

**Broads Local Plan – October Bite Size Pieces**

Report by Planning Policy Officer

<b>Summary:</b>	This report introduces the following topics for the Publication version of the Local Plan: Sustainable Communities Strategy Assessment, Equalities Impact Assessment, Gypsy and Traveller, Travelling Show People, Caravan and Houseboat Accommodation Needs Assessment and Single Issue Focussed Consultation Responses.
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<b>Recommendation:</b>	Members views are requested .
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## **1 Introduction**

- 1.1 This report introduces the following topics for the Publication version of the Local Plan: Sustainable Communities Strategy Assessment, Equalities Impact Assessment, Gypsy and Traveller, Travelling Show People, Caravan and Houseboat Accommodation Needs Assessment and Single Issue Focussed Consultation Responses.
- 1.2 Members' views are requested to inform the draft policy approach in the Publication version of the Local plan.
- 1.3 As a reminder, at Full Authority on 29 September 2017, it was agreed that the Local Plan should proceed to pre-submission consultation subject to understanding the impacts on the Local Plan of the final versions of the Gypsy and Traveller, Travelling Show People, Caravan and residential mooring accommodation needs study and the Strategic Flood Risk Assessment. The final decision to go to pre-submission consultation will be made by the Chief Executive, Chair of Planning Committee and Chair of Full Authority on the basis that any changes arising as a result of these studies are technical in detail and do not materially alter the policies of the Local Plan.
- 1.4 The Gypsy and Traveller, Travelling Show People, Caravan and residential mooring accommodation needs study is presented at this Planning Committee for consideration. The SFRA will follow at a later date when it is completed.

## **2 Topics covered in this report:**

- 2.1 Sustainable Communities Strategy Assessment
  - 2.1.1 This is an assessment of the Local Plan against the Sustainable Communities Strategies and Business or Corporate Plans of our District and County Councils.

## **2.2 Single Issue Focussed Consultation Responses.**

- 2.2.1 During the drafting of the policies between the Preferred Options and Publication Stage of the Local plan, some stakeholders were asked for their opinion on some of the policies. This report brings together the responses with the Authority's proposed reply.

## **2.3 Equalities Impact Assessment**

- 2.3.1 The Local Plan and how it has been produced has been assessed against the protected characteristics addressed in the Equalities Act.

## **2.4 Gypsy and Traveller, Travelling Show People, Caravan and Houseboat Accommodation Needs Assessment**

- 2.4.1 This sets out the need for these types of accommodation for the period to 2036. The figures for the Broads Authority cover the entire Executive Area, including that in Waveney District.

## **3 Financial Implications**

- 3.1 Generally officer time in producing these policies and any associated guidance as well as in using the policies to determining planning applications.

Background papers:None

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Appendices:

Appendix A	Sustainable Community Strategy Statements
Appendix B	Responses to Single Issues Consultation
Appendix C	Equalities Impact Assessment
Appendix D	<a href="#"><u>Norfolk Caravans and Houseboats Accommodation Needs Assessment including for Gypsies, Travellers and Travelling Show people</u></a>

## Broads Authority Local Plan and Sustainable Community Strategy Statements

September 2017

### 1. Introduction

Parts of the Broads Authority Executive Area cover parts of six District Councils in two Counties. The Sustainable Community Strategies of these councils have informed the production of the Broads Authority Local Plan. These are assessed below in terms of compatibility between the objectives of the Strategies and the policies of the Local Plan. The Broads Authority has not produced a Sustainable Community Strategy. As such, the Broads Plan objectives have been assessed. The Broads Plan is the management plan for the Broads Executive Area.

✓	Compatible
✗	Not compatible
-	Not relevant

In general, whilst these documents are quite old and have not been updated, they are still in place.

Because of the age of the documents, we have also assessed the Corporate or Business Plans of our districts.

### 2. The Broads Authority

The Broads Plan and Local Plan Comparison assessment briefly shows how the Local Plan is in conformity with the emerging Broads Plan (2017). [http://www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0008/827279/Appendix-X-Links-with-Broads-Plan.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0008/827279/Appendix-X-Links-with-Broads-Plan.pdf)

### 3. Norfolk County Council

a) Norfolk Health and Wellbeing Board:

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Promoting the social and emotional wellbeing of pre-school children	-	Nothing specifically relating to this age group.
Preventing obesity	✓	Health section of the Local Plan refers to active lifestyles.
Making Norfolk a better place for people with dementia and their carers	✓	Dementia addressed in the design policy of the Local Plan.

b) The County Council Plan 2016 – 19

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Excellence in Education	-	Not covered specifically in the Broads Local Plan.
Real Jobs	✓	See economy section of the Local Plan
Good Infrastructure	✓	The Local Plan generally supports the right infrastructure in the right place

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
		designed in the right way.
Supporting Vulnerable People	✓	The Local Plan has a design policy relating to dementia and wheelchairs as well as an specialist accommodation policy.

#### 4. Suffolk County Council

##### a) 'Transforming Suffolk'. 2008-2028.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
A prosperous and Vibrant Economy	✓	The policies of the Local Plan as a whole aim to maintain the economy and tourism at the very least but grow it in a sustainable way. Land is allocated at Oulton Broad for a mixed use scheme.
Learning and Skills for the Future	✓	
The Greenest Economy	✓	
Safe, Healthy and Inclusive Communities.	-	Whilst not specifically stated in the policies that relate to Suffolk, it is hoped that the Local Plan has a positive effect on residents. Much detail is also agreed at the planning application stage. The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted. There is a health section of the Local Plan.

##### b) OUR PRIORITIES 2017-21

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
INCLUSIVE GROWTH	✓	Generally the Local Plan meets this aim.
HEALTH, CARE AND WELLBEING	✓	Generally the Local Plan meets this aim.
EFFICIENT AND EFFECTIVE PUBLIC SERVICES	-	Not covered specifically in the Broads Local Plan.

#### 5. Broadland District Council

##### a) BCP Community Plan – Update. 2004-2014.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Feeling Safe	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted.
Ease of Access	✓	Mooring Plots, moorings, access on land and to the water are addressed in some

Objective	How the Broads Local Plan relates to this objective	
		policies.
Where we live (value special character)	✓	Many policies in the Local Plan seek to emphasise the importance of landscape character, biodiversity and cultural heritage.
Good Health	✓	In Acle, land is allocated for recreation use. Open space is also protected in Thorpe St Andrew. General health policy of the Local Plan.
Decent Homes	-	Land is not allocated in the Broadland Area for residential development. Some settlements do have Development Boundaries allocated.
Thriving Economy	✓	The policies of the Local Plan as a whole aim to maintain tourism at the very least but grow it in a sustainable way. See Economy Section.
Our Potential	✓	The Local Plan seeks to plan for the future.
Living for the Future	✓	
Pride of Place	✓	Many policies in the Local plan seek to emphasise the importance of landscape character, biodiversity and cultural heritage.

b) Broadland Business Plan 2015 to 2019

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
To deliver economic success in our area	✓	Economy is addressed in the Local Plan.
To achieve environmental excellence in everything we do	✓	This is fundamental to the Local Plan.
To plan and provide well housed communities	✓	Housing is addressed in the Local Plan.
To increase health and wellbeing	✓	There is a health section in the Local plan.
To keep people safe and secure	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted.
To continue to provide high quality, value for money service on our own or as a trusted partner	-	Not covered specifically in the Broads Local Plan.

**6. Great Yarmouth Borough Council**

a) A Long Term Vision and a Sustainable Community Strategy for 2008-2011.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Providing a range of opportunities for different groups in the local community to come together to engage in positive dialogue with each other	✓	There are policies relating to community and visitor facilities. Also the Local Plan consultation has sought to engage all parts of the community.
Developing and implementing a comprehensive, inter-agency	✓	The Local Plan consultation has sought to engage all parts of the community.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
approach to engaging with local communities and building their capacity to enable them to have a say in the design and delivery of services		
Reducing crime, violence and anti social behaviour and raising the confidence of communities in the safety of their areas	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted.
Supporting families in crisis and protecting vulnerable people	-	Not covered specifically in the Broads Local Plan.
Increasing the participation of people in their local communities, encouraging active citizenship and creating the environment for a thriving third sector	-	The Local Plan consultation has sought to engage all parts of the community.
Promoting a diverse cultural offer and increasing the engagement of people in sport, the arts, heritage and cultural life of the area	✓	This is fundamental to the Broads Authority and reflected in the Local plan.
Reducing poverty, discrimination and disadvantage by identifying and dealing with the underlying causes and by providing seamless, high quality, tailored services	-	Not covered specifically in the Broads Local Plan. That being said, it is hoped that the Local Plan can contribute to this aim.
Breaking the cycle of deprivation by making early interventions and concentrating attention on the most deprived families and individuals.	-	Not covered specifically in the Broads Local Plan.
Reducing the incidence of mental health problems and promoting people's resilience and emotional wellbeing	✓	There is a health section in the Local Plan that has these aims.
Reducing health inequalities by promoting healthy lifestyles, encouraging active participation and access to health information.		
Ensuring adequate, affordable and suitable housing for all residents, including accommodation for people with additional needs and those who are homeless	✓	There are housing policies in the Local Plan. Not all the need in the GY area of the Broads is met in the Broads Local Plan, but GYBC will seek to provide the residual through the Duty to Cooperate.
Providing affordable, fully accessible, sustainable and reliable transport	✓	See transport section of the Local Plan.
Providing the services that older people and those with disabilities or long term health condition and their carers need within their communities	-	Not covered specifically in the Broads Local Plan.
Working with young people to identify and provide the facilities, opportunities and activities that they want and to ensure they are safeguarded	✓	Young people have been involved in the Local Plan production.
Tackling the issues relating to rural deprivation and exclusion	✓	In general, as most of the Broads is rural, the Local Plan seeks to address this.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Minimising the use of global resources and reducing carbon emissions	✓	The transport, energy and climate change policies of the Local Plan relate to this.
Effectively managing the historic and natural environments of Great Yarmouth and its biodiversity	✓	These topics covered in the Local Plan.
Minimising waste and increasing recycling	✓	The Local Plan generally seeks to meet this aim.
Improving street and environmental cleanliness and greenness	-	Not covered specifically in the Broads Local Plan.
Managing the impact of new development on the environment	✓	The Local Plan generally seeks to meet this aim.
Adapting to and helping to mitigate climate change	✓	See climate change section of the Local Plan as well as the Plan promoting sustainable transport.
Managing flooding risks and coastal erosion	✓	These topics covered in the Local Plan.
Improving the urban brownfield built and waterfront environments and delivering the associated supporting infrastructure	✓	The Local Plan generally seeks to meet this aim.
Lobbying for resources to improve the built environment and transport infrastructure	-	Not covered specifically in the Broads Local Plan.
Raising the profile of Great Yarmouth and reshaping its image and its reputation as a good place to do business	✓	The Local Plan generally seeks to meet this aim.
Developing the right infrastructure for businesses and creating an environment in which both existing and new businesses will flourish	✓	The Local Plan generally seeks to meet this aim.
Creating pathways into employment for people who have never been employed or who have been unemployed for some time and ensuring that they have the help and guidance they need to access education training and employment opportunities	-	Not covered specifically in the Broads Local Plan.
Promoting an enterprise culture by providing tailored business start up and business support and advice targeted to deprived communities	-	Not covered specifically in the Broads Local Plan. There are economy related policies in the Local Plan however.
Encouraging workforce development	-	Not covered specifically in the Broads Local Plan.
Making Great Yarmouth a well-connected Borough through improved and sustainable transport connectivity supporting economic and social growth	✓	See the transport section of the Local Plan.
Diversifying and strengthening the whole economy.	✓	See the economy section of the Local Plan.
Ensuring that major developments in the area are linked to providing employment and training opportunities for local people, especially for low skilled groups	-	Not covered specifically in the Broads Local Plan. There are economy related policies in the Local Plan however.
Ensuring public bodies work together to provide appropriate training and employment opportunities for local people, especially for low	-	Not covered specifically in the Broads Local Plan.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
skilled groups and those with mental and other health conditions		
Improving levels of educational attainment	-	Not covered specifically in the Broads Local Plan.
Boosting the educational aspirations of young people and recognising achievement	-	Not covered specifically in the Broads Local Plan.
Supporting families to overcome barriers to learning and achievement	-	Not covered specifically in the Broads Local Plan.
Improving basic skills (including ICT skills) and encouraging learning for people of all ages	-	Not covered specifically in the Broads Local Plan.
Ensuring that education and training activities fit the needs of Great Yarmouth socially, economically and environmentally	-	Not covered specifically in the Broads Local Plan.
Focusing on the needs of vulnerable young adults	-	Not covered specifically in the Broads Local Plan.

