigger for further investigation. Table 3.1 of the draft HRA notes that critical loads are already being exceeded for the Broads SAC and Broadland SPA, for some of their qualifying features. Where Habitats Sites are already at their critical loads, then experience from planning application consultations adjacent to the Breckland SAC has taught us that increases in traffic levels far below the AADT threshold can have significant impacts on features of Habitats Sites already at Critical Load, and that any addition would cumulative exacerbate the existing baseline.	The HRA consultants have been made aware of this comment and will consider it as they produce the next version of the HRA.	HRA consultant will consider this comment.
Habitats Regulation Assessment	Dr Sarah Eglington	Norfolk Wildlife Trust	Instead, we would recommend that further analysis is carried out of the locations of allocations against the sensitive features of the Habitats Sites where critical loads are already noted, as a precautionary measure, and the potential for quantifiable mitigation measures investigated further.	The HRA consultants have been made aware of this comment and will consider it as they produce the next version of the HRA.	HRA consultant will consider this comment.
Habitats Regulation Assessment	Dr Sarah Eglington	Norfolk Wildlife Trust	We have recently commented on the latest draft of the Great Yarmouth Local Plan, where we expressed concern at the potential for surface water run-off impacts from allocations within the drainage catchment of our Trinity Broads nature reserve, part of the Broads SAC. Whilst no allocations in the draft Broads Plan appear to be within this catchment, we recommend that the potential for surface water run-off impacts in new development to be considered for all the allocations, as a precautionary measure, given the sensitivity of wetland sites to groundwater inputs from their catchments.	The HRA consultants have been made aware of this comment and will consider it as they produce the next version of the HRA.	HRA consultant will consider this comment.
Habitats Regulation Assessment	Dr Sarah Eglington	Norfolk Wildlife Trust	Section 5.4.4 of the HRA refers to CIEEM guidance, noting ‘investment to encourage cleaner car technology may be sufficient to regard a new proposal which leads to a small increase in traffic on local roads as acceptable’ (our emphasis). We are concerned at the level of uncertainty in this statement, and where critical loads are already noted, we do not regard a reliance on uncertain future air quality improvements from car designers as proof enough that cumulative additions to an existing adverse effect would be avoided. We also recognise that figure 5.1 of the HRA demonstrates the proportional contributions of various sectors to the baseline, and the relative levels of road traffic compared to other sectors. However, it is not the Plan’s responsibility to address the wider existing contributions of society to air quality impacts. Rather, here this Plan needs to demonstrate that the allocations it is promoting will not result in adverse effects on Habitats Sites through cumulative additions to existing critical loads.	The HRA consultants have been made aware of this comment and will consider it as they produce the next version of the HRA.	HRA consultant will consider this comment.
Habitats Regulation Assessment	Sarah Morrison	Natural England	It is Natural England’s opinion that all potential impacts to European Sites have been considered and brought to the preliminary Appropriate Assessment stage, and that the mitigation measures discussed are appropriate based on the information currently available. 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 2017 as amended (‘the Habitats Regulations’).	The HRA consultants have been made aware of this comment and will consider it as they produce the next version of the HRA.	HRA consultant will consider this comment.
Houseboats	Cllr Chris Greenhill	Beccles Town Council	BTC believes there is scope for houseboats in Beccles, learning from the commercial success of houseboats on the Hipperson’s boatyard site, and request that this issue is covered in the response to the consultation. We understand that houseboats need to be movable, as are the houseboats we have investigated.	Houseboats are judged on a case by case basis. That being said, according to National flood risk policy, residential in flood zone 3b (which is what a river is classed as) is not appropriate. The houseboats at Hipperson's (and indeed elsewhere in the Broads) are historic - the new ones were permitted as they were replacing a use that has been there historically.	No change to Local Plan.
Libraries, Archives, Museums and Arts	Georgia Teague	Suffolk County Council	If there is growth, SCC will seek contributions to mitigate the increase in demand for libraries services as usual. Provision of a library service is a statutory duty. The Public Libraries and Museums Act 1964 (c. 75) is an act of the United Kingdom Parliament. It created a statutory duty for local authorities in England and Wales "to provide a comprehensive and efficient library service for all persons".	Noted.	No change to Local Plan.

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Minerals Facility Safeguarding	Georgia Teague	Suffolk County Council	NPPF paragraph 216e requires mineral extraction sites and a variety of minerals related facilities be safeguarded in local planning policy. Policy MP10 of the SMWLP safeguards mineral extraction sites and Policy MP9 safeguards other facilities, including railheads, wharves and facilities related to the manufacture of concrete and asphalt.	Noted.	No change to Local Plan.
Minerals Resource Safeguarding	Georgia Teague	Suffolk County Council	NPPF paragraph 216c requires local planning policy to identify and safeguard areas of known mineral resource. Policy MP10 of the Suffolk Minerals and Waste Local Plan (SMWLP) is in place to protect potential mineral resources (in the case of Suffolk, sand and gravel) from being unnecessarily made inaccessible (sterilised) by development. The Minerals Safeguarding Area (MSA) indicates areas of potential resource. Allocated sites that fall into the MSA potentially sterilise parts of a finite minerals resource and Policy MP10 will apply. In the interest of using resources sustainably, it may be appropriate for some of this resource to be extracted prior to development, or for the development to use some of the resource on site and this should be addressed in the explanatory text to the site allocation policies.	Noted.	No change to Local Plan.
Minerals Resource Safeguarding	Georgia Teague	Suffolk County Council	Referring only to the area of the Broads in Suffolk: the whole of the Broads is within the Minerals Safeguarding Area. Any development meeting the policy criteria will need to adhere to Policy MP10 and engage with SCC as the Local Minerals Authority.	Noted.	No change to Local Plan.
Navigation and tourism	Jamie Campbell	Member of public	My prime concern is that the plan fails to effectively address two of the Broads Authorities prime responsibilities - navigation and tourism. There is no consideration of growth or increasing prosperity within the Broads area, yet against this background we have boatyards and riverside pubs closing. Quality in many respects is also failing - not a bad watchword for retailing in general and tourism in particular is: 'No quality; No future'.	The Broads Authority has recently been consulting on a revised Tourism Strategy and the Integrated Access Strategy has recently been adopted and works with the local industry through Broads Tourism to both promote the area and improve quality. This is against a background of competitive rates for foreign holidays and pressures on household incomes.	No change to Local Plan.
Navigation and tourism	Jamie Campbell	Member of public	Let us begin at Great Yarmouth, which is the most important route into the Broads from the sea. Yarmouth still pretends to the title of Haven, yet if a yacht has to run for shelter in the North Sea, an old, very young or disabled sailor will be unable to climb their iron ladders to get ashore in Yarmouth (the next nearest safe haven to the north is on the Humber). Once ashore, there is a complete absence of facilities. Amenities for small boats in Great Yarmouth rank amongst the worst in Europe, yet this is the gateway to the Broads. This is important, not just from a point of view of social responsibility amongst seafarers but the geographic location represents a significant tourism opportunity for both Great Yarmouth Borough and the Broads Authority. In 1994, when a £3m EU funding application was submitted to convert Lowestoft yacht basin to a marina, it was then possible to show that every visiting Dutch boat spent £300 on their first night ashore. On occasion, sixty Dutch yachts are moored in that yacht basin. I don't have a current estimate of nightly spend but assume a six man crew have a few drinks on arrival, eat out and refuel their vessel. The Netherlands is home to a large number of small boats and IJmuiden is closer to Great Yarmouth than London. The potential tourism market available to both Great Yarmouth and the Broads is enormous. I appreciate the local authority boundaries and this has to be achieved as a joint effort between the Broads Authority, Great Yarmouth Borough Council and Peel Ports - but it requires the will to develop and generate prosperity, which is nowhere evident in this plan. The River Yare in Great Yarmouth needs to become small boat friendly. Bridges should open on demand and the notion of trying to charge £20 for access to the Broads abandoned. Associated British Ports do not charge yachts 'light dues' in Lowestoft, as they find the admin cost can easily outweigh the income.	<p>The Broads Authority is well aware of the frustrations and difficulties that private boat owners face in transiting the Port of Great Yarmouth. Officers attend the meetings of the Port Leisure Users and raise the concerns expressed by private owners. The latest of these is the dispute between Peel Ports and Norfolk County Council regarding the opening of Haven Bridge.</p> <p>Peel Ports is a commercial operator and does not appear to want private boats transiting the Port. This is frustrating and the Broads Authority will continue to argue the case for a more welcoming approach to the private boat owner.</p>	No change to Local Plan.
Navigation and tourism	Jamie Campbell	Member of public	Once sea going yachts are permitted easier and better access to the Broads, the two, low Bure bridges need to be raised to a similar height as Acle Weybridge. The boatyards at Cobholm and Burgh Castle would presumably be able to crane out yacht's masts if required. Lifting these bridges achieves two things. First, it facilitates access to more of the Broads to Dutch and continental visitors. A fresh influx of monied visitors will demand higher standards of tourism on the Broads and would also be likely to sponsor a wider range of establishments than currently demanded by a market dominated by customers of the hire fleets. Boatbuilding costs are usually cheaper on our East Coast than in Europe and the benefit to our local boatbuilding industry might be expected to be considerable. The boatbuilding industry is anyway likely to welcome easier access to the sea.	<p>The published heights for the Bure Bridge at Great Yarmouth and the Vauxhall Bridge are 7 feet and 6 foot 9 inches respectively. The height of the Acle Bridge is 12 feet.</p> <p>As it is a pedestrian bridge raising the Vauxhall Bridge by a little over 5 feet is probably feasible but a considerable cost. Doing the same to the carriageway over the Bure Bridge would be a major engineering operation and at a cost where it is unlikely that the economic benefits could be justified. There are other more pressing issues for investment in Broads bridges by Norfolk County Council, such as the repair of Carrow Road Bridge.</p>	No change to Local Plan.



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Navigation and tourism	Jamie Campbell	Member of public	The second impact is internal. The Broads Authority charges a full river toll to the many motor yachts moored at Brundall - yet most are unable to access a significant portion (almost half) of the waterways due to the two low bridges on the North River. I don't know what proportion of the total BA river toll income is derived from these vessels but it must be significant. It is therefore important not to lose them over excessive increases in river tolls. It might also be considered that each of these vessels moored at Brundall is worth c £25,000 per annum to the local economy. It isn't just the river toll that is lost in the event of further increases.	The Broads Authority is aware of the importance of the contribution the sea-going boats moored in Brundall make to the maintenance of the waterways. In recent years the number of larger motor boats has increased. It will be important to monitor the position going forward given the current economic squeeze on household incomes.	No change to Local Plan.
POACL1: Acle Cemetery extension	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the inclusion of text regarding the landscaping scheme to include boundary hedge and tree planting. We also support the text at 2 and 3. Point 4 needs some clarification regarding a peat assessment and must accord with Policy PODM11: Peat soils.	Support noted.	No change to policy.
POACL2: Acle Playing Field extension.	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the inclusion of text regarding the landscaping scheme to include boundary hedge and tree planting and that floodlighting shall be designed to minimise light spillage.	Support noted.	No change to policy.
POBRU1: Riverside chalets and mooring plots	Alasdair Hain-Cole	Environment Agency	We agree with the overall policy and recommend it links back to ‘Policy PODM49 Replacement Dwellings’ to provide clear guidance on issues of “flood risk resilience”, as highlighted in policy point 4.	Agree. We will cross refer in supporting text.	Add cross reference in supporting text.
POBRU1: Riverside chalets and mooring plots	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend additional wording at 4. to ensure that measures are in place to ensure that any extensions and replacement buildings do not have adverse impacts on the river or nearby important wildlife habitats.	Agree. Add text to part 4.	Add text to part 4.
POBRU1: Riverside chalets and mooring plots	Eleanor Roberts	Water Management Alliance	Adjacent to a main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line	Alasdair Hain-Cole	Environment Agency	<p>The policy states: “Full regard will be given to the limitations of the road access, avoidance of potential water pollution, and the risk of flooding to the site.” We recommend including some examples of water pollution prevention measures that may be deemed acceptable in the “Reasoned Justification” section supporting this policy. Possible measures we can recommend include:</p> <ul style="list-style-type: none"> <li>• Drainage maps for surface water and foul water to be easily available,</li> <li>• Surface water drains clearly marked on site (normally with blue).</li> <li>• Penstocks or other means of containing potential spills to be installed and easily operated.</li> <li>• Chemicals and oils to be contained in suitable bunded areas to contain 110% of any potential spill.</li> <li>• Spill kits to be easily available and training given on site as to their effective use.</li> <li>• Very clear labelling on drinking water tanks and oil store on any boats to reduce the incidence of oil tank being filled up with drinking water and overflowing.</li> <li>• Emergency plans to be drawn up with contact numbers to include out of hours.</li> <li>• Consideration given to appropriate points to install booms in any boatyard entrance to contain any oil spill and prevent it from reaching the main river, and installation of an eyelet each side suitable for tying on booms with ½ inch rope.</li> </ul> <p>There is no legal requirement for most of these, meaning they are particularly worth exploring as part of this policy.</p>	We will add these suggestions to the new Environmental Quality policy.	Add these to the supporting text of the new Environmental Quality policy.
POBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the Environment Agency highlighting the need to address risks of water pollution for waterside sites in industrial/boatyard use.	Support noted.	No change to policy.

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POBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line	Eleanor Roberts	Water Management Alliance	Adjacent to a main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POBRU3: Brundall Mooring Plots	Eleanor Roberts	Water Management Alliance	Adjacent to a main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POBRU4: Brundall Marina	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend additional wording at 4. to ensure full regard impacts on the river or nearby important wildlife habitats will also be taken into account.	Support noted.	No change to policy.
POBRU4: Brundall Marina	Eleanor Roberts	Water Management Alliance	Adjacent to a riparian watercourse and a main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POBRU5: Land east of the White Heron Public House	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy which continues the long-term protection of this semi-natural green area.	Support noted.	No change to policy.
POBRU5: Land east of the White Heron Public House	Eleanor Roberts	Water Management Alliance	Several riparian watercourses within and adjacent to the site. Consent required from the Board for any alteration or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POBRU6: Brundall Gardens Marina Residential Moorings	Eleanor Roberts	Water Management Alliance	Adjacent to a riparian watercourse and a main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POCAN1 Cantley Sugar Factory and Designation Boundary	Wakako Hirose	Rapleys on behalf of British Sugar	Cantley Sugar Factory benefits from a site specific designation under Policy CAN1 in the adopted Local Plan. The policy supports development within the defined area that secures and enhances the sugar factory's contribution to the economy of Broads and wider area. As confirmed in the previous representations, British Sugar is fully committed to the site in the foreseeable future and continues to invest in the improvement, enhancement and diversification of the operations. We therefore support the site specific designation being carried forward as Policy POCAN1 Cantley Sugar Factory in the Preferred Options document. In terms of the boundary of Policy POCAN1, the site boundary has been amended to include the area containing the car and truck park/service yard and the entrance to the factory in response to our previous representations. The precise boundary was agreed following the previous consultation, and as such, we support the amendment to the Cantley Sugar Factory boundary on the draft Policies Map.	Support for amended boundary noted.	Include the additional area on the policy maps in the next version of the Local Plan.
POCAN1 Cantley Sugar Factory Part 2	Wakako Hirose	Rapleys on behalf of British Sugar	British Sugar welcomes the Local Plan Review's recognition of Cantley Sugar Factory's major contribution to the local economy and beyond and supporting its ongoing and future operations. We note that there are several additional criteria under Policy POCAN1 Part 2, which are not part of the adopted Local Plan Policy CAN1. We do not have objection to the additional criteria relating to the change associated with the legislative updates such as biodiversity net gain. We do however request that the Council considers our representations on some of the additional criteria as set out below in order to ensure that there are no unreasonable restrictions and impractical requirements placed on British Sugar's future development requirements.	Noted.	No change to policy.

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POCAN1 Cantley Sugar Factory part d	Wakako Hirose	Rapleys on behalf of British Sugar	Cantley Sugar Factory and The Reedcutter have been neighbours since Cantley Sugar Factory was constructed in the early 20th century and have not adversely impacted each other's operations. We note from Policy POSSPUBS that The Reedcutter is protected in their public house use as a key part of a network of community, visitor and boating facility as well as for its individual contribution to these facilities. An impact on matters such as the environmental considerations, visual amenity and access of the surrounding area will be addressed as part of usual development management considerations. Therefore, it is unclear as to what other specific impacts this criterion expects the applicant to address. The National Planning Policy Framework (NPPF) paragraph 16 requires Local Plans to contain policies that are unambiguous so it is evidence how a decision maker should react to development proposals and that serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. Any relevant impact on The Reedcutter will be addressed as required by development management policies. Policy POSSPUBS seeks to protect The Reedcutter in its public house use. As such, we do not consider that criterion d is necessary.	Comments noted. POSSPUBS is not relevant to the comments being made as that relates to any development proposals of the pubs. It is included in the policy as cross reference to the policy that relates to pubs to show that the pub is considered important to the Broads Authority and community. The reason for this additional criteria is because as stated in one of the previous comments, the additional land that is likely to be included in the boundary to which the policy applies is a car or service yard currently. The Factory have not said specifically what they wish to do to that land once it is included in the boundary. A car park use is different to, say, a building or some kind of treatment process associated with what the factory does. Therefore as an as yet unknown use could be brought closer to the pub, which as you say has been running for a long time, we feel it is reasonable to have the criterion that states that the proposals need to consider the pub.	No change to policy.
POCAN1 Cantley Sugar Factory part g	Wakako Hirose	Rapleys on behalf of British Sugar	Whilst British Sugar seeks to retain the existing tree belt along the easter edge of the track to the river wherever possible, we do not consider that criterion g is consistent with the NPPF. The NPPF seeks to ensure that existing trees are retained wherever possible (paragraph 136). Ancient woodland and veteran trees which are defined as irreplaceable habitats have the highest level of protection by the NPPF, and the loss or deterioration would require wholly exceptional reasons and a suitable compensation strategy (paragraph 286). We therefore request that criterion g is amended so that the retention of trees is sought wherever possible.	Comments noted. We have introduced a trees policy to the Local Plan - see Policy PODM24: Trees, woodlands, hedges, scrub and shrubs and development. That will be the policy used for any schemes that propose the removal of trees, woodlands, hedges, scrub and shrubs.	Add reference to the trees policy to this criterion.
POCAN1 Cantley Sugar Factory part k	Wakako Hirose	Rapleys on behalf of British Sugar	As identified in the supporting paragraph for Policy POCAN1, a public footpath runs through the operational area of Cantley Sugar Factory. As British Sugar carries out heavy industrial operations on a 24/7 basis all year round, ensuring health and safety is paramount for the ongoing operations and investment in the enhancement of the business. The existing public footpath (FP19) runs across the heavy industrial operational area where there are HGV movements. British Sugar is therefore seeking to invest in the diversion with suitable enhancements of the public footpath which ensures continued public access to the staithe and slipway without undermining/stifling British Sugar's ongoing operations. British Sugar has applied to Norfolk County Council for the diversion of Public Footpath FP19 and this application is in progress. As such, notwithstanding that British Sugar does not object to the principle of criterion k, the wording should be clearer so that the protection of public access to the staithe and slipway is considered alongside the need to ensure health and safety of its users given its location within the heavy industrial operational area. We request that the wording of the criteria is amended to "not result in the severance or loss of public access to the staithe and slipway, and where possible enhance public access by the provision of an alternative route, taking into account health and safety considerations."	Comments noted. But it sounds like there are two separate issues here. The PROW is through the factory, noted, but we do not refer to that in the policy. We note it as a constraint or feature on the site. What the factory are proposing sounds sensible, but it does not affect CAN1. The second issue is about criterion k. The staithe and slipway seems to be able to be accessed by the same route that accesses the pub. So it is not clear how heavy machinery affects the current access.	No change to policy.
POCAN1 and Designation Boundary	Eleanor Roberts	Water Management Alliance	Several riparian watercourses within and adjacent to the site. Also adjacent to a main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POCAN1: Cantley Sugar Factory	Andrew Marsh	Historic England	The site is located within the setting of the nearby Langley Conservation Area, and two Grade II* Churches – the Church of St Boltolph at Limpenhoe, and the Church of St Margaret at Cantley. We therefore welcome the inclusion of criteria 'f' which requires development to have regard to the setting of the nearby designated heritage assets. Policy POCAN1 includes a proposed extension to the area covered by the policy. We have no objection to this proposal, providing that the existing policy criteria would equally apply to the new extension area.	Support noted.	No change to policy.
POCAN1: Cantley Sugar Factory	Tessa Saunders	Anglian Water	Anglian Water supports criterion n) regarding water efficiency and re-use. We would recommend that this is cross referenced to Policy PODM54 – noting our policy recommendations for this policy.	Agreed. We will add this cross reference to the supporting text of CAN1.	Cross refer to the BREEAM policy in supporting text.
POCHE1: Greenway Marine residential moorings	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
PODIL 1: Dilham Marina (Tyler's Cut Moorings)	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend that the text at 6. is more robust and includes reference to the Priority Habitat (Deciduous Woodland). We also recommend that there are no adverse impacts on any designated sites downstream.	Agree. Refer to deciduous woodland in constraints and features. Add reference to no adverse impacts.	Refer to deciduous woodland in constraints and features. Add reference to no adverse impacts.
PODIL 1: Dilham Marina (Tyler's Cut Moorings)	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river. Also adjacent to a riparian watercourse. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.

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PODIL 1: Dilham Marina (Tyler’s Cut Moorings)	Martin Coates	Member of public	I am writing to request your assistance in separating our residential land and mooring from the Dilham Marina, as indicated on your map. It is important to us that our garden remains distinct from the marina please.	Request noted.	Amend area to which DIL1 applies.
PODIT1: Maltings Meadow Sports Ground, Ditchingham	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the wording 'It manages flood risk on the site and does not increase flood risk elsewhere'	Support noted.	No change to policy.
PODIT1: Maltings Meadow Sports Ground, Ditchingham	Eleanor Roberts	Water Management Alliance	No adjacent watercourses but near to riparian watercourses to the southeast. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
PODIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy, particularly that the site 'shall be protected as open space and habitat area'	Support noted.	No change to policy.
PODIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck	Eleanor Roberts	Water Management Alliance	Board Maintained watercourse within the site boundary (DRN275G0202 – Alma Beck). No works within 7m of this watercourse without prior consent from the Board. Consent required from the Board for any alteration of or discharge to the watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
PODM1 Major Development in the Broads	Georgia Teague	Suffolk County Council	Regarding part e) it is welcome that compensation is included in the sequence of tests; however, SCC suggests ‘would be moderated’ rather than ‘could be moderated’.	Agree. We will change it to 'would'	Change to would.
PODM1: Major Development in the Broads	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend that potential damage to locally designated wildlife sites is added to clause 3e. 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.	Noted. The policy already refers to the natural environment.	No change to policy.
PODM1: Major Development in the Broads	Dickon Povey	East Suffolk Council	As the National Planning Policy Framework contains two separate definitions of ‘major development’, for different purposes, for clarity paragraph 1 of Policy PODM1 should be clear which NPPF definition is being referred to.	The supporting text clarifies this.	No change to Local Plan.

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PODM10 'Green Infrastructure'	Helen Binns	Walsingham Planning on behalf of Greene King	PODM10 'Green Infrastructure' – requires development to contribute to the delivery and management of green infrastructure to meet the needs of communities and biodiversity within and beyond the site boundary. GK are concerned that it is not clear exactly what is required and therefore what impact it will have on the viability of development. Furthermore, we question how such a requirement that is to meet the needs of the wider community satisfies the planning test of being necessary to make a development acceptable in planning terms. GK is concerned that this policy introduces additional biodiversity requirements on new development that is above and beyond mandatory BNG and that in some instances it could render brownfield development undevelopable.	<p>The NPPF refers to the importance of green infrastructure in numerous places in the document, such as in relation to health, design and air quality. The thrust of the policy can be found in other adopted Local Plans. For example there are over 100 references to Green Infrastructure in North Norfolk Council's Local Plan which is at examination. The Local Plan for the Broads policy is clear that areas of green infrastructure need to be incorporated into the design of a scheme. We consider the policy to be consistent with the NPPF. We understand the need for developments to be viable, but the planning system is also about making sustainable developments and considering and protecting the environment and this is reflected in policy direction from the Government. Planning balances many issues and the way forward is judged on a case by case basis and it will be for developers to justify why, in their case, something in the Local Plan does not or should not apply.</p> <p>In terms of DM10 part 4, GI is a network of functional green space. By conserving and protecting GI on site, one is contributing to the network which includes areas off site. Agree this is not clear. We will improve the wording.</p>	Improve wording of DM10 part 4.
PODM10 Green infrastructure	Georgia Teague	Suffolk County Council	Part 7. could be made clearer that this refers to green infrastructure within wider development proposals.	Agreed. Add this text.	Add similar text to supporting text.
PODM10 Green infrastructure	Georgia Teague	Suffolk County Council	Suggested additional point under heading 'New Green Infrastructure', as follows: <u>j) Incorporate SuDS features where possible.</u>	Agreed. Add this text.	Add similar text to policy.
PODM10: Green infrastructure	Alasdair Hain-Cole	Environment Agency	We support the use of green infrastructure, as outlined in PODM10: Green infrastructure, especially where criteria for new proposals have considered how they “support the efficient use of water resources” and support “functioning ecosystems and robust natural systems for the management of basic resources such as water [...]”. Additionally, we would suggest the consideration of green spaces which are low-water demand and/or as water-efficient as possible, such as the measures mentioned in PODM20: Development and landscape, paragraph 6 (“To reflect that the East of England is an area of water stress, new landscaping/planting is expected to follow sustainable planting principles and be adaptive to climate change and be water-smart: using plants that are not dependent on additional watering/do not require a large amount of water.”)	Noted and agreed. We will add text to the policy regarding water efficiency.	Add text to policy in line with suggestion.
PODM10: Green Infrastructure	Alasdair Hain-Cole	Environment Agency	We support the inclusion of a policy on Green Infrastructure but recommend it be enhanced with a section on Blue Infrastructure, which is mentioned in the “Reasoned Justification”. River/stream/pond/wetland restoration, creation and enhancement should form integral aspects of an effective green infrastructure policy and therefore be set out within this section.	Agree. We will weave in blue infrastructure.	Weave in blue infrastructure.
PODM10: Green Infrastructure	Alasdair Hain-Cole	Environment Agency	The Plan provides an opportunity to create new - or enhance existing - off-channel refuge, which would be of great benefit to a diverse range of wildlife. This could provide valuable enhancements to green amenity spaces for members of the public to enjoy, which is a key objective of the Plan. Although the Plan does not mention specific angling improvements, the reconnection of wetlands and the creation of off-channel refuge would be of great benefit for juvenile fish/fry during times of extreme flooding, which is becoming more common every year. If implemented, this could actively assist in improving fish stocks in the Broads with greater survival rates of fry being expected, thus improving angling in the area in the future.	Agree. We will weave in blue infrastructure.	Weave in blue infrastructure.
PODM10: Green infrastructure	Andrew Marsh	Historic England	Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation. It may be helpful to refer in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.	Agreed.	Weave in reference to heritage interest and improving the setting of heritage assets.



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PODM10: Green infrastructure	Andrew Marsh	Historic England	We are pleased to see the inclusion of points a) and c) in this policy, these will ensure that GI networks will consider the impact upon the historic environment. This policy should be a benefit to the historic environment.	Support noted.	No change to policy.
PODM10: Green infrastructure	Dr Sarah Eglington	Norfolk Wildlife Trust	The key features of green infrastructure are that it is a network of integrated spaces and features, not just individual elements; and that it is ‘multi-functional’ providing multiple benefits simultaneously. These can be to: support people’s mental and physical health, encourage active travel, cool urban areas during heat waves, attract investment, reduce water run-off during flash flooding, carbon storage and provide sustainable drainage. A healthy natural environment is essential in delivering a wide range of ecosystem services to local communities, in addition to the benefit to wildlife itself.	We will weave in wording about GI being multi-functional.	Weave in wording about GI being multi-functional.
PODM10: Green infrastructure	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend setting a target to meet the urban greening factors set out in Natural England’s Green Infrastructure Standards (0.3 for commercial development, 0.4 for residential brownfield development and 0.5 for residential greenfield development).	Comment noted. We already have policies relating to Green Infrastructure and trees. Any sites allocated also have specific criteria relating to their design. And we have policies relating to design as well as an emerging design guide. We therefore consider that Green Infrastructure is addressed in the Local Plan quite well.	No change to policy.
PODM10: Green infrastructure	Dr Sarah Eglington	Norfolk Wildlife Trust	We strongly recommend that for urban areas, the Urban Greening Factor is applied as policy, as a means of effectively delivering multiple environmental benefits for wildlife, climate change and residents’ quality of life through new development.	Comment noted. We already have policies relating to Green Infrastructure and trees. Any sites allocated also have specific criteria relating to their design. And we have policies relating to design as well as an emerging design guide. We therefore consider that Green Infrastructure is addressed in the Local Plan quite well.	No change to policy.
PODM10: Green infrastructure	Dr Sarah Eglington	Norfolk Wildlife Trust	We believe that new development can provide valuable opportunities to incorporate wildlife, providing benefits not only for declining wildlife species but also improving quality of life of residents through greater daily interaction with wildlife, as well as making important contributions to reducing rainwater run-off, and mitigating climate change impacts through providing greater insulation for buildings and reducing the urban heat island effect. We recommend a review of the recommendations of Natural England’s recently released Green Infrastructure Framework: <a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx</a> , which sets out best practice aspirations for green infrastructure delivery, including guidance on Process Journeys for Local Authorities: <a href="https://designatedsites.naturalengland.org.uk/GreenInfrastructure/ProcessJourneys.aspx">https://designatedsites.naturalengland.org.uk/GreenInfrastructure/ProcessJourneys.aspx</a> .”	Noted. The policy refers to these things and the NE Framework is already referred to.	No change to policy.
PODM10: Green infrastructure	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy, although suggest that as currently worded, the first sentence does not read well. We suggest the following: 1. Green infrastructure should be central to the design of schemes, ensuring the site is suitable for wildlife and people and creating a multi-functional network of spaces and uses.	Noted. We have amended it line with another comment and hope that also addresses this comment.	No change to policy.
PODM10: Green Infrastructure	Paul Harris	Broadland and South Norfolk Councils	The Council supports the approach taken towards the provision of Green Infrastructure through development and the protection of the wider network. Specifically, the Council welcomes criteria 6 of the policy that refers to the studies conducted by other Authorities. This will ensure that the wider network is considered comprehensively.	Support noted.	No change to Local Plan.
PODM10: Green infrastructure	Sarah Morrison	Natural England	We support this policy and associated text. We particularly welcome reference to the Green Infrastructure Framework, Principles, Standards, Design Guides and Process journeys although Natural England notes that further scope exists to embed these within the Broads Authority’s own plan. See Natural England’s Green Infrastructure Framework: For example, the Accessible Greenspace Standards advise that Local Authorities have at least three hectares of publicly accessible greenspace per 1,000 population and no net loss or reduction in capacity of accessible greenspace per 1,000 population at an area-wide scale. Local authorities can specify capacity targets for all major residential development informed by a local accessible greenspace baseline, and taking into account local needs, opportunities and constraints. More detail is available in the Green Infrastructure Standards, see Page 20.	We already refer to this Framework.	No change to policy.

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PODM10: Green infrastructure	Sarah Morrison	Natural England	We suggest that this policy could be further enhanced by a Green Infrastructure (GI) Strategy. Government guidance on the Natural Environment states: ‘Strategic policies can identify the location of existing and proposed green infrastructure networks and set out appropriate policies for their protection and enhancement. These need to be evidence-based and include assessments of the quality of current green infrastructure and any gaps in provision. ... The green infrastructure strategy can inform other plan policies, infrastructure delivery requirements and Community Infrastructure Levy schedules...’ (Natural environment - GOV.UK (www.gov.uk). Natural England advises that any such strategy, should join up with neighbouring authorities GI strategies, for example the Greater Norwich Green Infrastructure Plan (under development), so that GI remains continuous across administrative boundaries and improves connectivity.	We do not intend to produce a GI Strategy. We tend to be involved in the GI Strategies of our districts and they tend to cover their entire area. We also have other documents and strategies that relate to GI that we produce for the Broads such as the integrated access strategy.	No change to Local Plan.
PODM10: Green infrastructure	Sarah Morrison	Natural England	This policy states that “1. Green infrastructure should be central to the design of schemes, ensuring the site for wildlife and people and creating a multi-functional network of spaces and uses.” We strongly support this approach. Natural England advises that you may wish to consider a method whereby the Green Infrastructure is designed first and the other elements are planned around it.	Agree. Add this stance to the policy.	Amend policy in line with comment.
PODM10: Green infrastructure	Sarah Morrison	Natural England	We recommend the design and management of green roofs should meet the GRO Green Roof Code. Further information can also be found in the Green Infrastructure Planning and Design Guide (available as part of Natural England’s GI Framework). This is also relevant to Policy PODM53: Heat resilient design.	Agree. Add this text to the reasoned justification.	Add this suggested text to the reasoned justification.
PODM10: Green infrastructure	Sarah Morrison	Natural England	Natural England welcomes the inclusion of a requirement for ongoing management of Green Infrastructure, and highlights that this is especially important when Green Infrastructure is being secured as a mitigation measure within a Habitats Regulations Assessment.	Support noted.	No change to policy.
PODM10: Green infrastructure	Sarah Morrison	Natural England	We welcome the wider referencing of Green Infrastructure throughout other policies and text.	Support noted.	No change to policy.
PODM10: Green infrastructure	Tessa Saunders	Anglian Water	Anglian Water welcome the policy aims and suggest that the title and reference to green infrastructure could be amended to green and blue infrastructure (G&BI) to reflect the potential for SuDS to be part of the multi-functional benefits that G&BI can provide. In addition, links to the LNRSs and contributing to nature recovery more broadly could be captured by the policy - recognising the references in the supporting text.	Regarding reference to nature recovery and LNRS, agree. Regarding reference to BI, agree. We will weave in Blue Infrastructure to the policy.	Weave in wording relating to LNRS and nature recovery. Weave in BI.
PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	There may be benefit in amalgamating point 4. and point 1. of this policy and putting the amended criteria first in the list. The wording of point 1. could be amended to be clearer that green infrastructure should benefit the wellbeing of both wildlife and people.	Noted. We will be amending criteria 4 following another comment received, so we will see how that looks to see if we should combine criteria. It may be that we keep them separate as number 1 is a catch all up front statement of intent.	See other comment relating to point 4.
PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	The requirement for an assessment at point 5. could be expanded in the supporting text to make it what Broads Authority expect to be included in such an assessment.	Agreed. Provide some guidance in supporting text.	Provide some guidance in supporting text.
PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	There is some repetition between point 6 and point 5. Point 5 could be shortened to just focus on the impacts on the delivery of green infrastructure strategies etc.	Agreed, but we will keep point 5 as it is and 6 can be amended to refer to strategies.	Amend point 6 to refer to impact on strategies.
PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	Point 7.a) could also reference ‘play environments’. ‘Play environments’ is meant in the same descriptive sense as ‘historic environment’, ‘natural environment’, ‘built environment’ – the extent to which opportunities for play feature and support play activities. A positive play environment would include ample opportunities for formal and informal unstructured play for different ages and abilities through different types of open space, sport, recreational and other social/community facilities.	Agreed. Weave this into the GI policy.	Include reference to play environment in policy.
PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	Point 7.e) could make clearer that landscaping can also support health and wellbeing through simply softening and naturalising the appearance of built environments through the addition of plantings, green walls, informal green spaces as well as more formalised landscaping.	Noted and we will weave this into the policy.	Weave wording into 7f.
PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	It may be beneficial to amalgamate PODM10 and PODM9. The NPPF definition set out in the supporting text supports the logic in combining them. If the distinction is retained, a direct reference to PODM9 in 7.e) would be useful. To further avoid confusion, you may wish to consider renaming PODM14 Natural Environment to better reflect its specific focus on Habitats Sites and otherwise sensitive sites.	We are content with them being separate. See related comment on DM14.	No change to Local Plan.
PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	Note that the NPPF definition in the Glossary is slightly different and should be corrected within this policy’s supporting text.	Noted. We will copy over the NPPF definition.	Copy over NPPF definition.

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PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	Point 7.g) – for clarity, it would be helpful to include cross a reference to Policy POSP5: Biodiversity.	Agree, we will add a cross reference.	Cross refer to SP5.
PODM10: Green infrastructure	Dickon Povey	East Suffolk Council	Sustainable drainage systems are not referenced in this this policy. If not integrated, a cross-reference to Policy PODM8 could be added. It may be worth making a cross reference to the East Suffolk Healthy Environments SPD (due for adoption in June 2024) for development within the area of East Suffolk covered by the Broads Authority.	Agree, we will add a cross reference.	Cross refer to DM8 and the SPD.
PODM11 Peat Soils	Georgia Teague	Suffolk County Council	Part 3 could be made clearer by replacing ‘and a suitable compensation strategy exists’ to ‘and a suitable compensation strategy is proposed’	Agree. We will amend the text.	Amend text in line with comment.
PODM11: Peat soils	Andrew Marsh	Historic England	We welcome the direct reference to waterlogged heritage, archaeology, and palaeoenvironments, and support the amended policy.	Support noted.	No change to policy.
PODM11: Peat soils	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy to protect, enhance and preserve peat soils and also the Authority’s definition of peat as an Irreplaceable Habitat. As per our comments at the previous consultation stage, we support policy wording that also encourages the creation of new peat habitats, and so recommend that the word ‘create’ is added to clause 5: “Proposals to create and enhance peat and protect its qualities will be supported”.	Noted. This policy is about protecting peat soils. There is nothing in the Local Plan that stops peat soils being created.	No change to policy.
PODM11: Peat soils	Dickon Povey	East Suffolk Council	It may be worth considering Peat soils for BNG Offsite delivery and as the sites for strategic wildlife corridors, local nature recovery strategy etc. (Policy PODM15: Biodiversity Net Gain). We are referring to the Local Nature Recovery Strategy guidance which identifies potential for peat soils Local nature recovery strategies - GOV.UK (www.gov.uk) along these lines; “ Peat soil is the natural ally to fight climate change. Being rich haven for wildlife, improving water quality and reducing flood risk. It will be good to link the protection of peat soils to BNG/LNRS. Possibilities of using peat soil areas for BNG offsite delivery, alongside strategic wildlife corridors should be considered. Local nature recovery strategies - GOV.UK (www.gov.uk)”	This point is noted. But it is fundamentally a protection policy - seeking to avoid peat being removed as a by-product of development and then dried out. The policy seeks to ensure peat's qualities are protected and considered and addressed. This does not preclude peat soils being enhanced as suggested.	No change to policy.
PODM12 ‘Heritage Assets’	Helen Binns	Walsingham Planning on behalf of Greene King	Policy PODM12 ‘Heritage Assets’ sets out the Authority’s policy and approach to development affecting non-designated heritage assets. It states that where local heritage assets are affected by development proposals, their significance should be retained within the development and that development resulting in harm or loss of significance of a locally identified assets will only be acceptable where two criteria are met. These are that there are demonstrable and overriding benefits associated with the development and it can be demonstrated that there would be no reasonably practicable or viable means of retaining the asset within a development.	Noted.	No change to policy.
PODM12 ‘Heritage Assets’	Helen Binns	Walsingham Planning on behalf of Greene King	GK raises objection and concerns to this policy. Not only is it inconsistent with policies contained in the National Planning Policy Framework, but the bar and test for development being acceptable is higher than what the Framework requires for a statutorily listed building. Policy 209 of the Framework sets out how planning applications affecting non-designated heritage assets should be assessed. It states “the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighting applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and significance of the heritage asset. Specifically, there is no requirement to demonstrate overriding, or indeed any benefit of the development or for it to be demonstrated that it is not practical or viable to retain the asset. Policy PODM12 should therefore be amended to ensure consistency with the NPPF.	We also think that the essence of the emerging policy is the same as the previous policy which required that the scale of any harm, the significance of the asset and the public benefits were balanced. This is still effectively the same assessment that would be carried out, albeit there would be a more clear presumption in favour of retention of significance.	In the Reasoned Justification section for NDHAs add more about the contribution that NDHAs make to the character, appearance of the Broads and their wider value to landscape and cultural heritage.  Add the word ‘public’ before benefit in section 3ai.
PODM12 ‘Heritage Assets’	Susan Grice	Norfolk Gardens Trust Planning Team	We support the policies as drafted and consider that they provide the framework for adequate protection and enhancement of designed landscapes of heritage value.	Support noted.	No further action.
PODM12 Heritage Assets	Georgia Teague	Suffolk County Council	The reference to SCC Archaeological Service in the supporting text of Policy PODM12 Heritage Assets is welcomed.	Support noted.	No change to policy.
PODM12: Heritage Assets	Andrew Marsh	Historic England	We welcome this amended policy which seeks to protect, preserve or enhance the significance and setting of the heritage assets and that of the wider historic environment. We are pleased to see reference within the policy, to non-designated heritage assets, archaeology and undiscovered heritage assets. Specifically, we welcome the amendments to the Policy and supporting text, which provide clarity with regards identified and unidentified non-designated heritage assets.	Support noted.	No change to policy.

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PODM12: Heritage Assets	Dickon Povey	East Suffolk Council	Section 3 – expanding on the criteria/process for identifying unidentified heritage assets would be helpful.	Noted. We have an internal checklist that we use. This is more measurable than subjective. We will put that checklist on our website and include a link to it in the supporting text.	Add link to checklist in supporting text.
PODM12: Heritage Assets	Dickon Povey	East Suffolk Council	Paragraph 5, point 2 – Reference should be made to the balance that needs to be struck, between the importance of retaining the significance of the heritage asset versus the benefits of development.	Noted. We would be putting these more than local significance assets to Historic England for consideration. Just because something is more than local significance, it does not mean that it cannot be developed or changed - this is where local and national policy comes in.	No change to policy.
PODM13 ‘Re-use, Conversion or Change of Use of Historic Buildings’	Helen Binns	Walsingham Planning on behalf of Greene King	Objection is also raised to Policy PODM13 ‘Re-use, Conversion or Change of Use of Historic Buildings’. This sets out a series of tests that applications for the change of use or conversion of a heritage asset will be required to comply with. As currently drafted the tests to be applied to a scheme for the change of use or conversion of a non-designated heritage asset are the same as for a designated heritage asset (i.e. a listed building). Given the former is of much lower value and having regard national policy contained in the NPPF, this cannot be right. Furthermore, many works to a non-designated heritage asset will also not require the Council’s consent. GK accordingly, consider that this the policy should be revised or omitted.	The policy is almost the same as the existing policy and it is considered that the minor changes can be justified. If anything part 3 is less stringent than the previous policy and is now more lenient in terms of the potential for appropriate conversion of LBs and remains the same for NDHAs.  In terms of the last point, we don’t think this is relevant as clearly the policy will only apply to those works / changes of use that require permission.	No change to policy.
PODM13 ‘Re-use, Conversion or Change of Use of Historic Buildings’	Susan Grice	Norfolk Gardens Trust Planning Team	We support the policies as drafted and consider that they provide the framework for adequate protection and enhancement of designed landscapes of heritage value.	Support noted.	No further action.
PODM13: Re-use, Conversion or Change of Use of Historic Building	Andrew Marsh	Historic England	We welcome the reordering of the criteria, particularly the elevation of the principle that buildings or structures should ideally remain in their original intended use whenever feasible, to the forefront of the policy.	Support noted.	No change to policy.
PODM14 ‘Natural Environment’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM14 ‘Natural Environment’ – requires previously developed land to be subject to a survey to determine if the site has an open mosaic habitat of intrinsic biodiversity value and if found requires the development to protect and enhance it or provide off-site mitigation. All development is required to have wildlife friendly features. Schemes that are not required to provide mandatory BNG will be required to provide it in accordance with local guidance.	Noted.	No change to policy.
PODM14 ‘Natural Environment’	Ian Robson	RSPB	Would it be possible to make specific mention of ‘swift bricks’ being incorporated into building design?	Agreed. Will add to the supporting text.	Add reference to swift bricks to supporting text to DM14.
PODM14 Natural Environment	Georgia Teague	Suffolk County Council	SCC suggest the following minor addition to part 14: 14. Schemes that seek to take innovative approaches to land management will be supported, <u>in principle</u> .	Agreed. Add text at end of number 14.	Amend point 14 as per suggestion.

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PODM14 Natural Environment	Ian Robson	RSPB	Habitat Sites: Is it worth making mention of ‘functionally linked land’ in this section? Might be helpful to describe and define how undesignated land adjacent to a habitats site acts as an important buffer or as a site used for example at high tide.	Noted. We will add a paragraph on SSSI impact risk zones. ‘Functionally linked land’ is an undefined concept which could include the majority of the Broads. The discussion about buffers and adaptation could be included at the in combination assessment if there are relevant plans or projects – such as those being developed by BFI. However, the ‘natural’ change of the climate (not a plan or project) does not fall into HRA.	Add this paragraph: The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make rapid initial assessment of the potential risks posed by development proposals to: Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs can be used by local planning authorities (LPAs) to consider whether a proposed development is likely to affect a SSSI, SAC, SPA or Ramsar site and determine whether they will need to consult Natural England to seek advice on the nature of any potential impacts and how they might be avoided or mitigated.
PODM14: Natural Environment	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy which aims to protect, restore and enhance biodiversity and habitats. However, we recommend that additional text is added to clause 6. We suggest the following: “Any detrimental impact of the proposal on biodiversity interest must be demonstrate clear adherence to the mitigation hierarchy through the use of all practicable avoidance, prevention, mitigation and compensation measures”.	Agree. But we will add some text to part 1 of the policy.	Add similar text referring to the hierarchy to part 1 of DM14.
PODM14: Natural Environment	Paul Harris	Broadland and South Norfolk Councils	The Council supports the approach to the protection of the natural environment and the reference to Local Nature Recovery Strategies in the policy.	Support noted.	No change to Local Plan.
PODM14: Natural Environment	Sarah Morrison	Natural England	We welcome the requirement for all schemes to include biodiversity enhancements and wildlife friendly features. We also welcome inclusion of the potential contribution of developments to Local Nature Recovery Strategies.	Support noted.	No change to policy.
PODM14: Natural Environment Policy PODM15: Biodiversity Net Gain	Tessa Saunders	Anglian Water	Anglian Water welcomes the approach of these policies and the links to the emerging Local Nature Recovery Strategies. In the absence of planning guidance regarding how LNRSs should be taken account of in Local Plans, we consider that they should at the very least be used as a framework for guiding delivery of G&BI and BNG to support nature recovery ambitions.	LNRS will be statutory documents and our policies refer to helping deliver them.	No change to policy.
PODM14: Natural Environment	Dickon Povey	East Suffolk Council	The overall approach set out in this policy is supported, however you may wish to consider whether there is value in renaming this policy to reflect its focus on habitats and species.	The policy refers to geodiversity as well as biodiversity. We are therefore content with the title.	No change to policy.
PODM14: Natural Environment	Dickon Povey	East Suffolk Council	We welcome the clarification in the explanatory text that there will be two Local Nature Recover Strategies that the Broads Authority will need to consider- one for Norfolk and one for Suffolk. There are a number of other places in the Plan that may benefit from further explanation on this point.	Noted. We note the comment relating to SP5 and will refer to LNRS there.	No change to policy.
PODM15 - Biodiversity Net Gain - (5) The Biodiversity Net Gain will be provided on site.	Henry Parkinson	Langley Abbey Estate	This wording appears to apply a strict policy requirement preventing developers from achieving BNG offsite; in other words, "BNG must be secured onsite". However, it is clear from paragraphs (6), (7) and (8) that this is not the Authority's intention. Clearly, in accordance with the Environment Act 2021 and a suite of secondary regulations, developers can achieve BNG offsite, so long as the biodiversity hierarchy is followed. With respect, it therefore strikes me that paragraph (5) is both inaccurate and misleading and ought to be clarified or omitted from the adopted Local Plan.	Paragraphs 5 and 6 of the policy set the location stance. This clearly shows a process of on site (number 5) and then if justified, elsewhere (number 6). The policy clearly follows the NPPG and the Biodiversity Gain Hierarchy: <a href="https://www.gov.uk/guidance/biodiversity-net-gain#para8">https://www.gov.uk/guidance/biodiversity-net-gain#para8</a> .	No change to policy.



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PODM15 - Biodiversity Net Gain - (8) Biodiversity gain sites need to avoid the best and most versatile agricultural land.	Henry Parkinson	Langley Abbey Estate	The agricultural land classification map at page 76 shows that the vast majority of the Broads Authority administrative area is BMV agricultural land. Paragraph (8) of Policy PODM15 states that biodiversity gain sites need to avoid BMV agricultural land yet paragraph 6(a) asks that offsite BNG be delivered locally, where identified in the LNRS and throughout the Broads, because of the significant ecological value of the Broads and the important role it can play in nature recovery. It is manifestly difficult to resolve the two: clearly if biodiversity gain is to be delivered within the Broads then it will necessarily take place on some BMV agricultural land. Furthermore, the NPPF does not state that BMV agricultural land is unsuitable for conservation efforts or biodiversity gain sites. In fact, paragraphs 180(b) of the NPPF explicitly states that "planning policies should enhance the natural environment by...recognising the wider benefits from natural capital and ecosystem services, including the economic and other benefits of BMV agricultural land". If biodiversity gain is focused solely on sites which are not BMV agricultural land then we miss an opportunity to maximise habitat connectivity and leverage conservation efforts adjacent to areas of existing species-richness and wildlife abundance, particularly in light of the fact that the ecologically diverse and distinctive Broads is largely BMV agricultural land because of the productivity of the drained peatland soils. In these circumstances, it should be recognised that BMV agricultural land has both an economic (through natural capital markets) and an other (ecological) benefit beyond food production.	As per POSP3, BMV agricultural land is defined as grades 1, 2 and 3a. As is shown at the map at page 76, most of the area of the Broads is grade 3. The map does not show 3a as there is not much, if any grade 3a land in the Broads (see comment below). So the assertion that most of the land in the Broads is BMV is not correct; some is, but not most. The mapping shows the area of the Langley Abbey Estate as grade 3. If you go to this website: <a href="https://magic.defra.gov.uk/MagicMap.aspx">https://magic.defra.gov.uk/MagicMap.aspx</a> and then click landscape classification and then then click Post 1988 Agricultural Land Classification (England) you will see what areas are classed as 3a that have been digitised. It does not seem that the area around the Langley Abbey is 3a. This is the only dataset that we are aware of that shows grade 3a. If the Langley Abbey Estate have any other information that shows that their land is grade 1, 2 or 3a, please get in touch.	No change to policy.
PODM15 - Biodiversity Net Gain - (8) Biodiversity gain sites need to avoid the best and most versatile agricultural land.	Henry Parkinson	Langley Abbey Estate	At Langley Abbey Environment Project we are committing to create 250ha of priority habitats for wildlife across what is, for the most part, BMV agricultural land. Our efforts are driven not by the lack of productivity across the Langley Abbey Estate, but because of its location directly opposite the 800ha Mid-Yare National Nature Reserve and our ability to provide significant habitat connectivity across 2,500ha of SSSI land within a 10km radius, including Halvergate Marshes and Breydon Water. Langley Abbey Estate is a strategically significant location to focus conservation efforts and can achieve more meaningful impacts across its 250ha than may be achievable elsewhere, where land does not benefit from such proximity to existing priority habitats.	Background information noted.	No change to policy.
PODM15 - Biodiversity Net Gain - (8) Biodiversity gain sites need to avoid the best and most versatile agricultural land.	Henry Parkinson	Langley Abbey Estate	Paragraph 181 states that local plans should "plan for the enhancement of natural capital at a landscape scale" whilst paragraph 182 states that the conservation of wildlife in the Broads should be given great weight in planning decisions. Paragraph 185 states that plans should "promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity." It is simply not possible to enhance natural capital at a landscape-scale in the Broads without delivering biodiversity gain across BMV agricultural land, and efforts which achieve measurable gains for biodiversity through restoring priority habitats should not be precluded on the basis that there is an alternative use of that land. In the Broads, BMV agricultural land will be needed if our efforts are to be "bigger, better, and more joined up". It is for these reasons that paragraph (8) appears to me to neither reflect the intentions of national policy in the NPPF nor the local context of the Broads and ought to be omitted from the adopted Local Plan.	See comment previously. If the Langley Abbey Estate have any other information that shows that their land is grade 1, 2 or 3a, please get in touch.	No change to policy.
PODM15 'Biodiversity Net Gain'	Helen Binns	Walsingham Planning on behalf of Greene King	PODM15 'Biodiversity Net Gain' – this policy is considered entirely unnecessarily as it duplicate national legislation. It also appears to go beyond statutory requirements thereby placing an even greater burden on development which could lead to it being unviable.	The policy is indeed in line with national legislation, although we may go further of course, depending on the outcome of the viability assessment on a BNG of greater than 10%. We are going beyond statutory requirements for the application stage and this approach is supported by the Planning Practice Guidance. Our extra requirements at application stage would still be statutorily required at pre-commencement stage. Considering BNG at the early stages of a project (as is the intention of the legislation and statutory guidance), may benefit project design and potentially increase viability alongside wider benefits. Fundamentally, the reason for requiring more reflects our National Park equivalent status.	No change to policy.
PODM15 'Biodiversity Net Gain'	Ian Robson	RSPB	Is there value in expressing a desire of a minimum of 10% and ideally 20%. The 20% value would be compatible with the current, draft GY Local Plan ambition?	Noted. We have the justification for greater than 10% and our viability consultants are looking at the impact of greater than 10%. If the evidence supports a % greater than 10%, we will include it in the next version of the Local Plan.	If evidence shows we can justify greater than 10% and it is viable, amend policy accordingly.
PODM15 Biodiversity Net Gain	Georgia Teague	Suffolk County Council	Regarding part 4; 'see later'; this could be better referenced.	Agreed. Will refer to policy.	Refer to policy rather than saying 'see later'.

