

Broads Authority Local Plan Regulation 19 version Representation Form

This is the form for making representations on the Broads-Authority Local Plan Publication version.

There is guidance about how to respond to this consultation and that can be found here: [Regulation 19 response guidance](#)

The various documents that are being consulted on can be found here: [Consultations](#)

The consultation ends 4pm on 26/09/2025. Responses received after this date may not be considered. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

Please note:

- **Separate forms should be completed for each representation.**
- All respondents must provide their personal details.
- Representations should be on the basis of the **soundness or legal compliance** of the Plan. (Please see guidance note for more details.)
- It is recommended that groups who share a common view submit a **single form rather than multiple copies** and provide a list of each person supporting the representation.
- By completing this form you agree to your details being shared. Your name, organisation and comments (but not your other personal details) will be made available for public viewing. **These representations cannot be treated as confidential.**

* 1. Your Contact Details:

Name: [Sarah Bowerman](#)

Organisation/Group: [Essex & Suffolk Water](#)

2. Agent Details (if applicable):

Name: [Mark Hodgson](#)

Organisation/Group: [Savills \(UK\) Ltd](#)

3. Group Representations:

If your representation is on behalf of a group, how many people support it? [N/A](#)

Please send a list of each person in your group that supports the representation to planningpolicy@broads-authority.gov.uk.

* 4. To which part of the Plan does your representation relate?

Paragraph Number:

Policy Number: [Policy PUBORM1: Ormesby waterworks](#)

Map Reference:

Appendix:

Supporting Document:

*** 5. Do you consider that this part of the Plan meets the legal and procedural requirements?** (see guidance note for assistance with this question)

Yes

No

*** 6. Do you consider this part of the Plan has met the tests of soundness?** (see guidance note for assistance with this question)

Yes

No

*** 7. If you answered No, to Q6 - Do you consider this part of the Plan to be unsound because it is not:**

Positively Prepared:

Justified: The policy is not considered to be justified or effective in relation to the development of essential water infrastructure.

Effective: The policy is not considered to be justified or effective in relation to the development of essential water infrastructure.

Consistent with National Policy:

(Select this option if you did not answer no)

*** 8. Please give details of why you consider this part of the Plan is not legally compliant or sound. If you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.**

Point 2 of Policy PUBORM1: Ormesby waterworks states (underline added by Savills for emphasis):

“Development reasonably required for the operation of the water treatment works, and the operator’s statutory duties as a water supply undertaker, will be supported where:

- a) it is designed to make a positive contribution to the local landscape or to minimise any negative visual impact, particularly when viewed from Ormesby, Ormesby Little, and Rollesby Broads;*
- b) the tree coverage of the site, which makes an important contribution to the character and appearance of the area, is retained and also protected during construction works;*
- c) it reduces and does not cause light pollution;*
- d) it is appropriate considering the flood risk to the site; and*
- e) it has no adverse effect on the adjacent Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI)”.*

It is considered that the phraseology ‘*reasonably required*’ is unhelpful with regard to the operation of the Ormesby waterworks. Development is either required or not required for the continued effective operation of the water treatment works to ensure the provision and maintenance of a consistent water supply to homes across the area. The wording ‘*reasonably*’ is therefore deemed ambiguous and unnecessary.

Further, in relation to point 2. a), whilst Essex & Suffolk Water will always endeavour to minimise negative visual and landscape impacts, it will not always be possible to make a positive contribution due to the nature of their capital projects premised on the delivery of much-needed essential water infrastructure.

The requirement at point 2. b) for tree coverage to be retained and protected during construction works is also considered somewhat restrictive in relation to the delivery of essential infrastructure projects. Essex & Suffolk Water has a number of operational sites with considerable tree coverage. Whilst trees

will be retained wherever practicable, it must be recognised that this will not always be possible, and a degree of flexibility within policy is therefore required.

Paragraph 190 of the NPPF does not contain a blanket restriction on tree removal but rather that any applications should include an assessment of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

*** 9. Have you raised this issue during previous consultations on the Local Plan?**

Yes

No

If you have answered 'No' could you please explain why this has not been raised before:

Savills (UK) Ltd was not acting on behalf of our client, Essex & Suffolk Water, during the previous consultations on the Local Plan. To provide comments during the Regulation 19 consultation, it is not required to have commented on previous versions of the Local Plan. Comments during the Regulation 19 consultation are focused on issues of legal compliance and soundness.

*** 10. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound.** You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and cover all the evidence and supporting information necessary to support/justify the representation. If you are not seeking changes then please write 'not seeking changes'.

On behalf of Essex & Suffolk Water, it is requested that the word 'reasonably' be removed from Policy PUBORM1, point 2. Instead, it is proposed that Policy PUBORM1, point 2 reads as follows:

"Development required for the operation of the water treatment works, and the operator's statutory duties as a water supply undertaker, will be supported where..."

This wording change would enable the continued effective operation of the water treatment works, and avoids any ambiguity regarding whether development is required or not required.

To enable flexibility for the delivery of essential water infrastructure, it is also requested that point 2. a) be amended from:

"it is designed to make a positive contribution to the local landscape or to minimise any negative visual impact, particularly when viewed from Ormesby, Ormesby Little, and Rollesby Broads"

To:

"it is designed to avoid detrimental impact on the character and quality of the local landscape".

Similarly, it is requested that point 2. b) be amended from:

"the tree coverage of the site, which makes an important contribution to the character and appearance of the area, is retained and also protected during construction works"

To:

"the tree coverage of the site, which makes an important contribution to the character and appearance of the area, is retained wherever possible and also protected during construction works to avoid unnecessary loss".

*** 11. If your representation is seeking a change, do you consider it necessary to participate in the public examination?** (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the public examination, although all members of the public may observe the proceedings)

Yes

No

~~I am not seeking changes~~

*** 12. Would like to be notified of the following?**

- Submission of the Local Plan to the Secretary of State for Public Examination;
- The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report); and
- The adoption of the Broads Local Plan.

Yes

No

*** 13. Please sign and date this form (writing your name and dating it is adequate):**

Signature:

On behalf of Essex & Suffolk Water

Date: 25/9/25

The closing date for responses is 4pm, 26/09/2025