b) THE PLAN 2015-2020

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Economic Growth	✓	See economy section of the Local Plan.
Housing	✓	See housing section of the Local Plan.
Neighbourhoods, Communities and the Environment	✓	These topics are addressed in the Local Plan.
Tourism, Culture and Heritage	✓	These topics are addressed in the Local Plan.
Great Yarmouth's Town Centre	-	The Town Centre is not within the Broads Authority Executive Area.
Transport and Infrastructure	✓	There is a transport section in the Local Plan.

**7. North Norfolk District Council**

a) Sustainable Community Strategy. 2008 – 2011.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
where people feel safe and live in decent homes	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted.  A Development Boundary is included at Hoveton and Wroxham. There are three allocations for mixed use schemes in Hoveton which could include residential.
where equality and diversity are valued and celebrated	✓	During the production of the Local Plan, consultation was undertaken and all parts of society were invited to help shape the Local Plan.
where people have diverse career and training opportunities, and	✓	The policies of the Local Plan as a whole aim to maintain tourism at the very least

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
jobs which add value		but grow it in a sustainable way.
where residents choose healthy lifestyles	✓	Areas of open space are protected in some places.
communities can access a wide range of activities which meet everyone's needs	✓	The policies of the Local Plan as a whole aim to maintain tourism at the very least but grow it in a sustainable way.
Where the environment is protected and where the identity and special character of the area is retained.	✓	Many policies in the Local Plan seek to emphasise the importance of landscape character, biodiversity and cultural heritage.

b) CORPORATE PLAN 2015 - 2019

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
A district with a thriving economy offering better jobs and prospects for local people	✓	There is an economy section in the Local Plan
To address housing and infrastructure for local people whilst meeting the market demand for housing	✓	There is a housing section in the Local Plan. The Local Plan generally supports the right infrastructure in the right place designed in the right way.
A district where the beautiful natural environment is managed and protected for future generations	✓	This is fundamental to the Local Plan.
A district with vibrant communities and where healthy lifestyles are accessible to all	✓	This is a general aim of the Local Plan.
To make the council more efficient so that we can both deliver our priorities and offer value for money for local taxpayers	-	Not covered specifically in the Broads Local Plan.

## 8. Norwich City Council

a) 'A New Vision for Norwich'. 2008-2020. There is also a position statement: [www.greaternorwichgrowth.org.uk/dmsdocument/1758](http://www.greaternorwichgrowth.org.uk/dmsdocument/1758)

Objective	How the Local Plan relates to this objective	
	Compatible?	Notes
to help enterprise flourish	✓	Utilities Site is promoted for mixed use development.
to raise aspirations, skills and achievement	✓	See Economy section of the Local plan.
to develop the right infrastructure for business	-	Utilities Site is promoted for mixed use development although specific infrastructure is not referred to.
to raise Norwich's profile	✓	Generally the Local Plan seeks to protect and enhance the Broads which would benefit Norwich.
to promote the well-connected city through sustainable transport	✓	Policy NOR2 in particular refers to promoting walking and cycling. Local Plan seeks to promote sustainable travel.
to become a low-carbon city	✓	Policy NOR2 in particular refers to promoting walking and cycling. Local Plan seeks

Objective	How the Local Plan relates to this objective	
	Compatible?	Notes
		to promote sustainable travel.
to minimise our use of global resources	✓	Policies often have reference to mineral extraction and reference to the Waste and Minerals DPDs.
to become a model city for the management of the natural and historic environments	✓	These considerations are fundamental for the Broads Authority.
to inspire people	-	Not covered specifically in the Broads Local Plan.
to create an environment where things can happen	✓	This objective is fundamental to the DPD – allocating land in the Local Plan provides some certainty.
to improve quality of life	✓	This objective is fundamental to the Local Plan.
to promote Norwich as a city of culture	✓	Cultural heritage is an important element of the work of the Broads Authority.
to reduce crime and anti-social behaviour	-	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. ACLO consulted.
to support families in crisis	-	Not covered specifically in the Broads Local Plan.
to reduce the harm caused by alcohol	-	Not covered specifically in the Broads Local Plan.
to improve neighbourhood engagement	✓	During the production of the Local Plan, consultation was undertaken and all parts of society were invited to help shape the Local Plan.
to reduce poverty and disadvantage	-	It is hoped that the policies in the Local Plan can go some way to addressing this objective.
to reduce the incidence of mental health problems	-	Not covered specifically in the Broads Local Plan.
to reduce health inequalities	✓	Policy NOR2 in particular refers to promoting walking and cycling. Other policies seek to protect open spaces. There is a health section of the Local Plan.
to ensure adequate housing for all Norwich residents	✓	The Sites Local Plan allocates land at the Utilities Site for mixed use development.
to improve levels of educational attainment	-	Not covered specifically in the Broads Local Plan.
to boost aspirations of and opportunities for people of all ages	✓	This objective is fundamental to the Local Plan.

b) Norwich City Council Corporate Plan 2015-20

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
A safe, clean and low carbon city	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted. Water quality is addressed in the Local Plan.
A prosperous and vibrant city	✓	Generally, the Local Plan will contribute to this aim.

Objective	How the Broads Local Plan relates to this objective	
A fair city	✓	Generally, the Local Plan will contribute to this aim.
A healthy city with good housing	✓	Generally, the Local Plan will contribute to this aim.
Value for money services	-	Not covered specifically in the Broads Local Plan.

## 9. South Norfolk District Council

a) 'Your Sustainable Community Strategy for South Norfolk'. 2008 – 2018. There is also a position statement: [www.greaternorwichgrowth.org.uk/dmsdocument/1758](http://www.greaternorwichgrowth.org.uk/dmsdocument/1758)

Objective	How the Local Plan relates to this objective	
	Compatible?	Notes.
An expanded Norwich Research Park and further development of Hethel Engineering Centre and other employment areas.	-	The Local Plan does not allocate employment land in South Norfolk. The Norwich Research Park is not within the Broads Executive Area
Increased number of better paid jobs in the area.	-	
Improved road infrastructure and availability of public transport, including community transport schemes.	-	The Local Plan does not specifically improve public transport or roads but does protect main routes (SSROADS).
Vibrant market towns and villages attracting tourism and with flourishing rural businesses.	✓	WHI1 addresses the importance of Whitlingham as a tourist destination. See Tourism and Economy policies.
High educational attainment throughout the working age population.	-	Not covered specifically in the Local Plan
Have world class educational facilities and infrastructure.	-	Not covered specifically in the Local Plan
Easy access to education and training including basic skills, English and Maths courses	-	Not covered specifically in the Local Plan
All 16-18 year olds in employment, education or training.	-	Not covered specifically in the Local Plan
Development and growth is well planned and managed through the Local Development Framework, creating sustainable communities and meeting health and education needs.	✓	This objective is fundamental to the Local Plan.
A supply of affordable homes that meets need.	✓	There is a policy on Affordable Housing.
A housing stock that meets the changing needs of residents and ensure low levels of homelessness in our district.	✓	There are policies relating to housing in the Local plan.
Have permanent approved sites for Gypsy and Travellers with good access to support services.	✓	There is no need for Gypsy and Travellers in the Broads. There is a criteria based policy to help assess any windfall applications for Gypsy and Travellers.
Achieve carbon reduction targets for South Norfolk based on Defra targets for the district of 11.4% by 2020.	✓	Some policies seek mixed use developments in order to provide facilities and employment near to residential areas. Other policies seek to promote walking and cycling, be it for leisure or for work purposes. See also the Climate Change section of the Local Plan.
Working to achieve the Landfill Directive of 60% of materials recycled by 2020.	✓	The design policy refers to waste management.

Objective	How the Local Plan relates to this objective	
	Compatible?	Notes.
Continuing to protect and enhance our natural environment and its biodiversity.	✓	Seeking to protect and enhance the natural environments is a fundamental to the Broads.
Residents and businesses have a clear understanding of the causes of climate change and the actions they can take to mitigate and adapt to its effects.	-	Although educating the public on Climate Change is not the specific aim of the DPD, various policies emphasise the important issue of flood risk, renewable energy and sustainable transport.
Communities which have a say about the services that affect them and pull together to get what they need.	-	The Local Plan does not attempt to address service provision in South Norfolk.
A thriving Voluntary and Community Sector with wide opportunities for volunteering	-	Not covered specifically in the Local Plan
Support for the elderly, unpaid carers and vulnerable people in our communities	✓	There is a policy relating to specialist needs housing.
Young people participating in community life and empowered to address their own needs.	✓	During the production of the Local Plan, consultation was undertaken and all parts of society were invited to help shape the DPD.
South Norfolk an even safer place to live and one of the safest nationally, where vulnerable groups are understood and protected	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted.
People are confident that the Police, the Council and its partners will take action on the community safety issues that matter most locally		
People feel part of their community, respect one another and understand the consequences of any anti-social behaviour.	-	Not covered specifically in the Local Plan
Domestic violence no longer the major cause of violent crime in South Norfolk.	-	Not covered specifically in the Local Plan
The right help at the right time to support people's needs.	-	Not covered specifically in the Local Plan
Services available from health and social care organisations to reduce avoidable hospital admissions and to help people home from hospital.	-	Not covered specifically in the Local Plan
People in receipt of support from Adult Social Services have control over the services they receive.	-	Not covered specifically in the Local Plan
Family and unpaid carers are given the advice and support they need.	-	Not covered specifically in the Local Plan
People take more responsibility for their own health and lifestyle, to increase their years of being independent and free of ill health.	✓	There is a health section in the Local Plan.
Increased physical activity including swimming, walking and cycling for better health.	✓	also seek to protect the sports facilities at Ditchingham. Walking and Cycling is promoted throughout the Local Plan. There is an open space policy and some areas of open space and play are protected. There is a health section of the Local Plan.