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PODM15 Biodiversity Net Gain	Georgia Teague	Suffolk County Council	Part 5. slightly contradicts itself. The following amendment is suggested: Biodiversity Net Gain <del>shall</del> <u>will</u> be provided on site <del>with</del> <u>Where delivered on-site</u> habitats functionally linked to the wider habitat network creating coherent ecological networks.	Agreed. We will amend the policy.	The Biodiversity Net Gain will be provided on site. <del>Where delivered on-site,</del> <u>with</u> habitats <del>should be</del> functionally linked to the wider habitat network creating coherent ecological networks.
PODM15 Biodiversity Net Gain	Georgia Teague	Suffolk County Council	The text for the Reasoned Justification will need to be slightly amended to reflect that BNG requirements have now come into force.	Agreed. We will update the text.	Amend text in line with comment.
PODM15: Biodiversity Net Gain	Dr Sarah Eglington	Norfolk Wildlife Trust	Whilst we support the mandatory 10% biodiversity net gain required by the 2021 Environment Act, given the scale of the global biodiversity crisis, and the need to make clear and tangible progress on nature’s recovery, Norfolk Wildlife Trust recommends that wherever possible, a requirement for 20% should be set instead. This is particularly relevant given the comments in the Reasoned Justification "There is potential to require greater than 10% BNG in the Broads and this is something that we will look into ahead of the next version of the Local Plan. Having greater than 10% would contribute to the delivery of the National Park purposes and the enhanced biodiversity duty.” We have submitted a separate document outlining evidence as to why a 20% target is appropriate.	Noted and evidence welcomed. We are waiting on the viability testing of a % greater than 10% which is required.	Await viability assessment as to whether we can require more than 10% BNG.
PODM15: Biodiversity Net Gain	Dr Sarah Eglington	Norfolk Wildlife Trust	Clause 1 of the policy states that habitats must secured for a 30-year period from the commencement of the development. We recommend that the text is amended to reflect national guidance to state that the 30 year period should begin when the development is completed.	Agreed. Amend text.	Amend text in line with comment.
PODM15: Biodiversity Net Gain	Dr Sarah Eglington	Norfolk Wildlife Trust	We draw your attention to a potential missing word in the Reasoned Justification text: The following are other intended to support and supplement mandatory requirements and guidance.	Agree. We will amend the sentence.	Amend sentence so it reads better.
PODM15: Biodiversity Net Gain	Paul Harris	Broadland and South Norfolk Councils	The Council supports the approach to the protection of biodiversity and the reference to evidence bases of neighbouring districts in criteria 6 of the policy.	Support noted.	No change to Local Plan.
PODM15: Biodiversity Net Gain	Dickon Povey	East Suffolk Council	The approach set out in this policy is supported, noting the inclusion of a 10% BNG requirement in line with the mandatory BNG requirement. This approach is consistent with the approach in the East Suffolk Local Plans which support the implementation of Biodiversity Net Gain whilst not specifying that 10% is required.	Support noted.	No change to policy.
PODM15: Biodiversity Net Gain	Dickon Povey	East Suffolk Council	Where the policy and/or supporting text refers to the Local Nature Recovery Strategy there would be benefit in ensuring that these references reflect that there will be Local Nature Recovery Strategies for both Norfolk and Suffolk (noting that this explained alongside PODM14).	Agree. We will elaborate.	Clarify that there will be a LNRS for Norfolk and Suffolk.
PODM15: Biodiversity Net Gain	Dickon Povey	East Suffolk Council	Within PODM15 “All development types (unless meeting the criteria for an exemption) must achieve a minimum of 10% Biodiversity Net Gain (or any higher percentage mandated by national policy/legislation) over the pre-development site score as measured by the latest version of the DEFRA Biodiversity Metric (or Small Sites Metric if appropriate) or any subsequent Biodiversity Metric on the application site, secured for a 30- year period from the commencement of the development.”. It is suggested that the text reads as “secured and monitored for 30 years after the completion of the habitat creation”.	Agree with the proposed amendment.	Amend policy in line with comment.
PODM16 ‘Mitigating Recreational Impacts’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM16 ‘Mitigating Recreational Impacts’ – requires visitor accommodation to provide mitigation for adverse recreational impacts on the Norfolk RAMs. This places an additional financial burden on development.	Noted. An applicant does not have to pay the tariff; they can mitigate in another way, although the tariff is likely to be easiest. It should be noted that without this mitigation and unless a scheme is proved to be IROPI, it would fail HRA and not be able to be permitted. This scheme is also County-wide in Norfolk.	No change to policy.
PODM16: Mitigating Recreational Impacts	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy to mitigate recreational impacts on Habitat Sites.	Support noted.	No change to policy.

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PODM16: Mitigating Recreational Impacts	Paul Harris	Broadland and South Norfolk Councils	The Council supports the reference to wider Norfolk Strategies, such as the Norfolk RAMS, in this policy.	Support noted.	No change to Local Plan.
PODM16: Mitigating Recreational Impacts	Sarah Morrison	Natural England	We welcome point 4 regarding the need for adequate green infrastructure for developments over 50 units. It may be helpful to provide specific recommendations. As a minimum, we advise that such provisions should include: -High-quality, informal, semi-natural areas -Circular dog walking routes of 2.7 km within the site and/or with links to surrounding public rights of way (PRoW) -Dedicated ‘dogs-off-lead’ areas -Signage/information leaflets to householders to promote these areas for recreation -Dog waste bins -A commitment to the long term maintenance and management of these provisions	Agree. Add this text to the reasoned justification.	Add this suggested text to the reasoned justification.
PODM16: Mitigating Recreational Impacts	Sarah Morrison	Natural England	For guidance you can refer to Natural England’s Suitable Accessible Natural Green Space (SANGS) guidance (attached). Whilst this was produced for the Thames Basin Heaths Special Protection Area (SPA) it offers guidance that can be adapted to the requirements of the Broads Authority Local Plan area. Our comments on Policy PODM10: Green Infrastructure are also relevant here.	Agree. Add this text to the reasoned justification.	Add this suggested text to the reasoned justification.
PODM16: Mitigating Recreational Impacts	Dickon Povey	East Suffolk Council	The overall approach set out in this policy and references to the Suffolk Coast RAMS is supported.	Support noted.	No change to policy.
PODM16: Mitigating Recreational Impacts	Dickon Povey	East Suffolk Council	While the Suffolk Coast RAMS tariffs referenced in the explanatory text was correct at the time of drafting, you will be aware that this has recently increased as the result of index linking. The latest tariffs are available here: Habitat mitigation (RAMS) » East Suffolk Council . To avoid future iterations of the Local Plan becoming out of date, it is suggested that the Plan just includes a link to where the latest tariffs are published (the tariff will be updated annually).	Support noted. We will check the reference and amend accordingly.	For both Norfolk and Suffolk Coast RAMS, check the cost and reference as appropriate.
PODM16: Mitigating Recreational Impacts	Dickon Povey	East Suffolk Council	At point 1. reference is made to ‘Any development which results in a net increase in residential development and / or overnight tourism accommodation’ which is consistent with the Suffolk Coast RAMS. In the explanatory text the types of development listed also includes ‘Any development not involving overnight accommodation, but which may have non-sewerage water quality implications’ if RAMS is to apply to this type of development, then the policy and/or supporting text may benefit from further explanation as to what this type of development might include and what recreational disturbance impacts may arise it.	Noted. We will ensure the wording is addressed,	Clarify wording.
PODM17 Mitigating Nutrient Enrichment Impacts’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM17 Mitigating Nutrient Enrichment Impacts’ – requires development providing overnight accommodation to mitigate for increased nutrient loads. This places an additional financial burden on development.	This is noted. Mitigation schemes are being worked up by Natural England and by Norfolk Environmental Credits (which applicants in the Broads are able to work with). Some Water Recycling Centres will also be upgraded by 2030. It should be noted that without this mitigation and unless a scheme is proved to be IROPI, it would fail HRA and not be able to be permitted. This issue is experienced around much of England.	No change to policy.
PODM17 Mitigating Nutrient Enrichment Impacts’	Ian Robson	RSPB	Surely the aim should be to ensure no adverse significant effects on the integrity of any site in any condition.	Noted. Agreed.	Remove 'in an unfavourable condition; from point 1.
PODM17: Mitigating Nutrient Enrichment Impacts	Sarah Morrison	Natural England	Natural England supports this policy. Regarding the Norfolk Nutrient Budget Calculator, we refer you to the advice we sent to all relevant Local Planning Authorities on 7 October 2022. In summary, Natural England does not object to the use of the Norfolk Nutrient Budget Calculator, but it should be noted that this calculator is less precautionary than Natural England’s own Nutrient Budget Calculator.	Agree. Add this text to the reasoned justification.	Add this suggested text to the reasoned justification.
PODM17: Mitigating Nutrient Enrichment Impacts	Tessa Saunders	Anglian Water	Anglian Water recognises the need for an appropriate policy to address nutrient neutrality requirements of the designated sensitive catchments. We note that the supporting text states that this applies to development within the nutrient neutrality catchment of the Broads SAC and Broadland Ramsar. It might be helpful to state that this specifically relates to: • Bure Broads and Marshes SSSI • Trinity Broads SSSI • Yare Broads and Marshes SSSI • Ant Broads and Marshes SSSI • Upper Thurne Broads and Marshes SSSI	Agreed.	Add this clarification as a footnote.

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PODM17: Mitigating Nutrient Enrichment Impacts	Tessa Saunders	Anglian Water	The text also states: "Part 7 of the Levelling Up and Regeneration Act (2023) places a duty on water companies discharging to affected catchment areas to upgrade their WwTW to achieve the highest technological levels for nutrient removal by 1 April 2030". It should be clarified that this is not all WRCs (WwTWs) but those defined by the LURA amendments to the Water Industry Act, that are identified as nutrient significant plants within the designated sensitive catchments, serving a population equivalent of 2,000.	Agreed.	Weave in some of this text to the reasoned justification.
PODM17: Mitigating Nutrient Enrichment Impacts	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy to mitigate nutrient enrichment on Habitat Sites.	Support noted.	No change to policy.
PODM17: Mitigating Nutrient Enrichment Impacts	Dickon Povey	East Suffolk Council	We welcome the recognition of the importance of mitigating nutrient enrichment impacts. As you will be aware, East Suffolk was not included in the planning authorities contacted by Natural England regarding Nutrient Neutrality.	Support noted.	No change to policy.
PODM18 'Energy Demand and Performance of new buildings'	Helen Binns	Walsingham Planning on behalf of Greene King	PODM18 'Energy Demand and Performance of new buildings' – requires the expected energy use of buildings to be as low as possible with Building Regulations being the minimum standard. Applicants for change of use of a building will be required to improve energy efficiency.	Noted. This would benefit the future occupier as well with likely lower bills after the pay back period. With Greene King being the applicant, owner and future occupier of the buildings at HOV3, the lower bills may be beneficial.	No change to policy.
PODM18 'Energy Demand and Performance of new buildings'	Ian Robson	RSPB	4. As written this suggests that so long as the applicant 'considers' opportunities to improve energy efficiency that is all they need to do. Is this correct, is there no requirement to implement?	Noted. Agreed.	Add 'and implement'
PODM18: Energy demand and performance of new buildings (including extensions)	Andrew Marsh	Historic England	We welcome reference to heritage assets within this policy and the need for developments to comply with points 6a – d as well as other relevant legislation.	Support noted.	No change to policy.
PODM18: Energy demand and performance of new buildings (including extensions)	Dr Sarah Eglington	Norfolk Wildlife Trust	We support general intention of this policy to reduce the energy demand of buildings, in line with the weight afforded to the measures in the updated NPPF (Paragraph 164): In determining planning applications, local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).	Support noted.	No change to policy.
PODM18: Energy demand and performance of new buildings (including extensions)	Dr Sarah Eglington	Norfolk Wildlife Trust	However, given the scale of the climate crisis we recommend that the policy should be more ambitious and require new developments to follow an approach to achieving net zero emissions by 2035 based on the principle of setting ambitious fabric efficiency standards and then providing all heat and power renewably, on- or off-site. An example of this can be seen in the approach taken by Cornwall Council, who are using a policy approach that requires proposals to demonstrate how they will achieve net zero through energy efficiency and use of sustainable energy throughout their lifecycle (see Policy SEC1 – Sustainable Energy and Construction ).	Noted. We will be looking at what this policy can say in light of the Written Ministerial Statement and the outcome of any legal challenge.	Monitor situation and amend policy as appropriate.
PODM18: Energy demand and performance of new buildings (including extensions)	Dr Sarah Eglington	Norfolk Wildlife Trust	We are guided in our response by the best practice document 'The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change', which gives encouraging examples from other local authority plans on positive policies already adopted which will ensure local plans make clear and measurable contributions to national progress towards net zero.	Noted. We will be looking at what this policy can say in light of the Written Ministerial Statement and the outcome of any legal challenge.	Monitor situation and amend policy as appropriate.
PODM18: Energy demand and performance of new buildings (including extensions)	Dr Sarah Eglington	Norfolk Wildlife Trust	For all development proposals which involve the change of use or redevelopment of a building, or an extension to an existing building, the applicant is encouraged to must consider all opportunities to improve the energy efficiency of that building including the original building, if it is being extended.	Noted.	No change to policy.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
PODM18: Energy demand and performance of new buildings (including extensions)	Dr Sarah Eglington	Norfolk Wildlife Trust	As minor point, we recommend amending the title of this policy to remove the word ‘new’, as it is only in fact clauses 2 and 3 that deal with new buildings.	Noted. We will be looking at what this policy can say in light of the Written Ministerial Statement and the outcome of any legal challenge.	Monitor situation and amend policy as appropriate.
PODM18: Energy demand and performance of new buildings (including extensions)	Tessa Saunders	Anglian Water	Improved water efficiency measures can reduce the operational energy demand of buildings. Of all the CO2 emissions in the UK, 6% are from water use, and a massive 89% of this comes from heating water in homes - meaning 5.3% of UK emissions is from domestic water heating. The remainder (0.67%) from pumping and treating water as part of the supply and sewerage network. Improved water efficiency measures (fixtures and fittings such as water efficient showers and taps and white goods appliances) are therefore important in helping to reduce overall operational carbon in new homes.	Noted and agree. Add some of this text to the reasoned justification for this policy.	Weave in some of this text to the reasoned justification.
PODM18: Energy demand and performance of new buildings (including extensions)	Dickon Povey	East Suffolk Council	The Written Ministerial Statement of 13 December 2023 requires energy efficiency standards to be an uplift of dwelling target emission (TER). Bullet point 2 of the proposed policy uses the term “predicted energy requirements”. Perhaps TER should be specified in accordance with the WMS.	We will be reviewing this policy in line with any changes at the National Level.	Produce Energy Efficiency Topic Paper and check and improve policy.
PODM18: Energy demand and performance of new buildings (including extensions)	Dickon Povey	East Suffolk Council	I understand the FHS CO2 emissions will be 75% less than the 2013 Part L Building Regulations not the current/latest energy efficiency requirements (which are the 2023 Part L Building Regulations). The uplift in Building Regulations that took place in 2022 was relative to the 2013 Part L Building Regulations.	We will be reviewing this policy in line with any changes at the National Level.	Produce Energy Efficiency Topic Paper and check and improve policy.
PODM19: Renewable and low carbon energy	Andrew Marsh	Historic England	We welcome the addition of the historic environment reference in this policy, which reinforces the protection of the distinctive qualities and character of the Broads, including its historic environment.	Support noted.	No change to policy.
PODM19: Renewable and low carbon energy	Chris Waldron	Ministry of Defence	In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the potential implications of these forms of development, it is requested that provision is made in ‘Policy PODM19: Renewable and low carbon energy’ to communicate that applications for renewable energy development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets will be supported. Within any new Local Plan, policies and the reasoned justification supporting them should, ideally, refer to the presence of safeguarding zones and/or provide a developer with an indication as to potential limitations that might apply to certain development types.	Agree. Wording along the lines suggested is suitable.	Weave in suggested wording to policy.
PODM19: Renewable and low carbon energy	Dickon Povey	East Suffolk Council	Point 4 – what grade of agricultural land is considered suitable for solar farms? Do developers have to demonstrate they have considered land of different agricultural grades and selected the poorest quality land for the solar farm?	Suggestions noted and we will weave them into the policy. Avoiding best and most versatile land is favoured.	Improved point 4.
PODM2 ‘Embodied Carbon’	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy but recommend that additional text is included around the issue of embodied carbon. As building standards and regulations start to reduce the operational emissions from buildings, embodied carbon emissions can make up as much as 50% of total emissions over a building’s lifetime . We recommend that requirements are set for all new homes as following best practice policy recommendations by a Planning Sector professional body The RTPi: <ul style="list-style-type: none"> <li>• All developments shall demonstrate actions taken to reduce embodied carbon and maximise opportunities for re-use through the provision of a circular economy statement.</li> <li>• Major developments (defined as those with 10 or more dwellings or 1,000 square metres of floorspace) should calculate whole-lifecycle carbon emissions (including embodied carbon emissions) through a nationally recognised whole-lifecycle carbon methodology and should demonstrate actions taken to reduce lifecycle carbon emissions.</li> <li>• Performance changes should be monitored through updated as-designed and as-built embodied carbon assessments. Developments should not only measure performance, but also submit whole-lifecycle data to public databases (such as the Built Environment Carbon Database).</li> </ul>	Noted. We will add similar wording to reflect the first two bullet points.	Add similar two bullet points.

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PODM2 ‘Embodied Carbon’	Helen Binns	Walsingham Planning on behalf of Greene King	Policy PODM2 ‘Embodied Carbon’ sets out a presumption against the demolition of any building and its retention and reuse. Whilst such an approach is commendable, GK do not consider it to be justified in planning terms. In most cases demolition of a building does not require planning permission as it is either not development or permitted development. It is therefore not considered reasonable or appropriate to introduce a policy which seeks to prevent something which is entirely lawful or that requires the act of demolition to be justified. GK accordingly consider that this policy should be deleted.	Given that we are experiencing an energy crisis and climate crisis, we all need to do things differently and use less energy and produce less carbon dioxide. This type of policy has been used and adopted elsewhere. Furthermore, there are tests in the policy that applicants can address if they still need to demolish a building. In the cases where demolition does not need planning permission, then the policy will not apply. A similar policy has been adopted in the Central Lincolnshire Local Plan.	No change to policy.
PODM2 ‘Embodied Carbon’	Tessa Saunders	Anglian Water	Anglian Water supports the aims of the policy which align with our Net Zero Strategy which includes a target to reduce our capital (embodied) carbon in new developments by 70% against a 2010 baseline. Local Plan policies can help reduce the amount of new infrastructure and capital carbon needed by planning for sustainable and resilient growth - particularly in locations that have existing infrastructure capacity for growth or by planning for a quantum of growth that provides significant carbon efficiencies. We support the use of a whole life carbon assessment to reduce emissions over the lifetime of a building.	Support noted.	No change to policy.
PODM2 ‘Embodied Carbon’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM2 ‘Embodied Carbon’ – sets a strong presumption against the demolition of existing buildings and a requirement for a strong justification to be provided where it is proposed and requirement for materials to be re-used. For non-listed buildings, it is stated that demolition will only be supported where a number of criteria are met. Whilst well intended, such a requirement is likely to thwart development.	Given that we are experiencing an energy crisis and climate crisis, we all need to do things differently and use less energy and produce less carbon dioxide. This type of policy has been used and adopted elsewhere. Furthermore, there are tests in the policy that applicants can address if they still need to demolish a building. We don't think that this will thwart development; the policy is intended to ensure developers really consider their proposed approach.	No change to policy.
PODM2 relating to Embodied Carbon	Sarah Vergette	Broads Society	The Society supports Policy PODM2 relating to Embodied Carbon.	Support noted.	No change to policy.
PODM20 Development and Landscape	Georgia Teague	Suffolk County Council	Part 5. To improve clarity, SCC suggest inserting ‘ <u>to minimise the</u> ’ before ‘impact’.	Agree.	Amend as per comment.
PODM20 Development and Landscape	Georgia Teague	Suffolk County Council	Regarding part 8, which states: “Opportunities [...] will be encouraged” however, for clarity of wording, SCC would suggest: <u>8. Developers will be encouraged to realise opportunities</u> [...]	Agree.	Amend as per comment.
PODM20: Development and landscape	Dickon Povey	East Suffolk Council	As stated in our response to earlier local plan consultation (and against POSP 6) it is important to note the strong relationships between the landscape character within the Broads and within East Suffolk as defined in the Waveney District Landscape Character Assessment: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf</a> . Any adverse character impacts could have cross-boundary impacts and there would be value in reflecting this in the in the policy and/or supporting text.	Agreed. We will weave this into the text.	Weave reference to neighbouring LCAs into policy/supporting text.
PODM20: Development and landscape	Sarah Morrison	Natural England	1. Landscape character assessments may include as key characteristics features which exist but where the consensus is that they would be better being de-emphasised. An exhaustive look has not been made, but the Broads Authority needs to be sure, when seeking that key characteristics are conserved and enhanced, that that is its actual intention.	Agree, references to conserving key characteristics should be framed as ‘positive characteristics’, which prevents the policy from being interpreted that all characteristics would need to be conserved.	Amend text as follows: 1. Development proposals which conserve and enhance the key <u>positive</u> landscape characteristics of the Broads and comply with other relevant policies, in particular Policy PODM51 (design), will be permitted.
PODM20: Development and landscape	Sarah Morrison	Natural England	3. The National Character Area Profiles and Regional Landscape Typology are also useful sources of information.	Agreed. We will add reference to this.	Include reference to the other sources of information.
PODM20: Development and landscape	Sarah Morrison	Natural England	5. There may be a case for retaining views (of development) from the watercourse in some places. In any case, in situations where flooding regularly occurs it can also be difficult to sustain new landscaping at the waters edge.	Agree, Amend criterion 5, add a footnote to expand on what 'appropriate' means and refer to the potential for a management plan in the supporting text.	Amend criterion 5, add a footnote to expand on what 'appropriate' means and refer to the potential for a management plan in the supporting text.

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PODM20: Development and landscape	Sarah Morrison	Natural England	6. New planting may sometimes need to be able to withstand inundation as well as drought.	Agreed. We will add reference to this.	Include inundation.
PODM20: Development and landscape	Sarah Morrison	Natural England	7. It may sometimes be important to landscape character that natural or cultural features that have been lost or degraded are restored as part of the development.	Noted. It is not clear if the comment is suggesting to re-word the criterion. We are content with how it is written currently.	No change to policy.
PODM20: Development and landscape	Sarah Morrison	Natural England	10. We recommend signposting to the definition of “Adequate compensatory measures” in relation to landscape (as distinct from habitat)	We will remove reference to habitat in this instance as schemes would be assessed against the Natural Environment policies. We will also remove reference to adequate compensatory measures,.	Amend text in line with comment.
PODM20: Development and landscape	Sarah Morrison	Natural England	Natural England notes that Broads Landscape Character Assessment GIS dataset includes 58 parcels of arable land deemed in the GIS attribute table as “Outside the Broads” where the assessment is instead dependent on immediately adjoining assessments of constituent districts. We suggest that you may want to explain how your policy will interpret these adjoining assessments devised (at a moment in time) for neighbouring authorities.	Consideration of this will be tied into the LCA review which we’re currently working on. Going forwards we need to consider whether reference to the adjacent assessments is appropriate given the length of time since some of the LCAs were published. However given that all references within policy are to latest available documents, the current approach seems sensible rather than trying to include any of these areas in a BA LCA update. Taking as an example an area excluded from the Broads LCA, to the south of LCA 26 Muck Fleet Valley and the Trinity Broad, this refers to the GYBC LCA G3:Ormesby and Filby Settled Farmland. The GY LCA (2008) cross references the BA area and provides context as follows: “Relationship to the Broads Authority Executive Area G3.2 A small area of farmland within the Broads Authority Executive Area near Thrigby shares similar characteristics with the area. This area has been excluded from the Broads LCA.” Both the BA LCA and GYBC LCA acknowledge that the landscape characteristics do not reflect administrative boundaries and in some of these fringe locations the characteristics are more closely aligned with an adjacent LCA. Where this occurs, we would look to the Positive Landscape Features of Significance and inherent Landscape Sensitivities highlighted within the relevant adjacent LCA and interpret our policy with the protection of these in mind.	In part 2, refer to 'or adjacent sensitive landscapes'. In part 3a refer to 'or where appropriate adjacent district Landscape Character Assessment'
PODM20: Development and landscape	Sarah Morrison	Natural England	Natural England’s understanding is that there is also a small section of the Broads Authority Area for which there is no Landscape Character Assessment coverage at all.	Noted. We will look into this.	Look into this area of the LCA.
PODM20: Development and landscape	Sarah Morrison	Natural England	In addition, we support the references to landscape consideration throughout the policy, including PODM21 in respect of visual appearance and landscape character. We support policy POSP4: Historic Environment and POSSMILLS: Drainage Mills.	Support noted.	No change to policy.
PODM21: Land raising	Alasdair Hain-Cole	Environment Agency	We support the amended policy and recommend the following paragraph be added under ‘Reasoned Justification’ to highlight Environmental Permitting Regulations (2010): “Other consents that may also be required Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit from the Environment Agency 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 works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.” This paragraph is already included in the ‘Reasoned Justification’ section for PODM7 – page 62.	Agreed. We will add this paragraph.	Add paragraph to supporting text.
PODM21: Land raising	Dickon Povey	East Suffolk Council	Add to impact on existing property to list of criteria in paragraph 2.	Agreed.	Add to impact on existing property to list of criteria in paragraph 2.
PODM22: Excavated Material	Georgia Teague	Suffolk County Council	This policy should make clear that, if any excavated material constituting “mineral” (sand and gravel) is removed from a site for sale, then an application must be submitted to SCC or Norfolk County Council as the Local Minerals Authorities.	Noted. This policy is about excavation as a by product of development.	No change to policy.

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PODM23 Utilities infrastructure development	Georgia Teague	Suffolk County Council	SCC would suggest that part c) read ‘There is no <u>significant</u> adverse impact [...]’ Avoidance, Mitigation and Compensation of impacts should also apply here.	Disagree. We are content with 'adverse impact' as this ties in with the general thrust of the relevance policies referred to in part c.	No change to policy.
PODM23: Utilities infrastructure development	Dickon Povey	East Suffolk Council	The policy clearly states the utilities infrastructure development should prevent any significant impact on the special qualities, landscape, built environment and wildlife of the Broads. At the same time, the authority acknowledges the utilities importance for local communities and the economy, including rural broadband coverage and extending 4G coverage and the rollout of 5G infrastructure. Points 6 (dark skies) and 7 (radiation protection) address the possible harms from the new telecom masts and infrastructure. Planning applications for new installations should address availability on existing masts/ utility apparatus as appropriate to limit any further impacts from them. Removal of redundant utilities and equipment also deems fit and appropriate, for that annual utilities’ inspection shall aid its effectiveness. Landscape Sensitivity Study for large scale, bulk infrastructure and similar references is appropriate for associated developments.	Support noted.	No change to policy.
PODM23: Utilities infrastructure development	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend adding the following wording to clause 1h; “h) It would not adversely affect protected species or habitats or designated wildlife sites”	Agreed. We will add this wording.	Amend policy in line with comment.
PODM23: Utilities infrastructure development	Paul Harris	Broadland and South Norfolk Councils	The Council supports the protection of the natural environment and landscape when determining applications for utilities infrastructure.  The Council would however recommend that further clarity is provided on how the ‘wider landscape in criteria ‘c’ will be considered. The Council would like to see clarity on whether this includes the identified landscape characters in neighbouring district Local Plans.  The Council notes the ‘Reasoned Justification’ refers to neighbouring districts considering the Broads Landscape Sensitivity Study when determining applications. The Council would recommend that it is stated if equivalent studies from other authorities will be considered by the Broads Authority where appropriate.	The wider landscape would include adjacent LCA’s within the BA area or adjacent LCA’s of neighbouring authority where relevant. Within an LVIA which might be required for some utilities infrastructure development, the potential effects of the development would be considered across scales, for example some effects could be very localised and contained, whereas something such as a major might impact a number of LCA or be of regional scale.  Agree the wording should reflect that where a Broads application is close to a neighbouring district, their Landscape Sensitivity Study or equivalent document would be considered, however it is unlikely that the sensitivity would be greater in adjacent areas than the Broads given the level of protection the BA area has. However it should be acknowledged within the text; this would also be helpful as neighbouring districts might well have or produce more up to date LSSs or equivalent.	Add some explanatory text as a footnote.  Refer to the potential for studies produced by our constituent councils being of relevance.
PODM23: Utilities infrastructure development	Tessa Saunders	Anglian Water	Whilst the reasoned justification states that the policy applies to telecommunications, electricity, gas and water infrastructure, we would suggest that the wording is more likely to apply to telecommunications and electricity infrastructure, which is often above ground. Anglian Water assets include underground sewers and water mains, in addition to sewage pumping stations, water recycling centres and water treatment works above ground. New infrastructure is likely to be related to new development, or provision of public sewerage networks (first time sewerage schemes) to areas currently served by septic tanks. The natural beauty and biodiversity importance of The Broads is recognised, and it is considered that other policies in the Plan would be sufficient to guide new water/sewerage infrastructure. The requirement to remove any utilities equipment when it is redundant is too generic when applied to all utilities infrastructure, particularly when many of our assets are underground. However, in the context of The Broads as a designated landscape it is understandable in relation to telecommunications masts for example. We would suggest that the purpose of the policy is either solely related to electricity and telecommunications networks or that criteria in the policy are split between those that are generic to all utility infrastructure and those specifically related to electricity and telecommunications networks.	Noted. We would consider the relevant parts of policies when assessing schemes. Whilst water infrastructure may be underground, some elements could be above ground. Also, the construction element of a scheme would be relevant to the policy.	No change to policy.
PODM24 ‘Trees, Woodlands, Hedges, Scrub and Shrubs and Development’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM24 ‘Trees, Woodlands, Hedges, Scrub and Shrubs and Development’ – as currently drafted this policy pretty much prevents the removal of any trees, hedgerow or shrub within a site by only allowing this where it would enhance the survival of other vegetation or would allow a substantially improved overall design and landscaping of the site that would outweigh the loss. Tree replacement standards are also unrealistically onerous. The policy also requires development with a frontage to a highway of more than 10 metres to plant and maintain roadside trees. GK consider this policy to be extremely onerous and likely to lead to development on some sites not being viable.	We don't agree that this will thwart development. We are requiring developers to demonstrate the impacts of their proposals on the environment and communities. We would in all cases consider any justification for not addressing certain requirements. We think this policy approach is in accordance with government policies including NPPF para 136, 182 and 186 and required as a step to mitigate the impacts of the climate emergency that we have declared.	No change to policy.



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PODM24 Trees, woodlands, hedges, scrub and shrubs and development	Georgia Teague	Suffolk County Council	SCC (Landscape) welcomes the detail with regards to replacement trees in part 3.	Support noted.	No change to policy.
PODM24 Trees, woodlands, hedges, scrub and shrubs and development	Georgia Teague	Suffolk County Council	It is suggested to increase the first category to two replacement trees. SCC usually recommends planting of trees no bigger than light standard (girth 8-10), as these often establish more readily than larger standards and, should they fail, would be easier to replace. Usually, they reach the same height as the larger standards within a few years.	Noted regarding 2 replacement trees. The proposed policy seems to now being used as a emergent tree replacement policy around the country. We are therefore content with 1 tree for the loss of a tree in the smallest category.  With regards the size of the replacement the 10-12cm girth would still be our preferred size but we would suggest that, as a minimum, replacement trees should be 8-10cm girth container grown specimens. These are both readily available and tend to establish better than larger trees without	Amend policy to refer to 8-10cm girth for container grown specimens.
PODM24: Trees, woodlands, hedges, scrub and shrubs and development	Dickon Povey	East Suffolk Council	The inclusion of scrub habitat within the Policy is welcomed.	Support noted.	No change to policy.
PODM24: Trees, woodlands, hedges, scrub and shrubs and development	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy. With regards to clause 5, we recommend that development should only be permitted where it: avoids as a first principle, adverse impacts on existing trees, woodland and hedgerows. These features should be retained as they contribute value to the character, amenity and ecology of the locality. Where the loss of such features is demonstrably unavoidable, adequate replacement provision should be sought. Where the loss of a tree is accepted in these circumstances, developers will be required to ensure the loss is suitably compensated for, taking into account the size and condition of the tree.	We consider that our policy already achieves this. It effectively does mean that development detrimentally affecting trees etc would not be considered acceptable, except in certain circumstances which are set out. We do then state what replacement provision will be required.	No change to policy.
PODM24: Trees, woodlands, hedges, scrub and shrubs and development	Sarah Morrison	Natural England	Natural England particularly welcomes the following aspects of this policy: 3a) The sliding scale for tree replacements, through which a greater number of replacement trees are required when a larger tree is removed (the larger the tree lost, the more trees have to be planted to compensate for it). 4a) The inclusion of the principle of ‘the right tree in the right place’ in Policy PODM24. 7a) The policy through which any development proposal with a frontage of more than 10m in length will have to provide for the planting and maintenance of roadside trees. To ensure that this policy is as effective as possible, it might be prudent to include a requirement for the size of the tree to be planted (e.g. ‘Extra Heavy Standard’) and for the provision of appropriate protection of the tree to maximise its chance of survival.	Noted. The planting of Extra Heavy Standards is not only very expensive and required extensive and onerous maintenance to ensure their survival. The 10-12cm girth would still be our preferred size but we would suggest that, as a minimum, replacement trees should be 8-10cm girth container grown specimens. These are both readily available and tend to establish better than larger trees without	Amend policy to refer to 8-10cm girth for container grown specimens.
PODM25: Protection and enhancement of settlement fringe landscape character	Paul Harris	Broadland and South Norfolk Councils	The Council acknowledges the inherent sensitivities associated with development on settlement fringes and support the approach taken in the policy. The Council would recommend further clarification on the consideration of cumulative development as it is not clear if this includes development in neighbouring districts. If this is the case this should be made clear in the policy.	Comment noted. We will liaise with GYBC and ESC who have similar policies and amend the policy as required.	Liaise with GYBC and ESC who have similar policies and amend the policy as required.
PODM25: Protection and enhancement of settlement fringe landscape character	Dickon Povey	East Suffolk Council	This policy is supported.	Support noted.	No change to policy.
PODM26 – Amenity	Dickon Povey	East Suffolk Council	Part 2 appears to treat occupation, operation, and construction of development equally. The construction phase will only be temporary and is part and parcel of all development. Occupation and operation of development will be permanent in the majority of cases, therefore it is suggested that impacts arising from these elements of development are given greater weight in the policy.	Noted and agreed to some extent. The policy applies to all phases of development. We will take out the reference to various phases on development from the policy as construction is talked about in the supporting text.	Remove wording about the phases of development.

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PODM26 – Amenity	Wakako Hirose	Rapleys on behalf of British Sugar	Policy PODM26 states that “development will not be permitted if it would have an unacceptable impact on the amenity of existing or potential neighbouring properties or uses”. The requirement to address the impacts on “potential neighbouring properties or uses” is not aligned with the NPPF’s ‘agent of principle’ policy. The NPPF at Paragraph 193 states that existing businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established. It is the applicant for new development (or ‘agent of change’) who should be required to provide suitable mitigations where the operation of an existing business could have a significant adverse effect on new development in the vicinity – not the other way round as the policy requires. We therefore consider that Part 1 of Policy PDM26 should be amended to “Development will not be permitted if it would have an unacceptable impact on the amenity of existing neighbouring properties or uses. In applying the NPPF’s agent of change principle, development will not be permitted if it is not satisfactorily demonstrated that the existing neighbouring properties or uses will have no unacceptable impact on the amenity of the prospective use and occupiers of the proposed development, thereby ensuring that the existing neighbouring uses and operations will have no unreasonable restrictions placed on them as a result of the proposed development.”	The agent of change principle applies both ways. So it would apply if the factory applied to change or add a process or building, even though the factory is there currently - that new process or building is not and is a change.	No change to policy.
PODM26: Amenity	Georgia Teague	Suffolk County Council	The reference to Minerals and Waste in the supporting text of Policy PODM26 is welcomed, however SCC would suggest adding in "local plans" at the end of the sentence, i.e., As such, the Authority will liaise with Norfolk and Suffolk County Councils for sites that are near to mineral and waste sites in line with Norfolk and Suffolk County Council Minerals and Waste Local Plans.	Support noted. Agreed. Add this text.	Add similar text to supporting text.
PODM27 Light pollution, dark skies and nocturnal character	Georgia Teague	Suffolk County Council	See above comment regarding Lighting Design Guide.	Noted.	See other comment.
PODM27 Light pollution, dark skies and nocturnal character	Georgia Teague	Suffolk County Council	Part 1. Suggest ‘shall’, instead of ‘will’ Part 4. typo: suggest should be ‘is’ instead of ‘it’ Part 11. suggest: ‘... and dimmed down <u>during times</u> of little human activity.’	Disagree - we are content with 'will' in part 1. Agree re typo. Agree with suggested change to part 11.	Amend typo. Add text to part 11.
PODM27: Light pollution, dark skies and nocturnal character	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy but recommend an additional clause which states that ‘All proposals are required to address light spillage and avoid any adverse impact on nocturnal species.’	Agreed. We will add wording along these lines.	Add similar wording to start of policy.
PODM27: Light pollution, dark skies and nocturnal character	Dr Sarah Eglington	Norfolk Wildlife Trust	We also recommend the following text be added: ‘All development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats: ( <a href="https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/">https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/</a> ). Where applications are adjacent to or near to designated wildlife sites or Priority Habitats then they must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds and other species.’	Noted. We already include that guide at the end of the supporting text and a scheme that addresses the requirements of the policy will not affect bats.	No change to policy.
PODM27: Light pollution and dark skies and nocturnal character	Dickon Povey	East Suffolk Council	We welcome the recognition of the importance of lighting design strategies for protecting biodiversity.	Support noted.	No change to policy.
PODM27: Light pollution and dark skies and nocturnal character	Dickon Povey	East Suffolk Council	It is suggested that Point 1 include a cross reference to Policy POSP7: Tranquillity in the Broads.	Agree. We will cross refer to SP7 in this policy.	Cross refer to SP7.
PODM27: Light pollution and dark skies and nocturnal character	Dickon Povey	East Suffolk Council	There is a minor typo at Point 4- ‘it’.	Noted.	Amend typo.

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PODM27: Light pollution and dark skies and nocturnal character	Dickon Povey	East Suffolk Council	Point 15 sets quite a high bar for development throughout the Broads Authority area – this might be more difficult to defend (in terms of construction cost) outside of the mapped Dark Skies zones, and therefore may need to be limited to the zones (which do cover most of The Broads anyway).	Noted. We often see schemes with much glazing. Lots of glazing means lots of internal light escaping. If you are going to design in such an amount of glazing then you need to mitigate it. Applicants can choose not to have so much glazing if this policy requirement causes them issues. We are content to set a high bar in policy. We note that GYBC are including policies on dark skies in their emerging Local Plan too and so it is an issue that is gaining traction.	No change to policy.
PODM28 Transport, Highway and Access	Wakako Hirose	Rapleys on behalf of British Sugar	Policy PODM28 Part 8 safeguards public rights of way and categorically prevents development where it would result in the severance or loss of an existing public route. As explained in this letter, British Sugar seeks to ensure health and safety and the existing public right of way is a concern as it runs through the operational area of Cantley Sugar Factory. The legislation includes provisions for the diversion of public rights of way. As such, we request that Part 8 is clarified as follows: “Development will not be acceptable where it would result in the severance or loss of an existing public route, without a suitable diversion.”	Agree. Wording along the lines suggested is suitable.	Amend policy to say: When determining development proposals, the Authority will safeguard public rights of way and ensure that future routes are not compromised. Development will not be acceptable where it would result in the severance or loss of an existing public route. <u>The Authority, in liaison with relevant partners, will consider proposals for suitable, safe and convenient diversions.</u>
PODM28: Transport, highways and access	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy. However, we recommend strengthening the wording of clause 4 to make it more robust by replacing the term ‘have regard to’. We suggest the following: “All developments should demonstrate, where appropriate, that they have adhered to the following criteria”	Agreed. We will replace the text with the suggestion.	Add 'adhered' to the policy.
PODM28: Transport, highways and access	Dr Sarah Eglington	Norfolk Wildlife Trust	We also point out that the sub-clauses to this do not read well and suggest rewording as follows: a. Located where the use of sustainable transport modes are maximised; b. Minimised additional travel demand through the use of measures such as travel planning, safe and convenient public transport, car clubs, walking, wheeling and cycling links, cycle parking and integration with existing infrastructure; c. Made allowance for low, ultra-low and zero emission vehicle refuelling/charging infrastructure.	Agreed. We will replace 'making' with 'made'.	Replace 'making' with 'made'.
PODM28: Transport, highways and access	Georgia Teague	Suffolk County Council	SCC welcome part 5 & 6 regarding active travel from a Public Health perspective and welcome the Inclusive Design section in the supporting text.	Support noted.	No change to policy.
PODM28: Transport, highways and access	Georgia Teague	Suffolk County Council	Overall, SCC support this policy. Part 2d) could reference the Suffolk Guidance for Parking7 (updated October 2023) specifically. SCC welcome part 5 regarding active travel See: <a href="https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance">https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance</a>	Support noted. A general reference in the supporting text to the relevant parking guides will be added.	Add reference to parking standards in supporting text.
PODM28: Transport, highways and access	Dickon Povey	East Suffolk Council	Placing the user/modal hierarchy in criterion 1 is a positive approach in highlighting the importance of prioritising the most vulnerable users through the design process. So too is the further reference to the more vulnerable highway users throughout the policy.	Support noted.	No change to policy.
PODM28: Transport, highways and access	Dickon Povey	East Suffolk Council	Given the sensitive nature of the Broads, and the potential for transport, highways and access interventions to occasionally result in overly engineered solutions (e.g. excessive signage, road paint, and other highways paraphernalia), you may want to consider setting a presumption in favour of highways design solutions that avoid excessive signage, road paint, and other highways paraphernalia, etc and are landscape led so far as reasonably possible. Such designs would of course need to meet all the necessary safety and other requirements.	Agreed. We will weave this into the text.	Weave suggestion into the text.
PODM29 Recreation facilities parking areas	Georgia Teague	Suffolk County Council	Very useful policy, which also safeguards the local landscape and dark skies.	Support noted.	No change to policy.

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PODM29: Recreation facilities parking areas	Georgia Teague	Suffolk County Council	SCC agree with the principle of this policy, however, please note that all parking should adhere to the Suffolk Guidance for Parking. Regarding Part 4, SCC queries what is considered as an "appropriate provision" of disabled spaces. It may be helpful to provide a minimum figure or percentage, for clarity	Noted and the policy refers to those standards already. Regarding disabled parking spaces - as is required in the relevant standard. Will clarify policy.	Clarify text relating to disabled parking spaces.
PODM29: Recreation facilities parking areas	Dickon Povey	East Suffolk Council	It may be useful to it may be useful to include ‘push scooters’ in the list at criteria 2.	Agreed. Add this to 2b.	Add push scooters to 2b.
PODM3 ‘Climate Change Adaption and Resilience Checklist’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM3 ‘Climate Change Adaption and Resilience Checklist’ – All development, including changes of use, are required to demonstrate how climate change has been taken into account in the design via completion of a Climate Change Adaption and Resilience Checklist. On review of the checklist, it is unclear what meaningful benefit it will bring to the planning process.	Comments noted. It is a self assessment checklist. It is for you as applicant/architect/owner/future user of the scheme to consider the known and potential impacts of climate change on your scheme and future users/customers/occupiers.	No change to policy.
PODM3: Climate change adaption and resilience checklist	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy. We recommend that the reference given in the supporting text is updated as UKCP 2009 has been superseded by a newer report UKCP18 . The footnote given in the text should also be updated.	Agreed. Replace 2009 with 2018.	Replace 2009 with 2018.
PODM3: Climate change adaption and resilience checklist	Georgia Teague	Suffolk County Council	SCC supports this policy; it is important to have resilience for climate change. In particular, older people are more vulnerable in instances of climate change and extreme weather events (i.e., cold snaps and heatwaves).	Support noted.	No change to policy.
PODM3: Climate change adaption and resilience checklist	Dickon Povey	East Suffolk Council	The check list in appendix 4 would benefit from having two columns, one on the lefthand side listing the issues and the other on the righthand side for how it was addressed in the proposal. Asking for details of an original and changed scheme seems unnecessary. Applicants usually only submit one proposal, and the checklist should focus on how that proposal addresses the issues.	Agree. We will amend so the applicant says how they address the criteria.	One box for applicant to fill in that asks how they address the comment and also say how things have changed in light of this checklist, if they have.
PODM30: New employment development	Georgia Teague	Suffolk County Council	SCC welcome part h) regarding sustainable travel	Support noted.	No change to policy.
PODM30: New employment development	Dickon Povey	East Suffolk Council	Clarity around how this policy interacts with PODM61 would be helpful. It is assumed that the intention of policy PODM30 is to govern new employment buildings, however the policy simply says new employment development which can include changes of use. Policy PODM61 provides a criteria for the re-use, conversion or change of use of buildings and structures to employment. It would be useful to clarify (perhaps in the supporting text) whether these policies should be read alongside each other or whether PODM30 relates primarily to new build and PODM61 relates to change of use.	Agree. We will cross refer to each policy from the other policy.	Cross refer to each policy from the other policy.
PODM30: New employment development	Dickon Povey	East Suffolk Council	Criteria 5 has been added, but the number formatting appears incorrect as criteria 6 should be 5(1). In addition, the justifying text does reference this change, but this appears to have been added to the original policy. Some text explaining its addition in the justifying text would be useful or a link to the marketing and viability guide.	This refers to the on line version. The PDF version is correct and we will ensure numbering is correct of the HTML version.  Text about Class E is in the footnote.  Add reference to the Marketing Guide.	Ensure HTML version matches PDF version.  No change.  Add reference to Marketing Guide.
PODM31: Protecting general employment	Dickon Povey	East Suffolk Council	Guidance to what a ‘statement’ should include is within the justifying text. Perhaps reference to the Statement and a pointer to the guidance should be within the policy itself. The Waveney Local Plan contains the guidance in a separate appendix with reference to the appendix in the policy.	Agree - add reference to the statement and guide.	Add reference to the need for a Statement to 1a.  Add reference to the Marketing and Viability Guide.

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PODM31: Protecting general employment	Dickon Povey	East Suffolk Council	It's assumed that the business diversification section refers to diversification to uses outside employment (B2, B8 and Eg) use. Accordingly, the diversification could result in the loss of employment land and whilst it will remain part of the wider employment unit still it's unclear whether it should still need to go through the steps outlined under 'Alternative uses'.	Noted. We feel that the sub title of 'alternative uses' may cause some confusion and therefore propose to remove that so point 2 follows point 1. This may address the comment, if not, please raise this next time.	Remove the sub title 'alternative uses'. Move point 3 to end of policy. Amend typo in point 2.
PODM32: Farm Diversification.	Sarah Vergette	Broads Society	The Society supports proposed Policy PODM32: Farm Diversification.	Support noted.	No change to policy.
PODM33: Development on waterside sites in employment or commercial use, including boatyards	Sarah Vergette	Broads Society	With regard to Policy PODM33, The Society is disappointed that there appears no flexibility in the 12 month marketing approach and still would like to see a more flexible and adaptable approach to prevent economic stagnation and missed opportunities.	Comments noted. This period is similar to other local Local Plans as well as other Local Plans of protected landscapes. It is not clear how marketing for 12 months would result in economic stagnation and missed opportunities as the site could be bought by someone else, through the marketing exercise, and any potential buyer could benefit the economy.	No change to policy.
PODM33: Development on waterside sites in employment or commercial use, including boatyards.	Dickon Povey	East Suffolk Council	Point 5. Guidance on what represents a 'comprehensive change' as opposed to any other change of use would be beneficial.	We will replace 'comprehensive' with 'significant' as that is a usual planning term. This will be judged on a case-by-case basis.	Replace 'comprehensive' with 'significant'.
PODM33: Development on waterside sites in employment or commercial use, including boatyards.	Dickon Povey	East Suffolk Council	The term 'The Design Guide', but the Broad's Authority has a number of active design guides to it is recommended that the full name of the guide is added when this is known.	Agreed.	When refer to Design Guide, check and be clear as to what Guide is being referred to.
PODM33: Development on waterside sites in employment or commercial use, including boatyards.	Dickon Povey	East Suffolk Council	Under criterion 4 and 5 it states that, 'only be permitted subject to a, b, c, d and e above'. However, the criteria above use numbers and not letters so this will need amending.	This refers to the on line version. The PDF version is correct and we will ensure numbering is correct of the HTML version.	Ensure HTML version matches PDF version.
PODM34: Retail development in the Broads	Naomi Chamberlain	Norfolk County Council	Policy 34 is supported in particular the reference to planning obligations which may be sought by the County Council.	Support noted.	No change to Local Plan.
PODM34: Retail development in the Broads	Paul Harris	Broadland and South Norfolk Councils	Welcome reference to cross boundary relationships and potential impacts on Council areas. Support reference to District Council requirements for town centre development in relevant Local Plans and most recent evidence.	Support noted.	No change to policy.
PODM34: Retail development in the Broads	Dickon Povey	East Suffolk Council	Reasoned justification: Paragraph 1 makes reference to the Oulton Broad District Centre. While this is not necessarily wrong it is important to note that this is a District Centre and not a town centre. As such it is lower in the hierarchy than a town centre and so provides a more limited range of shops and services.	Noted. And the text refers to this.	No change to policy.
PODM34: Retail development in the Broads	Dickon Povey	East Suffolk Council	Paragraph 2 needs refer to proposals for town centre uses within town centre development in town centres as designated by District Council Local Plans. This is to ensure consistency with NPPF paragraphs 91-93 and Waveney Local Plan policy WLP8.18 (New Town Centre Use Development). It is development that is located outside of town centres that should be subject to the sequential test.	Agreed - clarification would be useful .	Make part 2 clearer.
PODM34: Retail development in the Broads	Dickon Povey	East Suffolk Council	Paragraph 4 refers to 'a to d above'. This should be points 1 to 4. It also refers confusingly to 'settlements'. Should this really refer to town centres? National policy and Waveney Local Plan policy both refer to town centres, edge of centre locations and out of centre locations. In this context it isn't really clear what a settlement is. It also potentially repeats paragraphs 2 and 3.	This refers to the on line version. The PDF version is correct and we will ensure numbering is correct of the HTML version.  Regarding part 4 - agree, this is confusing and could repeat. We will assess this and improve accordingly.	Ensure HTML version matches PDF version.  Remove part 4 and put 4b in part 3.