Objective	How the Local Plan relates to this objective	
	Compatible?	Notes.
High quality of life and a long life expectancy for disadvantaged residents.	✓	There is a health section in the Local Plan.
Users involved in planning health and social care services to meet their needs.	-	The Local plan does not attempt to address service provision in South Norfolk.

b) South Norfolk Business Plan 2016-17

Objective	How the Local Plan relates to this objective	
	Compatible?	Notes.
Working as part of Greater Norwich to support investment in critical infrastructure, utilising innovative funding mechanisms, increasing the number of local jobs and the area's overall productivity	✓	This aim is generally covered in the Local Plan.
Supporting new and existing Businesses to grow; facilitating innovation and providing targeted support to key sectors.	✓	There is an economy section of the Local Plan.
Working with key partners to develop local skills to match what our businesses need, and supporting apprenticeships	✓	There is an economy section of the Local Plan.
Sustaining the character and supporting the vitality of our local market towns, stimulating business growth, both in town centres and across the rural parts of our District	✓	This aim is generally covered in the Local Plan.
Encouraging our residents to live healthy and active lives	✓	This aim is generally covered in the Local Plan.
Supporting people within our communities who need our help the most	-	Not covered specifically in the Local Plan
Working as part of communities to proactively provide early help	-	Not covered specifically in the Local Plan
Helping our older and vulnerable residents to stay independent and in their own homes for longer.	✓	There is a policy relating to specialist needs accommodation and the design policies refer to dementia and wheelchairs.
Keeping streets and public spaces safe, clean and tidy	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted. Water quality is addressed in the Local Plan.
Encouraging communities and businesses to recycle more - reducing the amount of waste that we send to landfill	✓	The Local Plan addresses this aim.
Enhancing our high quality environment by supporting development that respects and enhances the distinctive character of South Norfolk.	✓	Character and design are important issues covered in the Local Plan.
Working effectively with the voluntary sector and community groups to make sure our residents have access to a wide range of services	-	Not covered specifically in the Local Plan

Objective	How the Local Plan relates to this objective	
	Compatible?	Notes.
and support to meet their needs		
Ensuring the range and number of local homes match the needs of local families and residents	✓	Housing is addressed in the Local Plan.
Supporting a transparent and democratic Council, that enables communities to have their say on local decisions and services.	-	Not covered specifically in the Local Plan
Increasing our ability to be self-financing through commercialising where appropriate to support those services that matter to residents the most	-	Not covered specifically in the Local Plan
Delivering increased value for money by increasing productivity	-	Not covered specifically in the Local Plan
Delivering the services that customers need when they need them.	-	Not covered specifically in the Local Plan
Leading and building collaborative working with our private, public and voluntary sector partners to deliver better and more efficient services for our residents.	-	Not covered specifically in the Local Plan

#### 10. Waveney District Council

- a) 'Waveney's Future'. 2010-2028. The East Suffolk partnership has taken on elements of the role of the former Local Strategic Partnerships, but not any statutory responsibilities associated with the community strategies.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Develop a sustainable, market-leading, nationally and internationally recognised offshore and renewable energy sector	-	Not covered specifically in the Broads Local Plan.
Exploit and promote Waveney's unique land and sea assets	✓	Many policies in the Local Plan seek to emphasise the importance of landscape character, biodiversity and cultural heritage.
Tackle rural and urban deprivation	✓	Brownfield land on the edge of Oulton Broad is allocated for mixed use in the Local Plan.
Identify and deliver an iconic project	-	Not covered specifically in the Broads Local Plan.
Make Waveney a significant gateway to Europe and develop a masterplan	-	Not covered specifically in the Broads Local Plan although Oulton Broad is a riparian link between the North Sea and the Broad and there is potential to increase waterborne visitor numbers by improvements to the OB environment as a result of the development at Pegasus
Plan for sustainable economic growth to develop local sustainable industry	✓	The Pegasus site is allocated for mixed use development. See Economy Section of the Local Plan.
Enhance not-for-profit community interest Companies	-	Not covered specifically in the Broads Local Plan.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Lobby service providers to deliver comprehensive high speed broadband access	-	Not covered specifically in the Broads Local Plan.
Deliver specific improvement projects	✓	Brownfield land on the edge of Oulton Broad is allocated for mixed use in the Local Plan.
Act, in partnership, to minimise the effects of climate change	✓	Flood risk is an essential factor to consider and is emphasised in the Local Plan and so too is climate change.
Develop a more integrated and sustainable rural and urban transport network	✓	Sustainable transport addressed in the Local Plan.
Ensure compliance with the requirements of the Local Better Regulation Office	-	Not covered specifically in the Broads Local plan.
Secure effective regulatory services	-	Not covered specifically in the Broads Local plan.
Identify funding opportunities and deliver safety improvements along the A12	-	Not covered specifically in the Broads Local plan.
Increase use and availability of public transport	✓	Sustainable transport addressed in the Local Plan.
Successfully deliver against Government targets on climate change	✓	Mixed use development, near to facilities and services is promoted in the Local Plan. Also see Climate Change section.
Encourage investment in rail infrastructure	✓	SSSTATIONS relates to rail stations/halts. Sustainable transport addressed in the Local Plan.
Improve access to and provision of public transport	✓	Sustainable transport addressed in the Local Plan.
Increasing value for money	-	Not covered specifically in the Broads Local plan.
Achieve top quartile performance in annual local environmental quality surveys.	✓	There are policies relating to amenity, light pollutions, design, heritage, landscape character.
Secure additional funding for the sustainable protection of the Waveney coast	-	Sustainable transport addressed in the Local Plan.
We will progress policies to reduce drinkable water consumption.	✓	Local Plan has a policy requiring 110 l/h/d.
Tackle areas of relative deprivation in the District	-	Not covered specifically in the Broads Local Plan.
Create a network of vibrant, cohesive, sustainable and empowered communities	✓	During the production of the Local Plan, consultation was undertaken and all parts of society were invited to help shape the DPD.
Establish a strong locality focus in Lowestoft addressing social exclusion	-	Not covered specifically in the Broads Local Plan.
Significantly improve health and well-being through a major cultural uplift	✓	There is a health section of the Local Plan.
Promote healthy and active lifestyles	✓	
Tackle health inequalities both between different communities	✓	There is a health section of the Local Plan.

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Provide improved and sustainable activities and facilities for children Maintain Waveney's status as one of the safest places to live in the country	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted.
Maintain Waveney's essential culture and heritage, as a source of pride	✓	Promoting and maintaining cultural heritage is fundamental to the Broads Authority.
Ensure local people are actively involved in planning the future of their area	✓	During the production of the Local Plan, consultation was undertaken and all parts of society were invited to help shape the Local Plan.
Maximise the use of participatory budgeting and local charters	-	Not covered specifically in the Broads Local Plan.
Encourage and provide support for local voluntary and community groups	-	Not covered specifically in the Broads Local Plan.
Devolve increasing power and assets to Town and Parish Councils	-	Not covered specifically in the Broads Local Plan.
Deliver improved services for all vulnerable adults and new dignity of independence for older people	-	Not covered specifically in the Broads Local Plan.
Ensure the development of health services for the growing elderly population within Waveney	-	Not covered specifically in the Broads Local Plan.
Deliver an increasing take up of "Individual Budgets"	-	Not covered specifically in the Broads Local Plan.
Invest in and support a healthy voluntary and not for profit sector	-	Not covered specifically in the Broads Local Plan.
Create fully developed 'E-communities'	-	Not covered specifically in the Broads Local Plan.
Reinvigorate and provide a sustainable mix of housing	✓	The Local Plan allocates land for dwellings at Pegasus. There is a Development Boundary at Oulton Broad. There are policies relating to Affordable Housing and design in the Local plan. Negotiations with relevant districts are also undertaken at the planning application stage in relation to the housing mix of schemes.
Provide new lifetime homes	✓	
Provide more affordable housing	✓	
Provide appropriate accommodation and support to address and reduce homelessness	✓	
Strengthen the multi-agency Children's Trust	-	Not covered specifically in the Broads Local Plan.
Ensure that the majority of young people progress and are successful	-	Not covered specifically in the Broads Local Plan.
Establish Lowestoft's reputation as a University town	-	Not covered specifically in the Broads Local Plan.
Lowestoft College plays in supporting skills development	-	Not covered specifically in the Broads Local Plan.
Deliver a new sixth form college	-	Not covered specifically in the Broads Local Plan.
Strengthen the community and business reach of Lowestoft College	-	Not covered specifically in the Broads Local Plan.
Raise attainment levels in local schools	-	Not covered specifically in the Broads Local Plan.
Provide strong local role models	-	Not covered specifically in the Broads Local Plan.

b) East Suffolk Business Plan

Planned actions for the whole of East Suffolk

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Create more apprenticeships.	✓	This is referred to in the Economy section.
Provide more effective business support to facilitate the growth of Small & Medium-sized Enterprises.	✓	There are economy related policies in the Local Plan.
Support local business associations and partner organisations to create vibrant market towns which are attractive to residents, businesses and visitors.	✓	There are economy related policies in the Local Plan.
Empower local town and parish councils by continuing to transfer amenity and community assets to them with their agreement.	-	Not covered specifically in the Broads Local Plan.
Increase the opportunities and number of affordable homes (freehold, self-build, shared and rental) for our local young people and those in their senior years, through a revised exceptions sites policy and substantially improved support package for our local communities.	✓	The Broads Local plan does not have this policy, but covers housing and affordable housing.
Develop even closer working relationships with other Suffolk councils on strategic planning and in reviewing the Councils Local Plans.	✓	We work with Suffolk and Waveney Councils.
Support communities to develop innovative approaches, including 'enabling developments' to help fund major estuary and coast protection works.	-	Not covered specifically in the Broads Local Plan.
Continue to reduce the number of long term empty properties. Ensure all those entitled to welfare support and benefits receive them promptly.	-	Not covered specifically in the Broads Local Plan.
Financially support Suffolk County Council to identify and develop suitable short stay stopping sites in Suffolk for Gypsies & Travellers.	✓	Local Plan does not allocate sites but there is a policy relating to Gypsy and Travellers.
Expand the diversity of social housing providers operating in East Suffolk.	-	Not covered specifically in the Broads Local Plan.
Deliver the adopted Housing and Health Charter in East Suffolk	✓	Local Plan generally relates to this.
Increase physical activity, participation in sport & recreation across all age groups, and implement additional local health initiatives.	✓	Local Plan has a policy on open space.
Develop and launch 'Eat out Eat Well', a healthy food award scheme to encourage food businesses in Suffolk to offer healthy food choices.	-	Not covered specifically in the Broads Local Plan.
Deliver greater financial self sufficiency for leisure services.	-	Not covered specifically in the Broads Local Plan.
Build on the 2014 & 2015 Women's Cycling tour to encourage greater	✓	The Local Plan addresses Tourism.