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PODM34: Retail development in the Broads	Dickon Povey	East Suffolk Council	Paragraph 6 is a bit vague and should refer to town centres rather than settlements. It is not clear if it refers to development in the countryside, for example in the form of farm shops or shops which serve a village. If this is the case, then a separate policy may be more appropriate.	Agree. We mean in the countryside.	Remove 'settlements' and replace with 'countryside'.
PODM34: Retail development in the Broads	Dickon Povey	East Suffolk Council	Paragraph 7 could provide more information by referencing Historic England guidance. See also the North Lowestoft Heritage Action Zone Design Guide and the Historic Environment Supplementary Planning Document, which can be accessed via the following link. <a href="https://www.eastsuffolk.gov.uk/planning/planning-policy-and-localplans/supplementary-planning-documents/">https://www.eastsuffolk.gov.uk/planning/planning-policy-and-localplans/supplementary-planning-documents/</a> Both documents provide guidance about the restoration of historic shop fronts and include the type of guidance that could be prepared by the Broads Authority.	Noted. An internet search does not bring up any shop front guidance from Historic England. We will consider shop front guidance.	Consider shop front guidance. Amend policy as follows: 7. Proposals which seek to <u>enhance shopfronts or to</u> appropriately restore and/or put back traditional features on historic shop fronts will be particularly supported.
PODM34: Retail development in the Broads	Dickon Povey	East Suffolk Council	Bullet point 8 – The imposition of an article 4 directions could also be used to stop the conversion of a shop to another use.	Noted. We will consider this, but outside of the Local Plan.	Consider Article 4 Directions, but no change to Local Plan.
PODM34: Retail development in the Broads	Dickon Povey	East Suffolk Council	Reasoned justification: Beccles town centre is located on the edge of the Broads Authority area and also provides a range of shops and services. Reference could also be made to Bungay town centre.	Agree.	Refer to the retail area at Potter Heigham in first para. And say that some other centres are close to the Broads like Bungay and Beccles.
PODM34: Retail development in the Broads	Dickon Povey	East Suffolk Council	Reasoned justification. Paragraph 7 refers to the use of conditions to control changes of use within use class E. It might also be possible to introduce Article 4 directions for this purpose.	Noted. We will consider this, but outside of the Local Plan.	Consider Article 4 Directions, but no change to Local Plan.
PODM35 Sustainable tourism and recreation development	Dickon Povey	East Suffolk Council	It would be useful within the justification text to include additional guidance on the consideration of brownfield site. Within particular interest would be the geographical scope of the justification given the Broads large and often winding nature. Large scale brownfield sites are likely to be scarce in some places so any assessment should include particular reference to the needs of the site itself.	The policy reference does not relate to a particular sized scheme. This will be on a case-by-case basis and depends on the specifics of the scheme. An applicant can say how they addressed this policy requirement in their planning statement or other documentation that supports their application.	No change to policy.
PODM35 Sustainable tourism and recreation development	Dickon Povey	East Suffolk Council	Under criterion 3 the cycling and walking connections is fully supported. It is not clear whether the policy expects the connections to exist already or would encourage the developer to create such connections. Care will need to be taken that the development doesn't result in harmful increase in the numbers of cyclists and walkers (which will also include dog walkers) gaining access to vulnerable natural area.	Comment noted, but this is an example where the other policies of the plan will be considered, such as the transport policies and natural environment policies.	No change to policy.
PODM35 Sustainable tourism and recreation development	Dickon Povey	East Suffolk Council	For clarity, it would be helpful if the policy or justification text included a cross reference to the relevant mitigation policies (PODM16 and PODM17)	Agreed.	Refer to DM16 and DM17.
PODM35 Sustainable tourism and recreation development	Dickon Povey	East Suffolk Council	Under part 2 of the policy, consideration could also be given to the sustainability of construction.  Follow up: Part 2 talks of the principles of sustainable tourism so they may want to consider the additional of sustainable construction, but it's a minor point.	Noted, but there are many other policies in the Local Plan that will be of relevance to schemes that relate to sustainable construction.	No change to policy.
PODM35 Sustainable tourism and recreation development	Georgia Teague	Suffolk County Council	SCC welcome part b) sustainable travel	Support noted.	No change to policy.
PODM36: Holiday/tourism accommodation – new provision and retention	Dickon Povey	East Suffolk Council	We support the inclusion of any conditions that restrict year-round occupation or second homes. The policy says either a condition restricting sale on open market or a condition restricting use of the property for year-round occupation or as a second home. Would there be a situation where both conditions would need to be applied? If so, perhaps it should state and/or.	Agreed. Add and/or.	Add and/or.

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PODM36: Holiday/tourism accommodation – new provision and retention	Dickon Povey	East Suffolk Council	Support the inclusion of a definition of a second home in the justification text.	Support noted.	No change to policy.
PODM36: Holiday/tourism accommodation – new provision and retention	Dickon Povey	East Suffolk Council	It is not clear whether smaller hotels will require to show it is no longer viable albeit without a full marketing report.	Part 4 refers to hotels and guest houses. The policy does not differentiate between sizes.	No change to policy.
PODM37: Access to the water	Alasdair Hain-Cole	Environment Agency	We support the policy but also recommend guidance on Environmental Permitting Regulations (2010). We recommend the following paragraph is added to the ‘Reasoned Justification’ section: “Other consents that may also be required Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit33 from the Environment Agency 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 works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.” This paragraph is already included in the ‘Reasoned Justification’ section for PODM7 – page 62.	Agreed. We will add this paragraph.	Add paragraph to supporting text.
PODM37: Access to the water	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the inclusion of clause 1.d and recommend for consistency it is included in all other relevant policies in the Plan.	This wording is in other places. In the absence of specific suggestions, no action.	No change to policy.
PODM38: Bank stabilisation	Alasdair Hain-Cole	Environment Agency	We support the policy but also recommend guidance on Environmental Permitting Regulations (2010). Under ‘Reasoned Justification’, we recommend the following paragraph is added: “Other consents that may also be required Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit33 from the Environment Agency 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 works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.” This paragraph is already included in the ‘Reasoned Justification’ section for PODM7 – page 62.	Agreed. We will add this paragraph.	Add paragraph to supporting text.
PODM39: Moorings, mooring basins and marinas	Tessa Saunders	Anglian Water	Anglian Water agrees that proposals for moorings, particularly permanent moorings, should have adequate access to pump out facilities that connect to the main sewer (and available headroom at the receiving WRC) consistent with the requirements in Policy PODM4.	Support noted.	No change to policy.
PODM4 ‘Water Quality and Foul Drainage’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM4 ‘Water Quality and Foul Drainage’ – requires development to demonstrate that adequate sewage treatment provision to serve the development is available. It is considered inappropriate for this to become policy test.	Comments noted. This is a request from Anglian Water Services and you will find it in many other Local Plans. See also the comments that Anglian Water Services provide in response to this consultation. With the requirement to demonstrate nutrient neutrality, this is even more important.	No change to policy.
PODM4 ‘Water Quality and Foul Drainage’	Sarah Vergette	Broads Society	The Society still feels that there is a clear difference between ‘residential moorings’ and ‘liveaboards’ and although supportive of the Residential Mooring strategy set out in PODM45, there is still concern that the issue of ‘liveaboards’ is not dealt with adequately. In fact, the Local Plan fails to identify any difference between the two types of residential mooring. Liveaboards by their nature represent a more transient residential use of the waterways and this appears not to be catered for anywhere on the system which can lead to navigational and other safety issues. Although this type of migratory residential lifestyle is not a major issue, the Society feels that this is a lifestyle choice that needs some form of consideration if not regulation. It is felt that perhaps some form of mooring allocation in a few larger centres e.g. Wroxham, Oulton Broad, Beccles and Stalham would help to provide safer options for those choosing this form of residential use of the waterways.	Comment noted. If there is a specific issue somewhere in the Broads that needs to be looked at, please get in touch and we can do so. That being said, if a boat being lived upon is transient in nature, it does not need planning permission. If there is concern about a boat overstaying on 24 hour moorings, please let us know and we can look into it. Equally, if there is a boat moored somewhere and being lived on for a long period of time, again, let us know and we can look into it.	No change to policy.

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PODM4: Water quality and foul drainage	Alasdair Hain-Cole	Environment Agency	Policy PODM4: Water quality and foul drainage paragraph 1 states “Development will be permitted only 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”. While we are in support of this statement, we would encourage your authority to consider how any adverse impact will be assessed. An individual assessment for any and each prospective development may be a difficult to determine. In addition, it is worth considering that focusing on the risks of individual developments in isolation risks overlooking the cumulative impacts that may occur for multiple developments. A WCS or IWMS may assist your Authority establish what would constitute “adverse impact” within the Broads Area. If not possible as part of this Local Plan review, we would strongly recommend you undertake a WCS as part of the next iteration of your Local Plan. This will need to inform the strategic policies of the local plan on housing, non-housing development and infrastructure delivery. Due to the pressures on local water resources and the potential risk of deterioration from increased levels of abstraction, we would advise that any new development in the area aim for the highest levels of water efficiency. We also recommend that non-domestic demand and domestic demand be dealt with separately whenever possible.	Noted. We will produce a policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.	Produce new policy about protecting environmental quality and pollution and hazards in development and will include groundwater, source protection zones and contaminated land.
PODM4: Water quality and foul drainage	Alasdair Hain-Cole	Environment Agency	We support this policy and are pleased to see that the issues around Horning Knackers Wood Water Recycling Centre have been included, together with the joint position statement. While the “Reasoned Justification” text is very clear as to the requirements around foul drainage, we recommend amending the final line on page 45 to read “Constructed reed bed systems should only be formed where there is no negative impact on the wetland habitat of the Broads.”	Agreed. Add the word 'negative'.	Add the word 'negative'.
PODM4: Water quality and foul drainage	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy. However, in addition to any wider nutrient neutrality requirements for avoiding water quality impacts, we recommend a specific policy requirement for the assessment of run-off impacts on the water quality of the Broads from any new built development close to the water’s edge, either from new allocations or speculative development.	Noted. We are producing an environmental quality policy.	Produce environmental quality policy.
PODM4: Water quality and foul drainage	Dr Sarah Eglington	Norfolk Wildlife Trust	The supporting text states “As a minimum, our objectives are to ensure that there is no deterioration in water quality in the river and that the water quality thresholds set out in the Conservation Objectives for Habitat Sites continue to be met or bettered”. We recommend making this wording more ambitious and that the policy should state the explicit aim for the water quality to be improved, ideally through the promotion of nature-based solutions and restoration of floodplain natural habitats, potentially aligned with the ongoing work on the Nature Recovery Network for the county. We would be happy to meet the Broads Authority following the consultation to discuss this point further, if that would be considered helpful.	Comment noted. Betterment is included in the text. There are also other policies that address water quality such as boat wash down and Nutrient Enrichment.	No change to policy.
PODM4: Water quality and foul drainage	Sarah Morrison	Natural England	For point 5 relating to constructed reedbeds as a filtration method, Natural England refers you to Designing for Nutrient Neutrality in the Constructed Wetland Hub to offer advice on how to robustly evidence wetland creation to achieve nutrient neutrality.	Agreed. We will add reference to this.	Add reference to the Hub.
PODM4: Water quality and foul drainage	Tessa Saunders	Anglian Water	Anglian Water supports the policy approach in terms of foul drainage and adequate sewage provision. Anglian Water is not a statutory consultee for planning applications; however, we will comment on planning applications for major development as defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015. We would encourage developers to contact Anglian Water regarding connections at the earliest opportunity. Details are available on our website <a href="https://www.anglianwater.co.uk/developing/drainage-services/connect-to-sewer-network/">https://www.anglianwater.co.uk/developing/drainage-services/connect-to-sewer-network/</a> We welcome the policy requirement regarding Horning Knackers Wood WRC and the explanation of the supporting text - we would also request that a link is provided to the Anglian Water Statement of Fact in addition to the Joint Statement so that a comprehensive viewpoint is provided. Furthermore, we suggest that Policy PODM4 also references the appropriate policy measures required for new permanent mooring sites and the need to ensure that there are adequate facilities (and available headroom at the receiving WRC) for the pump-out of holding tanks in house-boats.	Agree regarding reference to liaising with AWS.  The Joint Position Statement includes the Statement of Fact.  Agree re reference to resi mooring sites and pump out.	Refer to liaising with AWS.  No change to local plan re statement of fact.  Refer to resi moorings and pump out.
PODM40: The Impact of Replacement Quay Heading on Navigation	Sarah Vergette	Broads Society	The Society supports the approach put forward in Policy PODM40: The Impact of Replacement Quay Heading on Navigation in that it will be looked at on a case by case basis.	Support noted.	No change to policy.
PODM42 – Affordable Housing	Dickon Povey	East Suffolk Council	The approach to referring to the relevant district Council policies on affordable provision on major developments is supported. The relevant policy in the Waveney Local Plan is Policy WLP8.2, with further guidance provided in the 2022 East Suffolk Affordable Housing Supplementary Planning Document.	Support noted.	No change to policy.



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PODM42 – Affordable Housing	Dickon Povey	East Suffolk Council	For absolute clarity, footnote 129 should be clear that it is currently the Waveney Local Plan that is relevant (and not other policies of East Suffolk Council as set out in the Suffolk Coastal Local Plan).	Agree. We will clarify in the supporting text.	Refer to the Waveney Local Plan in the supporting text.
PODM42 – Affordable Housing	Dickon Povey	East Suffolk Council	East Suffolk Council adopted an Affordable Housing Supplementary Planning Document in 2022. This contains guidance which will help to support the implementation of a number of areas of Policy PODM42, and it is understood that the SPD has been endorsed by the Broads Authority.	Noted. We do refer to 'adopted standards and policies of the relevant district council' so that SPD is covered.	No change to policy.
PODM42 – Affordable Housing	Dickon Povey	East Suffolk Council	In terms of the tenure of affordable housing, the Affordable Housing SPD sets out the Council's approach to the provision of First Homes, which were introduced as a new tenure of affordable housing in 2021.	Noted. We do refer to 'adopted standards and policies of the relevant district council' so that SPD is covered.	No change to policy.
PODM42 – Affordable Housing	Dickon Povey	East Suffolk Council	Guidance is provided through the First Homes Planning Practice Guidance, with a requirement for at least 25% of affordable housing delivered through planning obligations to be First Homes. The SPD explains that, under policy WLP8.2 in the Waveney Local Plan area, the affordable housing requirement will be expected to be split 25% First Homes and 50% affordable rent, with an expectation that shared ownership would also still be provided.	Noted. We do refer to 'adopted standards and policies of the relevant district council' so that SPD is covered.	No change to policy.
PODM42 – Affordable Housing	Dickon Povey	East Suffolk Council	In terms of commuted sums, the SPD explains that commuted sums will be calculated based on the serviced open market plot values for the size of dwellings that would have been required on site and that the Council annually updates the evidence of open market plot values.	Noted. We do refer to 'adopted standards and policies of the relevant district council' so that SPD is covered.	No change to policy.
PODM42 – Affordable Housing	Dickon Povey	East Suffolk Council	The Council supports that the Broads Authority has endorsed the Affordable Housing Supplementary Planning Document, and it is recommended that specific reference is made to the SPD in the supporting text for Policy PODM42.	Noted. We do refer to 'adopted standards and policies of the relevant district council' so that SPD is covered.	No change to policy.
PODM42 – Affordable Housing	Sam Hubbard	Great Yarmouth Borough Council	The preferred approach of requiring the delivery of affordable housing in line with Borough Council's standards is supported as is the approach in circumstances where departures from such delivery may be justified. Some Neighbourhood Plans without the Borough contain their own policies regarding housing mix and affordable housing tenures which should be recognised under criterion '1'. Consideration should be given as to whether the wording could be revised to "policies of the relevant district council's or Neighbourhood Plan's". Please see the above point with regard to 'district/borough council' phrasing.	Noted and agreed.	Make change in line with comment to refer to Neighbourhood Plans.
PODM42: Affordable housing	Member of public at drop in event.	Member of public	Is short term letting for AirBNB (taking housing out) likely to need control in hotspots? Have an article 4 direction?	There was a consultation by the Government: <a href="https://www.gov.uk/government/consultations/consultation-on-a-registration-scheme-for-short-term-lets-in-england/consultation-on-a-registration-scheme-for-short-term-lets-in-england">https://www.gov.uk/government/consultations/consultation-on-a-registration-scheme-for-short-term-lets-in-england/consultation-on-a-registration-scheme-for-short-term-lets-in-england</a> . They have also published their proposed next steps: <a href="https://www.gov.uk/guidance/delivering-a-registration-scheme-for-short-term-lets">https://www.gov.uk/guidance/delivering-a-registration-scheme-for-short-term-lets</a>	This is a national issue, so we await what the Government propose.
PODM42: Affordable housing	Paul Harris	Broadland and South Norfolk Councils	The Council supports the reference to affordable housing requirements as set by relevant district Council.	Support noted.	No change to policy.
PODM43: Residential development within defined Development Boundaries	Dickon Povey	East Suffolk Council	This approach is supported.	Support noted.	No change to policy.
PODM43: Residential development within defined Development Boundaries	Dickon Povey	East Suffolk Council	Development Boundary for Oulton Broad section. Presumably this means to say: '...and a site-specific flood risk assessment may be required...	Agreed. Will amend text.	Amend text to refer to 'site-specific'

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PODM43: Residential development within defined Development Boundaries	Paul Harris	Broadland and South Norfolk Councils	The Council supports the approach to focusing development within areas with services.	Support noted.	No change to policy.
PODM43: Residential development within defined Development Boundaries	Tessa Saunders	Anglian Water	Anglian Water agrees with the aims of the policy and the need to be consistent with other policies in the plan. We acknowledge that the statement in the supporting text that "development could be acceptable, notwithstanding other policies, constraints and material considerations", would address our key concerns around flood risk, infrastructure capacity, and resilience over the longer term. We agree with the justification for not including a development boundary for Horning in Development Boundary Topic Paper (updated August 2023) - however, it would be helpful to provide a link to the Anglian Water Statement of Fact, in addition to the Joint Position Statement to provide a complete factual position for Horning and capacity at the WRC.	The policy does not refer to Horning. It is assumed that the suggestion relates to the Topic Paper. The Topic Paper already refers to the Joint Position Statement. And the Joint Position Statement is referred to in the Local Plan. The Statement of Fact is referred to in the Joint Position Statement.	No change to Local Plan.
PODM44: Gypsy, Traveller and Travelling Show People	Alasdair Hain-Cole	Environment Agency	We support the policy and recommend an additional paragraph to better highlight development considerations in locations of flood risk. We recommend the following text is added to the “Reasoned Justification” under sub paragraph ‘Locations of sites’: “Where development is proposed in a location at flood risk, development must comply with national policy and the requirements set out in policy PODM7 Development and flood risk.”	Agree. Add this to the supporting text.	Add this wording to the supporting text.
PODM44: Gypsy, Traveller and Travelling Show People	Alasdair Hain-Cole	Environment Agency	We recommend the following text is added to the “Reasoned Justification” under sub paragraph ‘Locations of sites’: “Where development is proposed in a location at flood risk, development must comply with national policy and the requirements set out in policy PODM7 Development and flood risk. “	Agree. Add this to the supporting text.	Add this wording to the supporting text.
PODM44: Gypsy, Traveller and Travelling Show People	Dickon Povey	East Suffolk Council	It is noted that there will be an assessment of need commencing April 2024, and that this will inform the next version of the Local Plan, (i.e. the Regulation 19 pre-submission version). We would be pleased to engage with this work, as needed and appropriate.	Noted. As and when consultants are commissioned, they may well engage with all our districts.	No change to Local Plan.
PODM44: Gypsy, Traveller and Travelling Show People	Dickon Povey	East Suffolk Council	In the meantime, the approach set out in the policy, to provide for Gypsy and Traveller accommodation to meet an identified need, is welcomed. Consideration could be given to the wording of criterion u) which would better refer to proposals not adversely impacting rather than ‘sites are not proposed which will...’.	Agreed. We will amend u to make it read better.	Improve criterion u.
PODM44: Gypsy, Traveller and Travelling Show People	Georgia Teague	Suffolk County Council	SCC supports the concept of this policy.	Support noted.	No change to policy.
PODM44: Gypsy, Traveller and Travelling Show People	Member of public at drop in event.	Member of public	Does the definition of a 'traveller' include a liveaboard - someone who lives on a boat rather than in a caravan?	No. Those who live on boats and not included in the assessment of and related sections of the local plan that refer to gypsy and travellers and travelling show people. Those who live on boats are separate.	No change to policy.
PODM45: New residential moorings	Alasdair Hain-Cole	Environment Agency	We support the amended policy, which better highlights the requirement for a Flood Risk Assessment than the equivalent 2019 policy (DM37). We require an additional paragraph to reflect additional consents required under Environmental Permitting Regulations 2010. We also recommend links are added to necessary relevant policies. We recommend the following paragraph be added to the “Flood Risk” subparagraph of the ‘Reasoned Justification’ section: “Other consents that may also be required Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit <sup>33</sup> from the Environment Agency 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 works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.” This paragraph is already included in the ‘Reasoned Justification’ section for PODM7 – page 62.	Agreed. We will add this paragraph.	Add paragraph to supporting text.

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PODM45: New residential moorings	Alasdair Hain-Cole	Environment Agency	We also recommend including a reference to the relevant related policies in this section, as follows: “See relevant Policy PODM7 (development and flood risk) and PODM21 (land raising)”. PODM21 seems to be relevant as the Reasoned Justification to that policy states “. Dredgings or material imported or won on site (for example resulting from a new mooring basin) may be disposed of on-site and the land raised. Such land management to maintain land levels is a historic practice in the Broads.”	We will refer to PODM7. As for PODM21, most residential moorings allocations and permissions are on moorings already in place. If a new basin were to be made, then lots of policies will come in to play that are relevant. It is not proposed to list all of the relevant policies.	Refer to PODM7.
PODM45: New residential moorings	Alasdair Hain-Cole	Environment Agency	We support the inclusion of the policy’s a requirement for permanent residential moorings to make “adequate provision for waste, sewage disposal and the prevention of pollution”. We have several examples of vessels polluting with sewage so the more facilities they can access, the better the water quality will be.	Support noted.	No change to policy.
PODM45: New residential moorings	Alasdair Hain-Cole	Environment Agency	While we note the “Reasoned Justification” explains that houseboats are not considered to be vessels for the purposes of this policy and states that any such proposals will be dealt with on a case-by-case basis, we strongly recommend a similar requirement for adequate sewage disposal on site also be applied to houseboats. This is particularly important as houseboats are not able to navigate to other sites to dispose of their sewage. They should be required to provide evidence of adequate sewage disposal before permission to moor is granted. For example, a large containment tank with a proven arrangement for collection by a sewage collection boat etc with the requirement to retain evidence for at least 6 years of adequate legal disposal. We wish to emphasise the importance of ensuring a requirement for adequate sewage disposal also applies to houseboats. While the current wording suggests that “may” happen (“This policy on residential moorings may be used to help determine the acceptability and suitability of such schemes”), we consider it extremely important that it does. So you could include a sentence at the end of the Houseboats and lodges or other structures that float section to state that houseboats etc will be required to provide evidence of adequate sewage disposal (for example, a large containment tank with a proven arrangement for collection by a sewage collection boat etc with the requirement to retain evidence for at least 6 years of adequate legal disposal).	Agreed. We will add the suggested sentence.	Add the suggested wording to the text.
PODM45: New residential moorings	Dickon Povey	East Suffolk Council	The approach to meet the identified need for moorings is supported.	Support noted.	No change to policy.
PODM45: New residential moorings	Dickon Povey	East Suffolk Council	The Council welcomes the continued allocation at Somerleyton under Policy SOM1 in providing a contribution to meeting the need. Given the overall need for moorings has declined from 63 to 48 moorings, it would be helpful to have clarity on the increase to up to 15 moorings at Somerleyton, from up to 10 in the current Local Plan policy SOM1. As the moorings would come forward alongside the existing uses, it will be important to ensure the adequate residential amenity of future residential occupants. It is acknowledged that this allocation is carried over from the current plan and that it hasn’t yet come forward. This position should therefore be monitored to understand whether and when the moorings may come forward, to address the identified needs.	Somerleyton Estate requested the number be increased from 10 to 15. This has been assessed and stakeholders asked for comment. See the HELAA produced to accompany the Local Plan. All applications will be assessed against relevant Local Plan policies and the Amenity policy is a key policy.	No change to policy.
PODM45: New residential moorings	Dr Sarah Eglington	Norfolk Wildlife Trust	With regards to clause 1e ii, for consistency, we recommend that the same wording is used within this policy as for the previous one (PODM44): “Sites are not proposed which will adversely impact on protected species, priority habitats and designated wildlife sites”. As currently worded, (“protected species, priority habitats and Habitat Sites”) locally designated wildlife sites would not be taken into account.	Agree. Add reference to other designated wildlife sites.	Add reference to other designated wildlife sites.
PODM45: New residential moorings	Tessa Saunders	Anglian Water	We support the approach taken in this policy but note there is also considerable repetition in the plan regarding moorings and their requirements. We suggest that there might be an opportunity for some rationalisation and consolidation of policies with cross-references to relevant policies where appropriate, given that the Plan must be read as a whole, with all relevant policies considered when submitting a planning application.  Follow up: I was referring to other policies on moorings such as Policy PODM39, so that Policy PODM45 could be rationalised and cross reference as applicable e.g. in terms of sewage disposal and wastewater pump out which is mentioned twice in PODM45 but are also requirements in PODM39.	Noted. Whilst we note there may be repetition, the repetition is consistent and it is better to repeat something than not have it considered.	No change to Local Plan.

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PODM45: New residential moorings	Member of public at drop in event.	Member of public	What about affordable residential moorings?	Generally, the affordable housing approach applies to land base dwellings. The marina owner of any site would need get a Registered Provider involved and buy the boat for someone to live on. This is different to building an affordable house, especially as a house needs to be built to a certain standard - building regulations. Registered Providers have minimum space standards and energy-efficiency obligations; query if these could be achieved in a boat. As for specifying standards in a S106 agreement this may be difficult. Further, the NPPF says affordable homes must not cost more than 80% of market price/rent; there is no known market rent for a boat. Finally, the design life of a boat is likely to be much less than bricks & mortar.	No change to policy.
PODM45: New residential moorings	Member of public at drop in event.	Member of public	Use affordable housing offsite contributions in the BA area rather than going in a pot for use anywhere by the district?	We think this is a case of considering the greater good the money can achieve. This is because there are not many schemes in the Broads that result in onsite or offsite affordable housing. So it could take time for the funds to build up to be enough to deliver a house. After a certain period of time, if planning obligations money is not spent, we need to give it back. So if we insisted on this money being spent in the Broads, it could sit there for a long time and might never be spent.	No change to policy.
PODM46: Permanent and temporary dwellings for rural enterprise workers (caravans and FZ3)	Alasdair Hain-Cole	Environment Agency	We support the requirement for no caravans or mobile homes in Flood Zone 3, as set out in point 4 o). We recommend some amendments to the ‘Reasoned Justification’ section due to the omission of integral flood risk information and links to national guidance and associated policies. Existing paragraph: “The NPPG lists caravans and mobile homes for permanent occupation as a ‘highly vulnerable’ use. Accordingly, a proposal to site a caravan or mobile home in an area defined as being within Flood Zone 3 will be contrary to the NPPG on flood risk.” Recommended paragraph: “The NPPG categorizes caravans and mobile homes intended for permanent residential use as ‘highly vulnerable’ development. As per national policy, any development in Flood Zone 3 is not permitted. Development in Flood Zone 2 is only allowed when both the Sequential Test and the Exception Test have been successfully passed. As stated in Footnote 59 of the National Planning Policy Framework (NPPF), a site-specific Flood Risk Assessment is required in Flood Zone 2 and Flood Zone 1 in specific cases. See related policy, PODM7 (development and flood risk).	Agreed. We will replace the text with the suggestion.	Replace the text with the suggested text.
PODM47 Elderly and specialist needs housing	Dickon Povey	East Suffolk Council	The inclusion of the policy supporting the provision of accommodation for the elderly and those with specialist needs is supported, and in particular supporting such uses in locations where they are accessible to services and facilities.	Support noted.	No change to policy.
PODM47 Elderly and specialist needs housing	Dickon Povey	East Suffolk Council	The policy refers to proposals being designed to use water efficiently. It isn’t clear however how this is expected to be implemented, and for residential uses it would be preferable to refer to the requirement for 110 litres per person per day as set out in Policy PODM6 ‘Water efficiency and re-use’.	Agreed, for the residential element, we will refer to DM6.	Clarify water efficiency part of policy.
PODM47 Elderly and specialist needs housing	Georgia Teague	Suffolk County Council	SCC support part 1 of this policy in particular, and welcome reference to an ageing population in the supporting text.	Support noted.	No change to policy.
PODM47 Elderly and specialist needs housing	Georgia Teague	Suffolk County Council	SCC supports this policy, and part 1 especially. Reference to the ageing population in the supporting text is welcomed.	Support noted.	No change to policy.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
PODM48: Residential ancillary accommodation (annexes)	Alasdair Hain- Cole	Environment Agency	We support the amended policy, which highlights design and flood risk where it previously did not. We suggest a new paragraph is added under ‘Reasoned Justification’ to highlight specific flood risk information associated with the development permission (point 3). Recommended paragraph: “Development proposals for new residential ancillary accommodation proposed in an area of flood risk must adhere to the national development guidance, NPPF and NPPG. The NPPG, Paragraph 5, states a development must be safe for its lifetime by ensuring the safety of residents and users. Residential developments must provide safe access and egress in a design event and safe evacuation before an extreme flood (0.1% annual probability of flooding with allowance for climate change). Where flood risk cannot be avoided, mitigated or controlled, the development may require Emergency Flood Plans to manage flood risk. See the guide by ADEPT and the Environment Agency September 2019194 .”	Agree. Add this to the supporting text.	Add this wording to the supporting text.
PODM48: Residential ancillary accommodation (annexes)	Alasdair Hain- Cole	Environment Agency	We also recommend a minor amendment to policy point 7a) - replacing “flood risk” with “flood risk (see policy PODM7- development and flood risk)”. This is to link existing policy information together.	Agree. Add reference to the flood risk policy.	Add reference to the flood risk policy.
PODM48: Residential ancillary accommodation (annexes)	Dickon Povey	East Suffolk Council	This policy is supported and the guidance in the supporting text is considered to be very useful.	Support noted.	No change to policy.
PODM49: Replacement dwellings	Alasdair Hain- Cole	Environment Agency	We agree with the overall amended policy. We fully support the text stating abandoned residential dwellings will be being assessed as new build residential dwellings, an area which is regularly queried between the EA and LPA.	Support noted.	No change to policy.
PODM49: Replacement dwellings	Alasdair Hain- Cole	Environment Agency	We recommend an adjustment to the wording of policy point 3e) to strengthen the position on flood risk and link the information to relevant policies. Point 3 e) suggests the replacement dwelling could be located elsewhere within the curtilage, “which would be at a lower risk of flooding OR would provide benefits for landscape, wildlife, or cultural heritage...”. We strongly recommend this wording is revised as it leaves open to interpretation the possibility of a choice, or “trade-off”, between flood risk and environmental benefits. The “Reasoned Justification” sets this requirement out in a more satisfactory manner, stating: “The replacement dwelling should be sited on or close to the existing footprint of the building unless the benefits that may be achieved for flood risk, landscape character, wildlife or cultural heritage can justify the replacement dwelling to be sited in an alternative location.”	Agreed. We will replace the text with the suggestion.	Replace the text with the suggested text.
PODM49: Replacement dwellings	Alasdair Hain- Cole	Environment Agency	We support inclusion of the requirement to ‘justify’ siting the replacement dwelling in an alternative location in this sentence.	Support noted.	No change to policy.
PODM49: Replacement dwellings	Alasdair Hain- Cole	Environment Agency	We also recommend the following text is included towards the bottom of the “Reasoned Justification” section: “See Policy PODM7 for development and flood risk”	Agree. Add this to the supporting text.	Add this wording to the supporting text.
PODM49: Replacement dwellings	Dickon Povey	East Suffolk Council	Does the term footprint apply to the size or location (or both) of the original dwelling? It would be helpful to be clearer on this point. The policy does not seem to restrict increases in size of the replacement dwelling, subject to the criteria in part 3. Are there any aspirations to limit the increase in size of a replacement dwelling to help prevent a prevalence of large homes (e.g. For affordability or landscape character reasons), or are the design criteria considered to be robust enough?	Regarding footprint, this criterion has been amended following another comment and is hopefully clearer.  Regarding increase in size, this policy and the design policy together will ensure the building fits into the context of the area. We need to also factor in that sometimes replacement dwellings are for holiday homes. Flood risk will also curtail/guide the size of the dwelling, although may increase the height in order to address resilience. Replacements dwellings do tend to be larger than the existing. The increase in size varies compared to each building. The design Guide and Codes will also address development relating to its context.	No change to policy.
PODM5: Boat wash down facilities	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy which aims to reduce water pollution and improve biosecurity.	Support noted.	No change to policy.

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PODM50 Self build	Dickon Povey	East Suffolk Council	Including a policy addressing custom and self-build housing is to be commended. The policy is similar to those set out in East Suffolk Council's two Local Plans (policies WLP8.3 and SCLP5.9). However, there are a few detailed matters set out below that we believe are worthy of consideration.	Support noted.	No change to policy.
PODM50 Self build	Dickon Povey	East Suffolk Council	Under 'provision of plots on large/multi-dwelling sites' criterion 2, sub criterion 3, reference is made to securing 'sufficient space to build without compromising neighbouring properties. This is a sensible requirement, however it could go further in setting a minimum distance between building areas on each plot, such as 1 or 2 metres.	Agreed. Will amend text.	Add this text to 3c: This will be judged on a case-by-case basis, but a space of 1 or 2 metres between buildings on each plot could be acceptable
PODM50 Self build	Dickon Povey	East Suffolk Council	Under 'provision of plots on large/multi-dwelling sites' criterion 2, sub criterion 4, reference to made to the provision of a 'design code or plot passport'. In practice, both the design code and plot passport are prepared. The design code is prepared across all the CSB plots, and a corresponding plot passport that sets out the key design parameters (as set out in the design code) for each plot. Thus, further consideration of the wording of sub-criterion 4 may be desired.	Agreed. Will amend text.	Replace or with and and add a footnote with similar text as per the representation.
PODM50 Self build	Dickon Povey	East Suffolk Council	Under 'unsold plots', criterion 1, it is not clear what is meant by 'criteria (a)-(d)' and 'e) and f) and g)' as all criterion within the policy are numbered. It is assumed reference is being made to criterion 2 sub criteria 1-4, and under 'unsold plots' criterion 1, sub criterion 1-3.	Noted. You were looking at the HTML version and as you have identified, the numbering between the HMTL and PDF versions is inconsistent.	Ensure numbering is consistent between PDF and HTML version
PODM50 Self build	Georgia Teague	Suffolk County Council	Please note that all parking should still adhere to Suffolk Guidance for Parking (when in Suffolk).	Noted.	No change to policy.
PODM51 'Design'	Helen Binns	Walsingham Planning on behalf of Greene King	BODM51 'Design' – requires, amongst other things, mature trees and landscape features to be a focal point in site layout and schemes to address Secured by Design Standards and be line with Crime Prevention Through Environmental Design. In many cases neither of these requirements will be achievable in practical terms and thus development will be unable to satisfy this policy.	We are requiring developers to demonstrate the impacts of their proposals on the environment and communities. We would in all cases consider any justification for not addressing certain requirements.	No change to policy.
PODM51 'Design'	Sandra Squire	Forestry Commission	We also note the recommendation for the use of timber as a sustainable material under PODM41 for quay headings and landing stages etc, but could find no similar recommendation for general development.  In line with the Government's 25 Environment Plan (Page 47), the "Timber in construction" roadmap and the Net Zero Strategy, the use of home grown timber used in construction as a sustainable building material could be promoted via the Local Plan, therefore reducing the embodied carbon emissions of new build properties.  Policy PODM51 – Design (g – detailed design and materials) mentions sustainable materials, but that could be expanded to mention home grown timber as an example.	Agreed.	Add reference to home grown timber.
PODM51 Design	Andrew Marsh	Historic England	Noted.	Noted.	No change to policy.
PODM51 Design	Dickon Povey	East Suffolk Council	Under the permeability criterion, reference is made to the importance of promoting permeability and accessibility, which is supported. However, you may want to consider taking this further and highlighting the importance of prioritising the most vulnerable users (e.g. pedestrians, disabled people) particularly at the intimate scale of developments. Thus, layouts should be designed to prioritise cycling, walking and wheeling movements over vehicle movements, especially on low order streets. This principle is set out in the Suffolk Design Streets Guide.	Agreed. Will amend text.	Amend text in line with comment.
PODM51 Design	Georgia Teague	Suffolk County Council	SCC welcome the references landscape character, trees and other landscape features.	Support noted.	No change to policy.

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PODM51 Design	Georgia Teague	Suffolk County Council	<p>SSC is supportive of this policy, and in particular of part i) regarding adaptability. However, it is suggested that this policy could go further, and set stronger requirements for M4(2) and M4(3). It is noted that the supporting text makes reference to the ageing population of the Broads area, and that almost a quarter of the Broads population say that their daily activities are limited. This indicates the need for adaptable and accessible homes. The supporting text regarding dementia and design is welcomed, as is reference to Building for Healthy life.</p> <p>Follow up: Other Local Plans in Suffolk have gone further and had higher requirements for a percentage of M4(2) &amp; M4(3) housing: -<del>B</del>MS JLP part 1 policy LP24 design and residential amenity = at least 50% M4(2) -<del>A</del>adopted 2019 Waveney LP policy WLP8.31 Lifetime Design = 40% M4(2) on proposals of 10 or more dwellings  -<del>A</del>adopted Suffolk Coastal LP policy SCLP5.8 Housing Mix = at least 50% M4(2) on proposals of 10 or more  -<del>T</del>he Submission version of the West Suffolk LP policy LP21 Housing type and tenure, = All new homes M4(2), 13% M4(3)</p> <p>The plan indicates that there is an ageing population, and we would suggest that requiring higher provisions of M4(2) / M4(3) in policy could help to meet the needs of an ageing population.</p>	Noted. Out threshold is 5 dwellings so in a way that is going further than some of the examples given. We will ask the viability consultants to assess other thresholds. Also note that the Government intended to change building regulations, although there is now a general election set to happen.	Assess different thresholds and % through viability assessment.
PODM51 Design	Georgia Teague	Suffolk County Council	It is suggested that this policy should include reference to Suffolk Guidance for Parking, and the Suffolk Design Streets Guide8, in the Guidance section of supporting text. See <a href="https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas">https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas</a>	Agreed. Add reference.	Add reference to parking standards.
PODM51 Design	Sarah Morrison	Natural England	Natural England welcomes the reference to high design quality, particularly given that the Broads is a Protected Landscape. We welcome the reference to landscape character, and recommend that in addition to its stance with respect to local character and distinctiveness revealed in part through neighbourhood and local landscape character assessment, the Plan also references character and distinctive features as they have been assessed regionally (e.g. Regional Landscape Typology) and nationally (e.g. The National Character Area Profiles).	Agreed. We will add reference to this.	Add a footnote along the lines of the comment.
PODM51 Design	Tessa Saunders	Anglian Water	We support the policy aims for design particularly those that relate to safeguarding on site utilities infrastructure, sustainable design including water efficiency measures, and flood risk and resilience. This reflects earlier comments on similar policy themes.	Support noted.	No change to policy.
PODM52 ‘Source of Heating’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM52 ‘Source of Heating’ – requires new buildings to be heat pump or hydrogen ready and for existing buildings improve the method of heating following a hierarchy. GK do not consider this to be a planning matter or an issue for consideration as part of the determination of an application for planning permission. Rather it is a matter for Building Regulations.	<p>We have checked this against building regulations, in particular Part L. Part L says this: 25A. (1) Before construction of a new building starts, the person who is to carry out the work must analyse and take into account the technical, environmental and economic feasibility of using high-efficiency alternative systems (such as the following systems) in the construction, if available— (a) decentralised energy supply systems based on energy from renewable sources; (b) cogeneration; (c) district or block heating or cooling, particularly where it is based entirely or partially on energy from renewable sources; and (d) heat pumps.</p> <p>We consider the policy supplements the thrust of Part L building regulations.</p>	No change to policy.
PODM52 ‘Source of Heating’	Sarah Vergette	Broads Society	The Society still has some concerns about the proscribed approach for new buildings as illustrated in PODM52 (2) but generally supportive of the overall hierarchy.	Noted.	No change to policy.
PODM52: Source of heating	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy, in particular the statement that oil heating of new builds and replacement dwellings will not be supported. We recommend that the wording of the policy is strengthened from being an ‘encouragement’ policy to being a mandatory requirement.	Noted. We will review and check and amend wording as required.	Check wording and improve as appropriate.

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PODM53 ‘Heat Resilient Design’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM53 ‘Heat Resilient Design’ – all schemes for new buildings are required to demonstrate they are heat resilient and explore green roofs and walls. If insisted upon it is likely to adversely impact viability.	We are requiring developers to demonstrate the impacts of their proposals on the environment and communities. We would in all cases consider any justification for not addressing certain requirements. We are also going to check this policy against Part O building regulations.	Check policy against building regulation.
PODM53: Heat resilient design	Dickon Povey	East Suffolk Council	There is no reference to Building Regulation Approved Document O: Overheating (June 2022). It would be helpful to know if the policy is setting standards higher or in some way different to Building Regulations.	Point noted. Part O applies to new residential only so this policy could address overheating of other buildings. We could amend it to not apply where part O applies. That being said, Part O does not seem to refer to shading of public spaces and green roofs or walls. We will re-jig the policy in light of this comment.	Add statement requirement. Weave in part O. Weave in that shading and green roofs and walls apply even to buildings subject to part O.
PODM53: Heat resilient design	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy, in particular clause 3 about the use of green roofs/walls. However, as written, this clause does not read well and we recommend re-wording. We suggest including the following at the start of the clause: 3. Proposals for new buildings must demonstrate, commensurate with the scale and location of the proposal, consideration of the potential to include a green roof/walls .....”	Agreed.	Intro text to be added to this part of the policy.
PODM53: Heat resilient design	Georgia Teague	Suffolk County Council	SCC supports the policy principle, as research has indicated that older people are often more vulnerable to extreme heat events 3. See <a href="https://www.gov.uk/government/publications/hot-weather-and-health-supporting-vulnerable-people/supporting-vulnerable-people-before-and-during-hot-weather-social-care-managers-staff-and-carers#:~:text=Older%20people%20and%20those%20with,higher%20risk%20of%20becoming%20unwell.">https://www.gov.uk/government/publications/hot-weather-and-health-supporting-vulnerable-people/supporting-vulnerable-people-before-and-during-hot-weather-social-care-managers-staff-and-carers#:~:text=Older%20people%20and%20those%20with,higher%20risk%20of%20becoming%20unwell.</a>	Support noted.	No change to policy.
PODM54 ‘Non-Residential Development and BREEAM’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM54 ‘Non-Residential Development and BREEAM’ – requires all non-residential development over 250 sq. m to achieve a minimum of BREEAM Very Good unless it can be shown not to be viable. Development is also required to achieve 3 credits in BREEAM Wat 01. Based on extensive experience, such requirements will place an unaffordable cost burden on modest sized developments and will render them unviable.	This is being tested through the viability assessment and we await the conclusions from that.	Await the viability assessment.
PODM54: Non-residential development and BREEAM	Alasdair Hain-Cole	Environment Agency	We support policy PODM54: Non-residential development and BREEAM, which requires the high standard of “Very Good” for new proposals above 250 sqm floor space. While the “Reasoned Justification” rules out focussing just on the water element of BREEAM, as is the case in the 2019 Plan, we recommend that the policy is extended to require development of 1000 sqm gross floor area or more meet the BREEAM “Excellent” standards for water consumption. Older buildings are often the least efficient in resource use, as a result, we recommend that a policy is developed to require the retrofitting of existing buildings where opportunities arise through refurbishments and changes of use. There are several BREEAM Technical Standards documents to support retrofitting for commercial and residential buildings.	Noted and agree. We will add non-residential development above 1,000sqm floor space must achieve 5 credits in BREEAM category Wat 01. This will however be tested through the viability assessment.	Add: non-residential development above 1,000sqm floor space must achieve 5 credits in BREEAM category Wat 01 if viability assessment allows.
PODM54: Non-residential development and BREEAM	Dr Sarah Eglington	Norfolk Wildlife Trust	We note that this policy states that “Development must achieve 3 credits in BREEAM category Wat 01”. We recommend that the requirement is for all new non-residential development to gain full credits related to category Wat 01 of BREEAM. This equates to a 55% improvement over baseline water consumption figures. This approach has been taken in the Cambridge local plan (Policy 28: Carbon reduction, community energy networks, sustainable design and construction and water use) so we recommend consulting this document for appropriate wording and supporting text.	Noted. We will add non-residential development above 1,000sqm floor space must achieve 5 credits in BREEAM category Wat 01. This will however be tested through the viability assessment.	Add: non-residential development above 1,000sqm floor space must achieve 5 credits in BREEAM category Wat 01.
PODM54: Non-residential development and BREEAM	Tessa Saunders	Anglian Water	Anglian Water can no longer guarantee to supply non-domestic water requirements for intensive/high water consumptive uses such as manufacturing/ food processing and production. Our regulatory position means we are unable to supply new non-domestic demands if this jeopardises domestic supplies for existing and new residential customers and businesses. As a result of limited water availability, we are undertaking more modelling and decisions on non-household growth looking at available headroom in the water resource zones. We are looking to work together with new or expanding non-household users that are requesting significant non-domestic water supplies to find solutions such as opportunities for water recycling, reuse, and final effluent reuse. Longer term supply options are dependent on bringing forward two new reservoirs in Lincolnshire and Cambridgeshire, among other options such as desalination and water reuse.	Background information noted. Also see next comment.	No change to Local Plan. See next comment.



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PODM54: Non-residential development and BREEAM	Tessa Saunders	Anglian Water	Future household and non-household developments will need to rise to the challenge of saving and delivering water for their schemes, driving forward innovative solutions, and exploring the full range of water efficiency, re-use, and offsetting options to ensure their developments are sustainable and significantly reduce reliance on potable water demand. We are supportive of the approach taken by this policy to ensure that economic growth can be delivered sustainably in The Broads to ensure that water efficient measures are implemented in new employment buildings by requiring developments to achieve 3 out of the 5 credits available in the BREEAM water calculator for water consumption. We would agree with the alternative suggestion that further investigation should be undertaken into the viability of requiring the full number of credits in the BREEAM water calculator. However, the BREEAM measure alone is unlikely to address factors in relation to major non-household developments that require significant non-domestic water use - in such circumstances we recommend that a Water Resources Assessment should be prepared, undertaking early discussions with the relevant water company to ascertain water availability and feasibility of their scheme, and demonstrating innovative solutions to reduce water demands.	Background information noted. The alternative option was to require excellent standard. See also comment from EA on this policy. We will add a criterion that says non-residential development above 1,000sqm floor space must achieve 5 credits in BREEAM category Wat 01, subject to viability considerations. We will also talk about a Water Resources Assessment in DM30.	Refer to Water Resources Assessment in DM30.
PODM55: Electric Vehicle (EV) Charging Points – fire safety, design, location, and lighting.	Georgia Teague	Suffolk County Council	Reading part 4), please note that EV charging cables should not trail over pavements, as this could be a trip hazard.	Agreed. Add this text.	Add similar text to supporting text.
PODM56 ‘Fibre to the Premises’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM56 ‘Fibre to the Premises’ – requires full fibre broadband prior to occupation of a building of 100 sq. m or more. Where this is not possible other options are to be explored. GK do not consider this to be a planning matter or an issue for consideration as part of the determination of an application for planning permission. Rather it is a matter for Building Regulations.	Noted. As part of the Norfolk Strategic Planning Framework, Norfolk LPAs agreed to include this policy in their Local Plans. Indeed, North Norfolk's Local Plan, that is at examination, has this policy. Given that businesses and people function nowadays using internet and wi-fi, this requirement will benefit the future occupier.	No change to policy.
PODM56: Fibre to the Premises	Dickon Povey	East Suffolk Council	The policy is supported. It will be worth considering policy implications with (Policy PODM36: Holiday/tourism accommodation – new provision and retention) to attract as a remote work from home destination, digital nomads, and associated tourism alongside, (Policy PODM23: Utilities infrastructure development).	It is not clear what is meant by this comment. We will liaise with ESC about it.	Liaise with ESC about this comment.
PODM56: Fibre to the Premises	Georgia Teague	Suffolk County Council	Following the Covid-19 pandemic, more people are working from home/hybrid, so there is increased demand for good quality internet provision at homes.	Support noted.	No change to policy.
PODM57: Visitor and community facilities and services	Dickon Povey	East Suffolk Council	This policy covers two separate topics: facilities for visitors and local communities. As such, its intention might be clearer if it was split into two sperate policies.	Noted, but the facilities referred to are is listed in the supporting text and are things that the community and visitors use. We believe that one policy is adequate.	No change to Local Plan.
PODM57: Visitor and community facilities and services	Dickon Povey	East Suffolk Council	Paragraph 1 should be expanded with an extra criterion to state that community facilities should only be converted to a non-community use if there is an alternative facility in an equally sustainable location that is accessible to the local community.	This is noted. See paragraph 97 of the Inspector's Report into the current Local Plan that can be found here: <a href="https://www.broads-authority.gov.uk/__data/assets/pdf_file/0037/259597/Broads-Authority-Local-Plan-Report-April-2019.pdf">https://www.broads-authority.gov.uk/__data/assets/pdf_file/0037/259597/Broads-Authority-Local-Plan-Report-April-2019.pdf</a> . You will see that the Inspector directed us to remove such a criterion.	No change to policy.
PODM57: Visitor and community facilities and services	Dickon Povey	East Suffolk Council	Paragraph 4 refers to new visitor and community facilities and services. Waveney Local Plan policy WLP8.22 (Built Community Services and Facilities) also covers the provision of community facilities. Paragraph 1 of policy WLP8.22 also states that new facilities should not undermine existing ones, which are also easily accessible and available to the local community. A similar sentence should be added here. The Waveney Local Plan can be viewed via the following link. <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf</a>	Agreed. We will add the wording.	Amend policy to add similar wording to Waveney Local Plan.
PODM57: Visitor and community facilities and services	Georgia Teague	Suffolk County Council	SCC support the principle of this policy, however, please note that new facilities should include secure cycle storage/parking in accordance with Suffolk Guidance for Parking.	Agreed. Add reference.	Reference to parking standards included in supporting text.
PODM58 ‘Designing Places for Healthy Lives’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM58 ‘Designing Places for Healthy Lives’ – requires all development to explain how the development facilities enhanced health and wellbeing through the provision of conditions supportive of good physical and mental health. Whilst this policy may be appropriate for some developments, it will not be appropriate or applicable to many. It should therefore be redrafted.	Comments noted. This does not apply to all development as the comments implies. The Threshold is: All new housing, commercial and recreational development. There are template checklists to help applicants.	No change to policy.

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PODM58 ‘Designing Places for Healthy Lives’	Keith Mawson	Policy and Prevention Public Health, Norfolk County Council	Public Health welcomes that the Local Plan for the Boards Policy PODM58 has adopted the Norfolk and Waveney Planning in Health Protocol for developments of 50 dwellings or more and endorses that the Broads Authority has adopted a ‘Small Sites Checklist’ to ensure that health is consider in the smaller scale developments which are more typical in the Broads Authority Area.	Noted,	No change to policy.
PODM58 Designing Places for Healthy Lives	Dickon Povey	East Suffolk Council	We suggest consideration of a health net gain approach, where major residential developments have to demonstrate that their design choices respond to identified local health and wellbeing challenges (e.g. through use of indicators like overweight and obesity, inactivity, disability, ageing population, etc.) and therefore may go some way to ameliorate them for the future community.	This is noted. We already introduce something locally for schemes of fewer than 50 dwellings. The small sites and larger sites checklist have been assessed by Norfolk and Suffolk Public Health who are supportive.	No change to policy.
PODM58 Designing Places for Healthy Lives	Dickon Povey	East Suffolk Council	A separate checklist (Small Sites Healthy Planning Checklist, Appendix 13) may be less engaged with by developers than policy criteria; consideration should be given to whether the criteria can be included in this policy and the key wider determinant policies (tranquillity, amenity, sport and recreation, pollution, etc.) and design policy instead. If the checklist is retained, a hyperlink to take the reader directly to Appendix 13 is suggested.	Currently there is nothing to assess smaller sites and so a small sites checklist has been produced. This is a self-assessment checklist. We will assess the need to add it to the local validation checklist when we review that in light of adoption of this Local Plan. If it becomes a requirement on the validation checklist, then the applicant will be required to fill it in and submit it. There is a hyperlink to the checklist in the supporting text.	No change to policy.
PODM58 Designing Places for Healthy Lives	Georgia Teague	Suffolk County Council	SCC welcomes this policy, which covers many of SCC’s health indicators. Appendix 8, including reference to health, the economy and air quality, is also welcome.	Support noted.	No change to policy.
PODM58 Designing Places for Healthy Lives	Sarah Morrison	Natural England	Natural England supports this policy. We wish to highlight that Natural England also considers the provision of high quality, accessible greenspace to be necessary for improved health. We refer you to sections 5.9 and 5.10 of Natural England’s Green Infrastructure Planning and Design Guide for evidence and advice on how to design Green Infrastructure to support health benefits. Please also see our previous comments on green infrastructure and SANGS.	Support noted.	No change to policy.
PODM58 Designing Places for Healthy Lives	Ian Robson	RSPB	Reasoned justification: Mention is made in the third para ‘... potential impact on the surrounding area.’ How is the extent of the surrounding area calculated? Is it a standard measurement for all development or does it vary?	There is no standard. It would be judged on a case by case basis.	No change to policy.
PODM59: Planning obligations and developer contributions	Paul Harris	Broadland and South Norfolk Councils	The Council supports the approach to cross boundary contributions to deliver infrastructure and mitigation.	Support noted.	No change to policy.
PODM6 ‘Water Efficiency and Re- Use’	Helen Binns	Walsingham Planning on behalf of Greene King	PODM6 ‘Water Efficiency and Re-Use’ – requires all new visitor accommodation to be designed to have a water demand equivalent to 110 litres per head per day and incorporate grey water recycling and rainwater harvesting unless it is not feasible or viable. All converted buildings are required to be water efficient. Both of these requirements will impose additional costs burdens on new development.	The East of England is suffering from Water Stress and that is the justification for this Local Plan to do all it can to address water usage.  If an applicant proves that greywater and/or rain water harvesting is not feasible or viable then the policy clearly allows for that. As for the cost per dwelling from 125l/h/d (building regs) to 110l/h/d (optional building regs), according to our viability consultants, the cost is minimal. From the original impact assessment of several years ago c2017, it was £9 per unit.  With Greene King being the applicant, owner and future occupier of the buildings at HOV3, the lower bills may be beneficial.	We await the viability assessment and information from Anglian Water about potentially going further than 110l/h/d.
PODM6: Water efficiency and re- use	Alasdair Hain- Cole	Environment Agency	Regarding domestic development, we strongly support all efforts to make new residential developments as water efficient as possible. Due to the water stressed classification of our region, as a minimum Local Plan policies should be aiming for the higher standard of a maximum of 110 litres per person per day, which we are pleased to see in Policy PODM6: Water efficiency and re-use, paragraph 1, which includes replacement and converted dwellings.	Support noted.	No change to policy.

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PODM6: Water efficiency and re-use	Alasdair Hain-Cole	Environment Agency	<p>We would support any investigation into rainwater harvesting and/or grey water recycling in the plan, such as that mentioned in PODM6, paragraphs 2 and 3. Please note that the water companies cannot presently supply non wholesome water, so for greywater recycling, this would need to be operated by a third party. With rainwater harvesting the dry weather benefit should be considered, i.e. there is little rainfall in the times of high demand.</p> <p>Follow up: We do not require any changes to the wording in this policy. Our comments are provided on an advisory basis as current legislation states that water companies are not able to supply non-wholesome water for greywater recycling. There is currently an ongoing consultation that aims to change this in the future. This is currently on hold due to the election. Applicants can use on-site greywater recycling solutions or be supplied by third party operators so the policies in the Local Plan are still appropriate and welcomed.</p>	Noted.	No change to policy.
PODM6: Water efficiency and re-use	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy which requires new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. The design of new developments should optimise the inclusion of water efficiency and consumption measures, such as rainwater/ or greywater recycling, low flow taps and showers, low flush toilets, rain gardens and water butts and Sustainable Urban Drainage Systems (SUDS) in the construction of new buildings. We recommend that all major non-residential development should incorporate water conservation measures to achieve full credits for category Wat 01 of BREEAM and recommend that non-domestic buildings referred to in section 4 of the policy are given an appropriate efficiency target for clarity for developers and monitoring policy delivery.	<p>Noted.</p> <p>We will add non-residential development above 1,000sqm floor space must achieve 5 credits in BREEAM category Wat 01. This will however be tested through the viability assessment.</p>	Add: non-residential development above 1,000sqm floor space must achieve 5 credits in BREEAM category Wat 01.
PODM6: Water efficiency and re-use	Dr Sarah Eglington	Norfolk Wildlife Trust	We welcome the consideration being given to reducing the requirement further to 80 litres/person/day and recommend that this be taken forward, should evidence demonstrate the need.	Support noted.	Look into better than 110l/h/d water usage.
PODM6: Water Efficiency and Re-Use	Sarah Vergette	Broads Society	Although the proposed Policy PODM6: Water Efficiency and Re-Use is slightly less relaxed than the current general Building Regulations standards, this is something the Society can support.	Comment noted. Although Sanitation, hot water safety and water efficiency: Approved Document G says that unless there is a policy in a Local Plan, water use is 125 l/h/d.	No change to policy.
PODM6: Water efficiency and re-use	Tessa Saunders	Anglian Water	Anglian Water welcome the policy approach and the supporting text for this policy which identifies that a tighter standard than the optional higher standard of 110 litres per person per day may be introduced given the issue of water scarcity in the Greater Cambridge area. The Government's Environmental Improvement Plan sets out a roadmap for water efficiency with 10 key actions including a consideration of introducing a tighter standard of 100 l/p/d in water stressed areas. In December 2023 the Secretary of State for Levelling Up, Housing and Communities issued a Written Ministerial Statement that set out the Government's intention to review building regulations in the Spring of 2024 to allow local planning authorities to introduce tighter water efficiency standards in new homes, and in locations such as Greater Cambridge where water scarcity is inhibiting the adoption of Local Plans, local planning authorities provide the flexibility to introduce standards tighter standards than 110 l/p/d in agreement with the Environment Agency and delivery partners. Anglian Water continues to work with the Environment Agency, Natural England and Cambridge Water on developing a Joint Protocol on Water Efficiency, that will be underpinned by an evidence base, to assist local planning authorities with more ambitious water efficiency policy measures. This will be circulated to local planning authorities (LPAs) in our region once the protocol has been finalised and agreed by all parties and the evidence base has sufficient up-to-date evidence to assist LPAs.	Noted. Will liaise with AWS about this as we produce the next version of the Local Plan.	Liaise with AWS regarding a tighter water standard.
PODM60: Advertisements and signs	Dickon Povey	East Suffolk Council	It may be useful to have some added information regarding adverts. The aim is to maintain dark sky zones and the overall aesthetic of the Broads authority area. As such the policy is considered to be acceptable.	On following this up with ESC, they indicated that on reflection, the policy seems to cover what they were trying to say.	No change to policy.
PODM60: Advertisements and signs	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend that impact on nocturnal species be included with the list in point 3, although we welcome point 5, which states there will be a presumption against illuminating advertisements. We also recommend that there is a presumption against digital advertising boards, due to the carbon impacts of such methods.	Agree. Add text to part 3.	Add text to part 3.
PODM60: Advertisements and signs	Georgia Teague	Suffolk County Council	SCC suggests to add a reference to ensure all signage is neurodiverse friendly.	Agreed. Add this text.	Add similar text to policy.

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PODM61 'Re-use, Conversion or change of use of buildings'	Helen Binns	Walsingham Planning on behalf of Greene King	PODM61 'Re-use, Conversion or change of use of buildings' – sets a criteria and standards that new development involving the re-use of existing building is required to comply with some of which are not justifiable.	Given that we are experiencing an energy crisis and climate crisis, we all need to do things differently and use less energy and produce less carbon dioxide. This type of policy has been used and adopted elsewhere. Furthermore, there are tests in the policy that applicants can address if they still need to demolish a building. We don't think that this will thwart development; the policy is intended to ensure developers really consider their proposed approach.	No change to policy.
PODM61: Re-use, conversion or change of use of buildings	Alasdair Hain-Cole	Environment Agency	We agree with this policy but recommend an additional paragraph is added under "Reasoned Justification" to support policy points 1f) and 1g) regarding the design of the conversions and the measures they should incorporate under flood risk: "Where the existing building is located within an area of flood risk, the development proposal must be in accordance with the NPPF and NPPF. See related Policy PODM7 (development in flood risk) and PODM49 (replacement dwellings)."	Agree. Add this to the supporting text.	Add this wording to the supporting text.
PODM61: Re-use, conversion or change of use of buildings	Dickon Povey	East Suffolk Council	Criterion 3 refers to criterion a to g, but the criterion above is numbered.	Noted. You were looking at the HTML version and as you have identified, the numbering between the HMTL and PDF versions is inconsistent.	Ensure numbering is consistent between PDF and HTML version
PODM61: Re-use, conversion or change of use of buildings	Dickon Povey	East Suffolk Council	The policy is divided into sections with the first criteria related to employment, tourism etc with the second part referring to residential uses before the third criteria referring to holiday and tourism use. It is recommended that the structure of the policy is re-ordered to make it clearer so the criteria for different uses are clearly separated and appropriately ordered.	Noted. The policy is quite clear as to which criterion/criteria relate to which land use. No change to policy.	No change to policy.
PODM61: Re-use, conversion or change of use of buildings	Dickon Povey	East Suffolk Council	The justification text states, 'PODM61 does not relate to buildings currently in employment use – see PODM30 and PODM31', this may need to be more prominently located or even referenced in the policy itself to ensure it isn't lost.	Noted. We are content with where this cross reference is written.	No change to policy.
PODM7 – Development and flood risk	Paul Harris	Broadland and South Norfolk Councils	The Council supports the reference to the flooding requirements of neighbouring authorities in section 9 of this policy.	Support noted.	No change to Local Plan.

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PODM7 Development and flood risk	Alasdair Hain- Cole	Environment Agency	<p>We support the updated policy, which includes additional points within the main policy wording that were previously detailed under “Reasoned Justification” in Policy DM5 (2019). We request an amendment to the references to functional floodplain, in light of new and updated national guidance. We also request minor changes to the wording to provide additional clarity and context, as well as suggesting wording to future-proof the Local Plan where the Strategic Flood Risk Assessment (SFRA) is updated. As set out in the current 2017 SFRA, functional floodplain is defined in the “Reasoned Justification” for the policy as a 1:20 (5%) annual probability event. The Planning Practice Guidance (NPPG) was updated in August 2022 to now state in paragraph 78 that:</p> <p>“Functional floodplain will normally comprise:</p> <ul style="list-style-type: none"> <li>• land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or</li> <li>• land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).</li> </ul> <p>Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map).”</p> <p>The wording should therefore be amended to reflect the updated material and how it differs from the current 2017 / 2018 SFRAs.</p> <p>Follow up: Regarding functional floodplain and the August 2022 PPG update, you just need to replace the sentence from the Reasoned Justification that reads: “If flood waters which inundate the site in a 1:20 (5%) annual probability event can pass under or through a building or sit on land this will be defined as functional floodplain.” With “If flood waters which inundate the site in a 1:30 (3.3%) annual probability event can pass under or through a building or sit on land this will be defined as functional floodplain.” The section I’ve highlighted is a summary of the changes that we go on to set out our response, starting with “In the “Exceptions test requirements” section, policy point 1b) currently states:”.</p>	Agreed. Replace the text with the suggested text.	Replace the text with the suggested text.
PODM7 Development and flood risk	Alasdair Hain- Cole	Environment Agency	<p>In the “Exceptions test requirements” section, policy point 1b) currently states:</p> <p>“A site-specific Flood Risk Assessment, where required, demonstrates an acceptable flood risk”</p> <p>We recommend it is replaced with:</p> <p>“A site-specific Flood Risk Assessment, where required, demonstrates minimal flood risk”</p>	Agreed. We will replace the text with the suggestion.	Replace the text with the suggested text.
PODM7 Development and flood risk	Alasdair Hain- Cole	Environment Agency	<p>Policy point 11d) currently states: “In the case of the replacement of a residential property, a residential development must be on a like-for-like basis, with no increase in the number of bedrooms, on the same sized footprint<sup>23</sup>, potentially being relocated in a less vulnerable part of the site.”</p> <p>In order to tie this point in with the wording of policy point 2f), we recommend it is replaced with: “In the case of the replacement of a residential property, a residential development must be designed without increasing flood risk. It must be on a like-for-like basis, with no increase in the number of bedrooms, on the same sized footprint 23, potentially being relocated in a less vulnerable part of the site”.</p>	Agreed. We will replace the text with the suggestion.	Replace the text with the suggested text.
PODM7 Development and flood risk	Alasdair Hain- Cole	Environment Agency	<p>We also recommend adding the following text to follow on from the “Exceptions test requirements” section of the policy: Although the Exception Test is not required for water-compatible uses, these should still be designed and constructed to:</p> <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> </ul> <p>This is set out in paragraph 079 of the NPPG.</p> <p>This provides useful context, particularly given the numerous potential water-compatible developments within the Plan’s allocated sites and the Broads Authority area.</p>	Agree. We will add this text.	Add this text to the policy.
PODM7 Development and flood risk	Alasdair Hain- Cole	Environment Agency	<p>The “Flood Zones” section under “Reasoned Justification” states: “They are also shown in a Strategic Flood Risk Assessment (see later text).” In order to account for the likelihood that the 2017 SFRA is updated after the updated Local Plan is published, we recommend this wording is replaced with: “They are also shown in the latest Strategic Flood Risk Assessment”.</p>	Agree. We will add something similar to the proposal.	Add: this could be the 2017 SFRA or successor document)
PODM7 Development and flood risk	Alasdair Hain- Cole	Environment Agency	<p>In the “Reasoned Justification” section, “Site-Specific Flood Risk Assessments” states: “The EA Says that a flood risk assessment is required for all development”. We recommend this is replaced with: “NPPF and NPPG guidance states that a flood risk assessment is required for all development”.</p>	Agreed. We will replace the text with the suggestion.	Replace the text with the suggested text.

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PODM7 Development and flood risk	Alasdair Hain-Cole	Environment Agency	In addition to this change, we request a link to the guidance (Preparing a flood risk assessment: standing advice - GOV.UK (www.gov.uk) be included in the footer in order to support the text.	Noted. This is already referred to as a foot note.	No change to Local Plan.
PODM7 Development and flood risk	Georgia Teague	Suffolk County Council	Suggested amendment as follows: 1) Development within <u>areas of flood risk from any source</u> will be acceptable only when [...]	Agreed. Add this text.	Add similar text to policy.
PODM7 Development and flood risk	Georgia Teague	Suffolk County Council	SCC appreciate the Broads is mostly at risk from fluvial flooding but flooding from all sources should be considered as per NPPF and NPPG.	Agreed. Add this text.	Add similar text to policy.
PODM7 Development and flood risk	Georgia Teague	Suffolk County Council	Under the ‘SuDS’ heading of the supporting text, the following amendments are suggested: Sustainable Drainage Systems (SuDS) are an alternative to traditional drainage systems that aim to reduce <u>runoff by controlling rainfall at source (quantity), increase quality of water leaving the site (quality) and provide net benefits to biodiversity and amenity value of the site</u> . There is a range of possible SuDS techniques that can be used, although not all techniques will be appropriate for individual development sites. <u>Development sites should aim to provide a diverse mix of SuDS features</u> . Surface water run-off proposals should address the requirements of the Flood and Water Management Act 2010. See policy PODM8: Surface water run-off. <u>SuDS systems should be designed to the latest LLFA guidance and specifications</u> .	Agreed. Add this text.	Add similar text to supporting text.
PODM7 Development and flood risk	Tessa Saunders	Anglian Water	Anglian Water supports the approach to ensure that new development follows national policy and guidance - with NaFRA2 we consider the most up to date information will be available to inform sustainable and resilient growth in The Broads. Criterion 2. I) in relation to SuDS provision, the policy should also reference the scope for incorporating integrated water management measures such as reuse in association with Policy PODM4. We welcome the ability of the policy to provide for rollback/relocation from areas at increasingly greater risk of flooding to resilient sites with a lower probability of flooding, appropriate to the flood risk vulnerability classification of the development.	Support noted. Agree re cross reference to DM4.	Cross refer to DM4.
PODM8 Surface water run-off	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy, and the Reasoned Justification, particularly the text around the use of SUDS and their potential to reduce phosphorous in surface water run-off.	Support noted.	No change to policy.
PODM8 Surface water run-off	Georgia Teague	Suffolk County Council	3) Sustainable Drainage Systems (SuDS) shall be used unless, following adequate assessment, soil conditions and/or engineering feasibility dictate otherwise. These should be designed and implemented following the general principles set out at Appendix 9 as well as any relevant guidance or standards that are in place <u>such as Lead Local Flood Authority guidance on drainage design</u> .	Agreed. Add this text.	Add similar text to policy.
PODM8 Surface water run-off	Georgia Teague	Suffolk County Council	5) Where SuDS via ground infiltration is feasible, 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 procedure [37]. <u>Groundwater monitoring should identify a clear peak in levels which subsequently falls away, single tests will not be appropriate to demonstrate this</u> .	Agreed. Add this text.	Add similar text to policy.
PODM8 Surface water run-off	Georgia Teague	Suffolk County Council	Supporting text under the heading of “Management, maintenance, and adoption of SuDS” is suggested to be amended as follows: [...] Anglian Water’s standards for adopting SuDS may be viewed here: Sustainable surface water drainage (anglianwater.co.uk). SuDS can also be adopted by other bodies such as Management Companies <u>and the Highway Authority (if draining only an adopted road)</u> .	Agreed. Add this text.	Add similar text to supporting text.
PODM8 Surface water run-off	Georgia Teague	Suffolk County Council	Supporting text under the heading of “Additional information” should include links to SCC LLFA guidance: • <a href="https://www.suffolk.gov.uk/asset-library/2023-sf3967-scc-suffolk-flood-risk-appendix-a2.pdf">https://www.suffolk.gov.uk/asset-library/2023-sf3967-scc-suffolk-flood-risk-appendix-a2.pdf</a> • <a href="https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk">https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk</a>	Agreed. Add this text.	Add similar text to supporting text.
PODM8 Surface water run-off	Tessa Saunders	Anglian Water	It is the Government’s intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England. However, we welcome this policy to ensure SuDS are incorporated in new developments, until the Schedule is formally implemented, and the necessary measures are in place. Anglian Water supports the approach to the drainage hierarchy for rainwater - although we would suggest that this is termed the 'surface water disposal hierarchy' or 'surface water drainage hierarchy'.	Re surface water drainage hierarchy - agree.	Replace text with surface water drainage hierarchy.

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PODM8 Surface water run-off	Tessa Saunders	Anglian Water	Anglian Water supports the policy aims that broadly align with our surface water drainage policy which can be found here - it might be helpful to reference our policy with additional sources of information in the supporting text. It should be noted that a surface water connection to the combined sewer can only be permitted under exceptional circumstances and if it is proved that the previous site was connected to the same sewer. The combined sewer will be checked it has enough capacity to take the added flow. Anglian Water will seek to separate any surface water from any new developments to relieve the existing pressures and treatment requirements. If the combined sewer does not have enough capacity, the surface water should be run in a separate new surface water only sewer with its own outfall, and the total cost of the new infrastructure is paid for by the Applicant/Developer.	Regarding reference to AWS policy, agree. Regarding text relating to connection, noted.	Refer to AWS policy. Added text relating to connection to the supporting text.
PODM8 Surface water run-off	Tessa Saunders	Anglian Water	Criterion 2: Anglian Water agrees that betterment should be sought and encouraged particularly on brownfield sites, or on any site which could provide betterment for surface water flooding issues experienced more locally. Furthermore, we agree that run-off rates need to be agreed with Anglian Water where connections are required e.g. to a surface water sewer or where all other solutions are demonstrated to be unfeasible, to a combined sewer.	Support noted.	No change to policy.
PODM9 – Open Space on land, play space, sports fields and allotments	Dickon Povey	East Suffolk Council	It would be helpful if the open spaces mapping could be made available via a publicly accessible ArcGIS map.	We have an interactive map that is being used.	No change to Local Plan.
PODM9 – Open Space on land, play space, sports fields and allotments	Dickon Povey	East Suffolk Council	Regarding 1. A) iii – this, as a pre-commencement matter, sets quite a high bar that might not be achievable on some sites. Consideration should be given to whether it is critical for the replacement provision to be provided and management arrangements set prior to commencement, or if some flexibility can be provided on this matter.	This was an area that the Inspector who examined the current Local Plan intervened on. We are therefore content with the policy as written.	No change to policy.
PODM9 – Open Space on land, play space, sports fields and allotments	Dickon Povey	East Suffolk Council	Regarding footnote 43 – this can be updated to the East Suffolk Healthy Environments SPD, which will be adopted in June 2024.	Yes, we can update that.	Check footnote in terms of GYBC representation relating to CIL and this representation.
PODM9 – Open Space on land, play space, sports fields and allotments	Dickon Povey	East Suffolk Council	Regarding 2.b) – It may not always be possible for a S106 contribution to have an identified target scheme, though this will always be aimed for.	Noted. This was left over from when S106 pooling restrictions were in place. We will remove this.	Remove reference to specific scheme.
PODM9 – Open Space on land, play space, sports fields and allotments	Dickon Povey	East Suffolk Council	Regarding 2.c) – suggest a cross reference to Policy PODM16: Mitigating Recreational Impacts here.	Agree, that would be useful.	Cross refer to DM16.
PODM9 – Open Space on land, play space, sports fields and allotments	Dickon Povey	East Suffolk Council	Regarding 2.f) – watering requirements may be worth addressing in Policy PODM10: Green infrastructure as well.	Agree, that would be useful.	Refer to water stress in DM10.
PODM9 – Open Space on land, play space, sports fields and allotments	Dickon Povey	East Suffolk Council	Regarding 2.g) – suggest adding a reference to tenure blind design principles – ensuring amenities are equally accessible regardless of tenure.	Agree, that would be useful.	Weave in wording relating to tenure blind.
PODM9 – Open Space on land, play space, sports fields and allotments	Dr Sarah Eglington	Norfolk Wildlife Trust	We note that Winterton Dunes are allocated as Accessible Natural Green Space. This site is part of Winterton-Horsey Dunes SAC and SSSI, as well as being an area of priority habitat. It will need to be ensured that there is no detrimental impacts on the site from visitor pressure and disturbance.	Noted. We asked our districts to send us the open spaces they identify in their evidence as important so we can protect them in our Local Plan.	No change to policy.

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PODM9 – Open Space on land, play space, sports fields and allotments	Georgia Teague	Suffolk County Council	Suggest Appendix 13 Small Site Healthy Planning Checklist and/or PODM9 to add: engagement with young people on design for green spaces/play areas. Attached is the Homes England report on engaging young girls in particular2. See <a href="https://assets.website-files.com/6398afa2ae5518732f04f791/649a965c4611586b90cc4760_Homes%20England%20Inclusive%20Spaces%20MSFG.pdf">https://assets.website-files.com/6398afa2ae5518732f04f791/649a965c4611586b90cc4760_Homes%20England%20Inclusive%20Spaces%20MSFG.pdf</a>	Agreed. Add this text.	Add similar text to policy.
PODM9 – Open Space on land, play space, sports fields and allotments	Georgia Teague	Suffolk County Council	SCC notes that the links in the PDF version of this consultation document did not open, however they could be accessed through the html online version of this plan. SCC notes the rolling forward of the previous sites, and has no objection. SCC notes the new site at Herringfleet, and raises no objection. SCC Highways does not have specific comments relating to open space allocations; however, consideration will need to be given to the suitability of new vehicular access proposals should sites be allocated with the intention to provide a vehicle parking facility.	Noted. Add something to policy about parking.	Refer to bike, scooter and car parking.
PODM9 – Open Space on land, play space, sports fields and allotments	Sam Hubbard	Great Yarmouth Borough Council	It is noted that the Broads Authority will have regard to the Borough Council’s open space standards which the Council would support. Criterion ‘2b’ of the preferred policy option states that any contribution to open space provision will need to be towards a specific deliverable scheme, with the contribution being required to name a specific scheme. In this regard, you may wish to consider setting your own thresholds as to when offsite or onsite contributions would be taken, noting that there is unlikely to be a specific scheme fundable from small-scale development and funds would normally need to be pooled.	This wording has been rolled forward from the current policy when, due to the pooling restrictions in place at the time, a specific scheme was needed to be named.	Update this wording to reflect the current situation.
PODM9 – Open Space on land, play space, sports fields and allotments	Sam Hubbard	Great Yarmouth Borough Council	It should be noted that the Borough Council is currently consulting on introducing the Community Infrastructure Levy which would be used to fund offsite open space provision, with on-site provision only expected on sites larger than 20 units.	Noted. The policy has regard to/defers to the standards and policy of the relevant district and therefore we will liaise with you (and others) as and when needed to.	No change to policy.
PODM9 – Open Space on land, play space, sports fields and allotments	Sarah Morrison	Natural England	Natural England has not individually reviewed all open space allocations, but advises you to ensure the open space allocations will not adversely affect designated sites through increased noise, light or other disturbance. We support the policy reference and associated text referring to Green Infrastructure.	Noted. These open spaces are already used as open spaces. This policy protects them from other uses.	No change to policy.
PODM9 Open space on land, play space, sports fields and allotments - Oulton Broad	Georgia Teague	Suffolk County Council	PODM7 area has surface water flood risk but this appears to be proposed only for development that will not have a large provision of impermeable area.	Noted.	No change to policy.
PODM9 Open space on land, play space, sports fields and allotments.	Georgia Teague	Suffolk County Council	Regarding part 1b) SCC suggest that this only applies to development that is otherwise acceptable under 1a).	Agreed. Add this text.	Add similar text to policy.
PODM9: Open space on land, play space, sports fields and allotments	Paul Harris	Broadland and South Norfolk Councils	The Councils support the approach taken towards the protection of existing open space and provision of new open space. The Council acknowledges the reference to policy requirements for new provision from constituent authorities’ local plans.	Support noted.	No change to Local Plan.
POFLE1: Broadland Sports Club	Eleanor Roberts	Water Management Alliance	Adjacent to a riparian watercourse. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)	Dr Sarah Eglington	Norfolk Wildlife Trust	We particularly support clause 3 - proposals must ensure no adverse effects on water quality and the conservation objectives and qualifying features of the nearby SSSI (site is within SSSI Impact Zone).	Support noted.	No change to policy.



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POGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river. Also adjacent to a riparian watercourse. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POGTY1 – Marina Quays (Port of Yarmouth Marina)	Sam Hubbard	Great Yarmouth Borough Council	The re-use and enhancement of the space for river and other leisure activities where compatible with the flood risk of the site is supported.	Support noted.	No change to policy.
POGTY1: Marina Quays (Port of Yarmouth Marina)	Eleanor Roberts	Water Management Alliance	Recommend discharge limited to greenfield rate.	Noted. This is referred to in the SuDS policy.	No change to policy.
POHOR1: Horning Car Parking	Eleanor Roberts	Water Management Alliance	No watercourses immediately adjacent. Consent would be required if a surface water discharge is implemented to a riparian watercourse. Consideration should be made to include SuDS.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POHOR1: Horning Car Parking and POHOR2: Horning Open Space (public and private)	Member of public at drop in event.	Member of public	The summary wording on the boards at the drop in event are slightly different. What does that mean?	The actual policies are slightly different, but the intentions are the same.	Ensure the wording in both these policies is consistent.
POHOR2: Horning Open Space (public and private)	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POHOR3: Waterside plots	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POHOR4: Horning Sailing Club	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river. Support proposal to improve surface water disposal.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POHOR5: Crabbett’s Marsh	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy to protect this area for its landscape and nature conservation value	Support noted.	No change to policy.
POHOR5: Crabbett’s Marsh	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POHOR6: Horning - Boatyards, etc. at Ferry Road. and Ferry View Road	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POHOR7: Woodbastwick Fen moorings	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POHOV2: Station Road car park	Eleanor Roberts	Water Management Alliance	No watercourses immediately adjacent. Consent would be required if a surface water discharge is implemented to a riparian watercourse. Consideration should be made to include SuDS.	Add this to the constraints and features part of the policy.	Add to constraints and features.

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POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the clause stating that proposals must Incorporate the trees and hedges around the site	Support noted.	No change to policy.
POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Helen Binns	Walsingham Planning on behalf of Greene King	This policy allocates GK’s land to the north of the Kings Head in Hoveton for future redevelopment. This is welcomed as are the changes made to this policy from the Issues and Options stage, which appear to support the redevelopment of the site for any use or uses appropriate to the site’s village location rather than a limited number of prescribed uses as was originally proposed.	Support noted.	No change to policy.
POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Helen Binns	Walsingham Planning on behalf of Greene King	We would however welcome further minor amendments to the wording of the policy to make it explicit that a variety of uses, either singular or in combination, would be acceptable on this central village site. Specifically, we request that the wording of the policy be amended to read as follows: <del>“The site is allocated for mixed uses that are appropriate to the site’s village centre location that is next to the river as well as next to a public house. Proposals for the redevelopment of the site for any use or mix of uses appropriate to the site’s village centre location next to the river and public house will be supported.</del> The Authority would welcome a comprehensive scheme that covers the entire site to deliver a <del>mixed-use</del> scheme that takes advantage of this waterside location within the centre of the village and offers environmental and visual improvements”.	Agreed, we will make changes similar to that suggested.	Proposals for the redevelopment of the site for a use or mix of uses appropriate to the site’s village centre location next to the river and public house will be supported subject to it complying with other relevant policies of the development plan.
POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Helen Binns	Walsingham Planning on behalf of Greene King	The policy goes on to set out thirteen criteria that a development proposal for the site would need to satisfy. Whilst the general thrust and intention of part 2 of the policy is supported, GK have concerns with a number of specific aspects as follows:	Noted. See response to specific comments.	Noted. See response to specific comments.
POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Helen Binns	Walsingham Planning on behalf of Greene King	a) This appears to require a redevelopment scheme for the site to comprise a mix of uses, which may not be appropriate, feasible or viable. It may be the case that the scheme that comes forward for the site is for a single use. We would therefore suggest the following amended wording which provides flexibility and caters for both scenarios: “a use or mix of uses that is appropriate to the location that strengthens the attractiveness of the village centre”.	Agreed, we will make changes similar to that suggested.	Make changes similar to that suggested.
POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Helen Binns	Walsingham Planning on behalf of Greene King	c) The policy as currently worded requires new development to improve opportunities for public access to the river. The site is in private ownership and depending on the proposed use it may not be appropriate to provide public access through the site. As such, we respectfully request that this criterion is omitted.	We are requiring developers to demonstrate the impacts of their proposals on the environment and communities. We would in all cases consider any justification for not addressing certain requirements. The river is a really important part of the environment in Hoveton and there is limited public access and views to it and we would like that improved as much as possible and we therefore think this is a valid policy objective.	No change to policy.
POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Helen Binns	Walsingham Planning on behalf of Greene King	d) This partly duplicates criteria (c) and requires improved connections between Station Road, the site and the river. As the site is in private ownership and access may not be appropriate, it is requested that the first part of the policy referring to improved connections is removed.	We feel there is a slight difference between the two criteria; for example, public access could be achieved towards the edge of the site and also intervisibility does not necessarily mean public access. We understand that the land is private, and that is why we have these criteria so any future scheme can provide connections, access and intervisibility as appropriate.	No change to policy.
POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Helen Binns	Walsingham Planning on behalf of Greene King	i) This requires any car parking to be provided on the site to be thoroughly justified and a need for them proven. This requirement is considered unnecessary and unhelpfully restrictive as all new development is required to provide car parking to meet its needs and on-site car parking provision is generally an operational requirement for a commercial use. Furthermore, any future proposal for the site will need to ensure that existing car parking to serve the pub is retained. You will be aware that the recent planning permission for the Kings Head (Ref. BA/2023/0254) relocated pub car parking to the site in order to enable disabled provision to be improved and enhancements to be made to the area between the pub and outbuildings. We therefore respectfully request that this criterion is omitted.	There is a lot of parking in that area and the site is well-served by public transport. The aim of this criterion is to ensure the best use of the land and given the car parking close by, liaising with those operators could result in sharing car parking facilities. The policy aim is to prevent car parking being dominant in this area.	No change to policy.
POHOV3 ‘Brownfield Land off Station Road, Hoveton’	Helen Binns	Walsingham Planning on behalf of Greene King	j) Whilst GK support the principle of development being energy and water efficient, consideration must be given to the impact on viability particularly where the development involves the re-use of existing building. Accordingly, we request that this criterion is reworded as follows “Be designed to be energy and water efficient subject to viability considerations”.	Noted. Greene King are the applicant and occupier and so they will benefit eventually from lower bills. We are an area of water stress and the country as a whole is suffering from an energy crisis to some extent.	Cross refer to relevant other policies in the plan.

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POHOV3 'Brownfield Land off Station Road, Hoveton'	Helen Binns	Walsingham Planning on behalf of Greene King	k) Similarly, GK support the need to incorporate existing trees and hedges around the site. However, as we have advised on a number of occasions, this site is subject to significant constraints and as a result, compromises will almost certainly need to be made to achieve a viability redevelopment scheme. Accordingly, we respectfully request that flexibility is incorporated into criteria k) with the following amended wording "Incorporate the trees and hedgerows around the site where feasible and subject to viability considerations".	Comments noted. We have introduced a trees policy to the Local Plan - see Policy PODM24: Trees, woodlands, hedges, scrub and shrubs and development. That will be the policy used for any schemes that propose the removal of trees, woodlands, hedges, scrub and shrubs. That is already referenced in HOV3.	No change to policy.
POHOV3 'Brownfield Land off Station Road, Hoveton'	Helen Binns	Walsingham Planning on behalf of Greene King	With regard to part 3, GK welcome the recognition within the policy that the Waterside Rooms will need to be demolished. However, as currently worded the policy does not make it clear that the Council support the principle of a new building(s) on the site. It would be helpful therefore if the policy could make this clear. GK thus requests the following additional words be added to the policy after the first sentence "A scheme that proposes the demolition of the former Waterside Rooms building and the redevelopment of the site to provide new buildings will therefore be supported".	Comment is noted, but equally the policy does not say that the Waterside Rooms plot shall remain vacant. The general thrust of the policy is comprehensive improvements to the site as a whole and if the applicant wishes to include a building on the Waterside Rooms plot, that will be assessed using all relevant policies in the Local Plan.	No change to policy.
POHOV3 'Brownfield Land off Station Road, Hoveton'	Helen Binns	Walsingham Planning on behalf of Greene King	In addition, whilst GK appreciate the Council's desire to see the other buildings on the site retained, and refurbished and reused, as has been set out in previous representations made in respect of the site, such an approach may not be viable and as such, it is essential that the policy incorporates flexibility. We therefore request that the following words are added to the end of the final sentence "... subject to the structural condition of the buildings and viability considerations".	Noted. There are other policies that address the thrust of the comment and these will be cross referenced in the policy.	Cross refer to heritage section and DM61.
POHOV3 'Brownfield Land off Station Road, Hoveton'	Helen Binns	Walsingham Planning on behalf of Greene King	With regard to the Proposals Map, it is considered that the entire development allocation should be included within the defined town centre boundary of Hoveton. At present the buildings are within the town centre boundary but the car park land is outside of it.	The extent of the Town Centre is based on evidence produced by North Norfolk District Council using an established methodology. We do not intend to update this evidence at the moment, but will ensure we and NNDC consider your comment when we do.	No change to policy.
POHOV3 'Brownfield Land off Station Road, Hoveton'	Helen Binns	Walsingham Planning on behalf of Greene King	The designation of pub garden as green infrastructure should also be removed given it is private and not green space.	Noted. Whilst we note that this is private, the green of the pub garden contributes to the character of the area and we wish for it to remain. We will tidy up the boundary of HOV1 in this area.	Check and tidy HOV1 boundary in this area
POHOV3 'Brownfield Land off Station Road, Hoveton'	Helen Binns	Walsingham Planning on behalf of Greene King	To conclude, GK welcome the allocation of land at Station Road, Hoveton for redevelopment. However, they consider it important that the policy is clear that a single or mixed-use development would be acceptable and that onerous policy requirements are not imposed that inadvertently constrain development to the extent it becomes unviable. Amendments should also be made to the Proposal Map to bring the entire development allocation within the defined town centre boundary.	Noted. See response to specific comments.	No change to policy.
POHOV3: Brownfield land off Station Road, Hoveton	Eleanor Roberts	Water Management Alliance	No watercourses immediately adjacent. Consideration should be made to include SuDS.	Noted. We have policies relating to SuDS.	No change to policy.
POHOV4: BeWILDerwood Adventure Park	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy, in particular the clauses in the policy around impacts on individual trees and the woodland as a whole and impacts on protected species and habitats and adequate and appropriate provision of biodiversity enhancements	Support noted.	No change to policy.
POHOV4: BeWILDerwood Adventure Park	Eleanor Roberts	Water Management Alliance	Several riparian watercourses within and adjacent to the site. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POHOV4: BeWILDerwood Adventure Park	Ian Robson	RSPB	Page 302 Comment about barn owl habitat. Of greatest benefit would be rough, unmanaged, and undisturbed grassland to provide habitat for small mammals. Most of the grassland left and right of the entrance track as viewed on an aerial image looks like it is close mown, perhaps to provide alternative parking? Maybe there's an opportunity to create wildflower meadows in much of this area.	Comment noted. We do refer to habitat in the policy, but we could refer to rough and unmanaged and undisturbed grassland as well.	Weave in wording relating to rough, unmanaged, and undisturbed grassland to provide habitat for small mammals.
Policy PODM15: Biodiversity Net Gain	Sarah Morrison	Natural England	Natural England welcomes the inclusion of the mandatory 10% uplift for biodiversity net gain (BNG). Natural England advises that the Broads Authority may wish to consider a higher percentage for certain developments. We welcome the emphasis on providing on site BNG as a preference and the reference to the Local Nature Recovery Strategy for off-site delivery. We advise that point 5 is adjusted to say "The Biodiversity Net Gain will be provided on site where possible" for clarity.	The policy already refers to on site as a preference. The policy already refers to the LNRS. We are content with the wording of point 5 as point 6 then follows on from that. We are checking a higher percentage through the viability assessment.	No change to policy.

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Policy PODM15: Biodiversity Net Gain	Dickon Povey	East Suffolk Council	As highlighted in previous consultation responses, if gains of greater than 10% could be robustly justified and included in this policy this would be supported.	Support noted.	No change to policy.
Policy POFLE1 – Broadland Sports Club	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the wording in clauses 2, 3 4 and 5 particularly as the site is adjacent to the Broads SAC/Trinity Broads SSSI	Support noted.	No change to policy.
Policy POFLE1 – Broadland Sports Club	Sam Hubbard	Great Yarmouth Borough Council	The continued use and potential improvement to Broadland Sports Club as a health and wellbeing facility is supported.	Support noted.	No change to policy.
POLOD1: Loddon Marina Residential Moorings	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the clause stating that Proposals must ensure no adverse effects on water quality and the conservation objectives and qualifying features of the nearby SSSI.	Policy to be removed.	Policy to be removed.
POLOD1: Loddon Marina Residential Moorings	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Policy to be removed.	Policy to be removed.
POLOD1: Loddon Marina Residential Moorings	Ray Hollocks	Loddon Marina	Requests that Loddon Marina is not allocated for residential moorings.	Request noted.	Remove allocation LOD1.
PONOR1: Utilities Site	Dr Sarah Eglington	Norfolk Wildlife Trust	This proposal for 271 homes is very close to Carey's Meadow CWS, it must be ensured that there is no adverse impact on the CWS through increased levels of visitor pressure/disturbance.	Agree. Add this to the policy.	Add wording about Carey's Meadow CWS.
PONOR1: Utilities Site	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river. The Board would also like to be consulted for comment due to the major scale of development within its IDD and potential to affect the local riparian network. Consent may be required for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
PONOR1: Utilities Site	Ian Robson	RSPB	We have concerns over the proposal to develop the Deal Ground particularly due to the loss of green space/habitat within the City of Norwich.	The Deal Ground is not in the Broads. I believe the site already has permission. A SPD is being produced to cover the entire East Norwich Regeneration Site and so the RSPB will be able to comment on that. Further, the Greater Norwich Local Plan has just been adopted, and I am presuming the RSPB provided representations to that process as well.	No change to policy.
PONOR1: Utilities Site	Ian Robson	RSPB	Has the soil type been identified as one might expect that being further up the river valley it might contain or be predominantly peat, which would presumably negate any chance of development?	The BGS data that we have does not identify the area as peat. The site is previously developed land.	No change to policy.
PONOR1: Utilities Site	Paul Harris	Broadland Council	The Council supports the approach to development in the Greater Norwich Area and the contributions that sites within the Broads Authority will make to the strategic East Norwich Regeneration Area.	Support noted.	No change to Local Plan.
PONOR2: Riverside walk and cycle path	Dr Sarah Eglington	Norfolk Wildlife Trust	Should the footpath be linked up to Carey's Meadow CWS, it must be ensured that there is no adverse impact on the CWS through increased levels of visitor pressure/disturbance.	Agree. Add this to the policy.	Add wording about Carey's Meadow CWS.
POORM1 – Ormesby Waterworks	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the text stating that "Proposals will need to meet the requirements of policy PODM27 as the Trinity Broads generally has very good dark skies". We also support the final clause of this policy ensuring there is no negative impact on the SAC or SSIS	Support noted.	No change to policy.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
POORM1 – Ormesby Waterworks	Sam Hubbard	Great Yarmouth Borough Council	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 the Great Yarmouth Borough, and the upgrading and maintenance of these works are important in supporting economic and population growth in the Borough.	Support noted.	No change to policy.
POOUL1: Boathouse Lane Leisure Plots	Georgia Teague	Suffolk County Council	SCC notes that reference is made to minerals consultation area in the supporting text, which is welcomed. It is suggested that this fourth bullet point could include specific reference to the Suffolk Minerals and Waste Local Plan 2020.	Agreed. Add this text.	Add similar text to supporting text.
POOUL2: Oulton Broad - Former Pegasus/Hamptons Site	Alasdair Hain-Cole	Environment Agency	The policy states that this site is allocated for “(optionally) housing”. Although the ‘Reasoned Justification’ section mentions the 2012 planning permission for “76 market dwellings, office accommodation, and moorings”, the policy wording itself does not specify the number of dwellings or scale of development that would be permitted at this site. The policy should look to provide more detail on the scale of development (particularly residential) that would be permitted at this site so that the Sequential Test can be fully considered. In order to inform the above, you will need to consider and define the quantum of development that could be accommodated outside of the areas of flood zones 2, 3 and 3b at this site. In order to apply the Sequential Test, if development cannot be accommodated entirely within flood zone 1 you will need to be clear on why this site in Flood Zone 2/3 is being brought forward for development and that there are no suitable alternatives at lower risk. It will be essential to demonstrate that the Sequential Test has been passed.	Noted. This comment was also submitted as part of the technical consultation on the Sequential Test. We will refer to the scale of development that is already permitted in the policy, but in more general terms.	Add: Of a scale equal or similar to that which has been permitted
POOUL2: Oulton Broad - Former Pegasus/Hamptons Site	Dickon Povey	East Suffolk Council	This policy is supported. The encouragement for custom or self-build homes is welcomed. There is high demand for this type of housing in East Suffolk, much of which would also apply to this site.	Support noted.	No change to policy.
POOUL2: Oulton Broad - Former Pegasus/Hamptons Site	Georgia Teague	Suffolk County Council	The library in Oulton Broads is currently 75% of the modal size for the population of the catchment. Any development in the area would increase demand on this service and SCC would seek investment to mitigate the additional provision required.	Noted.	No change to Local Plan.
POOUL2: Oulton Broad - Former Pegasus/Hamptons Site	Georgia Teague	Suffolk County Council	Please note that any parking should be provided in adherence with Suffolk Guidance for Parking.	Agreed. Add reference.	Add reference to Suffolk Parking Guidance.
POOUL2: Oulton Broad - Former Pegasus/Hamptons Site	Georgia Teague	Suffolk County Council	Policy POOUL2: Oulton Broad, Former Pegasus/Hamptons Site - this site has already been accounted for in our pupil forecasts and S106 has already been secured.	Noted.	No change to policy.
POOUL3 – Oulton Broad District Shopping Centre	Georgia Teague	Suffolk County Council	Regarding part 5), SCC would suggest insertion of “secure” in relation to cycle parking/storage, and should include reference to the Suffolk Guidance for Parking.	Agreed. Add this text.	Add 'secure' and add a link to the Suffolk Parking Guidance.
POPHRB1: Bridge Area	Alasdair Hain-Cole	Environment Agency	We support the amended policy, which removes the reference to “New holiday accommodation” previously included in policy POT1 of the 2019 Plan. The flood risk constraints at this site could make the development of holiday accommodation unfeasible. The revised wording of “Proposals that are appropriate to the site’s location in terms of flood risk and proximity to the Bridge will be supported” is therefore more applicable.	Support noted.	No change to policy.
POPHRB1: Bridge Area	Dr Sarah Eglington	Norfolk Wildlife Trust	We support 2.2, requiring biodiversity enhancements on the site. It must be ensured that any development does not impact on the nearby SAC/SPA/SSSI/RAMSAR site	Agree. Add this to the policy.	Add text to policy.
POPHRB1: Bridge Area	Eleanor Roberts	Water Management Alliance	Several riparian watercourses within and adjacent to the site. Also adjacent to a main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.

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POPHRB2: Waterside plots	Eleanor Roberts	Water Management Alliance	Adjacent to Board Maintained watercourses (DRN021P0101, DRN021P0102, and DRN004P0505) riparian watercourses, and main river. No works within 9m of Board Maintained watercourse without prior consent from the Board. Consent also required from the Board for any alteration of or discharge to any watercourse (excluding main river). Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POPHRB3: Green Bank Zones	Eleanor Roberts	Water Management Alliance	The Board acknowledges and appreciates the retention of green space within this policy. These areas are adjacent to Board Maintained watercourses (DRN002P0303, DRN004P0506, DRN021P0101, DRN021P0102, DRN041P0104). No works within 9m of Board Maintained watercourse without prior consent from the Board. Consent also required from the Board for any alteration of or discharge to any watercourse (excluding main river). Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POSOL1: Riverside area moorings	Eleanor Roberts	Water Management Alliance	Several riparian watercourses within and adjacent to the site. Also adjacent to a main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POSOM1: Somerleyton Marina Residential Moorings	David Barker	Evolution Planning/Somerleyton Marina	We consider that the Somerleyton Marina is a good location for residential moorings. The Estate has owned the boatyard for many years. They bought the marina in 2012 when it was put up for sale by the holiday company TUI. The Estates aim was to support the traditional boatyard and provide employment and tourist facilities in the village. The marina is an important part of the Estate and creating residential moorings is an important part of the Estates plans for the marina. The main marina buildings are now very old and will need investment. Creating residential moorings allows the Estate to generate more income to maintain and improve the buildings and other parts of the marina.	Support noted.	No change to policy.
POSOM1: Somerleyton Marina Residential Moorings	David Barker	Evolution Planning/Somerleyton Marina	The businesses on the Estate include farming, tourist attractions such as Fritton Lake, Somerleyton Hall and Gardens and rental property. These businesses are important because they provide income which supports the upkeep of the Grade II* Somerleyton Hall and Gardens. These are important historic assets in the areas and are importantly open to the public so can be appreciated by everyone. Keeping these properties in good order is important for their conservation, for the local economy, local people employed there and the tourism industry.	Support noted.	No change to policy.
POSOM1: Somerleyton Marina Residential Moorings	David Barker	Evolution Planning/Somerleyton Marina	The moorings will bring benefits to the local area. The new moorings would meet the demand for this type of home in a sustainable location. There are numerous employment opportunities nearby and in the boatyard itself on site, in the Dukes Head Pub and local farms some 400 metres away and at Somerleyton Hall and Estate which are in Somerleyton village. The marina is in Somerleyton village which has a primary school, employment opportunities and a rail and bus service. The Estate owns the nearby Dukes Head Pub, and the moorings would provide welcome custom for the pub. The moorings would support the existing boatyard business. There are bus stops throughout the village the nearest being at the Dukes Head. The train station is 550 metres to the south with access via a public right of way.	Support noted.	No change to policy.
POSOM1: Somerleyton Marina Residential Moorings	David Barker	Evolution Planning/Somerleyton Marina	In respect of the residential moorings, the boatyard and marina are a well established business that can be expanded to create support residential moorings. The marina will be reconfigured to accommodate residential moorings. The existing pontoons will be replaced in a more efficient layout to increase capacity. The boatyard provides a facility which can maintain residential moorings. The boatyard has a range of services including electricity, water and communications which can be upgraded if necessary. There is an existing vehicular access. Existing buildings on the site can be reconfigured to provide on-site facilities for boat owners such as storage and welfare facilities.	Support noted.	No change to policy.
POSOM1: Somerleyton Marina Residential Moorings	David Barker	Evolution Planning/Somerleyton Marina	In summary the Somerleyton marina is a good location for 15 residential moorings and as such we support the plan.	Support noted.	No change to policy.
POSOM1: Somerleyton Marina Residential Moorings	Dickon Povey	East Suffolk Council	The Council welcomes the continued allocation at Somerleyton under Policy SOM1 in providing a contribution to meeting the need. Given the overall need for moorings has declined from 63 to 48 moorings, it would be helpful to have clarity on the increase to up to 15 moorings, from up to 10 in the current Local Plan. As the moorings would come forward alongside the existing uses, it will be important to ensure the adequate residential amenity of future residential occupants. It is acknowledged that this allocation is carried over from the current plan and that it hasn't yet come forward. This position should therefore be monitored to understand whether and when the moorings may come forward.	Simply put, the land owner would like more residential moorings. The residential moorings need is not a ceiling. And also, Loddon Marina will not be allocated any more. All policies in the Local Plan that are relevant will be used to determine any application and amenity is a key policy.	No change to policy.

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POSOM1: Somerleyton Marina Residential Moorings	Eleanor Roberts	Water Management Alliance	Adjacent to a riparian watercourse as well as on the main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POSOM1: Somerleyton Marina Residential Moorings	Georgia Teague	Suffolk County Council	Somerleyton Marina could have an impact on a Suffolk school and if we work on the basis of 0.05 per mooring then 15 moorings would generate 0.75 pupils (so 1 pupil). Based on current forecasts Somerleyton Primary is forecast to exceed 95% capacity during the forecast period. The capacity of the school is 56 and the pupil forecast for the next 5 years is 61 (2023), 58 (2024), 63 (2025), 67 (2026), and 68 (2027). So, if SCC were consulted on this application, it would request developer contributions for the improvement and enhancement (including increasing the pupil admission number) of primary school provision serving the development, in line with the SCC Developers Guide to Infrastructure.	Noted. Add this information to the supporting text.	Add similar text to supporting text.
POSOM1: Somerleyton Marina Residential Moorings	Georgia Teague	Suffolk County Council	No LLFA concern.	Noted.	No change to policy.
POSOM1: Somerleyton Marina Residential Moorings	Georgia Teague	Suffolk County Council	SCC would recommend that the introduction to the policy should include reference and links to the Lound, Ashby Herringfleet and Somerleyton neighbourhood plan, adopted July 2022 10. This would follow the format of the other neighbourhood plans, located within Norfolk, being hyperlinked with other allocation policies.	Agreed. Add reference.	Reference the Lound, Ashby Herringfleet and Somerleyton neighbourhood plan.
POSP1 ‘Responding to the Climate Emergency’	Dickon Povey	East Suffolk Council	We support the aims of the policy and agree with the justification provided for the measures. Climate change is a priority for East Suffolk Council, and we acknowledge that the measures set out in the policy will help to address climate change. We are pleased to see the Broads Authority responding to climate change and introduce relevant policies that will apply to development in the Broads part of East Suffolk.	Support noted.	No change to policy.
POSP1 ‘Responding to the Climate Emergency’	Helen Binns	Walsingham Planning on behalf of Greene King	POSP1 ‘Responding to the Climate Emergency’ – requires potential impacts to be identified and measures taken to mitigate. It is not clear however what mitigation is envisaged and therefore the cost to future development.	This is a Strategic Policy. It is clear that our climate is changing. The policy is clear in saying that mitigation, adaptation and resilience to climate change are important considerations. It is up to the developer to consider how their proposal addresses the various aspects.	No change to policy.
POSP1 Responding to the Climate Emergency	Dr Sarah Eglington	Norfolk Wildlife Trust	We strongly support this policy but recommend additional text is included under point 5 to promote the use of Sustainable Urban Drainage as a measure to be used in new developments to reduce potential impacts. We support the justification for this policy.	Agree. Add this to the policy.	Add text to policy.
POSP1 Responding to the Climate Emergency	Georgia Teague	Suffolk County Council	Suggested addition as follows: i) implementation of green, open Sustainable Drainage Features (SuDS)	Agreed. Add this text.	Add similar text to policy.
POSP1 Responding to the Climate Emergency	Tessa Saunders	Anglian Water	Anglian Water is supportive of the policy approach to ensure buildings are sustainable in terms of energy efficiency and resilient to the impacts of climate change, recognising the vulnerability of The Broads to flood risk and sea level rise. Extreme weather events, including the storms and significant period of wet weather experienced through the winter 2023/24 have highlighted the issues of prolonged surface water and groundwater flooding that have led to ingress and inundation of our sewer networks in low-lying areas - such as communities within and adjoining The Broads. We are working with other stakeholders/Risk Management Authorities to establish Multi Agency Groups for specific areas that have been impacted by the flooding events experienced over the winter 23/24 period so that future risks can be mitigated in these vulnerable areas.	Support noted.	No change to policy.
POSP10: A prosperous local economy	Paul Harris	Broadland and South Norfolk Councils	The Council supports the expanded support for new businesses, especially small businesses and start-ups, in the Broads area. With the acknowledged close relationship between the areas and their economies, the Council supports the potential of further economic growth that will benefit both areas.	Support noted.	No change to policy.