Objective	How the Broads Local Plan relates to this objective	
leisure, activity and health opportunities for East Suffolk, including cycle friendly district policies and initiatives.		
Increase visitor numbers to East Suffolk outside of the main tourist seasons.		
Continue to support the Suffolk Coast Destination Management Organisation to develop and sustain local tourism.		
Deliver and support further high profile cultural and sporting events as a catalyst for greater tourism opportunities.		
Continue to promote and encourage recycling across East Suffolk through a financially sustainable service.		
Provide an innovative, more customer friendly, transactional and intuitive Council website.	-	Not covered specifically in the Broads Local Plan.
Expand use of Social Media to enable development, improvement and growth of stakeholder and customer relationships.	-	Not covered specifically in the Broads Local Plan.
Integrate coastal management expertise with other local authorities to ensure most effective local delivery.	✓	There is no coastal section of the Broads in the Waveney part. The Coastal section of the Broads does have its own policy.
Develop, with academic institutions, the Local Enterprise Partnership, and other centres of excellence across Suffolk & Norfolk, an integrated and progressive approach to coastal management.		
Maintain a long term and adaptive approach to managing the coast – adopting innovative approaches in areas vulnerable to erosion and climate change.		
Launch a Suffolk wide commercial Building Control Service.	-	Not covered specifically in the Broads Local Plan.
Create a shared Legal Service within Suffolk.	-	Not covered specifically in the Broads Local Plan.
Explore the options for further integration between the partner authorities for more streamlined and resilient district services, and evaluate the potential for greater East Suffolk autonomy.	-	Not covered specifically in the Broads Local Plan.
Encourage Suffolk County Council to devolve enforcement of On-street Car Parking to the District Councils.	-	Not covered specifically in the Broads Local Plan.
Encourage and support more communities to develop local Community Emergency Plans.	-	Not covered specifically in the Broads Local Plan.
Continue to work, with partners, to ensure East Suffolk remains a safe place for our communities.	✓	The issue of safety is likely to be a planning application specific issue discussed at the planning application stage. There is a policy relating to safety by the water. The Architectural Liaison Officers have been consulted.
Support and protect, through partnership working, families and	-	Not covered specifically in the Broads Local Plan.

Objective	How the Broads Local Plan relates to this objective	
individuals identified as being vulnerable, by encouraging them to seek help earlier and helping them to help themselves.		
Support the development of a single footpaths service across Suffolk.	✓	General support for such paths. Some routes safeguarded in the Local plan.
Develop more Dementia Friendly Communities across East Suffolk.	✓	Design policy refers to dementia.
Fund and support community-led initiatives to improve health and wellbeing, including Men's Sheds, Carer support projects and Mental Health First Aid.	-	Not covered specifically in the Broads Local Plan.

Specific actions planned for Waveney

Objective	How the Broads Local Plan relates to this objective	
	Compatible?	Notes
Accelerate delivery of a 3rd River Crossing and a separate Pedestrian & Cycle bridge linking to the Sustainable Urban Neighbourhood across Lake Lothing.	-	Not covered specifically in the Broads Local Plan.
Deliver the first 5 year proposals contained within the Lowestoft Transport & Infrastructure Prospectus which will address the infrastructure constraints that are acting as a brake on economic and housing growth.	✓	The Local Plan generally supports the right infrastructure in the right place designed in the right way.
Deliver a Pedestrian & Cycle Bridge over the railway line at Normanston Park.	-	Not covered specifically in the Broads Local Plan.
Improve access to Broadway Farm industrial estate, Halesworth.	-	Not covered specifically in the Broads Local Plan.
Increase the number of new Council Houses.	-	Not covered specifically in the Broads Local Plan.
Complete the Lowestoft Flood Protection measures, including a tidal gate.	-	Not covered specifically in the Broads Local Plan but there is a flood risk section in the Local Plan.
Transfer Southwold Harbour to new local Trust.	-	Not covered specifically in the Broads Local Plan.
Improve the infrastructure, access & extend the Enterprise Zone (subject to Department for Communities & Local Government approval).	-	Not covered specifically in the Broads Local Plan.
Restore the historical features and landscape to improve accessibility & leisure facilities at Ness Point and the East of England Park (subject to a successful Heritage Lottery Fund bid).	-	Not covered specifically in the Broads Local Plan.
Conduct a Community Governance Review in relation to the unparished areas of Lowestoft.	-	Not covered specifically in the Broads Local Plan.
Establish a non-political Leader's Community Enabling fund of £25k per annum and consider developing Community Enabling Grants for	-	Not covered specifically in the Broads Local Plan.

Objective	How the Broads Local Plan relates to this objective	
each Councillor.		
Complete the refurbishment of the Marina, Lowestoft as a 'one-stop' customer service centre with Suffolk County Council.	-	Not covered specifically in the Broads Local Plan.
Deliver a community sports & leisure hub on Oakes Farm, south of Carlton Colville.	-	Not covered specifically in the Broads Local Plan.
Support the delivery of the Halesworth Campus providing new leisure & care facilities.	-	Not covered specifically in the Broads Local Plan.
Encourage re-development of the former Blundeston Prison site for uses that meet local community and Council aspirations.	-	Not covered specifically in the Broads Local Plan.
Support delivery of a new playing field facility in Kessingland, through an enabling housing development (in accordance with the draft Neighbourhood Plan).	-	Not covered specifically in the Broads Local Plan.
Support the development of a new Community Centre, Old Grammar Lane, Bungay.	-	Not covered specifically in the Broads Local Plan.
Deliver, in conjunction with Beccles Town Council, Sentinel & the Broads Authority a redevelopment scheme for Beccles Quay.	✓	The Quay area is designated as open space. There are general policies that will help guide such a project.

## 11. Conclusion

This assessment shows that if the particular objective of a County or District's Sustainable Community Strategy or Business Plan is relevant to the Local Plan, the Local Plan and objectives are compatible.

**Broads Local Plan – Responses to Single Issues Consultation  
Summer 2017**

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**Suffolk County Council**

**Flood Risk POSP4**

Thank you for the opportunity to consider this. The changes that have been made are in line with our policy and consistent.

**BA summary of response:**

General support

**BA comment:**

Support noted

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**Ward, M and Family**

**Land at Tiedam, Stokesby**

We residents at <<personal information removed>>, Stokesby are replying to your letter dated 2.6.17. We have lived here for approx 18 years and we have no concerns over the development of the land and feel it will be an advantage to the future of the village .

**BA summary of response:**

Support the proposed allocation.

**BA comment:**

Support noted.

---

**South Norfolk Council**

**Open Space**

I've looked at the comments we sent in response to the Preferred Options consultation and I'm pleased to see that the statement about there being an excess of recreational or amenity open space in the catchment area (in and out of the Broads) has been retained. I'm also pleased to see the comment about having regard to the approach and/or standards set by relevant constituent district councils is still in the policy. I still have some concern about the fact that proposals for one or more dwellings are expected to provide a contribution towards outdoor playing space. Does this refer to the provision of private gardens for family housing and communal open space for non-family housing or the provision of more formal open space/children's play areas? The revised South Norfolk Open Space SPD (out to consultation at the moment) sets a threshold of 15 dwellings for the provision of children's play space and 25 dwellings for the provision of older children/adult recreation space but does mention the need for all new residential development to provide adequate open space to serve the day to day needs of occupants regardless of site size in the form of private gardens or communal areas.

**BA summary of response:**

Generally welcomes changes but queries some other changes.

**BA comment:**

Policy simplified and sent round again for comment. South Norfolk support the amended policy.

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

##### **Open Space**

Many thanks for sending us the amended Preferred Options Open Space policy of the Broads Local Plan. Thank you for acknowledging our comments and taking them into account when redrafting the policy. We support the amendments and Policy as a whole.

##### **BA summary of response:**

We support the amendments and Policy as a whole.

##### **BA comment:**

Support noted.

---

#### **Waveney District Council**

##### **Open Space**

Thanks for providing us with the opportunity to comment on the open space policy. Below are some comments, if you require any clarification please do not hesitate to contact us.

A ii) The point could usefully refer to 'recreational facilities and their setting within the open space...'

A iii) This issue of relocation and what is considered to be better quality can be subjective. There is a risk that replacement open space may be relocated in a location that is convenient yet more isolated than its predecessor. Past examples of new open space provision have open resulted in improved facilities but located in locations that are less well overlooked and designed in a way which appears to future proof further developments so no additional would be required when another phase comes forward even if this is not in the current Local Plan. It is important that where open space is relocated it firstly still meets the needs of the existing community and the secondly meets the needs of the new development unless it is clearly demonstrated that the existing open space in question is surplus to requirements.

B) The requirement for new open space specifically references outdoor playing space. Does this mean that other forms of open space will not be considered? The first two paragraphs in part B are inconsistent in this regard.

Is there a minimum size threshold or a minimum number of dwellings? If an open space is too small to be of any real value in the long-term is it more practical that this designed as quality landscaping before considering if financial contributions are most appropriate (ensuring there is clear evidence in the plans that landscaping is designed to a standard reflecting the added investment of any financial contribution that may have been required)? If a constituent local authority does not set out specific per dwelling requirements and instead relies on local need and typologies how will this be considered in the context of applications that come forward?

Reason Justification: Is there What is the threshold for on-site open space provision or off-site contributions? There is reference to thresholds in the supporting text but there are no details associated with this in either the policy or complementary text.

##### **BA summary of response:**

Some queries relating to the detail of the policy.

##### **BA comment:**

Policy simplified and sent around again for comment. WDC generally supportive of amendments.

---

#### **Sport England**

## **Open Space**

Sport England are supportive of the revised policy which seeks to protect existing playing fields/sports facilities in line with our own adopted policy and Para 74 of the NPPF. It might be helpful to add in the supporting text that a local assessment, if relating to loss of playing fields, would need to follow the Sport England methodology 'Playing Pitch Strategy Guidance: An Approach to Developing and Delivering a Playing Pitch Strategy' (2013). This can be accessed here: <https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>

It is noted that with regard to new provision that the Broads Authority will defer to LA policy and/or standards. Existing Playing Pitch Strategies produced by the LAs can help to identify priorities for pitch provision in particular areas.

### **BA summary of response:**

Sport England are supportive of the revised policy which seeks to protect existing playing fields/sports facilities in line with our own adopted policy and Para 74 of the NPPF.

### **BA comment:**

Noted. Further changes made to simplify policy. Sport England asked for comment on the revised policy but no response received to date. They will now receive it through the normal consultation process for the Publication Local Plan.

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## **Environment Agency**

### **Soils**

I think the issues we raised in our response to the preferred options document are included in the policy. So we welcome the inclusion that site investigations will be required when there are contamination issues. (page 1). The paragraph in regards to non native invasive species is also welcome and covers our previous concerns page 1). The soil run off section highlights the danger to water quality which is welcome (page 2). So nothing else to add and policy seems to cover any concerns we may have in relation to soils.

### **BA summary of response:**

Nothing else to add and policy seems to cover any concerns we may have in relation to soils.

### **BA comment:**

Support noted.