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POSP10: A prosperous local economy	Dickon Povey	East Suffolk Council	Policy aligns with ESC economic strategy and our direction 2028. Broads should consider leveraging its unique setting, USPs and economic strategies to attract the right investments for working towards Point 3. Point 4 and 5, supporting the SMEs and startups/ entrepreneurial culture will directly influence Point 6, alongside all other points, while promoting local employment and knowledge. The need for the retention in employment use to prevent loss of local opportunities is well acknowledged along with Policy PODM31. Widening and diversification of the economic base, particularly agriculture (Policy PODM32: Farm diversification) are well noted for the long-term economic sustainability and continued livelihoods for the Broads communities. As there is no clear employment site allocation, consideration should be given to how effective the policies will be in delivering future economic growth.	Noted.	No change to policy.
POSP11: Waterside sites	Dickon Povey	East Suffolk Council	It would be useful to reference policy PODM33 somewhere in the text given the high level of interconnectivity between the two.	Agreed.	Include reference to DM33.
POSP11: Waterside sites	Dickon Povey	East Suffolk Council	The viability text within the justification could also be more aligned to that used in policy PODM33.	Agreed. Rather than copying over, cross refer.	Align text so cross refer to DM33.
POSP12 – Sustainable Tourism	Dickon Povey	East Suffolk Council	No significant comments, the broad aims are supported.	Support noted.	No change to policy.
POSP12 – Sustainable Tourism	Dickon Povey	East Suffolk Council	A reference to RAMS could be considered and relevant mitigation where appropriate could be mentioned here.	Agreed.	Refer to protecting Natural Environment and refer to recreation and nutrient impacts.
POSP12 – Sustainable Tourism	Dickon Povey	East Suffolk Council	Consideration should be given to the aim outlined in the justification text, ‘The aim is to distribute tourism throughout the Broads, while providing protection to sensitive and vulnerable areas.’ Whilst the aim is mitigated by the second part of the sentence, is there a benefit from having areas of relative quiet? For some visitors the ‘relatively quiet’ areas would be highly valued.	Agreed. We will check this part of the policy.	Review this part of the policy.
POSP12 – Sustainable Tourism	Sam Hubbard	Great Yarmouth Borough Council	The approach of the Policy in broadly supporting sustainable tourism in the Broads area which aligns with the Borough Council’s Local Plan is supported.	Support noted.	No change to policy.
POSP13: Navigable water space	Alasdair Hain-Cole	Environment Agency	We support the policy, which remains unchanged from 2019 Local Plan. We require an additional paragraph in the ‘Reasoned Justification’ section to support policy points 2 and 3, regarding the potential development in water spaces and the requirements of water compatible development under the NPPF, annex 3. We also require an additional paragraph in this section to highlight the likely requirement for additional consents under Environmental Permitting Regulations (2010), as already included for PODM7 – page 62. We recommend the following paragraph regarding development consent in areas of flood risk be inserted underneath the paragraph beginning “Development proposals close to the navigation will be assessed”: “Development proposals linked to navigable water space should be in accordance with national development policies in the NPPF and NPPG. Development associated with navigable/ recreational water space, where it is classed as ‘water compatible’ development according to Annex 3 of the NPPF, should adhere to Paragraph 79 of the NPPF. This requires all ‘water compatible’ development to be designed and constructed to: <ul style="list-style-type: none"> <li>• remain operational and safe for users in times of flood;</li> <li>• result in no net loss of floodplain storage;</li> <li>• not impede water flows and not increase flood risk elsewhere.”</li></ul>	Agree. We will add this text.	Add this text to the supporting text.
POSP13: Navigable water space	Alasdair Hain-Cole	Environment Agency	We recommend the following paragraph is added to the ‘Reasoned Justification’ section: “Other consents that may also be required Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit from the Environment Agency 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 works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.”	Agree. We will add this text.	Add this text to the supporting text.
POSP15 – Residential Development	Dickon Povey	East Suffolk Council	The aim to meet the housing need identified for the Broads is supported.	Support noted.	No change to policy.



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POSP15 – Residential Development	Dickon Povey	East Suffolk Council	The table on page 184 doesn’t show the site at Pegasus Marine as having planning permission (ref BA/2012/0271/FUL, 76 dwellings), which is thought to be because the need of 358 is net of any permissions in place as of April 2021. For clarity, it would be helpful to state the position in the supporting text and also to be clear in the policy that the need of 358 is net of any permissions in place as of April 2021, if this is the case.	The sites at Thurne, Stokesby and Pegasus were permitted many years ago. Thurne and Pegasus are not yet completed. Stokesby is completed and will be removed from the Local Plan. Thurne and Pegasus are kept in the plan in case any new scheme comes in for permission. Because they were permitted so long ago, before April 2021, they do not count. This is explained throughout the Local Plan, but we will weave something in to the text around the table to make it clear.	Weave in wording to the text before the table to say that Thurne and Pegasus are not included as they were permitted before April 2021.
POSP15 – Residential Development	Dickon Povey	East Suffolk Council	The acknowledgement in the plan that the housing needs identified are a part of the District need and not additional to is welcomed, noting that a need for 23 dwellings in the East Suffolk part of the Broads is identified for the plan period. In that regard, we would support a review and updating of the January 2018 Statement of Common Ground (agreed between the Broads Authority and the then Waveney District Council) to ensure that the approach to housing completions within the Broads contributing to meeting the housing need for the Waveney area / East Suffolk remains in place going forward.	Noted. We have contacted all our districts to address this issue.	No change to Local Plan.
POSP15 – Residential Development	Dickon Povey	East Suffolk Council	It is noted that a further call for sites is underway as part of this consultation to address the residual need for 58 dwellings in the Broads area over the plan period. It is noted that the supporting text states that, depending on the outcome of the call for sites it may be that the Authority works with the Districts in relation to meeting the outstanding need for housing in the Broads. The Great Yarmouth and the Broads Local Housing Needs Assessment (September 2022) shows that the needs in the East Suffolk area of the area of the Broads is 23 dwellings over the plan period. The Council would expect that all efforts are made to accommodate the need in the Broads but acknowledges that in circumstances where it is robustly demonstrated that the needs cannot be met in the Broads, discussions would potentially need to take place through the Duty to Co-operate. It is acknowledged also that the need is relatively small, and small housing developments will generally come forward as windfall.	Noted. It should also be noted that need is not additional to the need of the Districts; it is part of their need.	No change to policy.
POSP15 – Residential Development	Dickon Povey	East Suffolk Council	Under criterion 2), a cross reference to policy PODM42 would be helpful to clarify that the requirement for affordable housing doesn’t apply to all new housing development, only that above the thresholds.	To some extent agree. This is a given, but we will add some text.	Add some text to part 2 to clarify thresholds.
POSP15 – Residential Development	Dickon Povey	East Suffolk Council	Under criterion 4), it is anticipated that this will be updated to reflect the approach to planning to address the needs identified in the forthcoming Gypsy and Traveller and Travelling Showpeople needs assessment.	Yes, of course, we will update this part of the policy.	Update policy with evidence.
POSP15 – Residential Development	Sam Hubbard	Great Yarmouth Borough Council	The approach and method undertaken by the Broads Authority in deriving their housing need, which forms part of the wider housing need for the whole borough of Great Yarmouth is supported. The Borough Council notes the approach to meeting the housing target for the Broads area and accepts that the objectively assessed housing need of 59 dwellings from the part of the Broads within the Borough will likely need to meet in those parts of the borough outside of the Broads in accordance with Agreement 13 of the Norfolk Strategic Planning Framework (NSPF). Note that the emerging Great Yarmouth Local Plan makes no reliance upon the Broads Authority to deliver the element of the housing requirement within the Broads area of the borough.	Support noted.	No change to policy.
POSP15 – Residential Development	Sam Hubbard	Great Yarmouth Borough Council	There may be opportunities where housing development in the Broads could strengthen the sustainability of settlements, for example by helping to support the operation of key local facilities or meeting identified needs for the Gypsy and Travelling community. The Borough Council would therefore welcome further engagement with the Broads Authority should any sites be identified during the current call for sites that straddle the shared planning boundary between the two authorities.	Noted. Unfortunately, no additional sites have been put forward through the second call for sites.	No change to Local Plan.
POSP15 – Residential Development	Tessa Saunders	Anglian Water	Anglian Water notes that The Broads Authority must balance the demands of meeting housing needs and protecting the special qualities of The Broads given its designation and that large areas of the executive area are protected habitats. We also recognise that the special qualities of The Broads, and its vulnerabilities, also influence the capacity it has for sustainable and resilient growth over the longer-term, and the difficulty in identifying suitable locations to meet the objectively assessed need (OAN). We believe that growth (including the infrastructure required to support it) must be sustainable and resilient to meet longer term challenges of climate change, and this may present difficulties in terms of being able to fully accommodate the identified OAN within The Broads Executive Area. Therefore, we support the policy approach in relation to the Authority's intention to "endeavour to enable housing delivery to meet its objectively assessed need".	Support noted.	No change to Local Plan.

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POSP15: Residential development	Paul Harris	Broadland and South Norfolk Councils	Council recognises the acknowledgement that larger development will likely take place outside Broads.	Noted.	No change to policy.
POSP16: Strategic Design Policy	Dickon Povey	East Suffolk Council	The simplicity of the policy and the strength of language ('must') is supported. However, there are few detailed matters about which the following comments seek to help address.	Support noted.	No change to policy.
POSP16: Strategic Design Policy	Dickon Povey	East Suffolk Council	Criterion 1 requires development to 'protect and enhance' the built and landscape character. In relation to heritage policy, it is recommended that this be amended to 'preserve or enhance'. Such language is commonly used in heritage legislation (e.g. section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Heritage policy tends to be phrased around preserving/protecting or enhancing. This is because it is not possible to preserve/protect and enhance a heritage asset; Preserve means to do no harm, whereas enhance means to actively improve the significance of the heritage asset. Thus, it is not possible to do no harm and to actively improve the significance of the heritage asset, and so 'or' is the appropriate word between 'preserve' and 'enhance'. Alternatively, if the desire is for development to be required to improve the significance of affected heritage assets, then 'preserve/protect' could perhaps be removed from the policy so that the requirement is for developments to 'enhance' the affect built and landscape character. It would be interesting to see how PINS consider such a policy.	This is a strategic policy that is high level. We consider reference to 'distinctive built and landscape character' covers heritage. There are then detailed heritage and design policies that will apply.	No change to policy.
POSP16: Strategic Design Policy	Dickon Povey	East Suffolk Council	Criterion 2 proposes to require development to be 'of a quality that will be enduring'. While this is a commendable objective it is not clear how planning applications would be assessed against such a criterion. Is moderate development quality capable of being enduring? Or is only high quality development capable of being enduring? Without clear expectations as to what would be considered an 'enduring' development there is potential for the criterion to be ineffective. Consideration should be given to replacing this criterion with a simple criterion requiring high quality design, akin to NPPF paragraph 139, which states: "Development that is not well designed should be refused." Given the sensitivities of the Broads compared to other local planning authority areas it may be considered appropriate for a higher bar to be applied, such that 'development that is not well designed must be refused'.	Agreed. We will remove 'enduring' and add the suggested wording.	Amend policy in line with comment.
POSP16: Strategic Design Policy	Dickon Povey	East Suffolk Council	Criterion 3 makes an important point as regards the resilience of development to climate change and is supported.	Support noted.	No change to policy.
POSP16: Strategic Design Policy	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy, in particular clause 1 c which aims to increase resilience to a changing climate and minimise carbon emissions and waste.	Support noted.	No change to policy.
POSP17: Community facilities	Dickon Povey	East Suffolk Council	This policy repeats policy PODM57. Especially paragraph 4, points 1 and 2.	Noted. Neighbourhood Plans need to be in conformity with strategic policies. That is why we have produced this strategic policy.	No change to policy.
POSP17: Community facilities	Dickon Povey	East Suffolk Council	Reasoned justification includes text about Assets of Community Value, stating that district councils in the Broads Authority area are responsible for maintaining a list of ACVs, which is why there is no wording about ACVs in the policy itself. For information, Waveney Local Plan policy WLP8.22 (Built Community Services and Facilities) covers Assets of Community Value (ACVs). The policy seeks to increase the effectiveness of ACV designation by stating that applications to change the use of a designated ACV will not be supported. However, seeking to prevent the change of use of designated ACVs requires careful thought. This is because the policy as worded could dissuade potential purchases and enabling development. It also prevents the change of use of an ACV if community use if found to be unviable.	Noted. Although this would fit better in DM57.	Add text relating to ACV to DM57.
POSP2 Strategic flood risk policy	Alasdair Hain-Cole	Environment Agency	We support the updated policy, which builds on "SP2: Strategic Flood Risk Policy" from the 2019 Plan by better highlighting the requirement for Sustainable Drainage (SuDs). However, we require some adjustments to the wording in the main policy points in order to strengthen the position on flood risk and link the information to relevant policies. Policy point a) current states: "Will be located to minimise flood risk, mitigating any residual risk through design and management measures, and ensuring that flood risk to other areas is not materially increased; and" We recommend it is replaced with: "Will be located to avoid flood risk, mitigating any residual risk and deliver safe development through design and management measures, and ensuring that flood risk to other areas is not materially increased; and"	Agreed. We will replace the text with the suggestion.	Replace the text with the suggested text.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
POSP2 Strategic flood risk policy	Alasdair Hain-Cole	Environment Agency	Policy point 3 currently states: “Development proposals which would have an adverse impact on flood risk management will be refused.” We recommend it is replaced with: “Development proposals which would have an adverse impact on current and future flood risk management will be refused.”	Agree. We will add this text.	Add this text to the policy.
POSP2 Strategic flood risk policy	Alasdair Hain-Cole	Environment Agency	We also recommend adding links towards the end of the “Reasoned Justification” section to state “See policy PODM7 Development and flood risk.”	Agree. We will add this text.	Add this text to the supporting text.
POSP2 Strategic flood risk policy	Dickon Povey	East Suffolk Council	Consideration should be given to aligning the policy with the NPPF flood risk policy approach of the sequential and exception tests. In particular, consideration should be given to highlighting the need for development to provide wider sustainability benefits to the community that outweigh the flood risk (NPPF para 170a), and that development will be safe for its lifetime taking account of the vulnerability of its users, and where possible will reduce flood risk overall (NPPF para 170b).	Noted. This policy and other policies have been updated to reflect EA comments and the Sequential Test.	Policy changed to reflect Sequential Test and EA comments.
POSP2 Strategic flood risk policy	Dickon Povey	East Suffolk Council	It is not entirely clear what is meant, in criterion 3, by ‘adverse impacts on flood risk management’. Is this a reference to existing flood risk defences? Clarity could be provided to aid understanding and consequently successful policy implementation.	Comment noted. We will clarify that this means flood management structures as well as Government flood risk plans.	Clarify that this means flood management structures as well as Government flood risk plans.
POSP2 Strategic flood risk policy	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy and the requirement for new development to incorporate Sustainable Urban Drainage SUDS measures.	Support noted.	No change to policy.
POSP2 Strategic flood risk policy	Georgia Teague	Suffolk County Council	Suggested additions as follows: a) Will be located to minimise flood risk from all sources, mitigating any residual risk through design and management measures, and ensuring that flood risk to other areas is not materially increased; b) Will incorporate appropriate surface water drainage mitigation measures and will implement sustainable drainage (SuDS) principles <u>that control runoff (quantity), treat surface pollutants (quality), and enhance biodiversity and amenity value of the development. New development should not increase flood risk on site or to the surrounding areas.</u>	Agreed. Add this text.	Add similar text to policy.
POSP2 Strategic flood risk policy	Tessa Saunders	Anglian Water	We support the approach of this strategic policy. We suggest that a) incorporates reference to the Environment Agency's climate change allowances, recognising that the Environment Agency is publishing new national risk information for flooding (NaFRA2) which will include future scenarios accounting for climate change, that may have implications for locating sustainable and resilient growth within The Broads Executive Area. This is reflective of the approach in Policy PODM7.	Agree.	Weave in text to refer to climate change allowances.
POSP2: Strategic Flood Risk Policy	Dickon Povey	East Suffolk Council	This policy provides a thorough set of requirements and expectations relating to the consideration of flood risk through the sequential test, exception test, and site-specific flood risk assessment. It raises the question, alongside policy PODM8: Surface water run-off, what is the added value of policy POSP2: Strategic flood risk policy?	Neighbourhood Plans need to be in conformity with strategic policies. Hence a strategic policy on flood risk.	No change to policy.
POSP2: Strategic Flood Risk Policy	Dickon Povey	East Suffolk Council	This policy provides a thorough set of requirements and expectations relating to the consideration of surface water run-off. It raises the question, alongside policy PODM7: Development and flood risk, what is the added value of policy POSP2: Strategic flood risk policy?	Neighbourhood Plans need to be in conformity with strategic policies. Hence a strategic policy on flood risk.	No change to policy.
POSP3: Soils	Alasdair Hain-Cole	Environment Agency	We encourage the possible re-use of topsoil locally and the management of soils in a sustainable way during construction. Excavated materials recovered on a development site via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste Development Industry Code of Practice (DoWCoP) subject to certain conditions being met. This is sustainable approach. However, contaminated materials that are or must be disposed of are waste and must be managed in accordance with the relevant legislation. We recommend that the following guidance be referenced: • The Definition of Waste: Development Industry Code of Practice • The Waste Management page on gov.uk.	Agree. We will add this text.	Add this text to the supporting text.
POSP3: Soils	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy to conserve soils.	Support noted.	No change to policy.
POSP4 Historic Environment.	Andrew Marsh	Historic England	We welcome this amended strategic level policy which seeks to protect and enhance the historic environment. Specifically, we are pleased with the amendment to criterion ‘3b,’ which now requires the use of the highest quality appropriate materials. This change is beneficial as inappropriate materials can cause harm to heritage assets.	Support noted.	No change to policy.

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POSP4 Historic Environment.	Dickon Povey	East Suffolk Council	Paragraph 3, pt 2 – ‘highest quality of appropriate materials...’ could be hard to enforce. Top quality materials might not always be available or affordable.	We are content with the wording and setting the bar high at the policy stage.	No change to policy.
POSP4 Historic Environment.	Dickon Povey	East Suffolk Council	Paragraph 4, pt 1 - It might not always be possible to protect archaeological content from inappropriate development or change. In some cases, mitigation or removal and preservation might be better. If all else fails, an information board telling people what used to be there could be the best solution.	Agreed. This issue is then elaborated on in DM12.	No change to policy.
POSP4 Historic Environment.	Dickon Povey	East Suffolk Council	Reasoned justification It would be better to state in paragraph 6 that some NDHAs may be discovered through the planning application process, rather than just the planning process.	Neighbourhood Plans identify NDHAs and that is part of the wider planning process.	No change to policy.
POSP4 Historic Environment.	Georgia Teague	Suffolk County Council	SCC welcome the reference to the HER in the supporting text of Policy POSP4 Historic Environment.	Support noted.	No change to policy.
POSP4: Historic Environment	Susan Grice	Norfolk Gardens Trust Planning Team	We support the policies as drafted and consider that they provide the framework for adequate protection and enhancement of designed landscapes of heritage value.	Support noted.	No further action.
POSP5 Biodiversity	Georgia Teague	Suffolk County Council	SCC welcomes this strong and aspirational policy, however SCC suggest replacing ‘will’, both in parts 1. and in 2., with ‘ <u>shall</u> ’ or ‘ <u>is expected to</u> ’.	Disagree. We are content with the current wording.	No change to policy.
POSP5 Biodiversity	Georgia Teague	Suffolk County Council	The text for the Reasoned Justification will need to be amended to reflect that BNG requirements have now come into force.	Agreed. We will update the text.	Amend text in line with comment.
POSP5: Biodiversity	Dickon Povey	East Suffolk Council	The broad approach set out in this policy is supported, however point e) which refers to the mitigation of likely significant effects could be strengthened to make it clear that likely significant effects should, in the first instance, be avoid wherever possible. Furthermore, the policy could also reflect that there will be Local Nature Recovery Strategies for both Norfolk and Suffolk (noting this explained alongside PODM14).	Agreed. Will improved part e and will also refer to LNRS.	Improve point e and refer to LNRS.
POSP5: Biodiversity	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy which aims to prevent development having an adverse impact on internationally, nationally, and locally designated sites and are pleased to see that County Wildlife Sites and Section 41 Priority Habitats are referred to in this policy. We recommend that additional text is added to cover the functionally linked habitats of these sites. We also recommend additional policy text regarding a requirement for developments to submit full Ecological Impact Assessments in order that the potential impacts on biodiversity can be reviewed.	Functionally linked land’ is an undefined concept which could include the majority of the Broads. Add something to DM14 about need for assessments depending on scheme type etc.	Add something to DM14 about need for assessments depending on scheme type etc.
POSP5: Biodiversity	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend that any new development or renovation includes beneficial features for wildlife, such as integral bat, swift and bee boxes in the building infrastructure, to help turn around the decline in these Priority Species and help comply with the Council’s duty to have regard to the conservation and enhancement of biodiversity under the 2006 NERC Act and its amendment under the 2021 Environment Act.	Agree. This is a requirement in the Natural Environment policy.	No change to policy.
POSP5: Biodiversity	Sarah Morrison	Natural England	This policy states that “All developments will be planned around the protection and enhancement of nature.” We strongly support this approach.	Support noted.	No change to policy.
POSP5: Biodiversity and PODM14: Natural Environment	Sarah Morrison	Natural England	Natural England strongly supports the approach taken in these polices, in particular that developments should be planned around the protection and enhancement of biodiversity and wildlife friendly features. We also welcome inclusion of the potential contribution of developments to Local Nature Recovery Strategies.	Support noted.	No change to policy.
POSP5: Biodiversity and PODM14: Natural Environment	Sarah Morrison	Natural England	The Plan could also include policies and proposals for nature recovery. It should recognise the potential of a connected network of wildlife-rich habitats to improve biodiversity. For instance, the protection and recovery of priority species and habitats and supporting habitats outside designated sites for protected species. Consideration should be given to wider benefits such as carbon capture, flood risk management, enhanced access to nature and the consequent benefits to health from enhanced biodiversity.	Noted. We think the policies address this comment already as well as with some slight amendments we have made.	No change to policy.
POSP5: Biodiversity and PODM14: Natural Environment	Sarah Morrison	Natural England	We would also welcome a strategic objective to create a Nature Recovery Network that is resilient to climate change: The Nature Recovery Network - GOV.UK (www.gov.uk).	Agreed. Add this to objective 4.	Add to objective 4.
POSP6 Landscape Character	Georgia Teague	Suffolk County Council	Suggest replacing ‘will’ with ‘ <u>shall</u> ’ in part 1., and with ‘are expected to’ in part 2.	Disagree. We are content with the current wording.	No change to policy.

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POSP6: Landscape character	Andrew Marsh	Historic England	We welcome the inclusion of this strategic level policy, and in particular the recognition that that historic features and overall perception of landscape character form a part of the historic environment typifying the Broads. We note and support the amendments to this policy.	Support noted.	No change to policy.
POSP6: Landscape character	Dickon Povey	East Suffolk Council	As stated in our response to earlier local plan consultation, it is important to note the strong relationships between the landscape character within the Broads and within East Suffolk as defined in the Waveney District Landscape Character Assessment: <a href="https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf">https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf</a> . Any adverse character impacts could have cross-boundary impacts and there would be value in reflecting this in the in the policy and/or supporting text.	Agreed. We will weave this into the text.	Weave reference to neighbouring LCAs into policy/supporting text.
POSP7 Tranquillity in the Broads	Georgia Teague	Suffolk County Council	SCC suggest it could be worth mentioning the neighbouring National Landscape has just produced a guide on Dark skies: Dedham Vale National Landscape & Coast & Heaths National Landscape LIGHTING DESIGN GUIDE Guidance to reduce light pollution and protect our dark skies, July 20235. See <a href="https://dedhamvale-nl.org.uk/wp-content/uploads/2023/08/Lighting-Guidance-in-National-Landscapes.pdf">https://dedhamvale-nl.org.uk/wp-content/uploads/2023/08/Lighting-Guidance-in-National-Landscapes.pdf</a>	Noted and we will look at this to see if there is any useful text.	Check document and weave in guidance as appropriate.
POSP7: Tranquillity in the Broads	Dickon Povey	East Suffolk Council	The explanatory text provides a definition framework for ‘tranquillity’, which is not a well-defined concept at national level, either in planning or environmental protection terms, and as such there is not a set methodology for assessing tranquillity – whether or not an area is or is not ‘tranquil’, or if indeed considered tranquil, how tranquil it is. In our view, it would need to go beyond the typical landscape and visual assessments of tranquillity that we have seen for applications in East Suffolk to date as the equivalent National Park status could arguably be justified in setting a higher bar for the achievement and protection of ‘tranquillity’.	Tranquillity is quite subjective and relative. It is a difficult issue to address. We did a lot of research with National Park colleagues and no best fit solution is available. We note the general support of the policy. But in the absence of specific suggestions, we don't propose to change the policy.	No change to policy.
POSP7: Tranquillity in the Broads	Dickon Povey	East Suffolk Council	Notwithstanding this, paragraph 191 of the NPPF encourages the identification of tranquil areas for protection purposes. The supporting text notes that “...there are some particular areas around the Broads which are generally tranquil such as the Upper Thurne (Policy POSSUT) and the Trinity Broads (Policy POSSTRI)” Is it a possibility that the identified tranquil areas could be mapped and categorised by quality/sensitivity, similar to how Dark Skies areas are? If clear edges are drawn, rather than approximate buffer zones, justification for why boundaries have been drawn where they have will need to be included.	We considered mapping, and discussed things with other National Parks. We discounted that option in favour of a strategic policy.	No change to policy.
POSP7: Tranquillity in the Broads	Dickon Povey	East Suffolk Council	It is suggested that Policy PODM26: Amenity is cross referenced in the policy (not just the supporting text) for residential development to ensure tranquillity for both occupant and in the experience of the wider environment.	Agree. We will cross refer to amenity in this policy.	Cross refer to amenity.
POSP8: Accessibility and Transport	Dickon Povey	East Suffolk Council	The policy addresses a wide range of matters, and places particular importance on addressing the full range of transport needs for all users, in a manner that seeks transport decarbonisation. This approach is supported, as is the reference in the supporting text to the East Suffolk Cycling and Walking Strategy.	Support noted.	No change to policy.
POSP8: Accessibility and Transport	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the intention of this policy to improve sustainable transport options within the area.	Support noted.	No change to policy.
POSP8: Accessibility and Transport	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend the following additional wording to clause 7a: “7a The improvement of access to and views of the waterside by the introduction of additional footpaths and cycle ways, subject to these not having a direct adverse impact on Habitat Sites or other designated wildlife sites, or increasing access such that it will have an adverse impact”;	Agreed. Add reference to designated wildlife sites.	Add reference to designated wildlife sites.
POSP8: Accessibility and Transport	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend the addition of the word ‘sustainable transport’ to clause 7c: “7c The creation of sustainable transport links to/from settlements”	Agreed. Add 'sustainable transport' to policy.	Add 'sustainable transport' to policy.
POSP8: Accessibility and Transport	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend that safe, continuous, direct walking/cycling routes, physically separated from traffic are provided. It should be ensured that new housing and business developments include appropriate provision for walking and cycling. This includes provision of secure cycle parking, a cycling and walking network plan and clear wayfinding signage. It should be ensured that designated cycle routes are as at least as direct, or preferably more direct, than those available for private cars (ie contraflows for cyclists only). Cycle paths and footpaths should be of good quality, well maintained surfaces and of adequate width. There should be segregated crossing points at junctions with major roads for cyclists. All development proposals should be required to provide on-site cycle parking facilities. Secure cycle parking facilities should be designed at the outset of the scheme. Further guidance on cycle infrastructure design can be found in Local Transport Note 1/20	Noted and agree with the general thrust of the comment. Generally, the transport section and other policies in the Local Plan will enable these things to happen.	In the absence of specific proposed wording and given that the local plan supports these suggestions in the round, no change to local plan.
POSP8: Accessibility and Transport	Georgia Teague	Suffolk County Council	SCC welcome part 4 regarding accessibility for physical/visual/neurodiversity. SCC also support the encouragement of active travel including more cycling through Broads.	Support noted.	No change to policy.

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POSP8: Accessibility and Transport	Georgia Teague	Suffolk County Council	SCC support the encouragement of more cycling through Broads, and welcome hyperlinks provided in the supporting text.	Support noted.	No change to policy.
POSP8: Accessibility and transport	Naomi Chamberlain	Norfolk County Council	The Norfolk Walking, Wheeling and Cycling Strategy was adopted in March 2024, which should be reference on page 133.	Agree. We will add reference to the Strategy.	Add reference to the Strategy
POSP8: Accessibility and transport	Paul Harris	Broadland and South Norfolk Councils	The Council recommend that the Greater Norwich Infrastructure Needs Report is included in the list of related plans currently included within the ‘Reasoned Justification’ for this policy. Greater Norwich Infrastructure Needs Report Final.pdf (gnlp.org.uk)	Agree.	Add link to the report.
POSP9: Recreational access around the Broads area	Alasdair Hain-Cole	Environment Agency	We approve of the inclusion of point 2 within this policy, which states: “Improved access will only be permitted where adverse impacts on the natural and historic environment have been considered and addressed in line with other policies in this Local Plan.” The “Reasoned Justification” section also states “It is important to be aware of the risk of habitat deterioration and disturbance which could arise from increased access in some locations around the Broads.” However, this issue requires strengthening. It is not enough to just be aware of the risk - the risk needs to be actively addressed and the policy should reflect this. Recreational access and activities that are likely to cause deterioration and disturbance should be identified early on. Important and protected habitats and species within the Broads that are vulnerable to deterioration and disturbance from increased access and exposure to particular activities should be identified in order to monitor/adjust/tailor/prevent activities or access in order to avoid adverse effects to those habitats and species. The risks associated with the increased access, and activities associated with recreational water users, should be fully assessed prior to any implementation of this plan. Adjustments to this policy should then be made within the plan to reflect this.	Agree. We will add text to the policy and amend supporting text.	Amend policy and text in line with comment.
POSP9: Recreational access around the Broads area	Dickon Povey	East Suffolk Council	It might be useful to make explicit that the intention is that walking and cycling routes (via PRoW) and cycle parking are made more accessible and inclusive through (re)surfacing, widening, and where appropriate internally segregating and/or levelling of routes.	Noted, but this kind of standard might not be appropriate for or feasible for all PROWs. We are writing a plan for cycling and walking so where possible and appropriate we will suggest that routes be made accessible and inclusive through (re)surfacing, widening, and internally segregating and/or levelling of routes. Feasibility of suggested projects will be considered during the consultation of our LCWIP which starts in a few weeks.	No change to policy.
POSP9: Recreational access around the Broads area	Dickon Povey	East Suffolk Council	Reference to the DfT’s Inclusive Mobility guidance and LTN 1/20 may be useful, as well as BS 8300-1:2018 ‘Design of an accessible and inclusive built environment. External environment - code of practice’ which also covers related matters such as the accessibility of public benches.	Agree - add reference to this guidance.	Add reference to guidance.
POSP9: Recreational access around the Broads area	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the inclusion of clause 2 of this policy, which states that improved access will only be permitted where adverse impacts on the natural and historic environment have been considered and addressed in line with other policies in this Local Plan. It is important that increased recreational access does not result in a negative impact on habitats and species within the Broads.	Support noted.	No change to policy.
POSP9: Recreational access around the Broads area	Georgia Teague	Suffolk County Council	Welcome reference to SCC Rights of Way Improvement Plan and Cycling and Walking plan, in part 1a).	Support noted.	No change to policy.
POSSA47 – Road Schemes on the Acle Straight (A47T)	Sam Hubbard	Great Yarmouth Borough Council	The Borough Council notes the provision of a policy that would be used to assess proposals for changes to the Acle Straight. Realising the full dualling of the Acle Straight continues to be a key ambition of the Borough Council and is critical to the long-term health of industries and job growth in the borough, which are of importance to the wider and national economy. The potential identification of a strategic cycling route between Acle and Great Yarmouth, as required to be considered by criterion ‘8’ of the Policy is welcomed.	Noted.	No change to policy.
POSSA47: Road schemes on the Acle Straight (A47T)	Ian Robson	RSPB	Page 377 top line – needs explaining as to the lay person the rating doesn’t make any sense.	Noted. There is a footnote that explains it further.	No change to policy.

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POSSA47: Road schemes on the Acle Straight (A47T)	Ian Robson	RSPB	Page 378 Wildlife and Habitats 1st para, third line – which species of bat is being referred to?	We do not know the specific species in the area, but are content with the general reference to bats.	No change to policy.
POSSA47: Road schemes on the Acle Straight (A47T)	Ian Robson	RSPB	Page 381 Walkers, cyclists, and horse riders - we appreciate the need to be inclusive but by creating access routes for non-motorised transport would significantly increase the land-take. Surely better to encourage cyclists to use the A1064 to access the east coast.	Comments noted. As the supporting text says, such a link could offer opportunities for non-car journeys. The A1064 is a less direct route than the Acle Straight and is not likely to have segregated, designated shared use paths like the Acle Straight could.	No change to policy.
POSSA47: Road schemes on the Acle Straight (A47T)	Ian Robson	RSPB	We don't think the investment and complication involved in creating access for pedestrians and horses warrants the potential demand, which is likely to be extremely low.	This may be the case. The policy says that schemes will need to <i>consider</i> creating access.	No change to policy.
POSSA47: Road schemes on the Acle Straight (A47T)	Naomi Chamberlain	Norfolk County Council	Paragraph 2 of policy SSA47 needs to be amended to reflect the wording as agreed in the current adopted Broads Authority Local Plan. Paragraph 2 needs to be amended to: Any proposed scheme will need to be justified. Proposed schemes need to consider the special qualities of the Broads and the fact that it is a protected landscape of national importance. Proposals will need to undertake comprehensive scoping of constraints and opportunities at the earliest stage to set out the nature and scale of any resultant impacts (negative or positive) from proposals, demonstrate how any negative impacts would be avoided, mitigated or compensated and take opportunities to enhance the special qualities of the area and people's enjoyment of them.	Agree, we will amend the text, but keep reference to 'special qualities' and refer to HRA in the supporting text.	Amend to say 'special qualities' and refer to HRA in supporting text.
POSSA47: Road schemes on the Acle Straight (A47T)	Paul Harris	Broadland Council	The Council supports improvements to the A47 as a significant element of cross-boundary infrastructure.	Noted.	No change to policy.
POSSLGS Local Green Space	Georgia Teague	Suffolk County Council	SCC welcome plans that designate local green spaces. The Local Green Space Topic Paper provides overall good evidence with photos. SCC would suggest that the sites were listed in the policy rather than supporting text, for clarity. In the hyperlink to Local Green Spaces maps, Beccles rowing club site and Waveney meadow appear to be same image. It is unclear if the two sites are next to each other, or if they are the same site. therefore, clarity is sought; if it is two sites next to each other, it could be useful to draw a boundary to differentiate between the two sites. SCC notes that site sizes are not included in the Topic Paper. Whilst this is unlikely to be a significant issue, it could be useful to provide this, to ensure that each site meets criteria c) of paragraph 106 of the NPPF, not an extensive tract of land.	Support noted. Support for Topic Paper noted. Agreed re adding sites into the policy. Agreed re making the boundaries of the two areas identifiable.	Add sites into the policy. Make two areas of LGS identifiable.
POSSLGS: Local Green Space	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy.	Support noted.	No change to policy.
POSSMILLS: Drainage Mills	Dickon Povey	East Suffolk Council	This policy is supported.	Support noted.	No change to policy.
POSSPUBS – Pubs Network	Sam Hubbard	Great Yarmouth Borough Council	The protection of identified public houses for public house use, including pubs at Stokesby, Thurne, Ormesby, Filby, Burgh Castle and St Olaves in addition to adjoining settlements is supported. It is considered that such an approach would align with Great Yarmouth Local Plan Part 2 Policy C1 which seeks to retain existing community facilities.	Support noted.	No change to policy.
POSSPUBS: Pubs network	Dickon Povey	East Suffolk Council	The policy needs to set out what will happen if a change of use is necessary, for example, due to viability issues. This is discussed in the Reasoned Justification, but it is unclear whether a change of use of a public house would be supported or resisted, or what criteria would need to be met.	Agree. We will add some text along these lines. What might be correct for one pub might not be acceptable for another - location, flood risk, accessibility etc.	Refer to what to do if proven unviable to policy.
POSSPUBS: Pubs network	Dickon Povey	East Suffolk Council	The reasoned justification needs to make clear in paragraph 2 why being part of a network increases the value of a public house to visitors and to communities. For example, it could state that a network of public houses on The Broads ensures that boat users have some where to stop for food and drink. It could also mention that a network of public houses ensures that communities in the Broads are always close to a place to socialise or access assistance. However, the text as it is written does not explain the value of a network of public houses.	Agreed. Will weave in the suggestion.	Amend the reasoned justification in line with the comment.
POSSROADS: Main road network	Dickon Povey	East Suffolk Council	The 'south pdf map' and 'inset map pdfs' link to a map of the north east area of the Broads.	Links will be checked.	Ensure links are checked.

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POSSROADS: Main road network	Dickon Povey	East Suffolk Council	The map on page 35 of the Suffolk Local Transport Plan Part 1 shows the Principal Route Network, which is referenced in the policy. This is a useful resource. However, consideration should be given to whether the Local Plan policies map should identify these routes as the map on page 35 of the Suffolk Local Transport Plan is very high level and may lack the detail necessary to assess planning applications against.	We do already show the routes, but only highlight the parts that are in our area. We don't have a separate map, rather they are shown on the policies maps. They are also on our interactive map.	We will produce a separate roads policies map.
POSSROADS: Main road network	Dickon Povey	East Suffolk Council	The Lorry Route Network Map is referenced in the supporting text. However, it is not referenced in the policy and so it is not clear whether the policy applies to such routes.	Agreed. We will refer to lorry routes in the policy.	Amend policy so it refers to lorry routes.
POSSROADS: Main road network	Dickon Povey	East Suffolk Council	Equally, it is not clear from the policy or supporting text what the 'Main Distributor Routes' are. These do not appear to be set out within the Suffolk Local Transport Plan or the Local Plan policies map.	Noted. We will run this policy by Suffolk and Norfolk County Councils and ask them to check.	Check policy with Norfolk and Suffolk County Councils
POSSROADS: Main road network	Dickon Povey	East Suffolk Council	To ensure unacceptable highway impacts, severe residential impacts, and adverse amenity impacts are avoided it is recommended that consideration be given to replacing 'potential traffic impact can be mitigated such that it is unlikely to have' with 'potential impacts can be mitigated such that development will not have'. To ensure the assessment criteria are all reasonable requirements placed on development, it is recommended that consideration be given to amending sub criterion 3 to read 'unacceptable adverse impact....'.	Re 'potential impacts' suggestion - agree, will amend the text. Re 'unacceptable adverse impact' - disagree as the wording is consistent with other policies in the Local Plan.	Amend policy wording relating to 'potential impacts'.
POSSROADS: Main road network	Georgia Teague	Suffolk County Council	SCC does not object to this policy. Please note that the Suffolk lorry route link does not work (a review has taken place). An updated link is provided in the footnotes9. See <a href="https://www.suffolk.gov.uk/roads-and-transport/lorry-management/lorry-route-plan-review-in-suffolk">https://www.suffolk.gov.uk/roads-and-transport/lorry-management/lorry-route-plan-review-in-suffolk</a>	Updated link noted.	Correct link.
POSSSTATIONS: Railway stations/halts	Dickon Povey	East Suffolk Council	The 'south pdf map' and 'inset map pdfs' link to a map of the north east area of the Broads.	Links will be checked.	Ensure links are checked.
POSSSTATIONS: Railway stations/halts	Dickon Povey	East Suffolk Council	Of the identified railway stations 'Somerleyton southern platform' lies within East Suffolk, although of course within the Broads planning authority area. The protection of such railway assets is supported for the important service they provide to all those with an interest in their continued use.	Support noted.	No change to policy.
POSSSTATIONS: Railway stations/halts	Dickon Povey	East Suffolk Council	Sub-criterion 8 makes reference to the need to ensure development proposals 'reflect the flood risk to the site'. It is not entirely clear what this means. Given the location of such railway stations/halts it is likely that flood risk will be a constraint. However, taking account of wider sustainability objectives, enhancements to these assets is important and cannot be achieved at other locations. Consideration could therefore be given to amending this criterion to reflect the exception test at paragraph 170 of the NPPF.	Noted. The policy says 'The Authority will support appropriate and well-designed proposals that <i>inter alia</i> reflect the flood risk to the site'. It is therefore clearly saying that any proposal needs to reflect the flood risk. Depending on the proposal, the sequential test or exception test may be needed as per national policy. The policy as written does not negate the need to address national policy; it highlights flood risk as a consideration.	No change to policy.
POSSSTATIONS: Railway stations/halts	Dickon Povey	East Suffolk Council	The policies map identifies these railway stations/halts with a red circle. Given the different shapes and sizes of these assets would it be useful to map the exact area of each asset to avoid confusion as to the exact area that the policy does and does not apply to? Furthermore, would it be useful to include other land adjacent to the railway station/halt that it is within the railway use (e.g. car parks)?	Noted. We will have a go at identifying areas around the stations/halts, but the policy could apply to schemes beyond the red line boundary.	Make a boundary for each halt/station.
POSSTRACKS – Former Rail Trackways	Sam Hubbard	Great Yarmouth Borough Council	The potential to expand and integrate the networks of paths, cycleways, and bridleways which benefits residents and visitors is supported. The policy would align with adopted Policy GSP7 of the Great Yarmouth Local Plan Part 2 (and emerging Policy SUS1 of the first Draft Local Plan) by seeking to use former rail trackways to provide a link between Bradwell, Belton and areas outside of the borough to the south-west.	Support noted.	No change to policy.
POSSTRACKS: Former rail trackways	Dickon Povey	East Suffolk Council	The policy is supported. It seems to be reasonable and achievable whilst recognising the importance of the setting and sensitivity of the Broads whilst opening it up to residents and visitors.	Support noted.	No change to policy.
POSSTRACKS: Former rail trackways	Georgia Teague	Suffolk County Council	SCC is supportive of encouraging active travel.	Support noted.	No change to policy.



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POSSTRI: Trinity Broads	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the aim of this policy to protect Trinity Broads for its special nature, character, and tranquillity.	Support noted.	No change to policy.
POSSUT: Upper Thurne	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy. ☑	Support noted.	No change to policy.
POST01 – Land Adjacent to Tiedam, Stokesby –	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the wording of the policy to retain mature hedges and trees.	Support noted.	No change to policy.
POST01 – Land Adjacent to Tiedam, Stokesby –	Sam Hubbard	Great Yarmouth Borough Council	It is noted that the site currently benefits from planning permission and is allocated within the adopted Broads Local Plan.	Noted.	No change to policy.
POSTA1: Land at Stalham Staithe (Richardson’s Boatyard)	Eleanor Roberts	Water Management Alliance	On the main river. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POSTA1: Land at Stalham Staithe (Richardson’s Boatyard)	Ian Robson	RSPB	Has the soil type been identified? We would presume that peat would predominate given the geographical location upstream. How then does the Peat Policy get enacted given expression within this plan of the need to preserve peat and find alternative sites?	The BGS shows that there is peat. Any scheme would need to address the peat policy.	Add peat to the constraints.
POSTA1: Land at Stalham Staithe (Richardson’s Boatyard)	Ian Robson	RSPB	Pollution is especially important within the Ant valley, and we would expect the highest level of rigour to be applied to prevent leakage, pollution, contamination of the best example of floodplain fen in Western Europe.	Noted.	No change to policy.
POSTA1: Land at Stalham Staithe (Richardson’s Boatyard)	Naomi Chamberlain	Norfolk County Council	The Richardson’s site in Stalham will require visibility improvements at the access. Access visibility is currently restricted by private signage and fencing.	Noted. We will add this to the policy.	Refer to visibility improvements in policy.
POTHU1 - Tourism development at Hedera House, Thurne	Dr Sarah Eglington	Norfolk Wildlife Trust	We support clause 1.iii, iv, viii, ix and x of this policy.	Support noted.	No change to policy.
POTHU1 - Tourism development at Hedera House, Thurne	Sam Hubbard	Great Yarmouth Borough Council	It is recognised that the allocation may assist in supporting the small-scale range of services and facilities within Thurne (including the Local convenience store and public house)	Support noted.	No change to policy.
POTHU1: Tourism development at Hedera House, Thurne	Eleanor Roberts	Water Management Alliance	Not immediately adjacent any watercourses. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POTSA1: Cary’s Meadow	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy to conserve and enhance Carey's Meadow CWS	Support noted.	No change to policy.

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POTSA1: Cary’s Meadow	Eleanor Roberts	Water Management Alliance	Adjacent to a riparian watercourse as well as on the main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POTSA2: Thorpe Island	Eleanor Roberts	Water Management Alliance	Adjacent to a riparian watercourse as well as on the main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POTSA3: Griffin Lane – boatyards and industrial area	Eleanor Roberts	Water Management Alliance	Adjacent to a riparian watercourse as well as on the main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POTSA4: Bungalow Lane – mooring plots and boatyards	Eleanor Roberts	Water Management Alliance	Adjacent to a riparian watercourse as well as on the main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse.	Add this to the constraints and features part of the policy.	Add to constraints and features.
POWHI1: Whitlingham Country Park plus adjacent land	Andrew Marsh	Historic England	Policy POWHI1 includes a proposed extension of Whitlingham Country Park to incorporate more areas of the GII Crown Point RPG. Many of these areas are already supporting the country park with camping and levels of public access, but this policy could see further park-related development, e.g. parking, expansion of camping and cycling provision, play facilities, ropes course, events and associated infrastructure, and even initiatives like wilding, woodland creation, etc.	Noted.	No change to policy.
POWHI1: Whitlingham Country Park plus adjacent land	Andrew Marsh	Historic England	So long as it is handled correctly, the country park extension could potentially enable improved management and enhancement of significance by more effectively maintaining the lime avenue, restoring areas of former parkland, and actively managing the woodland at Coronation Belt and New Plantation with consideration for its ornamental character and structural role within the designed landscape.	Agreed.	Weave this wording into the policy.
POWHI1: Whitlingham Country Park plus adjacent land	Andrew Marsh	Historic England	We therefore recommend the policy text under 2b is amended to read: b) Contribute positively to the river valley landscape <u>and the significance of the Crown Point Registered Park and Gardens and its setting;</u>	Agreed.	Amend text to say: b) Contribute positively to the river valley landscape and the significance of the Crown Point Registered Park and Gardens and its setting;
POWHI1: Whitlingham Country Park plus adjacent land	Andrew Marsh	Historic England	Finally, considering the sensitivities and potential opportunities outlined above, we strongly recommend that a (Conservation) Management Plan, Spatial Plan, or Masterplan (in the form of an SPD) be required to inform future development, stipulated within the policy.	Agreed. We will add text.	Add: 5. The Authority would welcome a Master Plan and/or a Conservation Management Plan that covers the area in order to inform future development, as well as change that does not require planning permission.
POWHI1: Whitlingham Country Park plus adjacent land	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the clauses in the policy to ensure there are no negative impacts on biodiversity within the area.	Support noted.	No change to policy.
POWHI1: Whitlingham Country Park plus adjacent land	Eleanor Roberts	Water Management Alliance	Several riparian watercourses within and adjacent to the site. Also adjacent to a main river. Consent required from the Board for any alteration of or discharge to a riparian watercourse. Environment Agency should be consulted on any alteration of or discharge to the main river.	Add this to the constraints and features part of the policy.	Add to constraints and features.

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POWHI1: Whitlingham Country Park plus adjacent land	Tessa Saunders	Anglian Water	We support the policy approach – particularly the reference to safeguarding our assets within the country park.	Support noted.	No change to policy.
Public Rights of Way	Georgia Teague	Suffolk County Council	SCC notes that there is not a specific Public Right of Way policy.	Noted. PROW are referenced in DM28.	No change to Local Plan.
Public Rights of Way	Georgia Teague	Suffolk County Council	SCC want the Public Rights of Way to be protected and enhanced in line with the NPPF and the SCC Green Access Strategy <sup>6</sup> . see <a href="https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/green-access-strategy">https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk/green-access-strategy</a>	Add reference to Norfolk and Suffolk PROW webpages.	Add webpage links.
Residential moorings	Georgia Teague	Suffolk County Council	SCC has established that 0.05 primary children could arise from a single mooring.	Noted.	No change to Local Plan.
Residential moorings	Naomi Chamberlain	Norfolk County Council	General comment: Moorings will need to provide an appropriate level of car parking to ensure that there are not unacceptable impacts on the local road network.	Noted. DM45 on residential moorings already refers to adequate parking provision.	No change to policy.
SA	Dickon Povey	East Suffolk Council	The Introduction section could provide more of an overview of the structure of the document, and the inclusion of the SEA Regs in the SA process.	Noted. The various chapters at the start of the SA adequately set the scene.	No change to SA.
SA	Dickon Povey	East Suffolk Council	Section 2. Previous versions of the SA – the reference to the former Waveney District Council needs to be corrected to East Suffolk Council, which was created in 2019.	Agreed.	Change made.
SA	Dickon Povey	East Suffolk Council	The in-text hyperlinks to Appendix 2: The Baseline, the source of Geodiversity information and the additions to the Literature Review are broken.	Links will be checked.	Ensure links are checked.
SA	Dickon Povey	East Suffolk Council	Sustainability Appraisal. Policy POSP4: Historic Environment Page 171 – Under ‘Secondary Effects’ there is a typo: ‘Maintains’ should be spelt ‘Maintains’.	Noted. Amend typo.	Typo amended.
SA	Dickon Povey	East Suffolk Council	Sustainability Appraisal ODM13: Reuse, Conversion or Change of Use of Historic Buildings Page 171 – Under ‘Secondary Effects’ there is a typo: ‘reasling’ should be spelt ‘releasing’.	Noted. Amend typo.	Typo amended.
SA	Sarah Morrison	Natural England	As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity.	There are monitoring indicators in the SA - see last column of appendix 7.	No change to SA.
SA	Sarah Morrison	Natural England	It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.	There are monitoring indicators in the SA - see last column of appendix 7.	No change to SA.
SA	Sarah Morrison	Natural England	Whilst it is not Natural England’s role to prescribe what indicators should be adopted, the following indicators may be appropriate. Biodiversity: •Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. •Percentage of major developments generating overall biodiversity enhancement. •Hectares of biodiversity habitat delivered through strategic site allocations. Green infrastructure: •Percentage of the city’s population having access to a natural greenspace within 400 metres of their home. •Length of greenways constructed. •Hectares of accessible open space per 1000 population.	Noted. The implementation and monitoring framework is in the Local Plan.	No change to SA other than referring to monitoring indicators in the Local Plan.
SA Appendix 3 literature review	Dickon Povey	East Suffolk Council	It was raised through the previous consultation that The Broadland Rivers Catchment Abstraction Management Strategy, The Natural Capital Evidence Compendium for Norfolk and Suffolk (2020) and The STEAM Report had not been scoped into the literature review but would be included at the next stage. These documents do not appear to have been scoped into the literature review at this stage, and it is suggested that they are for the next stage.	Noted. We will add this to the literature review.	Add those documents to the literature review.