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## **Natural England**

### **Soils**

We welcome and support the proposed amendments to the soils policy section of the above plan and have the following suggestions and comments to make on the proposals:

Policy PUBSPxxx Soils (p 1)

For clarity point i) should be amended to read 'protect the best and most versatile agricultural land, defined as Grades 1, 2 and 3a of the Agricultural Land Classification'. However, the best and most versatile land (BMV) protection wording (in Policy PUBSPxxx Soils) could be made stronger and requirements for Agricultural Land Classification (ALC) surveys to determine quality be included. The Broads Authority should ensure that sufficient site specific ALC survey data is available to inform decision making. For example, where no reliable information was available, it would be reasonable to expect that developers should commission a new detailed ALC survey, for any sites they wished to put forward, together with proposals for mitigating any adverse impacts on soil resources or the irreversible loss of high quality land. We suggest that Policy PUBSPxxx Soils could be amended as follows:

Proposals [delete 'are'] shall address the following in relation to soils in the Broads:

i) development of “best and most versatile” agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification system\*) will not normally be permitted unless it can be demonstrated that:

- The need for the development clearly outweighs the need to protect such land in the long term, or
- In the case of temporary / potentially reversible development that the land would be reinstated to its pre-working quality, and
- There are no suitable alternative sites on previously developed (brownfield) or lower quality land.

The Council will require all applications for development to include realistic proposals to demonstrate that soil resources were protected and used sustainably, in line with accepted best practice including the Defra.

(\*For example; the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites August 2013)

ii) address decontamination where needed in order to improve quality:...etc

By inserting the above wording in the policy text it would help to avoid the needless loss of BMV land without justification eg only permit where i) the need for the development is demonstrated (NPPF para 112) and ii) it cannot reasonably be met using lower quality land (NPPF para 112) and iii) all reasonable options (consistent with other planning or sustainability considerations) to safeguard the long term capability of the land have been considered.

The reference in the guiding text to the protection of soils in general as per best practice (p 2) should be included in the policy wording itself.

Monitoring indicators (pg. 5) – this is currently given as ‘Development on best and most versatile agricultural land’ but a better monitor might be something along the lines of ‘Number of planning approvals leading to permanent loss of ‘best and most versatile’ (BMV) agricultural land’ (ie not all development on BMV land necessarily leads to permanent loss of BMV land so the suggested indicator would not take this into account).

**BA summary of response:**

- 1: protect the best and most versatile agricultural land, defined as Grades 1, 2 and 3a of the Agricultural Land Classification
- 2: could be made stronger and requirements for Agricultural Land Classification (ALC) surveys to determine quality be included.
- 3: delete are in the first line of the policy
- 4: Suggests changes to the policy.
- 5: The reference in the guiding text to the protection of soils in general as per best practice (p 2) should be included in the policy wording itself.
- 6: Monitoring indicator should be: ‘Number of planning approvals leading to permanent loss of ‘best and most versatile’ (BMV) agricultural land’

**BA comment:**

- 1: agreed and change made.
- 2: Will contact NE to discuss this.
- 3: typographical error amended
- 4: will consider these changes and discuss with NE.
- 5: Noted and will check with other suggested amendments.
- 6: Will amend.

---

**Broads Reed and Sedge Cutters Association**

**Staithe General comment**

- Initial comment:

Brasca is satisfied with the response from Mr. Clarke (email 2nd June 2017) concerning Somerton Parish Staithe and his acknowledgement that the references to Somerton Parish Staithe in the Staithe Report contained mistakes. Brasca will support any steps to correct mistakes in the report since the use of staithe are vital to reed & sedge cutting in the Broads. We therefore request that the Staithe Policy in the Broads Local Plan be amended to include;

"All Parish Councils, landowners and interest groups will be consulted on the Staithes Report as soon as it is completed."

"The Staithes Report will available for public inspection on the Broads Authority website"

"Members of the public are invited to comment on the report when it is completed".

- Follow up comment:

Brasca strongly objects to Staithe Policy in the Broads Local Plan as it is based on a report (Staithes Report) which contains false statements, The report has not been made available to the general public therefore the Local Plan should be deemed unsound as the Broads Authority have failed in its duty to consult. The Policy should therefore be removed.

**BA summary of response:**

- Initial comment - the Staithe Policy in the Broads Local Plan be amended to include;

"All Parish Councils, landowners and interest groups will be consulted on the Staithes Report as soon as it is completed."

"The Staithes Report will available for public inspection on the Broads Authority website"

"Members of the public are invited to comment on the report when it is completed".

- Follow up comment:

Brasca strongly objects to Staithe Policy in the Broads Local Plan as it is based on a report (Staithes Report) which contains false statements

**BA comment:**

Initial comment: Such criteria are requests to the officer leading on the production of the work rather than criteria for a land use policy in the Local Plan. No change to policy.

Follow up comment: Objection noted.

---

**Somerton Parish Council**

**Staithes General comment**

- Initial comment:

Somerton Parish Council has today received a reply from Adrian Clarke - Senior Waterways & Recreation Officer concerning the issues we have with the Broads Authority commissioned Staithes Report and the reference to access in the Broads Local Plan Policy PUBXNS13: Staithes (as per your email of the 15th May 2017). Somerton Parish Council is satisfied with the assurances given by Mr.Clarke concerning Somerton Parish Staithe and therefore the Council has no objections to the amended wording of the Staithes Policy outlined in your email of the 15th May 2017.

The Parish Council must,however, point out that Mr.Clarke has acknowledged that the Broads Authority commissioned Staithes Report contains mistakes and the Parish Council will be sent some revised text to consider. We will of course be happy to work with the Broads Authority in producing an accurate description of Somerton Parish Staithe ownership, management, uses etc etc. Since the Broads Authority now acknowledges that the Staithes Report is not accurate can we suggest that Policy PUBXNS13: Staithes be amended to include the following;

1. All Parish Councils will be sent a copy of the Staithes Report when it is completed .
2. Parish Councils, landowners, Staithe Managers etc are invited to comment on the references in the report.

I take this opportunity to again thank you and Cally Smith for your help with this matter.

- Follow up comment

You have stated "A commitment to consult on a study is not a land use policy so your amendments are not appropriate for a Local Plan Policy". I consider that the Broads Authority has a statutory obligation to consult on it's Broads Local Plan. We have tried very hard to work with the Broads Authority on this matter and still you refuse to take onboard our constructive comments. The Broads Authority failed in it's statutory requirements to have documents pertaining to policies in the Broads Local Plan ready and available for public scrutiny during the official consultation stage. The Staithes Report remains unfinished and has not been published on the Authority's website. You have rejected our suggestion to work together on this matter for the benefit of all staithes in the Broads.

I feel I am unable to comment further on this matter but I will include this as an agenda item for our next Parish Council meeting on the 4th July for the purpose of proceeding with a formal complaint against how this Local Plan consultation has been conducted with a policy based on a Staithes Report which contains mistakes and has yet to be completed and made available for public comment.

**BA summary of response:**

- Initial comment - the Staithe Policy in the Broads Local Plan be amended to include;

"All Parish Councils, landowners and interest groups will be consulted on the Staithes Report as soon as it is completed."

"The Staithes Report will available for public inspection on the Broads Authority website"

"Members of the public are invited to comment on the report when it is completed".

- Follow up comment:

Objects to Staithe Policy in the Broads Local Plan as it is based on a report (Staithes Report) which contains false statements and will complain formally.

**BA comment:**

Initial comment: Such criteria are requests to the officer leading on the production of the work rather than criteria for a land use policy in the Local Plan. No change to policy.

Follow up comment: Objection noted.

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**Anglian Water**

**Surface Water PUBDM5**

Anglian Water is generally supportive of Policy PUBDM5 as drafted and the overall objectives of the policy which will help to reduce the risk of surface water and sewer flooding. However we have some detailed comments relating to the wording which appears in the first and second paragraphs of this policy.

Point g): It would be helpful to clarify what is meant by the term 'surface water drains' and who has responsibility for these. As it is unclear whether it is intended to refer to a drain which connects to the public sewerage network or a drain that belongs to another body e.g. highway authority.

Point h): it is suggested that deep infiltration or borehole soakways should be considered at the same time as a combined sewer based upon advice provided by LLFA. However this appear to be inconsistent with Part H of Building Regulations which specifies public sewers as the method of last resort for surface water disposal. We therefore ask that discharge to a combined sewer appears separately to these discharge methods.

Second paragraph: In relation to the discharge of surface water we normally require a greenfield run off rate from the site including on brownfield sites. Reference is made to surface water run off rates being no more than prior to development taking place. I am assuming that this is intended to be a reference to greenfield run off rate but would be grateful if you could confirm that this is the case.

Management and adoption of SuDs: reference is made to the adoption of SuDs by Anglian Water. We would ask that reference is also made to the adoption of SuDs by other relevant bodies e.g. management companies.

I note that in the Consultation Statement presented to Planning Committee reference was made to Anglian Water's previous comments on this issue and the need to seek clarification from ourselves. For the avoidance of doubt the inclusion of the above policy (subject to our suggested changes) would address our comments relating to the discharge of surface water into the public sewerage network.

**BA summary of response:**

- 1: Point g): It would be helpful to clarify what is meant by the term 'surface water drains' and who has responsibility for these. As it is unclear whether it is intended to refer to a drain which connects to the public sewerage network or a drain that belongs to another body e.g. highway authority.
- 2: Point h): it is suggested that deep infiltration or borehole soakways should be considered at the same time as a combined sewer based upon advice provided by LLFA. However this appear to be inconsistent with Part H of Building Regulations which specifies public sewers as the method of last resort for surface water disposal. We therefore ask that discharge to a combined sewer appears separately to these discharge methods.
- 3: Second paragraph: In relation to the discharge of surface water we normally require a greenfield run off rate from the site including on brownfield sites. Reference is made to surface water run off rates being no more than prior to development taking place. I am assuming that this is intended to be a reference to greenfield run off rate but would be grateful if you could confirm that this is the case.
- 4: Management and adoption of SuDs: reference is made to the adoption of SuDs by Anglian Water. We would ask that reference is also made to the adoption of SuDs by other relevant bodies e.g. management companies.
- 5: For the avoidance of doubt the inclusion of the above policy (subject to our suggested changes) would address our comments relating to the discharge of surface water into the public sewerage network.

**BA comment:**

- 1: Will check with LLFA
- 2: Will make amendment.
- 3: Will check with LLFA
- 4: We will mention that SuDS can be adopted by other bodies.
- 5: Noted.

---

**Suffolk County Council**

**Surface Water    PUBDM5**

I've read through the Surface Water section and as far as I can see all the relevant points have been covered and references given. It is consistent with SCC LLFA policy.

**BA summary of response:**

General support.

**BA comment:**

Support noted.

---

**Norfolk County Council**

**Surface Water    PUBDM5**

Thank you for the opportunity to contribute; I've reviewed the surface water section and have two comment:

(1) For consistency I recommend either adding the initials LLFA after the first use of Lead Local Flood Authority and then using LLFA thereafter or always using the text in full. Both styles are currently in use. See highlighted section in attached doc.

(2) I have a query regarding the wording of the section related to Deep Bore Soakaways (DBS). The current wording is contradictory with the first sentence stating that DBS are not supported by EA (implying that they cannot be used) and the third sentence stating that a permit will be required from EA to use DBS (implying that they can be used). See highlighted section in doc. I recommend that you ask the EA clarify their position.

**BA summary of response:**

1 Make clear what the initials LLFA refer to

2 check with EA stance on DBS

**BA comment:**

1: Will amend.

2: Will check with EA.

---

**Armstrong D**

**TSA2**

As a resident of South Avenue my observations on the planning document appendix are as follows:

Some of the definitions could be loosely interpreted, especially by some of the local residents on the island. I would want to make it quite clear that there must be absolutely no further expansion of the island as a 'residential suburb of Thorpe St Andrew' (which it seems to have turned into). Put a target on reducing island residents.

- that sewage, and other utilities are being handled correctly.

- rubbish collection and other services are fully supported by appropriate council taxes.

Visitors should be the priority at River Green, when it comes to boat moorings. Only the highest quality structures should be approved. It looks a mess at the moment. I fully support the strictest possible enforcement of the planning regulations on the island.

**BA summary of response:**

Some definitions could be loosely interpreted. Would not support further residential use of the island. Sewerage and rubbish disposal are issues that need addressing. Visitor boats should be priority at the Green.

**BA comment:**

The policy has been reviewed in light of this comment and the Authority are content with its wording.

Regarding the use of moorings, this comment will be passed on to Thorpe St Andrew Council.

Comment passed on to Head of Planning to consider next steps. No change to the policy.

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**Broadland District Council**

**TSA2**

Just a few general points.

1. The first bit is not really policy, more objectives for the policy, so probably should be in supporting text.

2. In the second bit it is not that clear what the policy is:

a. Eastern End – “This part of the island is retained in boatyard usage” could be read as a simple statement that it is currently in boatyard use, or alternatively that it is the intention of the policy for it to be retained in boatyard usage. The following text adds to the confusion as it refers to existing private moorings and the possibility of

permanent residential moorings – so more than just boatyard use is already in the area, or could be allowed within it.

b. Central part - “Continued use of this area for low key recreation and private amenity space is supported”. What does “low key” mean, and recreation implies public use – is this what is intended? Also, what is meant by “supported” – if support is given for those uses it does not necessarily mean that other uses would not get permission. So, if it is the intention to restrict the uses it would be useful to be more explicit. If not, then what are the other uses that would be acceptable in principle ?

c. Western end – what is meant by “low key uses” ? Low density residential development, for example, could be viewed as a low key use and would meet the other criteria of improving the appearance etc. The policy then goes on to provide for 25 private moorings and associated onsite carparking, refuse disposal, upgrades to the bridge etc. This scale of development seems to conflict with the policy requirement for uses that are “low key”. In terms of carparking, presumably there would have to be at least one space for each mooring which would have an impact in terms of traffic generation accessing the island through the small residential estate. There would also seem to be a conflict with the first part of the policy (referred to in 1 above) which aims to avoid any significant increase in “the intensity or extent of mooring use”, or “vehicular traffic using the bridge”. Also, the policy requires that “moorings shall be laid out in an informal configuration to avoid regimentation in appearance”, but wouldn’t moorings normally be fairly regimented ? Elsewhere, in a), the policy seems to be doing the opposite and requiring for the existing, presumably informal, moorings that “proposals which seek to give more order and improve the appearance of these moorings”.

So, overall, the policy is not sufficiently clear as to what is being proposed / what uses would be allowed. Does it simply boil down to within each of the areas the existing uses can continue and that minor developments related to these that enhance the appearance and character of the area will be permitted, provided that there are no significant impacts ? Except, in addition, in the western end a significant development for new moorings is proposed. If so, the policy could be much more clearly worded to express this.

**BA summary of response:**

Policy needs to be clearer in some parts as to what is acceptable and what is not acceptable.

**BA comment:**

Comments noted. We have reviewed the policy in light of these comments against the most recent legal and Inspector judgements and are content with the wording in the policy.

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**Chamberlain, E**

**TSA2**

With regard to your letter earlier this month which brought to my attention various proposals concerning Thorpe Island. I purchased my house some ten years ago being majorly attracted to my outlook of the river and the boats moored there. I live near the eastern part of the Island which faces many of the permanent moorings on the Island and continue to enjoy my view! Some years back, the Broads Authority made an attempt to alter the aesthetics by suggesting that the Island should not be cultivated etc. I wrote a lengthy letter to both you and the Broadlands Council at the time which strongly suggested that you should leave well alone! The residents of the Island have formed a wonderful community and I have found them both obliging and reactive to any comments I have made regarding the appearances there. I am fully aware of ongoing works to further improve parts which are on view to the mainland and am perfectly satisfied with their intentions. As far as adequate parking is concerned, the problems in this direct area are caused mainly from residents of Chapel Lane who have no parking area by their homes. Only a handful of Island residents own vehicles. I also believe that whilst giving the residents of Yarmouth Road the opportunity to comment on this subject, no direct contact was made to any resident of the Island. I fail to understand this and hope it is something that will be immediately rectified. In conclusion, I feel that before the Broads Authority become further involved with the Eastern part of the Island, a clear and detailed list of the required improvements should be issued to a representative of the residents with a reasonable time to implement those considered necessary. Until then, I strongly believe that you should concentrate on other parts.

**BA summary of response:**

I live near the eastern part of the Island which faces many of the permanent moorings on the Island and continue to enjoy my view! As far as adequate parking is concerned, the problems in this direct area are caused mainly from residents of Chapel Lane who have no parking area by their homes. Only a handful of Island residents own vehicles. No direct contact was made to any resident of the Island. Before the Broads Authority becomes further involved with the Eastern part of the Island, a clear and detailed list of the required improvements should be issued to a representative of the residents with a reasonable time to implement those considered necessary.

**BA comment:**

Noted. Notices were subsequently placed on the Green and by the bus stop for people to see.

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**Clarke, J**

**TSA2**

Further to your letter dated 2nd June in regards to the draft policy for the entire island, we have no comments at this stage. We understand that the Local Plan is at the Preferred Options stage and that a further consultation period will take place once the Council has considered any responses.

**BA summary of response:**

we have no comments at this stage

**BA comment:**

Noted

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**Cooper, N**

**TSA2**

As owner of land, boathouse and slipway in the central part of the island, I have no comment or objection to policy PUBTSA 2 Appendix G.

**BA summary of response:**

I have no comment or objection

**BA comment:**

Noted

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**Cranmer, V**

**TSA2**

As per my phone call I have read the policy and am pleased it does tidy and secure the island. A proposal some time ago was for the bridge to be opened to cars going to the island and driving from there to the boat sheds with our ok, but having not been given any security in writing into the proposal it all died. We/I have to admit were pleased as this kept our and other properties safe. Leaving it to return to nature so your proposal as stated at the end of the document is in line with my thinking. The natural appearance which much of the Island provides is an important backdrop to views from Thorpe Green and its environs, and more generally to the character and appearance of the Conservation Area. It also provides a semi-natural view from the riverside path in Whitlingham Country Park, screening the traffic and urban development of Thorpe St Andrew and helping provide a more tranquil and semi-rural character to the Whitlingham Country Park. One other detailed in the document is of importance. The eastern and central parts of the island, there is no pedestrian or vehicular access from Land; access is to be retained as only by boat. Almost the whole of Thorpe Island is within the Thorpe St Andrew with Thorpe Island Conservation Area. (Only the railway line along the southern edge of the Island is excluded. Thus keeping the wildlife also safe from disturbance. The natural appearance which much of the Island provides is an important backdrop to views from Thorpe Green and its environs,

and more generally to the character and appearance of the Conservation Area. It also provides a semi-natural view from the riverside path in Whitlingham Country Park, screening the traffic and urban development of Thorpe St. Andrew and helping provide a more tranquil and semi-rural character to the Whitlingham Country Park. I am therefore pleased with the document if these highlighted parts are kept to the front as keeping the security of such a tranquil spot so near the city of Norwich and Thorpe St Andrew where We/I reside and have and will always be appreciate as I am sure all do.

**BA summary of response:**

Leaving it to return to nature so your proposal as stated at the end of the document is in line with my thinking. I am therefore pleased with the document if these highlighted parts are kept to the front as keeping the security of such a tranquil spot so near the city of Norwich and Thorpe St Andrew where We/I reside and have and will always be appreciate as I am sure all do.

**BA comment:**

Support for policy noted.

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**Dale, J**

**TSA2**

Firstly I'd like to say that it's an absolute pleasure to work opposite the island – the section directly opposite the Buck is well kept and the boats and gardens are clean and tidy. I understand that the buildings further down, opposite the Rush Cutters pub have already been painted by the residents of the island and that improvement works are ongoing in that section. I see no need for any dramatic improvements, as the charm lies in the variety and diversity of boats and residents. I do not believe that business would be as good were the island to look like a Wroxham boatyard. Many customers (both local and visitors) comment on the surroundings and they love the island and its individuality. My main concern regarding local planning is Thorpe St Andrew Town Council's desire to turn half of River Green into permanent moorings. The Buck thrives on its open view to the river and recently we have had a huge number of Pub & Paddle customers and other leisure boaters, all of whom use the western end of River Green to moor their boats. I would like to request that I am kept up to date on planning matters regarding River Green as this will severely affect my business. Concerns raised in Town Council meetings by myself and dozens of local residents have fallen on deaf ears and we require more transparency from all involved. I employ staff members who live on the island, none of whom have received a copy of the letter you sent regarding the draft policy. I think that they should also be involved in discussions – indeed they are already making the improvements you seek and I am sure they would be responsive. In regards to parking concerns; we have allocated spaces in our car park for most of the islanders who have cars. This does not impact our trade and it ensures the road is kept as clear as possible.

**BA summary of response:**

It's an absolute pleasure to work opposite the island. I see no need for any dramatic improvements, as the charm lies in the variety and diversity of boats and residents. My main concern regarding local planning is Thorpe St Andrew Town Council's desire to turn half of River Green into permanent moorings. In regards to parking concerns; we have allocated spaces in our car park for most of the islanders who have cars. This does not impact our trade and it ensures the road is kept as clear as possible.

**BA comment:**

Noted. Comment passed on to Thorpe St Andrew Town Council.

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**Knight, J (BA Navigation Committee Member)**

**TSA2**

I would first of all like to address the issue of visual amenity (para 1 (ii)). Whilst it is accepted that visual amenity can be given more weight in a conservation area, there is no "right to a view" in planning terms for neighbouring occupiers - not in the Broads, not in Thorpe St. Andrew, and not anywhere else.

I am pleased to see the presumption in favour of the retention and improvement of the existing facilities in the eastern and central parts of the island, though I can't see how planning policy can be used to improve the appearance of the moorings - which by inference must mean the boats themselves. Residential paraphernalia on land can - in principle - be controlled by a planning condition requiring a management plan, but trying to control the type of boats moored is close to impossible and does not fall within the ambit of planning. You might just as well try to control the types of car parked in a car park or street - it's not feasible, and also gives rise to accusations of gentrification. I appreciate that the BA is under pressure from objectors, and trying to create a policy which satisfies them, but planning policy must stick to matters which fall within the scope of planning control and have a realistic prospect of implementation. Land can be used for mooring boats, or not. The BA can't control the type of boats using those moorings, which have been established for over a century and are therefore immune from planning control unless there is a material change of use.

In respect of the western end, although I'm glad that the Authority is supporting at least some mooring in the marina, the wording suggests that the only safe policy is one which precisely accords with the appeal inspector's decision. Clearly the second appeal decision is a material consideration, but that doesn't mean that the inspector's comments have to be followed to the letter. I realise that the objectors at Thorpe Old Hall Close and Thorpe St Andrew Town Council have insisted that this be the case; however, they are not planners, are not employed by the Broads Authority and are serving their own interests. The Broads Authority, by contrast, must serve both the wider public interest and, in particular, navigation interests - if for no other reason than because there simply is nobody else to protect those interests on the Broads. The Authority could - and should - create an imaginative policy which makes the best use of the marina, the bridge and its proximity to the facilities of Thorpe and Norwich.