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SA Appendix 3 literature review	Dickon Povey	East Suffolk Council	The East Suffolk Rural Development SPD was adopted in April 2024 and is suggested to be added to the literature review.	Noted. We will add this to the literature review.	Add those documents to the literature review.
SA Appendix 3 literature review	Dickon Povey	East Suffolk Council	The East Suffolk Custom & Self Build SPD was adopted in May 2024 and is suggested to be added to the literature review.	Noted. We will add this to the literature review.	Add those documents to the literature review.
SA Appendix 3 literature review	Dickon Povey	East Suffolk Council	The East Suffolk Healthy Environments SPD is set to be adopted in June 2024 and is suggested to be added to the literature review. Once adopted this document will supersede the Waveney Open Space Provision & Developer Contributions SPD (2012).	Noted. We will add this to the literature review.	Add those documents to the literature review.
SA Appendix 4 SA Framework	Dickon Povey	East Suffolk Council	It is acknowledged that the changes identified from East Suffolk Council's comments on the SA Scoping Report's proposed decision making criteria/prompting questions have been actioned and included where the Broads Authority have agreed with the suggestions. SOC1 is suggested to cover safety and security and environmental protection and residential amenity matters, which could be integrated through merging ENV11 and SOC7 into SOC1.	Noted. We are content with carrying on with the SA objectives as they are for consistency through the various stages of the Local Plan.	No change.
SA Appendix 4 SA Framework	Dickon Povey	East Suffolk Council	SOC2 – lack of accessibility, planning that incurs the need to travel longer distances, and/or lack of public transport are key barriers to employment, health, education and leisure/socialising and therefore forms of social exclusion. Although employment, income, and disability cover some of the primary drivers of reduced access to transport, transport accessibility could be included as its own item in the decision-making criteria list. Alternatively, these points could be integrated into SOC6, which is suggested to be considered.	Agreed. Add another decision making criteria to SOC2.	Add this: Does the allocation/policy mean lack of accessibility or the need to travel longer distances?
SA Appendix 4 SA Framework	Dickon Povey	East Suffolk Council	SOC2 is also suggested to consider matters related to tenure blind design, as this isn't necessarily covered by the current list of decision-making criteria/prompting questions.	Noted, but this is more of a design response rather than fitting with the type of criteria listed against this SA objective.	No change.
SA Appendix 4 SA Framework	Dickon Povey	East Suffolk Council	SOC3 – lack of accessibility/need to travel and/or lack of public transport are key barriers to employment/skills.	Agreed. Add another decision making criteria to SOC3.	Add this: Does the allocation/policy mean lack of accessibility or the need to travel longer distances?
SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy PODM2: Embodied Carbon and Policy POSP1: Responding to the Climate Emergency – The benefits of responding to climate change challenges on health and wellbeing (e.g. eco-anxiety) is suggested to be acknowledged through the assessment – i.e. a '+' under SOC1.	Agreed. SA assessment amended.	Amend SA assessment.
SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy PODM9: Open space on land, play space, sports fields and allotments – free to use equipped play areas are important for widening access to children of all income groups to opportunities for informal active play. Allotments provide the opportunity to grow food, reducing food costs, improving the quality of nutrition, and providing a free of charge space for informal, varied-intensity physical activity for those keeping allotment plots; allotments are also important social spaces, particularly for some groups that might otherwise be at risk of social isolation. This policy is therefore recommended to be recognised as positively performing against SOC2, and expanded in how it positively impacts SOC1. Could be considered against SOC3 (as spaces for social prescribing/volunteering and skills building activities) SOC7 and ECO3 as well.	Agreed. SA assessment amended.	Amend SA assessment.
SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy PODM24: Trees, woodlands, hedges, scrub and shrubs and development – the health and wellbeing benefits of retaining plantings could be reflected in the assessment, i.e. under SOC1.	Agreed. SA assessment amended.	Amend SA assessment.
SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy POSP8: Accessibility and Transport - impacts of transport challenges on employment, income and social inclusion/exclusion are suggested to be recognised in the assessment, i.e. via SOC2.	Agreed. SA assessment amended.	Amend SA assessment.

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SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy PODM51: Design – it is suggested that the health and wellbeing benefits if well designed places, and in particular ensuring a minimum quantum of higher accessibility homes, is reflected in the assessment, i.e. SOC1.	Agreed. SA assessment amended.	Amend SA assessment.
Section 10.2 Vision	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this vision for The Broads which sets biodiversity at the heart of nature recovery.	Support noted.	No change to Local Plan.
Section 10.3 Current objectives	Alasdair Hain-Cole	Environment Agency	While we welcome the aim of OBJ6 - “Water quality is improved” – it is worth considering whether this could be made more targeted and ambitious. For example, the objective could state “Water quality is improved, and each waterbody passes the chemical and biological requirements of the Water Framework Directive.”	Noted. We are content with how this is worded. There are policies within the Local Plan that, when taken together, will help meet this target.	No change to objective.
Section 10.3 Objectives	Dr Sarah Eglington	Norfolk Wildlife Trust	We support these objectives although we recommend that some measurable targets are included so that progress towards meeting these objectives can be met. For example, OBJ4. The rich and varied natural environment is conserved, maintained, enhanced and sustainably managed. Nature can recover (more, bigger, better, joined) – state percentage of wildlife sites brought into good conservation management.	Noted. We feel that the objectives are adequate for the Local Plan.	No change to Local Plan.
Section 10.3 Objectives	Dr Sarah Eglington	Norfolk Wildlife Trust	We recommend aligning these targets with the 2030 and 2042 species recovery targets as set out in the Environment Act (Halting the decline in our wildlife populations through a legally binding target for species abundance by 2030 with a requirement to increase species populations by 10% by 2042).	Noted. We feel that the objectives are adequate for the Local Plan.	No change to Local Plan.
Section 10.3 Objectives	Dr Sarah Eglington	Norfolk Wildlife Trust	Also, OBJ7. ‘Climate-smart thinking’ minimises future adverse impacts and makes use of opportunities in an area vulnerable to a changing climate and sea level rise. The Local Plan helps the path to net zero, adaptation and resilience – we recommend specifying the percentage reduction in emissions by a set date.	Noted.	No change to Local Plan.
Section 10.3 Objectives	Ian Robson	RSPB	Objective 5: Is there a need to mention integration specifically as a part of the SMP6 such that the entirety of the coastal cell is treated in the same way?	We consider the current wording acceptable and adequate.	No change to objective.
Section 10.3 Objectives	Ian Robson	RSPB	Objective 5: In addition is it wise (debatable) to mention planning for the future and considering realignment and transition at an early stage, as is being done through BFI?	We consider the current wording acceptable and adequate.	No change to objective.
Section 10.3 Objectives	Ian Robson	RSPB	Objective 6: Add ‘sustainably’ after ‘managed.’	Agreed.	Add ‘sustainably’ after ‘managed.’
Section 10.3 Objectives	Ian Robson	RSPB	Objective 6: Page 49 Does the target 110l/h/day refer to a household target or a per head target? Need to make clear what the ‘h’ denotes as it is a significant factor/change.	h means head - so per person/per head.	Explain what l/h/d means at PUBDM6.
Section 10.3 Objectives	Ian Robson	RSPB	Objective 4: After ‘sustainably managed’ add ‘through a coordinated approach.’ To describe how stakeholders are working together.	Agreed.	After ‘sustainably managed’ add ‘through a coordinated approach.’
Section 10.3 Objectives	Paul Harris	Broadland and South Norfolk Councils	The Council supports the vision and objectives of the Broads Local Plan. Specifically the Council support OBJ10 relating to the cooperation with other Local Planning Authorities.	Support noted.	No change to Local Plan.
Section 10.3 Objectives	Tessa Saunders	Anglian Water	Anglian Water welcomes this objective, but we consider it could be worded to clarify the approach, with flood risk separated out as a stand-alone objective or associated with OBJ7. OBJ6 Water quality is improved by reducing pollution and nutrients entering watercourses, and water resources are managed sustainably using appropriate measures to improve water efficiency of homes and businesses including capture and reuse.	Regarding separating out flood risk - comment noted, but we are content that an objective that captures water together. Given that we have strong policies, we are context with the objective as written.  Regarding the suggested wording changes, again noted, but the proposed wording includes specific actions and the policies refer to that. Given that we have strong policies, we are content with the objective as written.	No change to objective.
Section 10.3 Objectives	Tessa Saunders	Anglian Water	Anglian Water supports objectives OBJ4 and OBJ7 regarding biodiversity conservation/nature recover and climate smart thinking.	Support noted.	No change to objective.

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Section 6.10 Neighbourhood Plans	Sam Hubbard	Great Yarmouth Borough Council	A list of neighbourhood plans adopted and in preparation is provided. Hemsby Neighbourhood Plan was adopted in July 2023 by the Borough Council and Broads Authority. Reference to the neighbourhood plan should be moved from the ‘in preparation’ to ‘adopted’ section. Belton with Browston, Burgh Castle and Fritton with St Olaves Neighbourhood Plan area was designated by the Borough Council and the Broads Authority in December 2022. The area partially falls within the Broads Authority Executive area to the north and west and should be included under the ‘in preparation’ section.	Noted. The list will be updated, but inevitably will soon be out of date.	Update list of Neighbourhood Plans.
Section 7.11	Georgia Teague	Suffolk County Council	Section 7.11 The Community of the Broads, third paragraph reads: “The Broads has an older pollution.” Should this be “population”?	Agreed. Amend typo.	Correct typo.
Section 7.5: The Landscape of the Broads	Sarah Morrison	Natural England	Natural England suggests that the description of the Broads could be enhanced by stronger reference to: <ul style="list-style-type: none"> <li>•Its uniqueness in landscape terms in the UK as a whole.</li> <li>•The significance in this open flat landscape of vertical elements, often visible over long distances. In particular the various types of mill and ecclesiastical buildings, many of which are regarded as iconic, but also pylons which many would regard as intrusive.</li> <li>•Notwithstanding comments about lack of a vernacular, the particular visual qualities and heritage associations of thatched timbered boathouses.</li> </ul>	Agree. We will weave in these suggestions.	Weave in the suggested text.
Section 7.7 The natural environment of the Broads	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this text but recommend additionally that the word ‘enhance’ is added to the final sentence as suggested below, in order to better match the requirements of the Biodiversity Duty held by the Authority. “The Broads is an important area for biodiversity. It is also one of the reasons why people live here, and tourists come to visit. We need to ensure we understand how development can impact biodiversity, so we protect it and look for opportunities to expand and connect and enhance habitats, and that we reflect this in the Local Plan.”	Agreed. We will add enhance.	Add enhance to section summary.
Section 8 – Duty to Cooperate	Paul Harris	South Norfolk Council	South Norfolk Council supports the Broads Authority in their continued engagement and participation with the Norfolk Strategic Planning Framework relating to cross-boundary planning issues and co-operation.	Support noted.	No change to Local Plan.
Section 8 – Duty to Cooperate	Paul Harris	Broadland and South Norfolk Councils	i, l – The Council recognises the importance of the Broads to the character and identity of the wider Norfolk area and, therefore, support the connections and relationship the Broads Authority maintains with neighbouring districts to maintain collaborative working.	Support noted.	No change to Local Plan.
Section 9.2 strengths	Ian Robson	RSPB	Add – thriving angling destination, supporting the local economy.	Agreed.	Add – thriving angling destination, supporting the local economy.
Section 9.3 Weaknesses	Ian Robson	RSPB	Add – in extreme rainfall events inability to evacuate excess via the single exit point at Great Yarmouth, leading to often significant upstream flooding of land and property.	Noted. Flooding is referred to at 9.3, d.	No change to Local Plan.
Section 9.4 – Opportunities	Paul Harris	Broadland and South Norfolk Councils	H – The Council acknowledges that due to the nature of the Broads that they are reliant on the provision of services, job, facilities etc. in neighbouring districts and, as mentioned in other comments, will continue to support collaborative working with the Broads Authority.	Support noted.	No change to Local Plan.
Section 9.4 Opportunities	Ian Robson	RSPB	Add – given likely incidence of more frequent flooding this provides a chance to assess how and where water is used, stored and how excess is removed from the system.	Noted. Generally, the opportunities from climate change are covered in 9.4 a.	No change to Local Plan.
Section 9.4 Opportunities	Ian Robson	RSPB	Add into b. mention of Norfolk Water Fund.	Agreed.	Add into b. mention of Norfolk Water Fund.
Section 9.4 Opportunities	Tessa Saunders	Anglian Water	Maintaining the recovery and improvement of water quality achieved over the last few decades by long-term and ongoing investment across a range of agencies, particularly water companies. We believe this opportunity should be more effectively reworded to state: Maintaining the recovery and improvement of water quality achieved over the last few decades by long-term and ongoing investment through collaborative working across a range of agencies and stakeholders.	Agree.	Change opportunity to reflect comment.
Section 9.5 – Threats	Paul Harris	Broadland and South Norfolk Councils	C, h – The Council acknowledges the identified threats from large scale development in neighbouring areas. The Council note that the impact on the setting of the Broads is a key consideration for relevant developments and has been acknowledged within the Local Development Plans for both Council.	Support noted.	No change to Local Plan.
Section 9.5 Threats	Ian Robson	RSPB	y. add ‘and sedge’ after reed.	Agreed.	y. add ‘and sedge’ after reed.

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Section 9.5 Threats	Ian Robson	RSPB	Add – in places recreational pressure can cause unsustainable disturbance to wildlife and damage to habitats sites.	Agreed.	Add – in places recreational pressure can cause unsustainable disturbance to wildlife and damage to habitats sites.
Section 9.5 Threats	Ian Robson	RSPB	Add – potential for reduced or loss of access to lowest lying areas as a result of flooding.	Agreed.	Add - Lowest lying land could be permanently flooded or flooded for many days or weeks
Section 9.5 Threats	Sarah Vergette	Broads Society	The current consultation lists 25 different perceived threats. Although these are all identifiable residual concerns from the Society still remain about the inflexibility of the local plan system and the need for policies to change more rapidly and be more flexible to prevent potential economic stagnation.	Support noted. The current Government are intending on changing the planning system relating to Local Plans. This Local Plan, however, is being produced under the current approach.	No change to policy.
Settlement Study	Sam Hubbard	Great Yarmouth Borough Council	Consideration should also extend to the provision of potential development boundaries within the Broads Authority area adjacent to the settlements of Rollesby and Repps with Bastwick in the development boundaries topic paper.	In the Settlement Study, Appendix A identifies that these areas have been checked and there is limited built up area in the Broads part of Rollesby and so it was not further considered. As for Repps, as per Appendix D, it scores quite poorly on services and facilities.	No change to Topic Paper.
Specific Question 1: Do you have any comments on the proposed new open space allocations?	Alasdair Hain-Cole	Environment Agency	In response to specific question 1 and regarding the proposed new open space allocations, Bure Park and the marshes adjacent to Broadland Rugby Club are both underlain by a historic landfill. These sites may require consideration with respect to land contamination.	Noted. We can refer to this in the supporting text.	Refer to the issue of contamination at these two areas in the supporting text.
Specific Question 2: Do you have any thoughts on the suitability of wind turbines in the Broads?	Chris Waldron	Ministry of Defence	Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example where proposals include a wind turbine or roof mounted solar PV system	Noted.	We will consider this comment when we address wind in the Local Plan.
Specific Question 2: Do you have any thoughts on the suitability of wind turbines in the Broads?	Chris Waldron	Ministry of Defence	Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to <ul style="list-style-type: none"> <li>o Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.</li> <li>o Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government’s online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m;</li> <li>o Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft; and</li> <li>o Any development, including changes of use and regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or property.</li> </ul>	Noted.	We will consider this comment when we address wind in the Local Plan.
Specific Question 2: Do you have any thoughts on the suitability of wind turbines in the Broads?	Georgia Teague	Suffolk County Council	From SCC Ecology regarding wind turbines in the Broads. If any plans for wind turbines are submitted, the proposed impacts on birds and bats must be fully assessed and will probably require a bespoke mitigation package to ensure the risk of any potential harm being caused is minimised. SCC Highways would advise that consideration is given to vehicle routing associated with construction activities for wind farms. It is anticipated that construction of these sites would require large goods vehicles.	Comments noted.	We will consider this comment when we address wind in the Local Plan.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
Specific Question 2: Do you have any thoughts on the suitability of wind turbines in the Broads?	Ian Robson	RSPB	<p>Especially in winter the Broads receives significant numbers of water birds from continental Europe. Numbers in the 10's of 1,000's are recorded, and they utilise locations within most of the Broad's landscape and surrounding farmland. These birds arrive in October and leave by April.</p> <p>Because of the large numbers and large flocks there is potential (high) for strikes with wind turbines.</p> <p>Equally breeding species such as European crane and bittern, both of which are large and relatively slow flying, combined with marsh harrier might also be considered vulnerable to collision with wind turbines.</p> <p>The coast is also a key area for migrating species (generally Mar-May and July-October) for a range of bird species both large and small.</p> <p>Little tern breed on the coast and are vulnerable to disturbance, common tern and cormorant commute between inland breeding sites and the North Sea to fish and in the case of cormorant, roost.</p> <p>Visually the turbines located off the coast at Great Yarmouth North Denes are imposing even from the western edge of Halvergate Marshes.</p> <p>Renewable forms of energy are important but more appropriate forms could be considered. However, the low-lying nature of the Broads means the threat of flooding and inundation of any structures is highly likely and might point in the direction of land outside of the Broads. Again, the argument regarding wind turbines and potential for collision would still hold.</p>	Comments noted.	We will consider this comment when we address wind in the Local Plan.
Specific Question 2: Do you have any thoughts on the suitability of wind turbines in the Broads?	Sam Hubbard	Great Yarmouth Borough Council	<p>In response to 'specific question 2: Do you have any thoughts on the suitability of wind turbines in the Broads', based upon the findings of the Broads Landscape Sensitivity Study the Borough Council would agree with a preferred approach whereby suitable wind energy development areas are not identified within the Broads Local Plan. The Borough Council notes that 8 of the 9 landscape character areas within the Borough of Great Yarmouth would have moderate-high or high landscape sensitivity to the Broads from wind turbines of all sizes. The Great Yarmouth first Draft Local Plan has not therefore identified specific suitable areas for wind energy development, owing to the sensitive nature of such development on the Broads landscapes. On the basis of this evidence it is not therefore considered appropriate to identify suitable wind energy areas within the Broads Local Plan.</p>	Comments noted.	We will consider this comment when we address wind in the Local Plan.
Specific Question 2: Do you have any thoughts on the suitability of wind turbines in the Broads?	Sarah Vergette	Broads Society	<p>The Society considers that the current approach of non-allocation of wind turbines should be maintained given the intrinsic value of the Broads specific landscape in relation to PODM19: Renewable and Low Carbon.</p>	Noted.	We will consider this comment when we address wind in the Local Plan.
Specific Question 3: Do you have any specific comments on the extension to the area to which this policy (POCAN1) applies?	Georgia Teague	Suffolk County Council	<p>No comment – Cantley is located in Norfolk, and it is not strictly within SCC's remit to provide comment. However, SCC as LHA provide the following comments: The Plan outlines that the works associated with Cantley Sugar factory will lead to heavy road freight which will have negative impacts on highway safety and capacity. Consideration should be given to the extent to the impacts associated with the proposal and whether it would have a material impact upon the road network in Suffolk. The Plan states that "Cantley Sugar factory receives substantial amounts of raw material from local farms, requiring substantial amounts of HGV movements". Consideration should be given to the extent to which those movements would increase following the proposed extension and whether there are existing highway issues (within Suffolk) which could be exacerbated by the proposal.</p>	<p>The proposed extension is an extension to the area the policy applies to. Cantley Sugar Beat Factory already own and use the land that the extension covers. The Factory is not being extended. The area to which the policy applies is proposed to be extended. The policy does not allocate a specific use or change of uses, but guides how any proposals at the factory need to be judged and implemented. Traffic is a consideration in the policy.</p>	Extend area to which CAN1 applies.
Specific Question 3: Do you have any specific comments on the extension to the area to which this policy (POCAN1) applies?	Paul Harris	Broadland Council	<p>The Council has no opposition to the proposal to extend the policy area for the Cantley Sugar Factory. This area is entirely within the Broads Authority area and, as stated in the supporting text, appears to be a logical extension.</p>	Noted. We will extend the area to which the policy applies.	Extend area to which CAN1 applies.



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Specific Question 4: What do you think about extending the area to which this policy (POHOV1) applies to include the area of land shown on the following map?	-	Wroxham Parish Council	The Parish Council do not wish to pursue the inclusion of this area.	Comments noted.	We will not allocate this area in HOV1.
Specific Question 4: What do you think about extending the area to which this policy (POHOV1) applies to include the area of land shown on the following map?	Jenny Mickelburgh	Landamores Boat Builders	<p>I would like formally object to the inclusion of the area around Bridge Broad being becoming Green Infrastructure, as shown on the attached maps. A large part of the area in question, land owned by Landamores Boatbuilders, is part of a working boatyard and marina and we don't believe it is suitable for inclusion. We are concerned that designating that land as Green Infrastructure would put unfair and unworkable restrictions on our current and/or future use of it.</p> <p>Please also note that the stretch along the railway line itself is Network Rail land and forms the embankment to the railway line. Whilst I have objection relating to that area, I can't see any benefit in its inclusion as Green Infrastructure.</p> <p>There is a comment on the website that indicates that this area has already been discounted by the Planning Inspector. However, it is still in the current document, therefore I am submitting my comments for the avoidance of doubt.</p>	<p>Concerns and objection noted.</p> <p>In terms of consideration by the Planning Inspector, as is clearly stated in the consultation document, this is about when the current Local Plan, that was adopted in 2019, was examined - the Planning Inspector considered the request by Wroxham Parish Council to include the area as green infrastructure, but declined to proceed with that as a recommendation/requirement for that Local Plan, hence the question this time around.</p>	We will not allocate this area in HOV1.
Specific Question 4: What do you think about extending the area to which this policy (POHOV1) applies to include the area of land shown on the following map?	Paul Harris	Broadland Council	The area in question appears to be a large area of established vegetation that contributes to the rural character, provides screening for the Boat Yard and the railway and is likely to have some significant biodiversity value. The Council would therefore support the inclusion of this area within the policy.	Support noted. Wroxham PC have stated that they do not wish to pursue this area being allocated.	We will not allocated this area in HOV1.
Specific Question 7: Do you have any specific comments on the extension to the area to which this policy (POWHI1) applies?	Georgia Teague	Suffolk County Council	Whitlingham is located in Norfolk, and it is not strictly within SCC's remit to provide comment. However, SCC LLFA provides the following comment: There are some areas of surface water flood risk, mostly in the 'area retained for openness' but as this appears to be just a country park extension, SCC do not believe it to have any major impacts on flood risk but the management of areas at risk of surface water flooding may need to be considered.	Noted. We will refer to flood risk in the policy.	Refer to flood risk in the policy.
Specific Question 7: Do you have any specific comments on the extension to the area to which this policy (POWHI1) applies?	Paul Harris	South Norfolk Council	The Council does not object to the prosed extension to the policy area. The Council will raise however that the area is extensive and it must be considered if extending the policy area could potentially result in some recreational development that could distract from the natural and untouched nature of the area. The Council support the provision of the area where any development would be prohibited.	Noted. We will refer to not affecting the natural parts of the area.	Amed part c to say: c) Ensure no loss of parkland character <a href="#">and any new proposal must respect and not detract from the parkland character of the area;</a>

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Specific Question 8: Do you have any thoughts on this area (Chedgrave Carr) being a Local Green Space?	Dr Sarah Eglington	Norfolk Wildlife Trust	We support the inclusion of this area as Local Green Space.	Support noted.	No change to policy.
Theme B: Improving landscapes for biodiversity and agriculture	Alasdair Hain-Cole	Environment Agency	While agriculture is included as one of the Plan’s main aims, this topic is not explored extensively in the policies. It is worth considering whether the Plan could do more to encourage more sustainable and less polluting agricultural practices, for example winter storage reservoirs, the roofing of manure heaps in farmyards, or creating pull-ins for sugar beet lorries to load in order to reduce the amount of mud pulled onto the road.	Some of these things are not development in terms of needing an application. But the supporting text to PODM32 could include something along the lines of how diversification could offer the opportunity for environmental improvements.	Add text along the lines of the comments to paragraph two of supporting text to DM32.
Throughout	Nigel Dixon	NNDC Cllr for Hoveton & Tunstead Ward	Starting on page 295 through to page 306 Hoveton is referred to many times as a Town, which is incorrect; whereas, North Norfolk DC as the Planning Authority for the vast majority Hoveton refers to it as a Large Village – although it too gets confused and occasionally refers to it in error as a small town. Hoveton has population of 1804 in 873 households (in 2011 census) in an area of 10.2 sqkm and density of 172/sqkm and it doesn’t have a Town Council. Lastly, Roy’s famously promotes itself as “the largest village store in the world” but then misleads people into believing it in Wroxham when it’s actually in Hoveton! Having said that, it’s recognised that Hoveton & Wroxham although 2 villages separated by the river Bure largely operates, in many practical ways, as one community but that doesn’t make them a Town either individually or together. Please ensure Hoveton is rightly referred to as a large Village in the Broads Local Plan.	Noted and agree.	Check Local Plan reference to Hoveton - replace 'town' with 'large village' or 'village'.
Tourism	Cllr Chris Greenhill	Beccles Town Council	BTC wishes to encourage tourism in Beccles and is taking active steps to raise its profile.	Noted.	No change to Local Plan.
Tourism	Cllr Chris Greenhill	Beccles Town Council	We hope that the Broads Authority will also take a proactive role in enhancing and promoting leisure facilities and tourist attractions within the Broads Authority boundary in Beccles.	Noted. We do, yes. One of our purposes is to promote enjoyment. We also have a Communications Team and Access and Recreation Officer that work with tourism attraction providers and promote the Broads in various ways.	No change to Local Plan.
Tourism	Cllr Chris Greenhill	Beccles Town Council	The Preferred Options document recognises the role and value of tourism and is rightly concerned with the balance between tourism and environmental issues. However, BTC is concerned that there appears to be no reference to the role of land and water-based tourist accommodation, since not every tourist wishes to hire a Broads cruiser.	The Local Plan contains policies relating to tourism. There are also topic-based policies that are used to help determine applications. Furthermore, the 'about the Broads' section talks about tourism and holiday accommodation. So the Local Plan does cover tourist accommodation. Furthermore, the Authority are producing a refreshed Tourism Strategy.	No change to Local Plan.
Tourism	Cllr Chris Greenhill	Beccles Town Council	Para 4.23 of the Beccles Neighbourhood Plan, which includes areas within the Broads Authority, recognises that there is a major shortage of overnight accommodation in the town. Policy BECC3 states that “Tourism development in Beccles, including the provision of moorings for tourist boating facilities on the river Waveney, will be supported.”	Background information noted.	No change to Local Plan.
Trees	Sandra Squire	Forestry Commission	We have assessed the documentation online and the proposed policies on the protection of ancient woodland and for tree planting where appropriate in the broads setting, these are in line with Government policies.	Support noted	No change to policy.
Waste Management Facility Safeguarding	Georgia Teague	Suffolk County Council	Policy WP18 of the SMWLP safeguards waste management facilities to avoid other development from preventing or prejudicing their operation. Where sites allocated in the Plan are within 250m of a waste management facility the explanatory text of the Plan should signpost to SMWLP Policy WP18. Planning applications for these developments will need to demonstrate that the development will not prejudice the operation of the waste management facility.	Noted.	No change to Local Plan.
Waste transfer facility	Georgia Teague	Suffolk County Council	There is also a Waste Transfer Facility which sits just outside the Broads: - WTF14 - Oulton Broads P W Waters Ltd. – waste transfer facility.	Noted.	No change to Local Plan.

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Water Resources	Alasdair Hain-Cole	Environment Agency	We are including the following advice as guidance in case you proceed with a WCS/IWMS either now or to support future iterations of the Local Plan (as we would strongly recommend):	Noted. See response to specific comments.	No change to Local Plan.
Water Resources	Alasdair Hain-Cole	Environment Agency	The study area of the WCS/IWMS needs to be scoped appropriately. Limiting the geographic area considered to just the development site or the hydrological system in the immediate or downstream vicinity (rivers and aquifers) is inadequate. The implications of growth need to be considered at the regional scale as that is the scale the water companies operate at. Growth in the Authority's area could have far reaching effects on the water environment that go beyond the Authority's boundaries. It is not just about the state of the environment where the growth is proposed, it's about the state of the environment and risks to that environment where the abstraction takes place to supply the growth. The abstraction could take place many miles away, but that impact needs to be considered.	Noted. We do not intend on commissioning a water cycle study. Our housing need is around 17 a year and is very small. Please note that our 358 dwellings over the plan period are part of, not additional to, the housing numbers of our districts. Water has been assessed through the Local Infrastructure Study: <a href="https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf">https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf</a>	No change to Local Plan.
Water Resources	Alasdair Hain-Cole	Environment Agency	Linked to first point, the WCS/IWMS needs to consider the effects of the planned growth in combination with other LPA growth plans affecting the water companies. The assessment of water company ability to supply, must consider the cumulative demands from growth.	Please note that our 358 dwellings over the plan period are part of, not additional to, the housing numbers of our districts. Also note that we are not likely to meet that need as only one site is allocated and, to date, no other suitable sites for residential dwellings have come forward.	No change to Local Plan.
Water Resources	Alasdair Hain-Cole	Environment Agency	The WCS/IWMS should not be based on information from the water companies' 2019 WRMPs unless this is explicitly verified that the data are still accurate. Companies have published drafts of their 2024 and we expect there to be significant differences to the state of their supply/demand balance from 2019. These differences could have a very significant bearing on the sustainability of growth in the short to medium term.	Noted.	We will update the Local Infrastructure Study to reflect updated evidence.
Water Resources	Alasdair Hain-Cole	Environment Agency	The studies need to address whether there is an interim period between now and when sustainable water supplies can be developed (e.g., transfers, reservoirs) and make clear recommendations on how that should influence the planned phasing of growth.	Noted. We do not intend on commissioning a water cycle study. Our housing need is around 17 a year and is very small. Please note that our 358 dwellings over the plan period are part of, not additional to, the housing numbers of our districts. Water has been assessed through the Local Infrastructure Study: <a href="https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf">https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf</a>	No change to Local Plan.
Water Resources	Alasdair Hain-Cole	Environment Agency	Ambitious water efficiency measures should be explored but should be presented so that it is clear what the risks are if they are not achieved and how those risks can be reduced. Water efficiency measures in general rely on customer behavioural changes and are not guaranteed. The studies should set out the likelihood of success, how water efficiency measures will be implemented, enforced, and monitored, what happens if the measures are not effective (i.e., does it lead to a review of the local plan policy or planned growth). Measures like rainwater harvesting should also set out their performance in varying climatic conditions, for example, they are unlikely to generate much benefit in periods of prolonged dry weather/drought which we are increasingly prone to in East Anglia. The study should make clear recommendations to the LPA on the local policy standards that should be aimed for, for residential, non-residential, and existing building stock where refurbishments/changes of use provide opportunities to improve efficiency.	Noted. We do not intend on commissioning a water cycle study. Our housing need is around 17 a year and is very small. Please note that our 358 dwellings over the plan period are part of, not additional to, the housing numbers of our districts. Water has been assessed through the Local Infrastructure Study: <a href="https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf">https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf</a>	No change to Local Plan.
Water Resources	Alasdair Hain-Cole	Environment Agency	The studies can look at historic performance of water companies in meeting water efficiency/leakage targets to give an understanding of whether new/more challenging targets are a stretch.	Noted. We do not intend on commissioning a water cycle study. Our housing need is around 17 a year and is very small. Please note that our 358 dwellings over the plan period are part of, not additional to, the housing numbers of our districts. Water has been assessed through the Local Infrastructure Study: <a href="https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf">https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf</a>	No change to Local Plan.
Water Resources	Alasdair Hain-Cole	Environment Agency	Water neutrality and water offsetting measures should be explored. However, the study needs to be clear what the metrics are for its assessment. This needs to bear in mind the geographic scale of the assessment. Our advice on a suitable metric is to look at the supply sources that would presently supply a new development and set a water neutrality target that average abstraction from those sources doesn't increase post development.	In terms of water neutrality, we are not aware of this approach in the Great Yarmouth, North Norfolk or Greater Norwich Local Plans. We are looking into going better than 110 l/h/d in liaison with Anglian Water.	No change to Local Plan.

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Water Resources	Alasdair Hain-Cole	Environment Agency	Water resources has become a significant issue for growth proposals in Local Plans in East Anglia. We have evidence to indicate that groundwater abstraction to meet current needs of the population is already in some cases causing ecological damage pressure to Water Framework Directive (WFD) designated waterbodies across East Anglia (including chalk streams where applicable) or there is a risk of causing deterioration in the ecology if groundwater abstraction increases. The development proposed is within the area supplied by Anglian Water Services (AWS) and Essex Suffolk Water (ESW) and lies within the Happisburgh, Norwich and the Broads and Northern Central Water Resource Zones (WRZs). The importance of the wetlands’ biodiversity is reflected in the fact that it is formed of multiple Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Licence changes have been identified and implemented within the Ant Valley some of which have been appealed or objected against and will be going through public inquiry proceedings beginning 14th May 2024. Further assessment of impacts from water abstraction licences within the wider Broads SAC catchments is also under evaluation.	Background noted.	No change to Local Plan.
Water Resources	Alasdair Hain-Cole	Environment Agency	Water supply is a strategic policy matter as set out in paragraph 20 of the NPPF. Proposed development in Local Plans has the potential to increase abstraction from groundwater sources. The effects of growth need to be considered at the water company/regional scale, alone and in combination with other Authorities’ plans to assess the overall effect on the water companies’ ability to supply whilst meeting their environmental duties. The duty to cooperate across boundaries applies to water supply and quality issues, as advised by the NPPG. It is therefore important LPAs work together and with the water companies to assess the risk of growth plans and identify effective mitigation strategies. Working jointly on evidence base studies is an effective way of doing this. Given the water resource pressures in the East Anglian Area, we encourage the inclusion of a Water Cycle Study (WCS )/Integrated Water Management Strategy (IWMS) with new Local Plans. Due to the quantum of growth allocated and the specific nature of the Broads Authority as a Local Planning Authority, we do not consider it proportionate to require a WCS to accompany this Local Plan Review. However, we recommend one is included as part of the evidence base for future iterations of the Plan. A WCS or IWMS should consider the impact to WFD waterbodies, chalk streams and water dependant habitats such as Sites of Special Scientific Interest. It should also consider the designated sites of national and international importance (Special Areas of Conservation) that are protected by the Habitats Regulations. The Local Plan spatial strategy and policies should not cause deterioration of WFD waterbodies or prevent them from attaining good ecological status in the future.	Noted. We do not intend on commissioning a water cycle study. Our housing need is around 17 a year and is very small. Please note that our 358 dwellings over the plan period are part of, not additional to, the housing numbers of our districts. Water has been assessed through the Local Infrastructure Study: <a href="https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf">https://www.broads-authority.gov.uk/__data/assets/pdf_file/0033/504789/Broads-Local-Plan-Local-Infrastructure-study-February-2024.pdf</a>	No change to Local Plan.
Water Resources	Alasdair Hain-Cole	Environment Agency	The Local Planning Authority must have regard to River Basin Management Plans and be satisfied that adequate water supply exists to serve growth. In addition, the LPA should also demonstrate that it has engaged in conversation with AWS and ESW to discuss whether any proposed growth within the Broads is in line with the capacity of the water companies’ dWRMP 2024 to supply sustainably. Physical ability to service growth does not automatically mean that the sources of water are fully sustainable. Water companies are obliged to produce water resources management plans (WRMPs) every 5 years, with the current plans, published in 2019, setting out how the companies will maintain customer supplies over the period 2020-2045. We are working the water companies and reviewing their draft 2024 WRMP to address this issue. The Local Plan should not be based on information from the water companies’ 2019 WRMPs unless this is explicitly verified that the data are still accurate. AWS and ESW have consulted on a draft WRMP 2024 in autumn 2023. These plans are still in draft format but provide the most up to date picture of the water companies’ situation. The dWRMP2024s show that there are significant differences to the state of their supply/demand balance from 2019 WRMPs. Where there is spare capacity in the water companies’ networks this may already be allocated to: 1. growth in resource zones elsewhere in the companies’ networks, 2. transfers to other companies in the region 3. to offset supply reductions required to protect the environment, i.e., not for meeting new developments.	Noted.	We will update the Local Infrastructure Study to reflect updated evidence.
Water Resources	Alasdair Hain-Cole	Environment Agency	In 2021 we issued licence capping guidance to the water companies to prevent deterioration. Given the water resource pressure in the East Anglian Area, we cannot rule out further reductions in the supplies available to AWS and ESW to prevent deterioration of the water related ecology. Any resultant loss in available supplies will need to be addressed in the companies’ next WRMP. Replacement supplies are likely to require strategic supply options (for example reservoirs and long-distance transfers) that could have significant delivery times. This is an important consideration for the phasing of planned development. The Authority should consider the long-term viability of supplying any new development and how the phasing of growth links to the timings of the necessary strategic schemes.	Background noted. AWS are an active consultee on the Local Plan. Please see their comments and our responses.	No change to Local Plan.

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Water Treatment Facilities in Suffolk	Georgia Teague	Suffolk County Council	<p>It is worth noting that there are 7 Anglian Water, water treatment facilities along/ within the boundary of the Broads:</p> <ul style="list-style-type: none"><li>- AW168 – Somerleyton-Marsh Lane STW</li><li>- AW223 – Worlingham-Marsh Lane HSW</li><li>- AW10 - Barsham STW</li><li>- AW9 - Barrow STW</li><li>- AW166 – Shipmeadow-Locks Lane STW</li><li>- AW128 – Mettingham STW</li><li>- AW25 - Bungay STW</li></ul> <p>The location of these can be seen in the policies map of the Suffolk Minerals and Waste Local Plan.</p> <p>They can also be seen on the interactive map4. (For any differences in maps, please use the map in the Minerals and Waste Plan as the definitive map.) <a href="https://scc-planning.github.io/minerals-waste-map/">https://scc-planning.github.io/minerals-waste-map/</a></p>	Noted.	No change to Local Plan.



## Local Plan for the Broads - Review

### Proposed environmental protection policy

Following some comments on the Preferred Options version of the Local Plan (see [end of document](#)), a new policy has been produced relating to pollution, hazards and environmental quality.

This is a proposed draft section/policy for the Publication Local Plan. Member's comments and thoughts are requested. This is a new policy.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document.

#### **PUBDMxx: Pollution and Hazards in development and protecting environmental quality**

1. All development proposals will protect the quality of the environment.
2. Development proposals will be supported where the potential for the creation of, or susceptibility to, hazards and pollution (including, but not limited to, air, water and light pollution) has been avoided or suitably mitigated.
3. Applicants will need to demonstrate that their proposals are safe from, and do not give rise to, unacceptable hazards and/or pollution as a result of the following matters:
  - a) the proposed development and the activities and substances involved.
  - b) the site itself, and any potential existing contamination or land instability. Development proposals on contaminated land (or where there is reason to suspect contamination) must include an assessment of the extent of contamination and any possible risks. Proposals will only be permitted where the land is, or is made, suitable for the proposed use.
  - c) the proximity of the proposal to any existing hazards and/or existing sensitive development.
  - d) the cumulative effect of development with respect to pollution and hazards on health, living conditions and the natural environment in combination with nearby development or developed uses.
4. Proposals will need to comply with statutory environmental quality standards and demonstrate, individually or cumulatively, that the development would not give rise to adverse impacts on:
  - a) the natural environment;
  - b) the health and safety of the public;
  - c) air quality;
  - d) water quality, including surface water and groundwater;
  - e) light and noise pollution; and,
  - f) land quality and condition.

5. Developments proposed within specified consultation distances from existing hazardous installations as identified by the Health and Safety Executive must take into account any risks involved from the hazardous installation and the need for appropriate separation between hazardous installations and incompatible uses.
6. Where proposals are within a close proximity (typically less than 400m, although this may vary based on local topography) to watercourses, there may be the potential for a hydrological link. Development proposals should take into account the potential for pollutants and provide a strategy for preventing this reaching the watercourses untreated. This includes the design of SuDS.

## **Reasoned justification**

The purpose of this policy is to ensure that every opportunity is taken to avoid, minimise and reduce all emissions and other forms of pollution, including light and noise pollution, and to ensure no deterioration in water quality. In accordance with national planning policy, the above policy sets out the details to assess development proposals where there may be pollution or hazard risks.

Sites and installations which have quantities of hazardous substances present on-site are designated as hazardous installations by the Health and Safety Executive (HSE).

The HSE sets a consultation distance around major hazard sites and major accident hazard pipelines after assessing the risks and likely effects of major accidents at the major hazard. Where proposals come forward within a specified distance to an installation, advice from the HSE will be needed to assess the risks and the appropriateness of development. Where there are risks, the emphasis will be on applicants to demonstrate that their proposals are safe and do not give rise to unacceptable impacts. The specified consultation distances are identified by the Health and Safety Executive and are subject to change over time

The Broads are underlain by the Crag Group, which is designated as Principal Aquifer, and overlain by superficial deposits of Secondary A aquifers in parts of the district. The groundwater is important for public water supply and a number of Source Protection Zones (SPZs) have been delineated to protect water resources in the district. SPZs show the level of risk to the protected source from contamination and contaminative activities and are used to guide decisions about the acceptability of potentially polluting development scenarios. The aquifers that underly the area also support abstractions for agricultural, industrial, commercial, public services and private/domestic water supply. The groundwater resource is therefore of high value.

The National Planning Policy Guidance also provides guidance on air quality and on hazardous substances, this guidance and particularly the flowchart section on how air quality considerations are relevant to the development management process will be referred to where applicable when processing planning applications. Other documents from statutory authorities will be considered such as DEFRA's Clean Air Strategy 2019.

In accordance with the provisions of the NPPF, local authorities must ensure that sites are suitable for development taking account of ground conditions, pollution arising from previous uses and any

63 proposals for land remediation. Remediation will need to remove unacceptable risk and make the  
64 site suitable for its new use. As a minimum, after carrying out the development and  
65 commencement of the new use, the land should not be capable of being determined as  
66 contaminated land under the relevant Regulations (Part IIA of the Environmental Protection Act  
67 1990).

68 The Environment Agency suggest these measures to address water pollution:

- 69 • Drainage maps for surface water and foul water to be easily available,
- 70 • Surface water drains clearly marked on site (normally with blue).
- 71 • Penstocks or other means of containing potential spills to be installed and easily operated.
- 72 • Chemicals and oils to be contained in suitable bunded areas to contain 110% of any potential  
73 spill.
- 74 • Spill kits to be easily available and training given on site as to their effective use.
- 75 • Very clear labelling on drinking water tanks and oil store on any boats to reduce the  
76 incidence of oil tank being filled up with drinking water and overflowing.
- 77 • Emergency plans to be drawn up with contact numbers to include out of hours.
- 78 • Consideration given to appropriate points to install booms in any boatyard entrance to  
79 contain any oil spill and prevent it from reaching the main river, and installation of an eyelet  
80 each side suitable for tying on booms with ½ inch rope.

81 There are various other policies that relate to the issues discussed in this particular policy. The  
82 policies in the amenity, tranquillity, light pollution, health and wellbeing, water and natural  
83 environment sections may be of relevance to proposals.

- 84 • The [Groundwater Protection guidance on gov.uk](#) which includes the Protect Groundwater  
85 and Prevent Groundwater Pollution guidance and The Environment Agency's Approach to  
86 Groundwater Protection.
- 87 • The [Groundwater Source Protection Zones \(SPZ\) guidance](#) on gov.uk.
- 88 • The [Land Contamination Technical Guidance](#) on gov.uk, including the [Land Contamination](#)  
89 [Risk Management \(LCRM\)](#) guidance.
- 90 • Paragraphs 124, 146, 180, 189 and 190 within the National Planning Policy Framework  
91 (NPPF).
- 92 • Part IIA of the Environmental Protection Act 1990;

93 Another option would be to not have a policy but given the potential impact of signs on the area,  
94 this is not deemed a reasonable alternative.

#### 95 **Why has the alternative option been discounted?**

96 Not having a policy has been discounted because having such a policy has been requested by some  
97 stakeholders and on research of some other Local Plans, such a policy is included within those.

#### 98 **UN Sustainable Development Goals check**

99 This policy meets these [UN SD Goals](#):



100

**3** GOOD HEALTH  
AND WELL-BEING



**6** CLEAN WATER  
AND SANITATION



**11** SUSTAINABLE CITIES  
AND COMMUNITIES



**12** RESPONSIBLE  
CONSUMPTION  
AND PRODUCTION

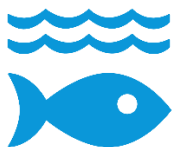


101

**13** CLIMATE  
ACTION



**14** LIFE  
BELOW WATER



**15** LIFE  
ON LAND



## Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

## Assessment of policy

	A: No policy		B: Publication Version Policy	
ENV1				
ENV2			+	Policy refers to water pollution.
ENV3			+	Fundamentally, the policy seeks to protect the environment.
ENV4				
ENV5			+	Taken in the round, there could be benefits of the policy to climate change.
ENV6				
ENV7				
ENV8			+	Taken in the round, there could be benefits of the policy in terms of waste.
ENV9				
ENV10				
ENV11			+	Policy refers to air and light pollution.
ENV12				
SOC1			+	Fundamentally, the policy seeks to reduce emissions and protect things like water quality with associated health benefits.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

## Comments received as part of the Preferred Options consultation

We received these comments that have prompted the introduction of this policy.

Topic area	Comment	Organisation	Comment
Groundwater and Contaminated Land	Alasdair Hain-Cole	Environment Agency	The importance of groundwater in the Broads has not been demonstrated. We recommend revisions to reflect the following comments in relation to aquifers and source protection. The Broads are underlain by the Crag Group, which is designated as Principal Aquifer, and overlain by superficial deposits of Secondary A aquifers in parts of the district. The groundwater is important for public water supply and a number of Source Protection Zones (SPZs) have been delineated to protect water resources in the district. SPZs show the level of risk to the protected source from contamination and contaminative activities and are used to guide decisions about the acceptability of potentially polluting development scenarios. The aquifers that underly the area also support abstractions for agricultural, industrial, commercial, public services and private/domestic water supply. The groundwater resource is therefore of high value.
Groundwater and Contaminated Land	Alasdair Hain-Cole	Environment Agency	We recommend that the following guidance be referenced: <ul style="list-style-type: none"> <li>• The Groundwater Protection guidance on gov.uk which includes the Protect Groundwater and Prevent Groundwater Pollution guidance and The Environment Agency's Approach to Groundwater Protection;</li> <li>• The Groundwater Source Protection Zones (SPZ) guidance on gov.uk.</li> </ul>
Groundwater and Contaminated Land	Alasdair Hain-Cole	Environment Agency	While the Plan does mention issues of Contaminated Land (such as in Policy POSP3: Soils), we consider an overall policy for dealing with land contamination should also be included. We recommend that the following guidance be referenced: <ul style="list-style-type: none"> <li>• Paragraphs 124, 146, 180, 189 and 190 within the National Planning Policy Framework (NPPF);</li> <li>• Part IIA of the Environmental Protection Act 1990;</li> <li>• The Land Contamination Technical Guidance on gov.uk, including the Land Contamination Risk Management (LCRM) guidance.</li> </ul>

Topic area	Comment	Organisation	Comment
Groundwater and Contaminated Land	Alasdair Hain-Cole	Environment Agency	Environment Agency guidance is regularly revised, meaning the most recent version or replacement guidance for superseded versions should be consulted throughout the Plan's duration.
Air Quality	Sarah Morrison	Natural England	Natural England notes there is no policy in the draft Local Plan relating to air quality. The HRA identified that the Plan has the potential to increase traffic related emissions within 10km of the plan area and therefore within 200m of The Broads Special Area of Conservation (SAC), Broadland Special Protection Area (SPA) and Broadland Ramsar.
POBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line	Alasdair Hain-Cole	Environment Agency	<p>The policy states: "Full regard will be given to the limitations of the road access, avoidance of potential water pollution, and the risk of flooding to the site." We recommend including some examples of water pollution prevention measures that may be deemed acceptable in the "Reasoned Justification" section supporting this policy. Possible measures we can recommend include:</p> <ul style="list-style-type: none"> <li>• Drainage maps for surface water and foul water to be easily available,</li> <li>• Surface water drains clearly marked on site (normally with blue).</li> <li>• Penstocks or other means of containing potential spills to be installed and easily operated.</li> <li>• Chemicals and oils to be contained in suitable bunded areas to contain 110% of any potential spill.</li> <li>• Spill kits to be easily available and training given on site as to their effective use.</li> <li>• Very clear labelling on drinking water tanks and oil store on any boats to reduce the incidence of oil tank being filled up with drinking water and overflowing.</li> <li>• Emergency plans to be drawn up with contact numbers to include out of hours.</li> <li>• Consideration given to appropriate points to install booms in any boatyard entrance to contain any oil spill and prevent it from reaching the main river, and installation of an eyelet each side suitable for tying on booms with ½ inch rope.</li> </ul>

Topic area	Comment	Organisation	Comment
			There is no legal requirement for most of these, meaning they are particularly worth exploring as part of this policy.
PODM4: Water quality and foul drainage	Alasdair Hain-Cole	Environment Agency	Policy PODM4: Water quality and foul drainage paragraph 1 states “Development will be permitted only 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”. While we are in support of this statement, we would encourage your authority to consider how any adverse impact will be assessed. An individual assessment for any and each prospective development may be a difficult to determine. In addition, it is worth considering that focusing on the risks of individual developments in isolation risks overlooking the cumulative impacts that may occur for multiple developments. A WCS or IWMS may assist your Authority establish what would constitute “adverse impact” within the Broads Area. If not possible as part of this Local Plan review, we would strongly recommend you undertake a WCS as part of the next iteration of your Local Plan. This will need to inform the strategic policies of the local plan on housing, non-housing development and infrastructure delivery. Due to the pressures on local water resources and the potential risk of deterioration from increased levels of abstraction, we would advise that any new development in the area aim for the highest levels of water efficiency. We also recommend that non-domestic demand and domestic demand be dealt with separately whenever possible.
PODM4: Water quality and foul drainage	Dr Sarah Eglington	Norfolk Wildlife Trust	We support this policy. However, in addition to any wider nutrient neutrality requirements for avoiding water quality impacts, we recommend a specific policy requirement for the assessment of run-off impacts on the water quality of the Broads from any new built development close to the water’s edge, either from new allocations or speculative development.

# Broads Local Plan

## Local Infrastructure Report

June 2024

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DRAFT

# 1. Introduction

Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences. By its very nature, it underpins everything we do and is fundamental to our daily lives. Infrastructure supports new development and facilitates the growth of jobs and access to technology and services.

The NPPF, at paragraph 20, says:

*Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: Inter alia*

*b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

*c) community facilities (such as health, education and cultural infrastructure)*

This report seeks to summarise the needs and approaches to provision of local infrastructure. A draft version of this report was sent to some stakeholders for a three-week technical consultation. The responses received are at Appendix 1.

## 2. The Authority's constituent districts and their infrastructure studies

To support their proposals in current Local Plans and to support future proposals in future Local Plans, our District Council's assess the infrastructure requirements. The Broads' housing need number is included within our district's total housing need and the infrastructure needs of that total number for the entire district will be assessed through these studies. The Authority works closely with its constituent districts as Local Plans are produced. Here are the most recent Infrastructure Studies. Please note that North Norfolk District Council do not appear to have such a study on the website.

- [Great Yarmouth Infrastructure Plan \(2020\)](#) - This document identifies the various forms of infrastructure that might be required to meet the level of growth planned in the Great Yarmouth Local Plan Part 2 to 2030. It presents an overview of growth patterns and their infrastructure projects needed to support such growth, their costs and the funding involved with this. This study has been prepared in consultation with infrastructure providers.
- This report is a review of the infrastructure requirements within the Greater Norwich Area: [Greater Norwich Infrastructure Needs Report](#) and [Greater Norwich Infrastructure Needs Report December 2020](#). There is also the [Five Year Infrastructure Investment Plan](#) which identifies the projects from the [Greater Norwich Infrastructure Plan](#) whose delivery is considered to be a priority for achieving the economic growth targets, as set out in the [Joint Core Strategy](#) and the [Greater Norwich City Deal](#).

- [Waveney Infrastructure Study](#) - This document identifies what infrastructure might be required to support the growth ambitions in the Waveney Local Plan. Where possible it identifies the cost, the organisation responsible for delivery, and any potential funding sources. The study has been prepared in consultation with infrastructure providers.
- At the time of writing, North Norfolk District Council were at examination into their Local Plan. Their infrastructure related information can be found here: [Home | 4: Evidence base and supporting documents \(north-norfolk.gov.uk\)](#)

It should also be noted that LPAs are required to produce Infrastructure Funding Statements each year. The infrastructure funding statement (IFS) must set out the amount of future planning obligation expenditure where funds have been allocated. The BA's Statement is here: [Developer contributions \(broads-authority.gov.uk\)](#).