There is no logical reason to exclude residential moorings from the basin, which complies with all of the requirements of PODM35, and would make an exceptionally well located base for residential boats. The only real constraint is the s52 agreement which restricts the use of the marina to private moorings only.

There is still no clear definition of what the BA regards as a residential mooring, and there are significant grey areas. The 1999 appeal decision at Hoveton (amongst others), however, makes clear that there is no material difference between a boat used as a primary residence and one which is not - "the lawful use of the appeal site is the mooring of boats." In fact, most appeal inspectors (including the 2014 inspector) simply regard the word 'residential' as meaning 'sleeping aboard', and any differentiation made is between transient and non-transient moorings - because the intensity of the use of the land is what makes a difference in planning terms. Planning only relates to the use of land, and the use of the land is mooring a boat. What someone does on that boat is beyond the scope of planning control.

In respect of the constraints, although the bridge is single track, I do not agree that the bridge is especially narrow and it is very short - I have traversed it myself and it is perfectly usable for any conceivable vehicular use which could be associated with the island. It was, after all, designed for the purposes of accessing a boatyard with a clubhouse and other facilities. Having regard for the BA's general presumption against the use of cars and encouragement of sustainable transport, it's somewhat surprising to find that supposedly constrained vehicular access and lack of sufficient parking should suddenly become an issue in one of the few locations on the broads which is within easy cycling and walking distance of Norwich.

Moving on to the riverbank, I am extremely disappointed to see the proposals to remove the historic mooring rights, for which there appears to be no reasoned justification. Vessels have been moored along this stretch of riverbank for longer than anyone can remember, and there is plenty of photographic evidence to support this. It is therefore a matter of considerable regret that two senior planning officers told members at the 26th May planning committee meeting that there had been no boats moored at the western end, or near the basin, when they know this to be factually incorrect.

At this same meeting, members were informed that the first planning inspector had indicated that there should be no moorings on the river, for reasons of river width and amenity. The planning inspector said no such thing in his decision, and had he done so then it would have been outside the scope of the appeal - which related only to the basin. Furthermore, the decision was in any event quashed and it is quite wrong for quashed decisions to be cited in support of planning policies. Both planning inspectors commented that any reasonable person would expect boats to be moored along the riverbank, and this is the complete opposite of what was reported to members of the planning committee.

I would urge you and your colleagues to have another look at this, with a view to producing a policy which reflects the cultural history of Thorpe Island, protects the interests of the many rather than the few, makes best use of the natural and man-made features and protects and enhances mooring facilities - in line with the Authority's statutory responsibilities.

**BA summary of response:**

- 1: Whilst it is accepted that visual amenity can be given more weight in a conservation area, there is no “right to a view” in planning terms for neighbouring occupiers .
- 2: I can’t see how planning policy can be used to improve the appearance of the moorings - which by inference must mean the boats themselves. The BA can’t control the type of boats using those moorings, which have been established for over a century and are therefore immune from planning control unless there is a material change of use.
- 3: The wording suggests that the only safe policy is one which precisely accords with the appeal inspector’s decision. Clearly the second appeal decision is a material consideration, but that doesn’t mean that the inspector’s comments have to be followed to the letter. The Authority could - and should - create an imaginative policy which makes the best use of the marina, the bridge and its proximity to the facilities of Thorpe and Norwich. There is no logical reason to exclude residential moorings from the basin, which complies with all of the requirements of PODM35, and would make an exceptionally well located base for residential boats. The only real constraint is the s52 agreement which restricts the use of the marina to private moorings only.
- 4: There is still no clear definition of what the BA regards as a residential mooring, and there are significant grey areas.
- 5: In respect of the constraints, although the bridge is single track, I do not agree that the bridge is especially narrow and it is very short.
- 6: I am extremely disappointed to see the proposals to remove the historic mooring rights, for which there appears to be no reasoned justification.
- 7: At this same meeting, members were informed that the first planning inspector had indicated that there should be no moorings on the river, for reasons of river width and amenity. The planning inspector said no such thing in his decision, and had he done so then it would have been outside the scope of the appeal - which related only to the basin. Furthermore, the decision was in any event quashed and it is quite wrong for quashed decisions to be cited in support of planning policies. Both planning inspectors commented that any reasonable person would expect boats to be moored along the riverbank, and this is the complete opposite of what was reported to members of the planning committee.
- 8: I would urge you and your colleagues to have another look at this, with a view to producing a policy which reflects the cultural history of Thorpe Island, protects the interests of the many rather than the few, makes best use of the natural and man-made features and protects and enhances mooring facilities - in line with the Authority’s statutory responsibilities.

**BA comment:**

- 1: No right to view, but visual amenity is an established planning consideration.
- 2: To use a condition, there first needs to be a planning permission. Agree cannot control types of boats. Eastern end supports boatyard usage.
- 3: Inspector’s decisions are significant material considerations and proposed policy reflects them. With regards to western end, aware of the plans of the landowners and any development here would have to have a realistic prospect of implementation.
- 4: Definition set out in reasoned justification to Residential Moorings Policy. The 1999 decision is an old decision and our definition been through an examination since (2011).
- 5: Bridge can only be used for access with landowner’s consent. Inspector decision refers to works to the bridge. Inspector’s decision refers to car parking on the island. There is no planning permission or established use for mooring on the riverbank in this location. The authority has taken legal advice on this matter. Existing TSA2 from 1997 Local Plan part b did not permit any such mooring and no change to the policy position since 1997.
- 7: Comments noted.
- 8: Noted.

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**Nice, S and S**

**TSA2**

We have looked at the draft policy and agree with the principles highlighted. We are wondering how the policy can be enforced based on historical difficulties? Is there a role for the town council and local residents in this process?

**BA summary of response:**

We have looked at the draft policy and agree with the principles highlighted. We are wondering how the policy can be enforced based on historical difficulties? Is there a role for the town council and local residents in this process?

**BA comment:**

Support noted however it is recognised that the implementation of this policy is dependent on landowners' aspirations and cooperation.

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**Thorpe St Andrew Town Council****TSA2**

Thorpe St Andrew Town Council welcomes the draft Broads Local Plan Appendix G, which is a positive step towards preserving and enhancing the local conservation area. A number of features of Appendix G have raised some comments. The Town Council would suggest the use of 'River Green' within the draft, rather than 'Thorpe Green' which may be confused with a different location. There is also some question of the current use of the boatyard opposite River Green, with the draft mentioning the operation of boatyard moorings, which differ from the residential moorings which appear to be in place. Furthermore, when mentioning the retention of boat usage on Thorpe Island, it would be useful to define whether this relates to the historic boatyard usage or residential moorings. Clarification on the wording is required to ensure the terms of the draft are unequivocal. This draft will be considered alongside other Broads Authority policies, including the residential mooring policy which requires consideration of the visual and amenity impact of residential mooring, along with car parking, waste disposal and adequate site management. A greater depth of detail regarding this policy should be included within the draft to ensure it reflects both the historic and current usage of the island. This would also demonstrate a vision for the future of the area. The Town Council has received comments from residents regarding the enhancement and protection of the conservation area and would welcome reassurance that policies, both in draft and already confirmed, will be followed.

**BA summary of response:**

Thorpe St Andrew Town Council welcomes the draft Broads Local Plan Appendix G, which is a positive step towards preserving and enhancing the local conservation area. The Town Council would suggest the use of 'River Green' within the draft, rather than 'Thorpe Green' which may be confused with a different location. Clarification on the wording is required to ensure the terms of the draft are unequivocal.

**BA comment:**

Consider that the wording appropriate, given previous decisions and planning status. Noted.

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**Wilson, R****TSA2**

Due to the elevated nature of my residential dwelling, Jenner's Basin is directly in my line of vision. It looks a lot better in its natural state with most of the moored vessels having recently gone. However, there are still two vessels in the basin as well as the partly sunken vessels. The latter have been in the basin since the early 1990s and I would like to know whose responsibility it is to remove them if they have been abandoned by the owners. They have been an eyesore for more than two decades and now have weeds growing out from them as they rot and break up. So my preferred outcome would be to see the wrecks removed from the basin and to retain the visual amenity of the basin that excludes any mooring of vessels or other human activity. These activities are incompatible with a wetland landscape.

**BA summary of response:**

My preferred outcome would be to see the wrecks removed from the basin and to retain the visual amenity of the basin that excludes any mooring of vessels or other human activity

**BA comment:**

Support noted. Site recently purchased and owners are in the process of clearing it.

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**Anonymous (sent via Thorpe St Andrew Town Council)**

**TSA2**

River Green (Thorpe Green) used to be a beauty spot but the ramshackle developments in recent years at the eastern end of the Island have made the view from River Green an eyesore. The Broads Authority are to be commended on their draft plan but it does not go far enough. The eastern end of the island was used as a thriving boatyard for holiday cruise boats with a few houseboats opposite the Green until comparatively recently and I do not understand why no action has been taken by the Broads Authority to stop the effective change of use of this part of the island since the Island was sold. Houseboats are crammed two and three abreast along the northern shore of the island, residential buildings have sprung up in and out of the water and the original boatyard seems to be dilapidated. The two large cabins (which appear to be permanent structures, not boats) opposite the Green in the water in front of the former boatyard surely do not meet any planning criteria. I would ask therefore that the Broads Authority include a commitment to enforcement action regarding the change of use at the eastern end of the island (including any unauthorized building in and out of the water and excessive numbers of houseboats) in their draft plan.

**BA summary of response:**

The eastern end of the island was used as a thriving boatyard for holiday cruise boats with a few houseboats opposite the Green until comparatively recently and I do not understand why no action has been taken by the Broads Authority to stop the effective change of use of this part of the island since the Island was sold. I would ask therefore that the Broads Authority include a commitment to enforcement action regarding the change of use at the eastern end of the island (including any unauthorized building in and out of the water and excessive numbers of houseboats) in their draft plan.

**BA comment:**

Noted. Comment passed on to Head of Planning to consider next steps. No change to the policy.

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**Anonymous (sent via Thorpe St Andrew Town Council)**

**TSA2**

We were pleased to receive the letter dated 13 June from the Broads Authority advising about draft policy for the Island under the emerging Local Plan. We welcome this as positive step towards enhancing and maintaining the local area as a special amenity place for Norwich generally. We write however, to express our growing concerns about 'developments' on the eastern end of the island. We are greatly impressed with the efforts of the Town Council in protecting and preserving the lovely River Green amenity area for public use but in our opinion the Council is being thwarted in its efforts by the messy and apparently uncontrolled growth of activity across the river on the island. The River Green must be one of the most attractive areas of Norwich for locals and visitors alike. We have issues with: 1) Apparent uncontrolled increase in number of boats and tumbledown 'sheds' moored on the island. 2) Concerns about removal of waste and provision of services for the boats and old sheds. 3) Ongoing issues with parking arrangements for those living aboard the boats and sheds. Our understanding is that anyone authorised to live on the island is required to have parking provided although we believe currently only one unit has that 'residential' right. We believe the current level of liveaboards has considerably affected parking on the Yarmouth Road. South Avenue is also very much affected by long term parking which creates access problems for emergency services, delivery vehicles and refuse wagons. Long term parked vehicles are often left in such a way as to make it very difficult to see up and down the road in order to enter/exit driveways safely. 4) Disappearance of greenery on the island. Is this not part of the local conservation area? 5) An apparent lack of overall management of the island by the owner who seems little interested in the overall appearance of his property. Again we would mention that we understand the island is within the local conservation area. 6) Access to the island has to be by boat. There seems to be a plethora of small craft moored on the road side of the river whenever the users feel like leaving them. Our understanding is that steps are being taken by Thorpe Council to try to bring some order to this matter.