**At the time of writing, the district councils have not asked the Broads Authority to include specific infrastructure in the emerging Local Plan. We will continue to work closely with the District Councils.**

### 3. Norfolk Strategic Planning Framework

As part of the [Norfolk Strategic Planning Framework](#) (NSPF) (January 2021) work is ongoing at a Norfolk-wide level to address the same issues as listed in the NPPF, but from a more strategic view point. Whilst the NSPF looks at strategic infrastructure this report summarises infrastructure at a local level. The following are agreements from the NSPF:

Agreement 21 – Norfolk Authorities have agreed to become members of Water Resource East (WRE), and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

Agreement 24 – To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Agreement 25 – To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 26 – Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

Agreement 27 – Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues: • Infrastructure • Governance • Heritage • Marine Protected areas • Marine and coastal employment • Sustainable port development • Energy – offshore wind and oil and gas • Access for tourism and recreation • Sustainable fisheries and aquaculture in small harbour towns • AONB and Seascape and landscape (character and natural beauty) • Biodiversity • Marine aggregates • Cabling • Water quality/water supply and sewerage • Climate change/ Coastal erosion and coastal change management

Agreement 28 – In recognition of: a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; b) the pressure that development in Norfolk could place on these assets; and c) the importance of ecological connections between habitats Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

**As the Local Plan is produced, we will ensure it addresses the agreements set out in the NSPF.**

## 4. Norfolk and Suffolk - Strategic Infrastructure

The [Norfolk Strategic Infrastructure Delivery Plan](#) (NSIDP) (2022) has been produced by Norfolk County Council working with all the local planning authorities and utility providers. It identifies strategic infrastructure requirements and provides an update on the delivery of a range of projects. The projects in the NSIDP reflect the key infrastructure needed to deliver the scale of growth ambitions outlined in the NSPF. The NSIDP is a working document that will be regularly

updated as information becomes available. The IDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development.

In Suffolk, there is a public sector led partnership, working with councils and partners to promote countywide economic growth. [Suffolk Growth](#) works at both a strategic and operational level, providing links across our multi-faceted growth agenda. Generally, the partnership work to:

- Connect transport investment and the development of the local economy,
- Ensure public investment in infrastructure and business development support delivers best value (economic, social and environmental) for Suffolk's firms.
- Enable growth of the visitor economy and support the rethinking of local high streets to deliver for residents, businesses and tourists, including our ambition to become the UK's first green tourist destination.

**The main infrastructure identified that is particularly relevant to the Broads, is the dualling of the Acle Straight. The current local plan has a policy on the Acle Straight and this will be rolled forward.**

## **5. The housing and residential moorings need for the Broads**

The NPPF says at paragraph 8 'that a sufficient number and range of homes can be provided to meet the needs of present and future generations.'

The NPPF goes on to say, at paragraphs 60 and 61 'to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay' and 'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signal'.

### **5.1 Residential dwellings**

The 2019 Local Plan was the first Local Plan for the Broads to include a housing need figure. The need figure was 286 dwellings or 11.43 dwellings a year.

According to annual monitoring, we have permitted the following number of net new dwellings:

- 2019/20: 21 dwellings
- 2020/21: 7 dwellings

- 2021/22: 21 dwellings

Most Local Planning Authorities now have their housing need calculated using the Standard Methodology. The NPPG says that the ‘standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply’.

However, the standard method does not apply to the Broads. The NPPG says ‘where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, where local authority boundaries have changed due to reorganisation within the last 5 years or local authority areas where the samples are too small, an alternative approach will have to be used. Such authorities may continue to identify a housing need figure using a method determined locally, but in doing so will need to consider the best available information on anticipated changes in households as well as local affordability levels.’

Working with Great Yarmouth Borough Council, who were commissioning work on their housing need at the same time as us, we commissioned ORS Consultants to calculate the housing need for the entire Broads area. The [study](#) was completed in May 2022 and identifies a housing need for the Broads from 2021 to 2041 as follows:

Projected Dwellings needed for the Broads by Local Authority

Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
105	97	6	68	59	23

Overall housing need for 2021-41 of 358 dwellings, or 17.9 dwellings per annum.

**It is important to note that the need for the Broads is part of the need of the districts and is not additional to the need of the districts.**

## 5.2 Residential moorings

The Housing and Planning Act 2016 sets out the requirement to understand the need for those living on boats.

The 2019 Local Plan was the first Local Plan for the Broads to include a residential mooring need figure. The need figure was 63 residential moorings.

According to annual monitoring, we have permitted 12 residential moorings (at Marina Quays in Great Yarmouth).

We commissioned RRR Consultancy to calculate the housing need for the entire Broads area. The study<sup>1</sup> was completed in July 2022 and identifies a residential mooring need of 48, as follows:

**Table 10**

---

<sup>1</sup> [Broads Authority Boat Dwellers Accommodation Assessment \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/broads-authority-boat-dwellers-accommodation-assessment)

181 Residential moorings need to 2041

Permanent residential moorings need	
2021-2026	45
2026-2031	1
2031-2036	1
2036-2041	1
<b>Total</b>	<b>48</b>

### 182 5.3 The Utilities Site

183 The Utilities Site is a brownfield site in Norwich. It is next to other brownfield sites which have  
184 the potential for regeneration. Working with Norwich City Council and Broadland and South  
185 Norfolk Councils, a partnership has formed to collectively look at sites in this area – the East  
186 Norwich Regeneration Area. Combined with the other four sites, it is fair to say that much  
187 infrastructure will be required. A [Masterplan](#) has been produced and at the time of writing, a  
188 Supplementary Planning Document (SPD) was being produced. The infrastructure needs of that  
189 wider scheme are considered in those two documents.

190 **Development in the Broads may require local specific infrastructure. The Utilities Site will**  
191 **require significant infrastructure and that site is part of a wider regeneration area subject to a**  
192 **Masterplan and emerging SPD.**

## 193 6. Transport

194 The NPPG Paragraph 104 says: *Transport issues should be considered from the earliest stages of*  
195 *plan-making and development proposals, so that:*

- 196 a) the potential impacts of development on transport networks can be addressed;
- 197 b) opportunities from existing or proposed transport infrastructure, and changing transport  
198 technology and usage, are realised – for example in relation to the scale, location or density  
199 of development that can be accommodated;
- 200 c) opportunities to promote walking, cycling and public transport use are identified and  
201 pursued;
- 202 d) the environmental impacts of traffic and transport infrastructure can be identified, assessed  
203 and taken into account – including appropriate opportunities for avoiding and mitigating any  
204 adverse effects, and for net environmental gains; and
- 205 e) patterns of movement, streets, parking and other transport considerations are integral to the  
206 design of schemes, and contribute to making high quality places.

207 The NPPF at paragraph 85 recognises the difference between rural and urban areas:



*Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.*

## **6.1 Acle Straight**

An important transport consideration is the dualling of the Acle Straight. Whilst on one hand this is local to the Broads, it is also of strategic importance as the road is a Trunk Road. The A47 is the main strategic route linking Norfolk to the midlands and the north (westbound) and central/northern Europe (eastbound). The Authority has an adopted policy relating to this in the Local Plan (2019) which will be rolled forward to the new Local Plan.

## **6.2 Policies in the Local Plan**

New allocations could have local highway network impacts of varying scales. The Authority will work with the relevant Local Highways Authority. Individual allocations will be considered by the Highways Authority. Indeed, the Highways Authority will still assess individual planning applications. Please note that those allocations rolled forward from the 2019 Local Plan that have planning permission (OUL2, STO1 and THU1) are deemed adequate in relation to transport. And all other sites that are to be included in the new Local Plan were assessed through the [Housing and Economic Land Availability Appraisal \(HELAA\)](#) and both Norfolk and Suffolk County Councils as Local Highways Authorities provided comments to consider and take on board when assessing the sites.

Development allocations and development boundaries are located in more sustainable locations where services and facilities can be accessed by modes other than single occupancy cars. The [Development Boundaries Topic Paper](#) is of relevance.

Some dis-used railways allocated in the Local Plan and safeguarded to enable them to be used as recreation routes.

## **6.3 Public transport, walking, wheeling and cycling.**

Public transport is supported, although it should be noted that the scale of growth and the sites allocated in the Local Plan will not be of a scale to generate the need for viable changes to bus routes. In relation to rail, the Local Plan seeks to identify and allocate rail stations. For walking and cycling, please see the Green Infrastructure section. Norfolk County Council is currently consulting on a Walking, Wheeling and Cycling Strategy for Norfolk (December 2023).

## **6.4 Alternative fuels**

Since June 2022, the Building Regulations have been changed so new homes and buildings such as supermarkets and workplaces, as well as those undergoing major renovation, are required to install electric vehicle charge points.

**It is not proposed to set a standard for electric vehicle charging points in the new Local Plan for the Broads although there will be a policy relating to fire risk and the design and location of charging points.**



## 6.5 Relevant district documents

### Great Yarmouth Borough Council:

[Local Plan Part 2 Transport Modelling](#): The purpose of the study is to assess the impact on the A47 trunk road of three additional allocations that are part of the Great Yarmouth Draft Local Plan 2. The study demonstrates the impact on the A47 trunk road of the following allocations:

- Policy ADA1 – Land to the south of Links Road Gorleston-on-Sea – 500 dwellings;
- Policy ADA4 – Land to the north of the A143 Beccles Road, Bradwell – 600 dwellings; and
- Policy PDP6 – Beacon Park District Centre – (subject to a lapsed planning consent)

The impact of including the three additional allocations either constrained to NTEM growth levels or with unconstrained growth, is to increase the likelihood of traffic congestion around the junction of A47 / Links Road / Beaufort Way.

[Great Yarmouth Transport Strategy and Implementation Plan - 6 April 2020 \(norfolk.gov.uk\)](#): This document sets out the transport vision for Great Yarmouth, highlighting the challenges and opportunities along with the transport infrastructure that needs to be delivered within the short and medium-term to enable growth to come forward sustainably as well as supporting the existing local communities. The transport infrastructure presented in this strategy has been sifted from an initial long-list of options which have been subject to stakeholder engagement, appraisal and prioritised using a bespoke Strategic Assessment tool and the Department for Transport's (DfT) Early Assessment and Sifting Tool (EAST), which compares the Strategic, Economic, Managerial, Financial and Commercial case for each transport option. An Action Plan has then been produced to take forward the identified options along with a series of recommended next steps.

### Norwich City Council

[About Transport for Norwich - Norfolk County Council](#): Transport for Norwich is a programme of work to improve accessibility by all forms of transport around the city. The aim is to encourage the use of more sustainable forms of transport, such as public transport, cycling and walking, while also improving the capacity of the road network. It is also designed to stabilise traffic levels and as a result improve air quality around the city. It is a partnership between Norfolk County Council and Norwich City Council, as well as local authorities within Greater Norwich on schemes in the wider area. Funding is from sources including the Department for Transport, developer contributions, New Anglia Local Enterprise Partnership and local growth funds.

### East Suffolk Council

The following evidence was produced to support the Waveney Local Plan.

- [Traffic Modelling](#) (2018)  
Assessing the impact upon the highway network of development planned in the Local Plan and identifying junctions that are likely to experience congestion in the future.
- [Suffolk County Transport Model Forecast Model Report](#) (2017)  
Assessing the impact on the highway network from different growth scenarios.

- [Suffolk County Transport Model Forecast Model Report Addendum](#) (2017)  
Examining the traffic impact from access options for growth to the south of Beccles.
- [Suffolk County Transport Model Preferred Option Traffic Forecasting Report](#) (2018)  
Assessing the impact of the emerging preferred option. It includes updates to the model from the July 2017 reports.
- [Technical Note – Response on Beccles Transport Impact Assessment](#) (2018)  
A response to issues raised within the Beccles Transport Impact Assessment, which was commissioned by Worlingham Parish Council.

## 6.6 Hoveton and Wroxham network improvement strategy

The [Hoveton and Wroxham network improvement strategy \(2020\)](#) identified potential measures to help address existing transport network constraints and transport improvements to facilitate the growth identified in the emerging Local Plans. This work produced some key findings:

- Through traffic is a significant proportion of the journeys.
- The highest quantities of traffic pass through Norwich Road / Stalham Road (A1151) with the majority travelling South towards Norwich.
- There is scope to encourage a greater use of sustainable transport.
- The A1151 Norwich Road / B1140 Salhouse Road mini-roundabout operates close to capacity with high delays in AM peak hour.
- The A1151 Norwich Road / Church Road / Station Road / A1151 Stalham Road junction is affected by high demand from the adjacent signal-controlled pedestrian crossing which creates queues.
- The A1151 Stalham Road / A1062 Horning Road / B1354 Horning Road West double mini-roundabout junction is close to capacity in both AM and PM peak hours and experiences congestion on all arms.

## 6.7 Transport East

[Transport Strategy 2023-2050](#): Through this strategy, we aim to overcome some of the transport challenges experienced, while also delivering a fit for purpose, high quality, inclusive and sustainable transport network that will be able to accommodate future growth in the area.

Strategic priorities and linked goals are as follows:

### Decarbonisation to net-zero

Working to achieve net zero carbon emissions from transport, building on our status as the UK's premier renewable energy region. Our decarbonisation pathway underpins the other three pathways in the Strategy.

- **Goal 1**  
Reduce demand for carbon intensive trips through local living; making it easier for people to access jobs and services locally or by digital means

- 319     • **Goal 2**  
320         Shift modes by supporting people to switch from private car to active and passenger  
321         transport, and goods to more sustainable modes like rail
- 322     • **Goal 3**  
323         Switch fuels with all private, passenger transport, fleet and freight vehicles switching to net  
324         zero carbon fuels at the earliest opportunity
- 325     • **Goal 4**  
326         Zero carbon growth by supporting authorities and developers to plan, locate and design  
327         new development that reduces the need for people to make carbon-intensive trips
- 328     **Connecting growing towns and cities**  
329         Providing enhanced links between our fastest growing places and business clusters. Improving  
330         access for people to jobs, suppliers, services, and learning; enabling the area to function as a  
331         coherent economy and improving productivity.
- 332     • **Goal 5**  
333         Improve connections and access within our urban centres through better walking, cycling  
334         and passenger transport, supporting sustainable access to services, education, training, jobs  
335         and leisure
- 336     • **Goal 6**  
337         Deliver faster and more reliable connections between our growing places and to the rest of  
338         the UK, to support business growth, skills development and employment
- 339     • **Goal 7**  
340         Fully integrate transport networks, services and operations across the Transport East region,  
341         through a customer-focused approach, enabling seamless and safe end-to-end journeys by  
342         sustainable modes that are attractive to all
- 343     **Energising coastal and rural communities**  
344         A reinvented sustainable coast for the 21st century which powers the UK through energy  
345         generation. Supporting our productive rural communities and attracting visitors all year round.
- 346     • **Goal 8**  
347         Increase accessibility for rural communities to education, training, services and jobs  
348         through; better ways of taking people to places sustainably, supporting more local trips  
349         through closer provision of goods and services, supporting regional partners and the digital  
350         sector to provide alternative options to travel
- 351     • **Goal 9**  
352         Improve connections along our 500miles of coastline, and connect our coastal communities  
353         to the rest of the region and the UK, supporting levelling-up and boosting our coastal  
354         industries
- 355     **Unlocking international gateways**

Better connected ports and airports to help UK businesses thrive, boosting the nation's economy through better access to international markets and facilitating foreign investment.

- **Goal 10**

Improve connectivity, journey time and reliability for freight, passengers and employees to ports and airports

- **Goal 11**

Move goods and people sustainably to ports and airports by shifting modes including to rail and water

- **Goal 12**

Increase the use of alternative fuels for both port and airports, and for the vehicles moving people and goods onwards from international gateways

[Strategic Investment Programme \(February 2023\)](#): This document sets out the proposed approach to a Strategic Investment Programme to enable delivery of the Transport Strategy. It is a supporting document for the Transport East Strategy, and the main document will be reviewed every three years or in response to emerging guidance and policy; the Appendices to this document will be updated annually.

**The scale of growth proposed will not have strategic transport impacts. There may be some more local highway changes or improvements that could be needed as a result of schemes. We will contact the relevant Highways Authority regarding any allocations that are proposed. We will ensure we keep up to date with any relevant documents and strategies.**

## 7. Telecommunications

NPPF paragraph 114 says: *Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).*

### 7.1 Mobile coverage

In 2020, 87% of those over 16 had a smartphone<sup>2</sup>. Whilst there remain many mobile “not-spots” in Norfolk and Suffolk (some rural areas and parts of the coast in particular), the use of smartphones to access the internet has increased hugely; in 2015, smartphones overtook the use of laptops as the number one device to access the internet in the UK<sup>3</sup>.

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<sup>2</sup> [Share of adults who own a smartphone in the United Kingdom \(UK\) in 2008 and 2019 to 2022 \(statista.com\)](#)

<sup>3</sup> [UK Communications Market Report, August 2015 \(ofcom.org.uk\)](#)

Norfolk County Council<sup>4</sup> commissioned an independent study in 2018, where the mobile signal was tested with consumer devices around Norfolk to establish a true picture of mobile voice and data coverage. They are using this information to work with mobile providers to improve coverage and tackle ‘not spots’ across the county. The survey covered:

- More than 3,400 miles of Norfolk’s roads
- 30 railway stations
- Main railway lines
- Enterprise zones
- Popular tourist destinations

The survey showed that phone signals for voice calls in Norfolk were an issue, with only 82% of call attempts being successful. The call failures happened throughout the county, across a broad range of locations and for all operators. Norfolk County Council provided the information from the survey in [interactive maps](#), allowing residents to see which of the four major providers - EE, Telefonica/O2, Three and Vodafone – have the best coverage in the area for the needs.

Suffolk County Council do not seem to have equivalent information relating to mobile coverage.

## **7.2 Broadband**

The use and demand for mobile and home fast internet connections will continue to grow exponentially - with increased dependency on technology in our everyday lives. Access to fast broadband is a vital component of infrastructure in today’s world. It is key to growing a sustainable local economy, vital for education and home working and an increasingly central part of community cohesion and resilience, particularly in the rural areas of the county. The availability, reliability and speed of mobile and fixed broadband provision is now a key consideration for most house buyers as well as tourists and many view it as essential as the traditional utilities. Similarly, it is also a key concern for the business sector. The services offered by Local Authorities, utility companies and banking services are increasingly reliant on digital infrastructure to provide services and interact with their customers. Planning policy can play an important role in helping to achieve the transformation in mobile and broadband provision. Local Planning Authorities have a pivotal role to play in encouraging and supporting developers to future-proof their developments and maximise their value by installing high-speed broadband and by working with mobile telecoms companies to ensure there is a comprehensive and reliable network that minimises the impact on the landscape.

Not all urban areas are well-connected; as an example, new residential development does not always have broadband connectivity installed up-front and rural areas are often less well-served by broadband, and the low speed of connectivity can be an issue in both urban and rural areas. Not all properties in a rural county – particularly isolated farmhouses and small hamlets - will be feasible financially to connect up to a broadband network, although there are some examples of

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<sup>4</sup> [Norfolk County Council study of mobile phone coverage in Norfolk \(norfolk.gov.uk\)](https://www.norfolk.gov.uk)

the residents of small villages working together to pool funding to secure and deliver fibre broadband<sup>5</sup>.

In Norfolk, [Better Broadband for Norfolk](#), [Local Full Fibre Network](#) and [Project Gigabit](#) have extended and will continue to extend the fibre broadband network to homes and businesses across the county where it wasn't economically viable for commercial companies to provide access. Funded through Norfolk County Council, BT and BDUK (Broadband delivery UK), the project is expected to have a huge positive impact on the economic and social development of Norfolk. The latest info taken from the [Think Broadband](#) data shows at October 2023, 96.7% of premises in Norfolk can now access superfast broadband. This map shows the upgraded postcodes to enable fast broadband and where it's planned for future delivery [Better Broadband for Norfolk coverage check \(arcgis.com\)](#).

In Suffolk, Suffolk's overarching aspiration is to deliver full coverage of better broadband services to all premises in Suffolk as soon as possible. The Better Broadband for Suffolk Programme<sup>6</sup>, run by Suffolk County Council, secured around £24m of public money (SCC and Central Government), which was been used to leverage further private sector investment from BT through a public procurement process. Here is the Programme history:

- In 2013, we achieved 50% superfast broadband coverage in Suffolk.
- In 2015, we reached 85% coverage.
- In 2020 the Better Broadband for Suffolk programme reached its 100,000th customer.
- In 2021, phase 3 of the Better Broadband for Suffolk programme started - this phase completed in early 2023 and extended coverage in the county past 98% (with speeds of 24Mbps or greater). To see the latest broadband coverage figures in the county, please go to the [Think Broadband website](#).

Project Gigabit is a £5 billion government infrastructure project aimed at delivering fast and reliable gigabit-capable broadband to homes and businesses in the hardest-to-reach parts of the UK. On 1 July 2023, it was announced that the contract for Suffolk, representing a £100 million investment in Suffolk, has been awarded by BDUK to CityFibre to provide new high speed Gigabit broadband capabilities. This will benefit around 80,000 properties across rural Suffolk.

### **7.3 Fibre to the premises**

Traditionally the main challenge to installing high speed broadband in new developments, particularly smaller developments and/or those in rural areas, has been that of cost and the complexities of working with the providers. Although the cost to developers of installing high speed broadband at larger sites can be cost neutral, the cost per unit increases on smaller developments where economy of scale is reduced. In addition, installing fibre cabling for superfast broadband across private land can often double the per-kilometre cost. Fibre to the Premises (FTTP) uses fibre-optic cable direct from the exchange to a business or home. Unlike

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<sup>5</sup> More information can be found at [Fibre Community Partnership \(openreach.com\)](#)

<sup>6</sup> [Better Broadband for Suffolk \(suffolk.gov.uk\)](#)



FTTC (fibre to the Cabinet), there is no use of the traditional copper wire from a street cabinet. While the copper wire from the cabinet to the premises makes for an economical alternative, it does not compare with the speeds that FTTP offers. While an FTTC connection offers up to 76Mbps, the full fibre option reaches up to 1000Mbps or 1Gbps. Not all homes or businesses need those speeds but the ultrafast option allows for future-proofing and growth. FTTP was designed to be easily expanded and improved upon so that bandwidth has more room for growth than the hybrid FTTC option. [Openreach](#) offer to install Fibre to the Premises (FTTP) free of charge to all new housing developments of 20 or more homes and an improved pricing structure all the way down to two homes.

A change to building regulations commenced from the 26th December 2022. These changes mandate the installation of a gigabit-ready telecoms infrastructure during the construction of new homes.

#### **7.4 Fifth Generation Technology Standard**

5G follows previous generations of mobile technology such as 3G, which led to the launch of smartphones, and 4G, which enabled faster browsing, allowing us to do things like watching videos on the move. All four major UK mobile networks have launched 5G services. Technology firms are also rolling out 5G-ready devices. 5G is much faster than previous generations of wireless technology. But it's not just about speed. 5G also offers greater capacity, allowing thousands of devices in a small area to be connected at the same time. The connectivity and capacity offered by 5G is opening up the potential for new, innovative services.

5G will use a wide range of frequency bands<sup>5</sup>, such as 700MHz, 3.4GHz and 30GHz.

The higher frequencies of 5G will have a shorter range. Achieving the levels of network capacity where there is a very high volume of network traffic will over time increasingly rely on smaller cells situated nearer to the ground on lampposts and other street furniture, in addition to rooftop and ground-based masts.

Whilst more base stations will be required, Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which can be rolled out on existing infrastructure where possible. The initial phase will be to strengthening the existing infrastructure or rebuilding the network where required, then densification for major areas using small high frequency cells which will be rolled out in areas with high demand.

#### **7.5 Recent Government Consultations**

In April 2021, the Government consulted on [changes to permitted development rights for electronic communications infrastructure: technical consultation](#). This consultation sought views on proposed planning reforms that will allow the deployment of telecoms equipment to be quicker whilst ensuring that there are appropriate environmental protections and safeguards in place.

In January 2021, the Government consulted on [changes to the Electronic Communications Code](#). Through this consultation, the Department for Digital, Culture, Media and Sport sought views on

whether changes to the Electronic Communications Code can help ensure that the UK has sufficiently robust electronic communications networks to deliver the coverage and connectivity consumers and businesses need.

Following these consultations, the [Product Security and Telecommunications Infrastructure Act 2022 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2022/26/contents) was produced and has received Royal Assent.

## **7.6 NSPF and telecommunications**

The Norfolk Strategic Planning Framework has two relevant agreements:

- Agreement 24 - To support the high-speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.
- Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations

## **7.7 Codes of practice**

[Cabinet Siting and Pole siting Code of Practice Issue 2](#) (2016): The purpose of this Code of Practice is to provide guidance to Code Operators, agents, contractors, planning and highway authorities and other persons entitled to be notified of the proposed deployment of electronic communications apparatus on the siting, keeping, maintenance and use of above the ground electronic communications apparatus, specifically cabinets and poles utilised by fixed line Code Operators, not including masts utilised by mobile Code Operators (which falls under a separate code of practice).

[Code of Best Practice on Mobile Network Development in England](#) (2016): The principal aim of this Code is to ensure that the Government's objective of supporting high quality communications infrastructure, which is vital to continued economic prosperity and social inclusion for all, is met. The development of such infrastructure must be achieved in a timely and efficient manner, and in a way which balances connectivity imperatives and the economic, community and social benefits that this brings with the environmental considerations that can be associated with such development. The Code also has an important role in making sure that appropriate engagement takes place with local communities and other interested parties. The Code applies to all forms of wireless development, but very obviously is most relevant to proposals for new masts or base stations and significant additions, extensions or replacements of existing sites.



**There is a policy that relates to telecommunications infrastructure emphasising the importance of addressing impacts on landscape in the Broads. The Local Plan will reflect the NSPF.**

## **8. Security**

Paragraph 97 of the NPPF says: *Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:*

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

**At this stage, the Authority is not aware of any specific security related issues that the Local Plan needs to address. Norfolk and Suffolk Architectural Liaison Officers are consulted at all stages of producing the Local Plan and their responses will be considered and addressed as appropriate.**

## **9. Waste**

The [National Planning Policy for Waste](#) states ‘Positive planning plays a pivotal role in delivering this country’s waste ambitions’

The NPPG states: *While such authorities may not have the planning functions in respect of the preparation of Local Plans covering waste, or dealing directly with waste planning applications, they must have regard to national planning policy for waste and are expected to help deliver the Waste Hierarchy. This might include:*

- working constructively with waste planning authorities to identify and protect those sites needed for waste management facilities. Local planning authorities should consider the need for waste management alongside other spatial planning objectives
- integrating local waste management opportunities in proposed new development
- considering, where relevant, the likely impact of proposed, non-waste related development on existing waste management sites and on sites and areas allocated for waste management
- promoting sound management of waste from any proposed development, such as encouraging on-site management of waste where this is appropriate, or including a planning

- 573 condition to encourage or require the developer to set out how waste arising from the  
574 development is to be dealt with
- 575 • including a planning condition promoting sustainable design of any proposed development  
576 through the use of recycled products, recovery of on-site material and the provision of  
577 facilities for the storage and regular collection of waste
  - 578 • ensuring that their collections of household and similar waste are organised so as to help  
579 towards achieving the higher levels of the waste hierarchy.

580 The Broads Authority is not the minerals and waste authority. The Authority's constituent  
581 districts are responsible for collecting waste from domestic properties while Norfolk and Suffolk  
582 County Council are the Waste Disposal Authorities and are therefore responsible for disposing of  
583 refuse as well as being the Minerals and Waste Local Planning Authority, producing Minerals and  
584 Waste Local Plans.

585 The County Councils are consulted at each stage of the Local Plan production and their  
586 responses will be considered and addressed as appropriate. There are some waste consultation  
587 areas that are in the Broads, which the Broads Authority are aware of and will act upon as  
588 required.

## 589 **9.1 Norfolk County Council**

590 The [Norfolk Core Strategy and Minerals and Waste Development Management Policies DPD](#)  
591 [2010-2026](#) (the 'Core Strategy') was adopted in September 2011. The [Norfolk Minerals Site](#)  
592 [Specific Allocations DPD](#) and the [Norfolk Waste Site Specific Allocations DPD](#) were both adopted  
593 in October 2013. The County Council are in the process of reviewing the three documents and  
594 bringing them together into one local plan. The Broads Authority will monitor progress and  
595 address any relevant policies or requirements as we produce our Local Plan.

596 The following table identifies the safeguarded waste management sites (see section 10.4 for  
597 safeguarded wastewater sites) where either the site itself or the consultation area for the site  
598 falls within the Broads Authority Executive Area.

SITE NAME	OPERATOR	TYPE
Caister on Sea (Household Waste Recycling Centre)	Norse LTD	Waste management site Consultation Area
Great Yarmouth-MT Skips	M T Skips	Waste management site
West Caister (Materials Recycling)	Norfolk County Council	Waste management site Consultation Area
Cantley (inert landfill)	British Sugar PLC	Waste management site and 250m consultation Area

## 599 **9.2 Suffolk County Council**

600 The [Suffolk Minerals and Waste Local Plan](#) was adopted in 2020. This does not propose any  
601 minerals or waste sites in the Broads area. In addition, there are no existing waste or minerals

management facilities in the Broads. There seems to be some wastewater treatment plants safeguarding areas that could be of relevance to the Local Plan.

### 9.3 The Local Plan and waste

Generally, the Local Plan supports the waste hierarchy. In terms of construction waste, as it accounts for a high proportion of waste that ends in landfill, it seems prudent to improve how that is considered in the Local Plan.

**The Local Plan will roll forward the current general support of the waste hierarchy as well as ensure any waste allocations in the Local Plans are considered. There is potential to improve reference to construction waste.**

## 10. Water

Adequate water and wastewater infrastructure are needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change.

The NPPG says:

***What are the water supply, wastewater and water quality concerns that plans need to address?***

*These will vary depending on the character of the local area, the [type of issues the plan covers](#) and the contribution that can be made to a [‘catchment-based approach’](#) to water. Wastewater treatment plants are waste developments and handled by the waste planning authority. In plan-making, there are a number of broad considerations relevant to water supply and water quality:*

- [infrastructure](#) (water supply and wastewater)
- [water quality](#)
- [wastewater](#)
- [cross-boundary concerns](#)
- [strategic environmental assessment and sustainability appraisal](#)
- habitats regulations assessments.

*Early discussions between strategic policy-making authorities and water and sewerage companies can help to ensure that proposed growth and environmental objectives are reflected in company business plans. Growth that requires new water supply should also be reflected in companies’ long-term water resources management plans. This will help ensure that the necessary infrastructure is funded through the [water industry’s price review](#).*

*Strategic policy-making authorities will also need to consider the objectives in the government’s [25 Year Environment Plan](#) to reduce the damaging abstraction of water from rivers and groundwater, and to reach or exceed objectives for rivers, lakes, coastal and ground waters that are specially protected.*

637 Paragraph: 002 Reference ID: 34-002-20140306

638 Revision date: 22 07 2019

639 Water is a particularly important consideration in the Broads. Abstraction to serve development  
640 and wastewater can potentially have a profound impact on the quality of the system.  
641 Development and activities within the catchment can impact on the Broads, for example  
642 agricultural practices, even if located some way from the Broads, can lead to sediment and  
643 chemicals washing downstream to the Broads which can lead to reduced water depth, turbidity  
644 and impact on the aquatic system through excess nutrients. These are all matters which planning  
645 can influence potentially with close cooperation with neighbouring Local Planning Authorities.

DRAFT

646 **10.1 Water supply**

647 The following table summarises water supply in the Broads Authority Executive Area:

Document	Description	What it says about the Broads Executive Area
<a href="#">The Water Stressed Areas - 2021 Classification</a> (Environment Agency, 2021).	This identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.	<p>The companies determined to be in areas of serious water stress are:</p> <ul style="list-style-type: none"> <li>• Anglian Water – East Anglia</li> <li>• Essex and Suffolk Water</li> </ul>
<a href="#">DRAFT Essex and Suffolk Water Resource Management plan</a> (2024)	Essex and Suffolk Water and Anglian Water Services have a statutory duty to prepare and maintain a Water Resources Management Plan (WRMP) under the Water Resources Management Plan Regulations 2007. These set out how the companies plan to maintain the balance between supply and demand over the next 25 years.	<p>East Anglia is one of the driest parts of the country and has been confirmed by the Environment Agency as being a Serious Water Stressed Area. We are forecasting that there will not be enough water supplies to meet forecasted demand over the next 25 years and beyond. We need to prepare for worsening droughts. To do this we are taking a twin track approach to address this by working hard to reduce demand and putting plans in place to increase supply.</p> <p>Northern Central WRZ: The majority of the water supply here comes from the River Waveney, the River Bure, and groundwater fed lakes at Ormesby, Lound and Fritton. The rest comes from the Chalk aquifer in the far north and south of the WRZ. We are predicting that without our intervention, demand for water could significantly exceed supply in our Essex and Suffolk supply areas and so we need to put plans in place now to make sure we have enough water in the future.</p> <p>Non households: We forecast an increase in the amount of water used by businesses and industry over this period because of a growth of new businesses in the area, such as new free ports and power stations in Essex and new food processing and cosmetic factories,</p>

Document	Description	What it says about the Broads Executive Area																
		<p>and a nuclear power station in Suffolk. Until we develop new resources (2030), we are currently unable to agree to new requests for water in our Hartismere Water Resource Zone where it will be used for non-domestic purposes, such as</p> <p>Households:</p> <table><thead><tr><th></th><th>Avg. litres used per person per day in 2020/21</th><th>Avg. litres used per person per day in 2050 forecast</th><th>Avg. litres used per person per day in 2050 after we implement our plan</th></tr></thead><tbody><tr><td colspan="4">1 megalitre is 1 million litres</td></tr><tr><td>Customers with a water meter</td><td>162.37</td><td>132.20</td><td>112.27</td></tr><tr><td>Customers without a water meter</td><td>168.23</td><td>143.00</td><td>112.77</td></tr></tbody></table> <p>Reducing demand:</p> <p>Water meters</p> <p>Promoting water efficiency</p> <p>Reducing leakage</p> <p>Increasing supply in Suffolk:</p> <p>Linking our Water Resource Zones: Our plan is to build new pipelines that will allow us to move water around our network from places with extra water to areas with a water shortage. These new pipelines will connect our Blyth, Hartismere, and Northern Central WRZs. Northern Central WRZ has a small surplus initially so once the new pipeline is built, it can share water with Blyth and Hartismere WRZ.</p>		Avg. litres used per person per day in 2020/21	Avg. litres used per person per day in 2050 forecast	Avg. litres used per person per day in 2050 after we implement our plan	1 megalitre is 1 million litres				Customers with a water meter	162.37	132.20	112.27	Customers without a water meter	168.23	143.00	112.77
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Customers without a water meter	168.23	143.00	112.77															

Document	Description	What it says about the Broads Executive Area
		<p>New treated water storage reservoirs: We will build new treated water storage reservoirs in Hartismere and Northern Central.</p> <p>New pipeline: We will install a new pipeline from an existing well near Bungay to a nearby water treatment works by 2030 to increase capacity in the area.</p> <p>River Waveney Nitrate Removal Scheme: We are going to build a new nitrate removal process at our River Waveney WTWs near Beccles in Suffolk. This is because the nitrate concentrations in river water during the autumn and winter are staying elevated for longer</p> <p>Lowestoft and Caister water reuse schemes: The water recycling scheme at Lowestoft would be ready by 2030. It is likely that we could build this quicker than we could build a new reservoir. The scheme at Caister is not needed until 2045.</p> <p>Suffolk adaptive plan</p> <p>We have tested our plans and where there is a risk of our supply and demand forecasts out turning differently, we have identified alternative investment programmes which may require supply schemes to be built earlier or may require different supply schemes to those in our preferred plan.</p> <p>Our best value plan is to complete Lowestoft Water Reuse scheme first because we think we can deliver it more quickly. However, we are going to complete further work to see if we can build the North Suffolk winter storage reservoir more quickly and instead of the Lowestoft Water Reuse scheme. In the long term, a reservoir is a better and more environmentally friendly option. We will complete further detailed designs by 2026 and will then decide whether we construct the North Suffolk Winter Storage Reservoir or the Lowestoft Water Reuse Scheme.</p>

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<a href="#">DRAFT Anglian Water Services Water Resource Management Plan (2024)</a>	<p><b>Supply demand balance (Ml/d)</b></p> <ul style="list-style-type: none"><li>&lt;-90</li><li>-40 - -90</li><li>-15 - -40</li><li>0 - -15</li><li>0</li><li>&gt;0</li></ul> <p><b>Legend:</b></p> <ul style="list-style-type: none"><li>1 Growth</li><li>2 Climate change</li><li>3 1 in 500 year drought</li><li>4 Licence reductions</li><li>5 Environmental destination</li></ul>	<p>This shows the scale of our region's new water needs by 2050. Without any action, we will experience a shortfall of 571 megalitres of water a day by 2050. That's equivalent to approximately half the amount of water we put into our network currently.</p> <table><tr><th>WRZ</th><th></th><th>1</th><th>2</th><th>3</th><th>4</th><th>5</th></tr><tr><td>1</td><td>Essex Central</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>2</td><td>Essex South</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>3</td><td>Fenland</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>4</td><td>Hartlepool</td><td></td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>5</td><td>Lincolnshire Bourne</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>6</td><td>Lincolnshire Central</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>7</td><td>Lincolnshire East</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>8</td><td>Lincolnshire Retford Gainsborough</td><td></td><td></td><td></td><td>✓</td><td></td></tr><tr><td>9</td><td>Norfolk Aylsham</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>10</td><td>Norfolk Bradenham</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>11</td><td>Norfolk East Dereham</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>12</td><td>Norfolk East Harling</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>13</td><td>Norfolk Happisburgh</td><td>✓</td><td></td><td></td><td></td><td></td></tr><tr><td>14</td><td>Norfolk Harleston</td><td></td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>15</td><td>Norfolk North Coast</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>16</td><td>Norfolk Norwich and the Broads</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>17</td><td>Norfolk Wymondham</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>18</td><td>Ruthamford Central</td><td>✓</td><td></td><td></td><td></td><td></td></tr><tr><td>19</td><td>Ruthamford North</td><td>✓</td><td>✓</td><td>✓</td><td></td><td></td></tr><tr><td>20</td><td>Ruthamford South</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>21</td><td>Ruthamford West</td><td>✓</td><td></td><td></td><td></td><td></td></tr><tr><td>22</td><td>SouthHumber Bank</td><td>✓</td><td></td><td></td><td></td><td></td></tr><tr><td>23</td><td>Suffolk East</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr><tr><td>24</td><td>Suffolk Iwerth</td><td>✓</td><td></td><td></td><td></td><td>✓</td></tr><tr><td>25</td><td>Suffolk Sudbury</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>26</td><td>Suffolk Thatford</td><td>✓</td><td></td><td></td><td>✓</td><td>✓</td></tr><tr><td>27</td><td>Suffolk West Cambs</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td><td>✓</td></tr></table> <p>These WRZs do not contain their own water resources so challenges 2-5 are not relevant</p> <p>Through our decision making processes, guided by the new water needs of our region, the best value plan framework and our customers' and stakeholders' views, we have developed a three-tiered strategy:</p>	WRZ		1	2	3	4	5	1	Essex Central	✓			✓	✓	2	Essex South	✓	✓	✓	✓	✓	3	Fenland	✓	✓	✓	✓	✓	4	Hartlepool				✓	✓	5	Lincolnshire Bourne	✓			✓	✓	6	Lincolnshire Central	✓	✓	✓	✓	✓	7	Lincolnshire East	✓			✓	✓	8	Lincolnshire Retford Gainsborough				✓		9	Norfolk Aylsham	✓			✓	✓	10	Norfolk Bradenham	✓			✓	✓	11	Norfolk East Dereham	✓			✓	✓	12	Norfolk East Harling	✓			✓	✓	13	Norfolk Happisburgh	✓					14	Norfolk Harleston				✓	✓	15	Norfolk North Coast	✓			✓	✓	16	Norfolk Norwich and the Broads	✓			✓	✓	17	Norfolk Wymondham	✓			✓	✓	18	Ruthamford Central	✓					19	Ruthamford North	✓	✓	✓			20	Ruthamford South	✓	✓	✓	✓	✓	21	Ruthamford West	✓					22	SouthHumber Bank	✓					23	Suffolk East	✓	✓	✓	✓	✓	24	Suffolk Iwerth	✓				✓	25	Suffolk Sudbury	✓			✓	✓	26	Suffolk Thatford	✓			✓	✓	27	Suffolk West Cambs	✓	✓	✓	✓	✓
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Document	Description	What it says about the Broads Executive Area
		<p>1. We will make the best use of our existing resources, building on our industry leading demand management and using any surplus water available.</p> <p>2. The progression of the strategic resource options (SROs): the Fens and Lincolnshire reservoirs, that will meet 36% of our new water needs, and provide the opportunity for many benefits identified in our best value plan framework.</p> <p>3. We have planned for adaptive future resources, which allows us to remain flexible to changing circumstances, whilst ensuring we limit bill impacts to our customers by only investing in low regret solutions.</p> <p>Figure 5 Our three pillars of demand management</p> <pre> graph TD     SM[Smart metering] --&gt; WS[Water Savings]     SM --&gt; IDL[Smart meter data will help identify customer and distribution loss leakage]     SM --&gt; ECP[Smart meter data will help us engage with our customers enabling water efficiency programmes]     LE[Leakage efficiencies] --&gt; WS     LE --&gt; CLRP[Customer leakage reduction will form part of the water efficiency programmes]     WE[Water efficiency] --&gt; WS     WE --&gt; CLRP     CLRP --&gt; WS   </pre> <p>Making best use of existing resource through supply-side options</p> <ul style="list-style-type: none"> <li>• Upgrading treatment works</li> <li>• Transfers</li> </ul>

Document	Description	What it says about the Broads Executive Area
		<ul style="list-style-type: none"> <li>Colchester water reuse</li> </ul> <p>Progressing strategic resource options- the Fens and Lincolnshire reservoirs</p> <ul style="list-style-type: none"> <li>The regional need for reservoirs</li> <li>Promoting reservoirs in WRMP24</li> </ul> <p>Supply demand balance (ML/d)</p> <p>&lt; -90 -40 - -90 -15 - -40 0 - -15 0 &gt; 0</p> <p>Population growth Drought resilience Licence caps Climate change Environmental destination</p> <p><b>2025 2030 2036 2040 2049</b></p> <p><b>Baseline deficits</b></p> <p>Hartlepool 2025-2049 5.0</p> <p><b>Demand management</b></p> <p>Hartlepool 2025-2049 5.0</p> <p><b>Supply-side options</b></p> <p>Raw water storage reservoir New transfer AAAPs 2025-2029 2030-2034 2035-2039 2040-2044 2045-2050 Water re-use Desalination Subject to WRMP investigations Strategic interconnector Backwash recovery</p> <p>1 Executive summary Anglian Water WRMP24 main report 10</p>

Document	Description	What it says about the Broads Executive Area																																								
		<p>Figure 22 Summary of WRMP24 problem characterisation</p> <table><tr><th>Area</th><th>Water Resource Zones</th><th>Total Needs Score</th><th>Total Complexity Score</th><th>Level of Concern</th></tr><tr><td>1</td><td>Lincolnshire WRZs</td><td>4</td><td>12</td><td>H</td></tr><tr><td>2</td><td>Ruthamford WRZs</td><td>6</td><td>20</td><td>H</td></tr><tr><td>3</td><td>Fenland WRZ</td><td>3</td><td>14</td><td>M</td></tr><tr><td>4</td><td>Norfolk WRZs</td><td>5</td><td>16</td><td>H</td></tr><tr><td>5</td><td>Essex and Suffolk East WRZs</td><td>6</td><td>17</td><td>H</td></tr><tr><td>6</td><td>Suffolk and West Cambridgeshire WRZs</td><td>4</td><td>16</td><td>H</td></tr><tr><td>7</td><td>Hartlepool</td><td>0</td><td>1</td><td>L</td></tr></table>	Area	Water Resource Zones	Total Needs Score	Total Complexity Score	Level of Concern	1	Lincolnshire WRZs	4	12	H	2	Ruthamford WRZs	6	20	H	3	Fenland WRZ	3	14	M	4	Norfolk WRZs	5	16	H	5	Essex and Suffolk East WRZs	6	17	H	6	Suffolk and West Cambridgeshire WRZs	4	16	H	7	Hartlepool	0	1	L
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<a href="#">Anglia District River Basin Management Plan</a> (2022).	The Anglian river basin district (RBD) river basin management plan describes the challenges that threaten the water environment and how these challenges can be managed.	<p>Significant water management issues are listed as:</p> <ul style="list-style-type: none"><li>• Physical modifications</li><li>• Pollution from waste water</li><li>• Pollution from towns, cities and transport</li><li>• Changes to the natural flow and level of water</li><li>• Negative effects of invasive non-native species</li><li>• Pollution from rural areas</li></ul> <p>The need for water efficiency measures features strongly in the document.</p>																																								
<a href="#">Meeting our Future Water Needs: a National</a>	The National Framework explores the long-term needs of all sectors that depend on a	According to the Environment Agency, if no action is taken between 2025 and 2050, around 3,435 million additional litres of water per day will be needed in England to address future pressures on public water supply; within this figure it is estimated that the																																								

Document	Description	What it says about the Broads Executive Area
<a href="#">Framework for Water Resources</a> (2020)	secure supply of water. This includes public water supplies provided by water companies to customers' homes and businesses; direct abstraction for agriculture, electricity generation and industry; and the water needs of the environment.	East of England will require an additional 570 million litres per day to meet the needs of residents and the agricultural sector, industry and energy sector.

648 Another source of information is existing water cycle studies completed by our districts:

District	Evidence	Information/policy
Broadland	<a href="#">Water Cycle Study (2021)</a> was produced for Norwich, SN, BDC, Norfolk County Council and the Broads Authority.	The water efficiency assessment can be used by GNA to develop a water use policy that requires developers to build new homes to meet the higher Building Regulation standards of 110l/h/d as a minimum, improving on it where possible and to consider working with AWS and other stakeholders to develop further options for retrofitting existing properties with efficiency fixtures and fittings.  The Emerging Local Plan says this in policy 2: Housing development will meet the Building Regulations part G (amended 2016) water efficiency higher optional standard.
Norwich		
South Norfolk		
North Norfolk	Not aware of any evidence.	Core Strategy and Development Management DPD policy relates to Code for Sustainable Homes. There is an emerging Local Plan under production which seeks 110l/h/d.

District	Evidence	Information/policy
GYBC	The <a href="#">Water Cycle Scoping Study</a> was a stage 1 report and was completed in 2009. This was not taken any further as the issues raised in the Scoping study were not significant to development plans at the time. This did include the Broads Authority Executive Area.	The emerging Local Plan (in examination) includes policy E7: Water conservation in new dwellings and holiday accommodation which says that new residential development, and holiday accommodation in buildings, will be supported only where it meets the higher water efficiency standard of requirement of 110 litres per person per day.
Waveney (now East Suffolk council)	<a href="#">Water Cycle Study 2017</a>	<p>The study concludes that a policy could be developed that ensures all housing is as water efficient as possible, and that new housing development should go beyond mandatory Building Regulations requirements, ideally to 110 l/h/d optional Building Regulations requirements where possible.</p> <p>Policy WLP8.28 – Sustainable Construction says that all new residential development in the District should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day unless it can be demonstrated that it is not viable or feasible to do so.</p>

## 10.2 Norfolk Strategic Planning Framework 2021

There is an agreement in the [Norfolk Strategic Planning Framework \(2021\)](#) that relates to water use.

*Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.*

According to The Housing Standards Review: Cost Impacts report that was produced for the Department for Communities and Local Government in 2014, the uplift in cost between 125 and 110 litres per person per day is just £9 per dwelling. It is noted that was in 2014 and the cost could be less now. The Government's Environmental Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress.

## 10.3 Water Resource East

Water Resource East's (WRE's) [updated position statement \(February 2021\)](#) promotes a vision for Eastern England to have sufficient water resources to support a flourishing economy, a thriving environment and the needs of its population, and for the region to be seen as an international exemplar for collaborative integrated water resource management.

On an average day, in a dry year, the total consumptive demand for water in the WRE region is equivalent to 2,311 million litres (megalitres) per day. Most of this water (85%) is used for public water supply (PWS). Most of the rest is used for spray irrigation (8%), power generation (3%) and in the manufacturing, food and drink sectors (2%).

### FUTURE WATER CHALLENGES FOR EASTERN ENGLAND

- Housing growth
- Agricultural growth
- Energy sector
- Systematic conservation planning
- Climate change

### OPTIONS FOR MEETING FUTURE DEMAND FOR WATER IN EASTERN ENGLAND

- Water company leakage
- Water efficiency measures
- Supply options

Looking forward to the 2050s and beyond, our Initial Resource Position Statement estimated that up to an additional 1,656 megalitres of water could be needed per day. The largest drivers of this were abstraction reductions to drive environmental restoration and enhancement (500 megalitres per day), housing growth (408 megalitres per day) and additional water for irrigation (288 megalitres per day).

**The Authority will continue with the 110l/h/d water usage requirement for new development. We will explore the potential to go lower than 110l/h/d.**

#### **10.4 Wastewater and treatment**

Water quality is a key consideration in the Broads and the Local Plan will look into drainage. With regards to how wastewater is transferred from a property, due to the low-lying nature of the area and remoteness of some settlements connection to a public sewer is not always possible in the Broads. The alternative disposal methods employed can have a significant local impact on water quality.

Anglian Water is implementing a series of first-time sewerage projects of some villages in the Broads Area. Stokesby for example is one area that has benefitted from this project.

Through discussions with North Norfolk District Council, Anglian Water Services and the Environment Agency, it is apparent that there are capacity issues at the Horning Knackers Wood Water Recycling Centre. This Water Recycling Centre discharges to the River Bure and contributes nutrient loads to the downstream watercourses as well as the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA). Both Anglian Water and the Environment Agency agree that the Horning Knackers Wood Water Recycling Centre (WRC) does not currently have capacity to accommodate further foul flows. Horning Knackers Wood WRC is in protracted exceedance of the volumetric permit due to the continued ingress of surface and groundwater. This means that development that will increase the foul water load in the Horning area cannot come forward and cannot be permitted. The Joint Position Statement and Statement of Fact can be found here:

- [Joint Position Statement on Development in the Horning Knackers Wood Water \(broads-authority.gov.uk\)](#)
- [Horning Statement of Fact - Revised August 2023 \(broads-authority.gov.uk\)](#)

There are also other treatment works, identified in the Norfolk<sup>7</sup> and Suffolk<sup>8</sup> Minerals and Waste planning documents that are of relevance to the Broads. The list of safeguarded wastewater sites and consultation areas in Norfolk relevant to the Broads Authority Executive Area is below. There are no wastewater sites or wastewater consultation areas in the Broads part of Suffolk.

SITE NAME	OPERATOR	TYPE
Acle (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
Belaugh (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
Horning (water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area

<sup>7</sup> [Norfolk County Council Minerals and waste planning policies \(norfolk.gov.uk\)](#)

<sup>8</sup> [Suffolk County Council Minerals and Waste Plan \(suffolk.gov.uk\)](#)



SITE NAME	OPERATOR	TYPE
Stalham(water recycling centre)	Anglian Water Services Ltd	Wastewater Site and 400m consultation Area
West Caister (water recycling centre)	Anglian Water Services Ltd	Wastewater Consultation Area
Whitlingham (water recycling centre)	Anglian Water Services Ltd	Wastewater Consultation Area

## 10.5 Nutrient neutrality

Alongside all other local planning authorities in Norfolk, the Broads Authority received a letter in 2022 from Natural England concerning nutrient pollution in the protected habitats of the Broads Special Area of Conservation and Ramsar site.

The letter advised that new development within the catchment of these habitats comprising overnight accommodation has the potential to cause adverse impacts with regard to nutrient pollution. Such development includes, but is not limited to:

- new homes,
- student accommodation,
- care homes,
- tourism attractions,
- tourist accommodation,
- permitted development (which gives rise to new overnight accommodation) under the Town and Country Planning (General Permitted Development) (England) Order 2015, and
- Any development not involving overnight accommodation, but which may have non-sewerage water quality implications.

The Conservation of Species and Habitats Regulations 2017 require local planning authorities to ensure that new development does not cause adverse impacts to the integrity of protected habitats such as the Broads prior to granting planning permission. At present there are no identified mitigation solutions available locally to resolve these impacts.

Whilst the Authority assesses the implications of these matters, it cannot lawfully conclude that development within the catchment of the Broads Special Area of Conservation and Ramsar site will not have an adverse effect. Therefore, until these matters are resolved the Authority will not be able to grant planning permission for developments comprising overnight accommodation within the affected catchments.

The fundamental issue being phosphorous and nitrogen in the water causing eutrophication. Water Recycling Centres have been identified as one of the causes of nutrient enrichment.

Mitigation schemes are being worked up, both locally and nationally which may involve nature-based solutions as well as other solutions that involve infrastructure.



**The Authority will address water quality in the Local Plan. The Authority will keep updated regarding Horning Knackers Wood Water Recycling Centre. The Local Plan will reflect Nutrient Neutrality.**

## **11. Flood Risk**

### **11.1 Flood Risk**

Approximately 82.5% of the Broads Authority Executive Area is covered by flood zone 3 (3a & 3b). This equates to 25,472 hectares. The Broads Authority boundary is tightly drawn around the edge of the functional floodplain<sup>9</sup>. The extent and nature of flood risk, with significant areas of 'functional floodplain', means that flood risk is a major constraint on development in the Broads. Flood risk includes all type of flood risk, so in addition to tidal and fluvial sources of flood risk, there is also surface water, reservoir and groundwater sources of flood risk.

The flood risk in the Broads is predominately from fluvial and tidal sources which are interlinked. However, other sources of flood risk include groundwater and surface water. The whole character and development in the Broads over many hundreds of years has been closely associated with the water environment and flood risk. Much of the Broads area is defended by flood defence embankments, which are maintained by the Environment Agency to reduce flooding. The flood defences, where they exist, only reduce the risk of flooding through containing some water to a given area and will never eliminate the flood risk; this has been the case historically within the Broads.

Working, living and visiting the Broads have been, and will continue to be, activities that have co-existed with the risk of flooding. However, any new development (which includes change of use, etc) must be in line with government policy and minimise flood risk by avoidance where inappropriate development is directed away from areas of highest risk. In the Broads area, this means identifying the risks from flooding and ensuring appropriate development is at a low a risk level as possible while being compatible with the wetland and water-based environment.

The Broads is not subject to open sea conditions (relating to tidal range and wave action) but much of the Broads are tidally influenced fluvial waterbodies.

The Broads is not subject to open sea conditions (relating to tidal range and wave action) but much of the Broads are tidally influenced.

The flood probability mapping carried out within the SFRA does not signify the degree of hazard likely to be experienced in the Broads Authority area, especially in the more upstream catchment areas and those areas not at risk of breaching of coastal defences, because it does

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<sup>9</sup> The NPPG defines Zone 3b The Functional Floodplain as: This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise:

- land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
- land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).

not quantify depth or water velocity. Hazard, or “danger to people”, is a function of depth and velocity. Hazard is very site specific and could vary greatly over a relatively small area due to the presence of drains, dykes, quay-headings, flood banks, etc. Hazards can be hidden by floodwaters and a site-specific Flood Risk Assessment will need to measure this.

The typical Broads river has a permeable catchment<sup>10</sup>, is groundwater dominated<sup>11</sup>, and is a slow responding watercourse with a slow increase and decrease of flow in response to rainfall. Although tidal surges can develop rapidly within 6-12 hours because of the movements of weather systems in the North Sea, the Environment Agency Flood Warning System covers the whole of the Broads area which could provide early warning (for fluvial and tidal flooding). Signing up to this service is voluntary or it may be a requirement of planning permission.

The nature of flooding in the Broads is such that flood water is likely to have a slow velocity, may be shallow in depth and may be low hazard (depending on topography), unless it is in or beside a breach in defences where the flow will be greater and the risk would subsequently be higher.

Some people living and working within the Broads are historically familiar with the water environment and are unlikely to be surprised or alarmed by the possibility of floods or rising water levels or may be more prepared. That being said, others may not have had any experience of flooding and historic knowledge and historic connections does not necessarily lower people's vulnerability, it can also lead to complacency which increases vulnerability. Measures will need to be in place to ensure effective communication with visitors - an issue which is already addressed on many sites locally. The measures to take before, during and after a flood should be detailed within a Flood Response Plan for each development site.

Any development encroaching within any of the plotted Flood Zones may increase flood risk to adjacent areas. The effect on flood risk of several small encroachments is cumulative. If the requirements of the NPPF and NPPG are met in full, then additional development should not increase flood risk elsewhere.

## **11.2 The Broads Flood Risk Alleviation Project and Broadland Futures Initiative**

The Broadland Flood Alleviation Project (BFAP) was a long-term project, led by the Environment Agency, to provide a range of flood defence improvements, maintenance and emergency response services within the tidal areas of the Rivers Yare, Bure, Waveney and their tributaries.

The main aim of project work was to strengthen existing flood defences and restore them to a height that existed in 1995 (a level defined by the Environment Agency) and make additional allowances for sea level rise and future settlement of the flood banks.

This aim has largely been achieved, through a phased programme of improvement works comprising:

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<sup>10</sup> A river catchment is the area of land whose water drains into that river. A permeable catchment lies on porous rock, such as chalk or sandstone.

<sup>11</sup> Where groundwater accounts for much of the inflow and outflow of the watercourse.

- Strengthening the existing flood banks, restoring them to agreed levels where excessive settlement has occurred
- Replacing existing erosion protection that is in a poor condition using more environmentally acceptable methods wherever possible
- Providing new protection where erosion is currently threatening the integrity of the flood defences
- Carrying out works at undefended communities

The Broadland Futures Initiative (BFI)<sup>12</sup> is a partnership for future flood risk management in the Broadland area. The main goal is to agree a framework for future flood risk management that better copes with our changing climate and rising sea level. The focus will be on what happens from the mid-2020s onwards. Planning is needed now to secure support and make well-informed decisions.

The Initiative has been set up by organisations responsible for managing coastal and inland flood risk. The Environment Agency have the lead responsibility and will be working with Natural England, County Councils, Internal Drainage Boards, Broads Authority and National Farmers Union. The Broads Authority will support the Initiative Project Team and governance arrangements.

The BFI will also work in partnership with local communities and other stakeholders to identify the way forward. This will be a democratic process, with local politicians making the core decisions to agree a framework for future flood risk management that better copes with our changing climate.

It is also worth noting the [Lowestoft Tidal Flood Barrier project](#) whose impacts will stretch into Oulton Broad and close to the BA boundary.

**The NPPF, current and new Local Plan policies and current Flood Risk SPD will enable flooding and flood risk to be addressed.**

## 12. Local Coastal Changes

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. 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 up to 2055. In relation to the present day, the Plan says: *‘Due to the considerable assets at risk and the uncertainty of how the coastline could evolve, the policy option from the present day is to continue to hold the line of the existing defence. This policy option is likely to involve maintenance of existing seawalls and reef structures, replacing groynes as necessary and continuing to re-nourish beaches with dredged sand. This policy option will provide an*

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<sup>12</sup> [Broadland Futures Initiative \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)

846 *appropriate standard of protection to all assets behind the present defence line, and, with the*  
847 *recharge, a beach will be maintained as well as a supply of sediment to downdrift areas.'*

848 Some Norfolk and Suffolk coastal Local Planning Authorities have produced a joint [SPD](#) to guide  
849 and inform development on the coast and elaborate on Local Plan policies.

850 **There is a policy relating to the coast which generally supports the Shoreline Management**  
851 **Plan's approach. A Coast SPD has been produced.**

## 852 **13. Minerals**

853 See section 8 of this document for references and information about the Suffolk and Norfolk  
854 Minerals and Waste documents.

855 The NPPF states 'It is essential that there is a sufficient supply of minerals to provide the  
856 infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite  
857 natural resource, and can only be worked where they are found, best use needs to be made of  
858 them to secure their long-term conservation.'

859 The NPPF states 'Local planning authorities should not normally permit other development  
860 proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral  
861 working.'

862 Whilst the Broads Authority is not a district council, it is not a mineral planning authority,  
863 therefore the below wording is relevant.

864 The NPPG states 'Whilst district councils are not mineral planning authorities, they have an  
865 important role in safeguarding minerals in 3 ways:

- 866 1) Having regard to the local minerals plan when identifying suitable areas for non-mineral  
867 development in their local plans. District councils should show Mineral Safeguarding Areas  
868 on their policy maps;
- 869 2) In those areas where a mineral planning authority has defined a Minerals Consultation Area,  
870 consulting the mineral planning authority and taking account of the local minerals plan  
871 before determining a planning application on any proposal for non-minerals development  
872 within it; and
- 873 3) When determining planning applications, doing so in accordance with development policy  
874 on minerals safeguarding, and taking account of the views of the mineral planning authority  
875 on the risk of preventing minerals extraction.

876 The following table identifies the safeguarded mineral extraction and mineral infrastructure sites  
877 where either the site itself or the consultation area for the site falls within the Broads Authority  
878 Executive Area.

Site Name	Operator	Type
Norton Subcourse Quarry	Breedon Trading Ltd	Mineral Extraction Site Consultation Area
Earsham Quarry	Earsham Gravels Ltd	Mineral Extraction Site and 250m Consultation Area
Trowse Railhead	Tarmac	Mineral Infrastructure Consultation Area

**Many current allocations in the Local Plan are partially on safeguarded minerals (sand and gravel) resource and this is identified. This approach is intended to be continued.**

## 14. Energy

The NPPG says that:

*When drawing up a Local Plan, local planning authorities should first consider what the local potential is for renewable and low carbon energy generation. In considering that potential, the matters local planning authorities should think about include:*

- the range of technologies that could be accommodated and the policies needed to encourage their development in the right places;*
- the costs of many renewable energy technologies are falling, potentially increasing their attractiveness and the number of proposals;*
- different technologies have different impacts and impacts can vary by place;*
- the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources. Whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.*

Paragraph: 003 Reference ID: 5-003-20140306

Revision date: 06 03 2014

**See separate Renewable Energy Topic Paper.**

## **15. Utilities**

In relation to gas and electricity, no providers who were consulted raised any concerns with regards to the Objectively Assessed Housing Need for the Broads during the Issues and Options Consultation, December 2022.

### **15.1 Gas**

National Gas Transmission owns and operates the national transmission system throughout Great Britain which connects to eight regional networks. In the borough, National Grid also own and operate the local gas distribution network and are therefore also responsible for distributing gas to the borough. National Grid has a duty to develop and maintain an efficient, co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances. Bacton Gas terminal is a large gas terminal located on the north Norfolk coast with an underground pipeline connecting the terminal with the gas power station in South Denes in Great Yarmouth. There are likely to be no future supply issues with gas provision. Improvements to the gas distribution network are generally carried out as a result of significant growth in overall regional demand rather than site specific requirements.

### **15.2 Electricity**

The electricity distributor for the area is UK Power Networks, which is known as a Distribution Network Operator (DNO), covering 29,000sq km of London, the south east and the east of England. Their role is to take electricity at high voltages from the National Grid and transform it down to voltages suitable for commercial and domestic use. UK Power Networks are responsible for ensuring that the infrastructure that brings power to homes, businesses, hospitals, schools and other public services continues to deliver reliable, safe and sustainable electricity at all times.

### **15.3 Relevant district documents**

Some of our constituent districts have produced energy studies and these may be relevant to the Broads. The ones in place (or being produced) at the time of writing are included below.

[North Norfolk Power Study \(2019\)](#) – the aim of this study is to review current energy infrastructure and identify areas where there may be constraints on energy supplies now and in the future. The areas of planned development are shown in relation to the local substation, which is also colour coded in a traffic light system according to the available capacity. The substations in green have no capacity issues, while those in red have under 5 MW of spare capacity and will struggle to serve major additional development without further reinforcement.



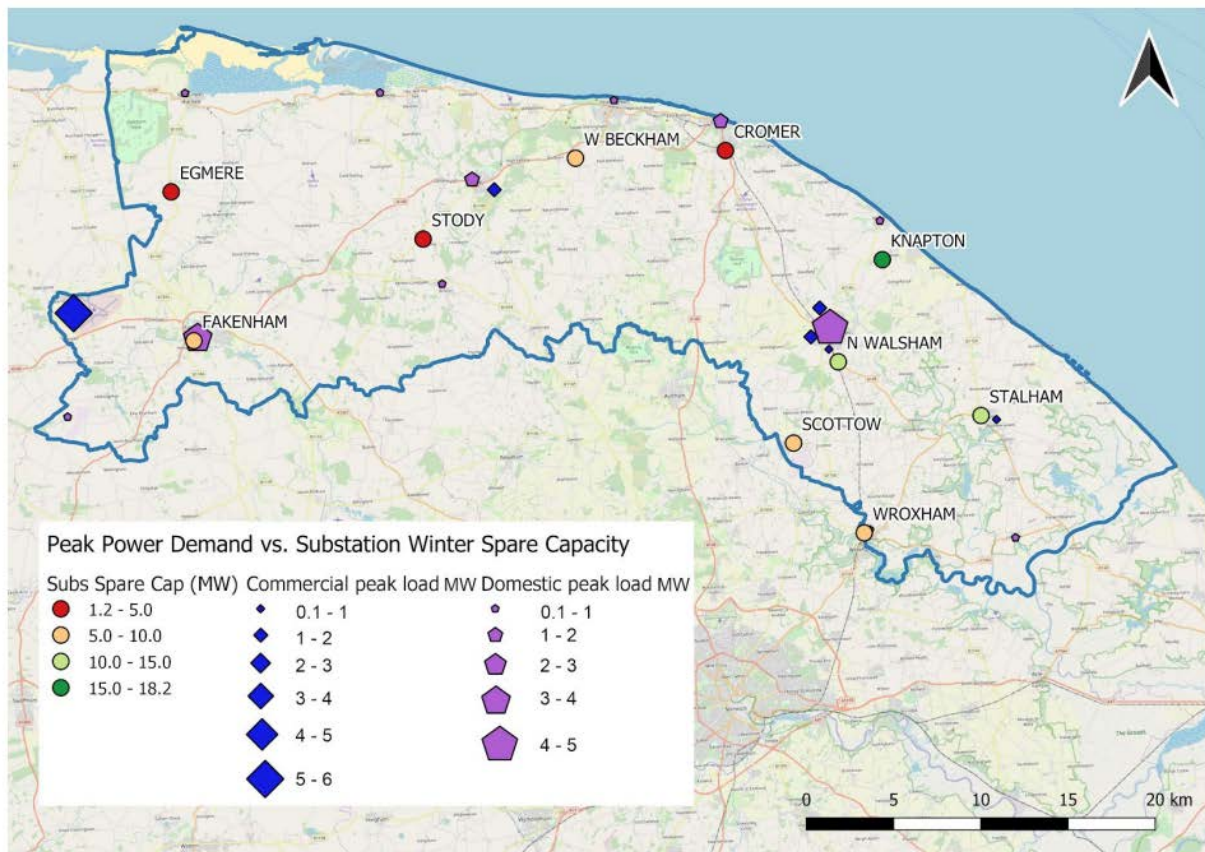


Figure 1: Development site demand mapped against winter spare capacity

930 [Greater Norwich Energy Infrastructure Study](#) (2019) - provide evidence in order for the emerging  
 931 GN Local Plan to support development and the spatial distribution of growth. By reviewing  
 932 existing energy demand for electricity, gas and heat we created and mapped a baseline across  
 933 the region, identifying areas of the highest demand. Plans for development, both commercial  
 934 and domestic, were also reviewed and the likely additional peak power demand was forecast,  
 935 based on benchmarks and coming changes to government policy. The final important element is  
 936 the capacity at each electricity substation across the region. These are the crucial parts of the  
 937 infrastructure, which can dictate if development is possible or not. This shows the current load  
 938 on these substations and does not account for 'reserved' capacity where part of the available  
 939 headroom on the substation has already been committed to a future customer. The substations  
 940 in green have no capacity issues, however there is only one on the map. Those in dark orange  
 941 and red already have little spare capacity and will struggle to serve any additional development  
 942 without any mitigation measures.

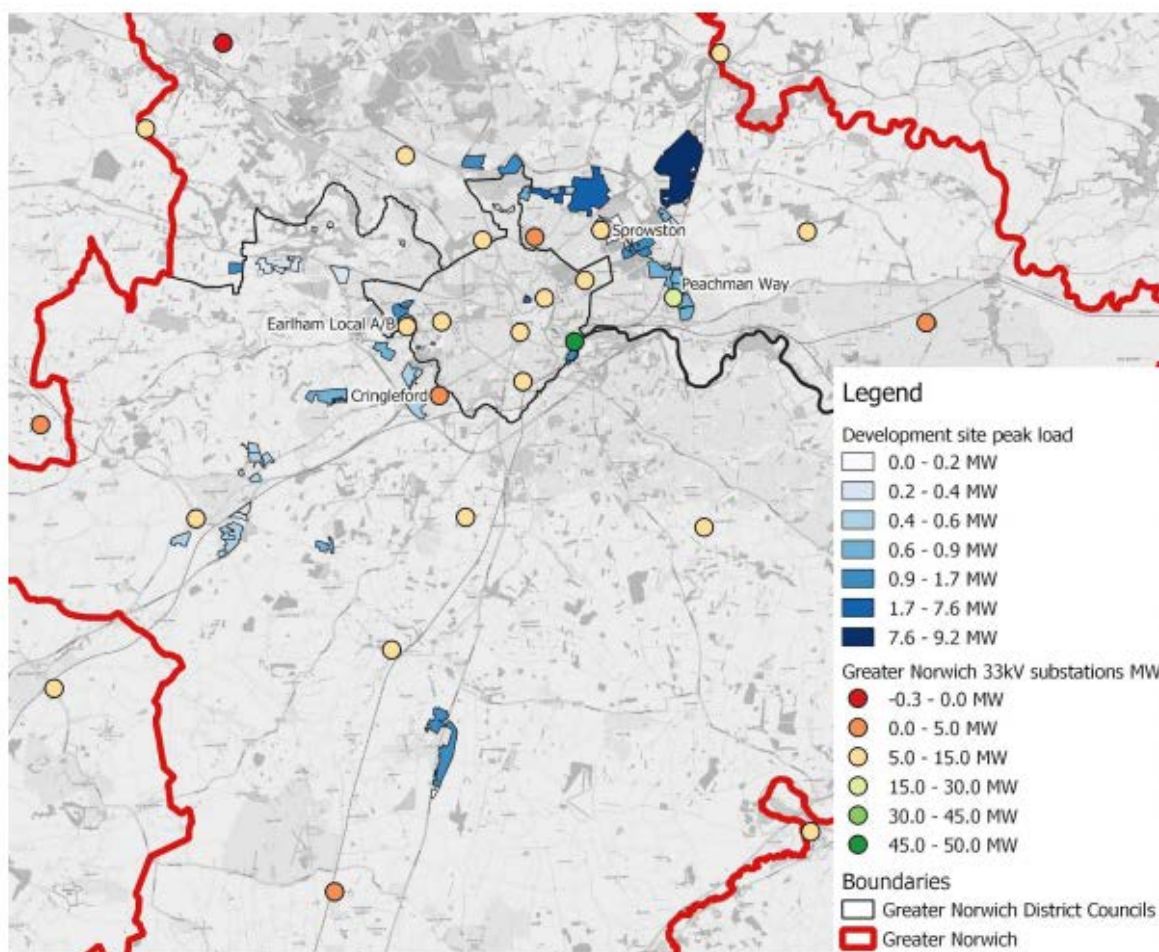


Figure 1: Planned development sites and existing substation spare capacity within Greater Norwich

943 The [Great Yarmouth Infrastructure Plan](#) 2020 says 'As part of the preparation of the Local Plan  
 944 Core Strategy, UK Power Networks confirmed that there was sufficient headroom in the  
 945 electricity distribution networks to accommodate the overall housing growth needs. No further  
 946 site-specific requirements were identified in relation to the allocated sites in the Local Plan  
 947 Part 2'.

948 **No specific issues relating to gas and electricity are identified.**

## 949 16. Health and social care

950 The NPPF says at para 20: 'Strategic policies should set out an overall strategy for the pattern,  
 951 scale and design quality of places, and make sufficient provision<sup>13</sup> (inter alia) community  
 952 facilities (such as health, education and cultural infrastructure)'.

953 The NPPG says: 'Plan-making bodies will need to discuss their emerging strategy for development  
 954 at an early stage with NHS England, local Clinical Commissioning Groups, Health and Wellbeing  
 955 Boards, Sustainability and Transformation Partnerships/Integrated Care Systems (depending on  
 956 local context), and the implications of development on health and care infrastructure'.



957 Paragraph: 005 Reference ID:53-005-20190722

958 Revision date: 22 07 2019

959 NHS England is not currently aware of a specific need for additional health facilities within the  
960 Broads Executive Area. There is currently sufficient capacity to cope with the existing  
961 populations in the area. Additionally, there is not at present, due to capacity reasons, a need to  
962 expand the health facilities outside the Broads Executive Area into the Broads Executive Area.

963 Should housing or population growth increase from the current levels, NHS England in  
964 conjunction with the relevant Integrated Care Systems (ICSs) would need to review the growth  
965 or projected growth to ensure that suitable facilities are available to meet the needs of patients  
966 within the areas. Where significant growth occurs, this could result in the requirement of future  
967 expansion of existing premises or the procurement of new facilities. Discussions would take  
968 place with existing practices. A business case would need to be reviewed based upon the  
969 information and proposals at the time.

970 Where significant housing growth is planned the NHS would be looking to secure appropriate  
971 Section 106 contributions to assist in mitigating the cost of providing such additional health  
972 infrastructure.

973 The Norfolk HUDU model provides estimates, based on different housing growth scenarios, for  
974 the additional health care needs required in Norfolk and Waveney to take account of projected  
975 growth. The figures are high level and contribute to understanding the potential strategic needs  
976 for ICS areas and are not intended to set requirements for specific developments.

977 The [Planning in Health Protocol](#) presents a process describing how relevant NHS organisations,  
978 Norfolk & Suffolk County Council Public Health and the Norfolk and East Suffolk Local Planning  
979 Authorities jointly consult to ensure that health considerations are adequately accounted for in  
980 plan making and in planning applications and their subsequent developments.

981 The Broads Authority will work with other parties to fully understand the needs of the proposed  
982 housing numbers for Norfolk and Waveney.

983 **At this stage, it is not proposed to have a specific policy on health facilities.**

## 984 **17. Education**

985 The NPPF says at para 20: *'Strategic policies should set out an overall strategy for the pattern,  
986 scale and design quality of places, and make sufficient provision<sup>13</sup> (inter alia) community  
987 facilities (such as health, education and cultural infrastructure).'*

988 *Para 95: It is important that a sufficient choice of school places is available to meet the needs of  
989 existing and new communities. Local planning authorities should take a proactive, positive and  
990 collaborative approach to meeting this requirement, and to development that will widen choice  
991 in education. They should:*

992 *a) give great weight to the need to create, expand or alter schools through the preparation of  
993 plans and decisions on applications; and*

994 *b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key*  
995 *planning issues before applications are submitted.*

996 Discussions with Suffolk and Norfolk County Councils indicate that there is not likely to be a  
997 requirement for any schools to expand into the Broads Authority Executive Area in this plan  
998 period. Future development proposals will be assessed as they emerge and seek S106 developer  
999 contributions if justified and satisfy the CIL 122 Regulations.

1000 East Suffolk Council said the following regarding education as part of the technical consultation:  
1001 If the Broads was to consider absorbing any housing of major scale in the Oulton area, then  
1002 current primary school space challenges in the area (The Limes Primary School is very close to  
1003 capacity) could be a significant issue.

1004 **At this stage, it is not proposed to have a specific policy on education establishments.**

## 1005 **18. Places of Worship, Local Services (shops, pubs, post** 1006 **offices...) and Community Facilities**

1007 The NPPF says '84. *Planning policies and decisions should enable (inter alia), d) the retention and*  
1008 *development of accessible local services and community facilities, such as local shops, meeting*  
1009 *places, sports venues, open space, cultural buildings, public houses and places of worship'.*

1010 The Local Plan will have a general policy for determining changes to and new community, visitor  
1011 and recreation facilities.

1012 Pubs will continue to have their own specific policy in the Local Plan.

1013 Open space, allotment, play and sport field need is assessed by the Broads' constituent districts.  
1014 They assess the entire district, including that which is the Broads. The need is translated into  
1015 standards for open space and a policy in the Local Plan will defer to these policies.

1016 Regarding the shopping area in Oulton Broad, a policy like that in the Waveney Local Plan will  
1017 continue to be in the Local Plan.

1018 Regarding shopping areas at Potter Heigham Bridge, the area will continue to have its own  
1019 policy.

1020 The Hoveton Town Centre policy will continue to be part of the Local Plan.

1021 **There are some policies on specific local services and facilities. Other policies in the Local Plan**  
1022 **will help determine applications for other uses and facilities.**

## 1023 **19. Police**

1024 Norfolk and Suffolk Police were contacted, through the Architectural Liaison Officers to confirm  
1025 if the dwellings and residential moorings which could be planned for in the Local Plan raised any  
1026 policing concerns.

1027 Norfolk Constabulary stated in November 2023 that an additional 17 dwellings a year or so  
1028 would not cause any strain on the policy services.

1029 **There is no requirement for the Local Plan to address operational policing requirements.**

## 1030 **20. Open Space and play, sport, recreation and Local Green** 1031 **Space**

1032 Currently, the Local Plan for the Broads seeks to protect open space and play identified on  
1033 [policies maps](#) and seeks new provision in line with the standards of the districts. Further open  
1034 spaces have been identified and will be protected in the Local Plan. Open space studies of our  
1035 District Councils are as follows:

1036 [Great Yarmouth Open Space Provision - Local Plan Topic Paper](#) (2020) – assesses the current  
1037 open space and play provision and identifies open space requirements.

1038 [North Norfolk Open Space Assessment](#) (2020) – assesses the current open space and play  
1039 provision and identifies open space requirements.

1040 [North Norfolk Amenity Green Space Study](#) (2019) - this is an appraisal of Open Space, Education  
1041 & Formal Recreation Spaces, and Local Green Space options, in the Towns, Villages & Open  
1042 Countryside in North Norfolk

1043 [Waveney Open Space Needs Assessment](#) (2015) - The assessment includes an audit of parks and  
1044 gardens, amenity green spaces, play spaces and allotments located within Waveney District  
1045 (including those located in areas within Waveney District that are administered by the Broads  
1046 Authority). Areas of biodiversity value have been identified and information relating to areas  
1047 important to the biodiversity network has been collated and discussed. An overview of natural  
1048 and semi-natural green space and cemeteries is provided and discussed in the context of the  
1049 green infrastructure network and their contribution towards biodiversity. Green corridors that  
1050 can support the movement of people and wildlife in the built-up areas of the District and  
1051 habitats which provide key linkages in the green infrastructure network for people and wildlife  
1052 are discussed. The River Wensum Strategy Delivery plan will be updated in early 2024.

1053 [Waveney Playing Pitch and Outdoor Sports Facilities Assessment](#) (2014) - to identify the existing  
1054 quantity and quality of pitches and outdoor sports facilities in Waveney district, identify areas  
1055 with a deficiency or surplus of provision and to make recommendations for the provision,  
1056 protection, and improvement for playing pitches and outdoor sports facilities across the district.

1057 Norwich City Council is starting work on a park's regeneration strategy, and Greater Norwich are  
1058 working on a new Green Infrastructure Strategy.

1059 The [East Suffolk Leisure Strategy](#) was published in Nov 2021 and covers open space as well as  
1060 sports and leisure.

1061 The Waveney GI Strategy will be partially replaced by the (currently emerging) Healthy  
1062 Environments SPD - general design guidance included in the GI strategy will be superseded by  
1063 the SPD, but the recommendations re meeting open space needs in specific areas are considered  
1064 to still be in date. Consultation on the draft SPD runs until 10<sup>th</sup> January 2024 - [Draft Healthy](#)

1065 [Environments Supplementary Planning Document - East Suffolk Council, Strategic Planning](#)  
1066 [Consultations \(inconsult.uk\).](#)

1067 The [East Suffolk Cycling and Walking Strategy](#) was adopted in 2022.

1068 **The Local Plan will continue the policy approach of protecting and enabling provision of open**  
1069 **space in line with the standards set by the districts.**

1070 In terms of leisure and sport, there are two sports centres in the Broads and these will have their  
1071 own policies: Broadland Sports Club and Ditchingham Maltings Sports Ground.

1072 **Continue with policies on these two important sports centres in the Broads.**

1073 In terms of Local Green Space, the current sites were [assessed](#), alongside new sites put forward  
1074 for consideration.

1075 **Some areas of Local Green Space will be allocated in the new Local Plan.**

## 1076 **21. Green Infrastructure**

1077 The NPPF defines green infrastructure (GI) as ‘a network of multi-functional green space, urban  
1078 and rural, which is capable of delivering a wide range of environmental and quality of life  
1079 benefits for local communities’.

1080 There are some policies already in the Local Plan that are particularly relevant to Green  
1081 Infrastructure. For example, local green spaces and former railway tracks are protected and  
1082 safeguarded, there are policies specifically on Green Infrastructure and recreational access  
1083 around the Broads.

1084 The following studies are of relevance. They are summarised and discussed below.

### 1085 **21.1 Integrated Access Strategy (2019)**

1086 One of the purposes of the Broads Authority is to promote the enjoyment of the Broads.  
1087 Footpaths and bridleways are important assets in the Broads. The main document that seeks to  
1088 meet this purpose is the [Integrated Access Strategy](#). This seeks to meet the following key  
1089 objectives:

- 1090 1) To improve links between land and water and to the water’s edge
- 1091 2) To improve access links to local facilities, settlements, and visitor destination points
- 1092 3) To improve access for all in the Broads
- 1093 4) To encourage sustainable travel choices such as public transport, walking, cycling and non-  
1094 powered boating, and improve links between public transport provision, visitor destination  
1095 points and access routes
- 1096 5) To deliver the River Wensum Strategy through the River Wensum Strategy Partnership
- 1097 6) To encourage provision of access routes that relieve visitor pressure on internationally  
1098 designated sites, avoid disturbance of protected species and help to accommodate growth
- 1099 7) To provide appropriate information on access to recreational opportunities and  
1100 interpretation about recreational sites.

1101 **The Local Plan will continue the policy approach of enabling appropriate improvements to**  
1102 **access and green infrastructure in line with the projects and principles set out in this strategy.**

## 1103 **21.2 River Wensum Strategy**

1104 The vision of this strategy is to 'To breathe new life into the river by enhancing it for the benefit  
1105 of all and increasing access to, and greater use of, this important asset. An enhanced river  
1106 corridor, with its unique natural and historic environment, will once again play an important part  
1107 in the growth and vitality of the city, strengthening the visitor economy and helping to give the  
1108 city a competitive advantage in attracting inward investment'. The [River Wensum Strategy](#)  
1109 [delivery plan](#) sets out the projects that have either been delivered or are planned.

1110 **The Local Plan will continue the policy approach of enabling delivery of the River Wensum**  
1111 **Strategy.**

## 1112 **21.3 Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy** 1113 **(RAMS) and Norfolk RAMS**

1114 Whilst access to the countryside and coast are important for people in terms of physical and  
1115 mental health and wellbeing, if it is not managed, there could be likely significant effects on the  
1116 protected sites in the area. Recreational impact has been identified as an issue that needs  
1117 addressing at all the protected sites in Norfolk and the coastal protected sites in Suffolk. That is  
1118 why the Broads Authority, like other relevant local planning authorities, is collecting tariffs from  
1119 holiday homes and residential dwellings (as well as other types of relevant development) to pool  
1120 with money from the other authorities, to mitigate likely significant effects on protected sites.  
1121 This money will then be spent on both capital and revenue projects at the protected sites to help  
1122 protect them.

1123 More information can be found here: [Habitat mitigation \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/habitat-mitigation)

1124 **The Local Plan will need to ensure the collection of the tariff and delivery of mitigation.**

## 1125 **21.4 Relevant district documents**

1126 Some of our constituent districts have produced Green Infrastructure Studies and these may be  
1127 relevant to the Broads. The ones in place (or being produced) at the time of writing are included  
1128 below.

1129 [Greater Norwich Local Plan Green Infrastructure Study Report \(2020\)](#) - Discusses potential  
1130 improvements in some areas near to or within the Broads.

1131 [Waveney Green Infrastructure Strategy](#) (2015) – looks into play, green corridors and churchyards  
1132 for example. Discusses potential improvements in some areas near to or within the Broads.

1133 [East Suffolk Cycling and Walking Strategy](#) (2022) – Some of the proposals are within the Broads  
1134 and are generally supported.

1135 **The Local Plan will continue the policy approach of enabling appropriate improvements to**  
1136 **access and green infrastructure in line with the projects and principles set out in these**  
1137 **documents, as relevant.**

## 21.5 Biodiversity Net Gain

Whilst not an infrastructure item itself, the net gain requirement could produce more green infrastructure and habitats.

**The Local Plan will ensure the requirements of Biodiversity Net Gain are met.**

## 22. Blue Infrastructure

Water is a key aspect of the Broads and one of the purposes of the Broads Authority is to protect the interest of navigation. The Local Plan for the Broads includes various policies to protect and support appropriate enhancements to access to and enjoyment of the water (blue infrastructure). Particularly important is moorings, slip ways, waterside facilities and water quality (as discussed earlier in this document). Particularly important is the Integrated Access Strategy (see previous) as that highlights the importance of improved links between land and water and to the water's edge.

**The Local Plan will continue the policy approach of protecting navigation and enabling appropriate improvements.**

## 23. Developer contributions

NPPF para 34 says: *'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan'*.

It should be noted that the Levelling up and Regeneration Act 2023 seeks the introduction of an Infrastructure Levy to replace Section 106 ad Community Infrastructure Levy. It is understood that trials will be ongoing and it could be a number of years before this Levy comes into place. The Authority will keep informed of progress.

**For affordable housing need, we have regard to/defer to the affordable housing policies of the relevant district council. As stated in earlier sections, there is no specific requirements relating to education and health. Policies will be in place to address green and digital infrastructure. In terms of transport, we will work with the Highways Authorities to understand any local impact each allocation needs to address. There are policies in the local plan relating to flood and water management and these will set out requirements for developers. There will be a whole plan viability assessment completed as well.**

## 24. Summary

- 1) At the time of writing, the district councils have not asked the Broads Authority to include specific infrastructure in the emerging Local Plan. We will continue to work closely with the District Councils.
- 2) As the Local Plan is produced, we will ensure it addresses the agreements set out in the NSPF.

- 1175 3) The main large-scale infrastructure identified that is particularly relevant to the Broads, is  
1176 the dualling of the Acle Straight. The current local plan has a policy on the Acle Straight  
1177 and this will be rolled forward.
- 1178 4) Development in the Broads may require local specific infrastructure. The Utilities Site will  
1179 require significant infrastructure and that site is part of a wider regeneration area subject  
1180 to a Masterplan and emerging SPD.
- 1181 5) It is not proposed to set a standard for electric vehicle charging points in the new Local  
1182 Plan for the Broads although there will be a policy relating to fire risk and the design and  
1183 location of charging points.
- 1184 6) The scale of growth proposed will not have strategic transport impacts. There may be  
1185 some more local highway changes or improvements that could be needed because of  
1186 schemes. We will contact the relevant Highways Authority regarding any allocations that  
1187 are proposed. We will ensure we keep up to date with any relevant documents and  
1188 strategies.
- 1189 7) There is a policy that relates to telecommunications infrastructure emphasising the  
1190 importance of addressing impacts on landscape in the Broads. The Local Plan will reflect  
1191 the NSPF.
- 1192 8) At this stage, the Authority is not aware of any specific security related issues that the  
1193 Local Plan needs to address. Norfolk and Suffolk Architectural Liaison Officers are  
1194 consulted at all stages of producing the Local Plan and their responses will be considered  
1195 and addressed as appropriate.
- 1196 9) The Local Plan will roll forward the current general support of the waste hierarchy as well  
1197 as ensure any waste allocations in the Local Plans are considered. There is potential to  
1198 improve reference to construction waste.
- 1199 10) The Authority will continue with the 110l/h/d water usage requirement for new  
1200 development. We will explore the potential to go lower than 110l/h/d.
- 1201 11) The Authority will address water quality in the Local Plan. The Authority will keep  
1202 updated regarding Horning Knackers Wood Water Recycling Centre. The Local Plan will  
1203 reflect Nutrient Neutrality.
- 1204 12) The NPPF, current and new Local Plan policies and current Flood Risk SPD will enable  
1205 flooding and flood risk to be addressed.
- 1206 13) There is a policy relating to the coast which generally supports the Shoreline  
1207 Management Plan's approach. A Coast SPD has been produced.
- 1208 14) Many current allocations in the Local Plan are partially on safeguarded minerals (sand  
1209 and gravel) resource and this is identified. This approach is intended to be continued.
- 1210 15) See separate Renewable Energy Topic Paper.
- 1211 16) No specific issues relating to gas and electricity are identified.



- 1212 17) At this stage, it is not proposed to have a specific policy on health facilities.
- 1213 18) At this stage, it is not proposed to have a specific policy on education establishments.
- 1214 19) There are some policies on specific local services and facilities. Other policies in the Local  
1215 Plan will help determine applications for other uses and facilities.
- 1216 20) There is no requirement for the Local Plan to address operational policing requirements.
- 1217 21) The Local Plan will continue the policy approach of protecting and enabling provision of  
1218 open space in line with the standards set by the districts.
- 1219 22) Some areas of Local Green Space will be allocated in the new Local Plan.
- 1220 23) The Local Plan will continue the policy approach of enabling appropriate improvements  
1221 to access and green infrastructure in line with the projects and principles set out in this  
1222 strategy.
- 1223 24) The Local Plan will continue the policy approach of enabling delivery of the River  
1224 Wensum Strategy.
- 1225 25) The Local Plan will need to ensure the collection of the tariff and delivery of mitigation.
- 1226 26) The Local Plan will continue the policy approach of enabling appropriate improvements  
1227 to access and green infrastructure in line with the projects and principles set out in these  
1228 documents, as relevant.
- 1229 27) The Local Plan will ensure the requirements of Biodiversity Net Gain are met.
- 1230 28) The Local Plan will continue the policy approach of protecting navigation and enabling  
1231 appropriate improvements.
- 1232 29) For affordable housing need, we have regard to/defer to the affordable housing policies  
1233 of the relevant district council. As stated in earlier sections, there is no specific  
1234 requirements relating to education and health. Policies will be in place to address green  
1235 and digital infrastructure. In terms of transport, we will work with the Highways  
1236 Authorities to understand any local impact each allocation needs to address. There are  
1237 policies in the local plan relating to flood and water management and these will set out  
1238 requirements for developers. There will be a whole plan viability assessment completed  
1239 as well.



1240 **Appendix 1: Responses received as part of technical consultation**

Organisation	Comment	Response
Norwich City Council	Line 29: Should this also refer to the Infrastructure Investment Fund, 5-year Infrastructure Investment Plan and Greater Norwich Infrastructure Plan documents?	Noted and text added to reflect this.
Norwich City Council	Sections 20 and 21 – Norwich City Council is starting work on a parks regeneration strategy, and Greater Norwich are working on a new Green Infrastructure Strategy. Might be helpful for these sections to make reference to these as emerging documents.	Noted and text added to reflect this.
Norwich City Council	Section 20 – Just bringing to your attention that the River Wensum Strategy Delivery plan will be updated in early 2024 so the link to this document may need updating once this has been done	Noted and text added to reflect this.
Norfolk Police and Suffolk Police	Only additional comments we have would have are to include SBD Security principles into some industry aspects such as boat yards, leisure/amenity spaces and caravan/lodge sites (if any).	Noted. We have included such reference in some draft policies of the Local Plan. No further action for this document.
Norfolk Police and Suffolk Police	Just to make you aware that the police may also have 'operations' in place for flooding management, so perhaps a nod to Partnership working.	
Norfolk Police and Suffolk Police	We have already commented regarding SBD principles within the Design guide for housing so that is covered I think.	Noted. We have included such reference in some draft policies of the Local Plan. No further action for this document.

Organisation	Comment	Response
Norfolk Police and Suffolk Police	With regarding to strains on policing any significant developments (over 100 houses) we would forward to our estates for CIL applications to help support with infrastructure to help support policing bigger areas, however if you are looking at 17 houses per year then I do not think that too much of a worry.	Noted.
Norfolk County Council – LLFA	Various comments and suggested track changes.	Most comments and track changes resulted in changes.
Norfolk County Council – Public Health	Reference to the County Councils ‘Walking, Wheeling and Cycling Strategy for Norfolk’ should be included in the transport section (currently available as a draft for consultation).  CCGs have been replaced by ICSs which needs to be updated.  Section 106 and CIL section (line 956 – 958) needs an update. Health infrastructure is not eligible for CIL as outlined in the Greater Norwich Infrastructure Plan.	Most comments and track changes resulted in changes.
Norfolk County Council – Minerals and Waste	Various comments and suggested changed.	Most comments and track changes resulted in changes.
Norfolk County Council – Education	Section is correct.	Noted.
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	NGET does not distribute electricity to individual sites and premises directly. It is the role of local distribution companies to distribute electricity to homes and businesses.	Noted.
Avison Young on behalf of National Grid Electricity Transmission	Specific development proposals within your local planning authority area are unlikely to have a significant direct effect upon NGET’s electricity transmission system. Generally, improvements to the system	Noted.

Organisation	Comment	Response
and National Gas Transmission.	to provide supplies to the local distribution network are as a result of overall regional demand growth rather than site specific developments.	
Avison Young on behalf of National Grid Electricity Transmission and National Gas Transmission.	National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.	Noted and changed.
Anglian Water Services	10.2 Might be worth mentioning here the government's Environmental Improvement Plan which sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress.	Noted and changed.
Anglian Water Services	10.3 We welcome this statement and hope the emerging Joint Protocol and supporting evidence base will assist with this.	Noted.
Anglian Water Services	10.1 Agree - revised draft is available on our website and a summary of WRMP has been sent via email to all LPAs. <a href="https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/">https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-resources-management-plan/</a>	Noted.
East Suffolk Council	<u>Ch 2.</u> Reference here should be made to the annual Infrastructure Funding Statements that district councils prepare, as they update infrastructure items and/or costs (including whether some such costs are S106 or CIL funded). See <a href="https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/">https://www.eastsuffolk.gov.uk/planning/developer-contributions/infrastructure-funding-statement/</a> for ESC's 22/23 IFS.	Reference to IFS added.

Organisation	Comment	Response
East Suffolk Council	<u>Ch 10.</u> Not in East Suffolk, but the strategic significance of Whitlingham WWTW appears to be under-played in the document, given its large size, huge catchment area, impact on nutrient neutrality etc.	Noted, but the section refers adequately to all Water Recycling Centres. No change.
East Suffolk Council	<u>Ch 11.</u> It does not directly affect the Broads, but the Lowestoft Tidal Flood Barrier project is probably worth a mention as the impacts will stretch into Oulton Broad and close to the BA boundary.	Reference added.
East Suffolk Council	<u>Ch 16.</u> Given Greater Norwich's general resistance to spending CIL on healthcare infrastructure, this might need to be considered further. As the Broads is not a CIL charging authority, it should probably be clearer that any healthcare infrastructure contributions would need to be generated via S106.	Section amended following comments from Norfolk County Council.
East Suffolk Council	<u>Ch 17.</u> If the Broads was to consider absorbing any housing of major scale in the Oulton area, then current primary school space challenges in the area (The Limes PS is very close to capacity) could be a significant issue.	Reference added to this issue.
East Suffolk Council	<u>Ch 18.</u> The recent use classes change introducing Class E means that any Oulton Broad shopping area policy would obviously need to reflect this.	Noted and this has been done.

Organisation	Comment	Response
East Suffolk Council	<p>Ch 20. Sports and recreation doesn't appear to be mentioned as a standalone topic (recreation gets a few passing mentions) but it probably should, given the Broads' key status as a recreation destination and because some sports facilities may be close to – or even in – the BA area. The East Suffolk Leisure Strategy was published in Nov 2021 and covers open space as well as sports and leisure: <a href="https://www.eastsuffolk.gov.uk/assets/Leisure/East-Suffolk-Leisure-Strategy/East-Suffolk-Leisure-Strategy.pdf">https://www.eastsuffolk.gov.uk/assets/Leisure/East-Suffolk-Leisure-Strategy/East-Suffolk-Leisure-Strategy.pdf</a>.</p> <p>The Waveney GI Strategy will be partially replaced by the (currently emerging) Healthy Environments SPD - general design guidance included in the GI strategy will be superseded by the SPD, but the recommendations re meeting open space needs in specific areas are considered to still be in date. Consultation on the draft SPD runs until 10<sup>th</sup> January 2024 - <a href="https://eastsuffolk.inconsult.uk/DraftHESPD2023/consultationHome">https://eastsuffolk.inconsult.uk/DraftHESPD2023/consultationHome</a>.</p> <p>The East Suffolk Cycling and Walking Strategy was adopted in 2022 (<a href="https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/">https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/</a>).</p>	Agreed and reference made.

## Local Plan for the Broads - Review

### Policy PUBDM11: Peat soils

See map: [Appendix 10: Location of peat soils](#)

1. Sites of peat soils<sup>1</sup> will be protected, enhanced, and preserved.
2. There will be a presumption in favour of preservation in-situ for peat soils.
3. Development resulting in the loss or deterioration of peat ~~(an irreplaceable habitat)~~ will be refused, unless there are wholly exceptional reasons (see supporting text), and a suitable compensation strategy is put in place by the applicant/developer ~~exists~~, and it is demonstrated that:
  - i) There is not a less harmful viable option; and
  - ii) The amount of harm has been reduced to the minimum possible; and
  - iii) An evaluation is submitted to assess the impact of the proposal in relation to palaeoenvironments, archaeology, biodiversity provision and carbon content; and
  - iv) Satisfactory provision is made for the evaluation, recording and interpretation of the peat before commencement of development; and
  - v) The peat is disposed of in a way that will limit carbon loss to the atmosphere.
4. Development that seeks to enhance biodiversity but may result in some peat removal will still need to demonstrate the criteria i) to v) and that the biodiversity benefit will outweigh carbon loss.
5. Proposals to enhance peat and protect its qualities will be supported.

### Reasoned Justification

Peat is an abundant soil typology in the Broads and an important asset. While there is a certain irony in protecting the peat soils in an area where the lakes originated from peat extraction, peat is a finite resource.

### Ecosystem services

Peat has many qualities and provides many ecosystem services:

- **Climate change:** The soils formed by the Broads wetland vegetation store 38.8 million tonnes of carbon<sup>2</sup>. Peat soils release previously stored carbon when they are dry. UK peats therefore represent both a threat and an opportunity with respect to greenhouse gas emissions. Correct management and restoration could lead to enhanced storage of carbon and other greenhouse gases in these soils, while mismanagement or neglect could lead to these carbon sinks becoming net sources of greenhouse gases.

<sup>1</sup> Peat is a partially decomposed mass of semi-carbonised vegetation which has grown under waterlogged, anaerobic conditions, usually in bogs or swamps

<sup>2</sup> NCA Profile 80, Natural England and the Broads Authority's [Greenhouse gas reduction strategy for the Broads \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)

- **Biodiversity:** Peat soils support internationally important fen, fen meadow, wet woodland, and lake habitats. 75% of the remaining species-rich peat fen in lowland Britain is found in the Broads. Milk parsley, the food plant of the Swallowtail caterpillar, grows only on peat soils. Fen orchids have their UK stronghold in the Broads, so the peat soils are critical for the survival of this species. Other rare and important plant and invertebrate communities (collection of species) are supported by the peaty soils.
- **Archaeology:** Historic England has identified the Broads as an area of *exceptional waterlogged heritage*. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past. Archaeology is discussed in more detail in the [Heritage section](#) of this Plan.
- **Palaeoenvironments:** The peat has accumulated over time and thus incorporates a record of past climatic and environmental changes that can be reconstructed through, for example, the study of its stratigraphy and pollen content, leading to increased knowledge of the evolution of the landscape.
- **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.

#### **How peat quality can be impacted**

Land management that could impact on the quality of the peat soil includes land drainage, introduction of polluted water, burying the peat under hard surfaces or gardens, compacting peat and peat removal to change the land use.

#### **Peat. Priority habitat. Irreplaceable habitat.**

NPPF (2023) para 186c) says ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>67</sup> and a suitable compensation strategy exists’.

Footnote 67 says ‘For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat’.

The NPPF glossary defines ‘irreplaceable habitats’ as ‘habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, considering their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen’.

[Priority habitats and species are defined by the NPPF as ‘Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006’.](#) Lowland fen

is a priority habitat under the UK Biodiversity Action Plan and the EU Habitats Directive because of the quality and diversity of species it supports. Lowland Fen is also classed as an 'irreplaceable habitat' in the NPPF. The JNCC says 'fens are peatlands which receive water and nutrients from the soil, rock and ground water as well as from rainfall: they are minerotrophic'.

Peat is not a habitat, but the Authority considers it irreplaceable in that it is very technically difficult and takes a very long time (perhaps thousands of years) to recreate once destroyed. Furthermore, peat can support lowland fen which is an irreplaceable habitat as defined by the NPPF. And in terms of priority habitats, it can also support wet woodland, purple moor grass and rush pasture, coastal floodplain grazing marsh and reedbed. ~~that can be recreated elsewhere as the deep soils take many thousands of years to form.~~ The tests set out in the NPPF will need to be passed for development that negatively impacts peat to go ahead.

Indeed, a site in Salford that formed part of Greater Manchester's local spatial framework Places for Everyone was removed by Inspectors due to the development proposal's public benefits not outweighing the loss of deterioration of peat<sup>3</sup>.

~~The Authority therefore considers peat is an irreplaceable habitat and so the tests set out in the NPPF will need to be passed for development that negatively impacts peat to go ahead.~~

#### **Lowland Fen**

~~Lowland fen is a priority habitat under the UK Biodiversity Action Plan and the EU Habitats Directive because of the quality and diversity of species it supports. Lowland Fen is also classed as an 'irreplaceable habitat' in the NPPF. The JNCC<sup>4</sup> says 'fens are peatlands which receive water and nutrients from the soil, rock and ground water as well as from rainfall: they are minerotrophic'.~~

#### **Biodiversity enhancements schemes**

On occasion, for nature conservation benefits, peat can be removed to create shallow turf ponds or scrapes (areas of temporary open water) on areas of fen or scrub habitat to maximise the biodiversity value and hold back succession to woodland habitat. The removal of peat can also be necessary for conservation management – for example, the most biodiverse areas of UK fen occur in areas where the turf has been stripped and vegetation subsequently grown back. This policy allows for such operations, provided they can justify the proposal against the criteria set out in the policy.

#### **Excavation of peat as a mineral resource**

The NPPF and NPPG mentions peat soils specifically in relation to its excavation as a mineral resource, rather than the issue in the Broads relating to impact due to groundworks from development and inappropriate land management.

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<sup>3</sup> [IN37-Further-Action-Points-July-2023-Final-Publication \(pdf | hwa.uk.com\)](#) and [PfE - Inspectors Report 01 - FINAL.docx \(greatermanchester-ca.gov.uk\)](#)

<sup>4</sup> [UK BAP Priority Habitat Descriptions \(Fen, Marsh & Swamp\) \(2008\) | JNCC Resource Hub](#)



**If the public benefit of a scheme is proved to clearly outweigh the loss or deterioration of peat**

The policy and NPPF seeks protection of peat soils through changes in the location of development in the first instance and then designing proposals to minimise disturbance to the qualities of the peat and the amount of peat removed. Development proposed on areas of peat would require justification for the need to site the development on peat, and subsequently a peat assessment that shows how efforts have been made to reduce adverse impacts on peat. Proposals that would result in removal of peat are required to assess the archaeological and paleoenvironmental potential of peat and make adequate recordings prior to removal.

To prevent the loss of carbon to the atmosphere that is sequestered in peat soils, disposal is of great importance. The Authority expects peat to be disposed of in a way that maintains the carbon capture properties. Peat needs to go somewhere where it can remain wet (and hence retain its function to lock up carbon and prevent it being released into the atmosphere) or potentially provide a seedbank (the potential for ancient peat to provide a viable seedbank may need to be evidenced) or be reused for local benefit (for example by boosting organic matter in degraded arable soils). When dry, peat changes its properties and oxidizes, so transfer to the receiving site would need to be immediate.

The Broads Authority have produced a guide to understanding and addressing the impact of new developments on peat soil. This [Guide Peat Guide \(or successor document\)](#) provides additional information to help applicants meet the requirements of the related peat policy. It seeks to reduce the amount of peat excavated, ensure the special qualities are addressed and ensure that any peat excavated it disposed of in a way to ensure stored carbon is not emitted into the atmosphere.