**BA summary of response:**

- 1) Apparent uncontrolled increase in number of boats and tumbledown 'sheds' moored on the island.
- 2) Concerns about removal of waste and provision of services for the boats and old sheds.
- 3) Ongoing issues with parking arrangements for those living aboard the boats and sheds.
- 4) Disappearance of greenery on the island. Is this not part of the local conservation area?
- 5) An apparent lack of overall management of the island by the owner who seems little interested in the overall appearance of his property.
- 6) Access to the island has to be by boat.

**BA comment:**

Noted. Comment passed on to Head of Planning to consider next steps. No change to the policy.

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**Anonymous (sent via Thorpe St Andrew Town Council)****TSA2**

Initial comments on text: Thorpe Green and River Green - are they the same place? Reasoned Justification: Last line of second paragraph - there is no operation of a boatyard only moorings for liveaboards which is a different function. 6th paragraph: 'retention of the boat usage' is misleading given the 'operation of a boatyard' words already used. It should be consistent in meaning.

Thoughts overall: How does this document address the current situation. If no applications are made to observe items 1 and 2 of the paper what happens to the status quo which is totally at odds with the proposals. There is a serious lack of parking in the area and some of the 'cultivation' on the island has diminished it as a conservation area. Some of the boats now moored are in very poor condition and the two floating shacks 'moored' by the bungalow are an eyesore. Potentially could sink and cause pollution in the river. A new pontoon beside the large green vessel has emerged recently which must need some form of consent.

**BA summary of response:**

- 1: Thorpe Green and River Green - are they the same place?
- 2: There is no operation of a boatyard only moorings for liveaboards which is a different function.
- 3: 6th paragraph: 'retention of the boat usage' is misleading given the 'operation of a boatyard' words already used. It should be consistent in meaning.
- 4: Generally concern about the appearance of the island and parking issues.

**BA comment:**

- 1: Noted and will improve wording.
  - 2: A number of boatyard buildings and service remain, although increase in residential mooring noted
  - 3: Noted.
  - 4: Noted.
- 

**Anonymous (sent via Thorpe St Andrew Town Council)****TSA2**

I would like to raise some issues concerning Thorpe Island and the surrounding area. Over the last few years I have noticed an increase in parked vehicles on South Avenue and Yarmouth Road belonging to the boat owners and residents on Thorpe Island which have caused problems for the owners of properties trying to get in and out of their driveways. I am worried that fire and emergency vehicles may not be able to drive up <this road> with the excessive number of vehicles being left there (sometimes on both sides of the road) for considerable amounts of time and would urge you to look at this situation. I am also concerned about the number of boats mooring on the island and

the apparent lack of services and sewerage arrangements which may lead to river pollution and navigation difficulties especially when boats are doubled and occasionally treble moored up there. What planning enforcement and legal powers are in place to improve the visual appearance of the island and restrict unauthorised development for what is a pleasant amenity for Thorpe St Andrew residents and a gateway for tourists to Norwich.

**BA summary of response:**

Over the last few years I have noticed an increase in parked vehicles on South Avenue and Yarmouth Road belonging to the boat owners and residents on Thorpe Island which have caused problems for the owners of properties trying to get in and out of their driveways. I am also concerned about the number of boats mooring on the island and the apparent lack of services and sewerage arrangements which may lead to river pollution and navigation difficulties especially when boats are doubled and occasionally treble moored up there.

**BA comment:**

Noted. Comment passed on to Head of Planning to consider next steps. No change to the policy.

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**Anonymous (sent via Thorpe St Andrew Town Council)**

**TSA2**

Please would you let me know who to contact for help to deal with the ever increasing problem of inconsiderate parking on South Avenue. On Sunday afternoon (July 9th) returning home I had great difficulty negotiating parked vehicles on the road and the opposite verge in my relatively narrow car - it was obvious that any emergency vehicles would not get past. Consideration must now be given to applying yellow lines at least as far as Stanmore Road, hence my request for a contact to discuss this problem and take it forward.

**BA summary of response:**

Ever increasing problem of inconsiderate parking on South Avenue.

**BA comment:**

Noted. Comment passed on to Head of Planning to consider next steps. No change to the policy.

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**Anonymous (sent via Thorpe St Andrew Town Council)**

**TSA2**

Parked cars in South Avenue: I want to draw your attention to the continuous congestion of parked cars in South Avenue. The problem of parked cars in South Avenue has accelerated since the increased number of boat owners moored around the River Green stretch of the river. When are The Broads Authority, Broadland District Council going to stop this influx of boats? Apart from the moorings on the river there is no facilities for these water people. Daily the right hand side of South Avenue is a long line of parked cars. This makes driving along the road difficult and dangerous. Pulling out of the drive blind onto the clear side of the road is an accident waiting to happen. Perhaps a fatality will spark positive action. Today matters became worse as a car was parked on the opposite side of the road to the entrance of 2/4 South Avenue turning the road into a slalom. For the above reasons please accept this letter as a formal request for double yellow lines in South Avenue.

**BA summary of response:**

The problem of parked cars in South Avenue has accelerated since the increased number of boat owners moored around the River Green stretch of the river.

**BA comment:**

Noted. Comment passed on to Head of Planning to consider next steps. No change to the policy.



**Local Plan for the Broads  
Pre-submission (publication) version  
Equalities impact assessment  
October 2017**

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## 1. Introduction

- 1.1 The Equality Act 2010<sup>1</sup> came into force in October 2010. The Act provides protection from unlawful discrimination in relation to 9 protected characteristics. Under equalities legislation as a public Authority, the Broads Authority has a duty to assess the expected impact of its functions, strategies, policies and services on particular groups of people and specifically those with protected characteristic status. This is done by carrying out an Equality Impact Assessment.
- 1.2 An Equality Impact Assessment anticipates and recommends ways to avoid any discriminatory or negative consequences for a particular group on the grounds of the 9 protected characteristics which are:
- Age
  - Disability,
  - Gender Re-assignment
  - Marriage and Civil Partnership
  - Pregnancy and Maternity
  - Race
  - Religion and belief
  - Sex
  - Sexual Orientation
- 1.3 This may be extended where relevant to include other potentially adverse or discriminatory factors such as socio-economic status or health. The assessment also helps to demonstrate the potential benefits for equality target groups, and ways these benefits might be improved. A definition of each of the protected characteristics is included in Appendix 1.

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<sup>1</sup>Equality Act 2010: guidance: <https://www.gov.uk/guidance/equality-act-2010-guidance>

## 2. What is being assessed?

- 2.1 An Equality Impact Assessment of the Local Plan has been undertaken to consider whether the Plan policies reflect the equality needs of the Broads' community and others potentially affected by the Plan.

Activity or project	Local Plan for the Broads
Aims	The Broads Local Plan contains policies and land allocations to help determine planning applications.
Who is affected	<p>All those with an interest or stake in the future enjoyment, development or management of the Broads, including local residents and businesses, landowners, Government organisations, trusts and charities, visitors and volunteers</p> <p>Demographic data relating to the Broads Executive Area is set out in the Sustainability Appraisal report that accompanies the Sites Specifics DPD. The report is available on the Authority's website at: <a href="http://www.broads-authority.gov.uk">www.broads-authority.gov.uk</a>.</p>
Responsible body	Broads Authority

This assessment considers the impacts of the Local Plan policies and highlights their potential implications where these are known.

### 3. Gathering evidence

- 3.1 Information to support the Equality Impact Assessment comes from a number of sources. The assessment will help to identify gaps in information and the need for further consultation or research. Data sources include:
- Service monitoring: Profile data relating to age, disability, gender, and ethnicity is collected as part of the Authority's performance monitoring programme
  - Information from consultation exercises, including consultation on draft versions of the Plan and other consultations
  - Service user feedback
  - Staff feedback
  - Liaison with partners, community groups and forums
  - Census data and demographics
  - National Park data and audits
- 3.2 Equality policies and good practice already in place include the following:
- i. Corporate Equalities Policy: Sets out how the Equality Standard for Local Government will be achieved in respect to access to services and employment. Recently reviewed and adopted October 2017.
  - ii. Statement of Community Involvement (SCI)<sup>2</sup>: sets out how the Authority intends to involve local communities and other stakeholders in the production of its Local Plan (formerly Local Development Framework). The principles and practices of community involvement apply across the whole of the Authority's work. The SCI identifies existing and potential ways of involving under-represented groups in the Broads, including young people, people with disabilities, black and ethnic minority groups, and gypsies and travellers.
  - iii. Broads Authority Communication Strategy: The strategy states that *"Published information will be accessible to all, and available in formats which are suitable for people with disabilities in line with the Disability Discrimination Act 1995. All key publications can be produced in large print on request and Broadcaster is available on CD. The Authority will actively promote diversity in its communications"*. This will be reviewed late 2017/early 2018.
  - iv. Broads Authority website: The Broads Authority is committed to providing a web site that is accessible to the widest possible audience, regardless of ability or technology and including those who have visual, hearing, motor and cognitive impairments. The Authority is actively working to increase the accessibility and usability of its web site and meet its legal obligations under the UK Disability Discrimination Act (DDA). The website aims to achieve overall compliance with the Web Accessibility Initiative's (WAI) guidelines, which explain how to make web content accessible to people with disabilities.

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<sup>2</sup> SCI: [http://www.broads-authority.gov.uk/data/assets/pdf\\_file/0006/576609/Final-Adopted-Statement-of-Community-Involvement-November-2014.pdf](http://www.broads-authority.gov.uk/data/assets/pdf_file/0006/576609/Final-Adopted-Statement-of-Community-Involvement-November-2014.pdf)

- v. Visitor information: A range of information on accessibility to the Broads is provided by a variety of information providers, including the Authority:  
<http://www.visitthebroads.co.uk/discover-the-broads/about-the-broads/access-for-all>
- vi. Member for Equalities: Members have received specific Equalities Training to assist them in their role.

## 4. General equality issues

### 4.1 Disability

The Broads is a flat, low-lying landscape but its wetland nature means that some areas can be difficult to access. It is not possible in practice to provide the same level of access to all users, but the needs of people with disabilities need to be considered by the Authority and its partners in the provision of access, services and facilities and in the development of planning policies. While not all areas can be accessible to all user abilities, a 'least restrictive' approach that removes or minimises barriers to access where possible, with a range of graded routes for varying user abilities, ensures that people with disabilities can access and enjoy the Broads. Furthermore, the concept of 'miles without stiles' is something that the Broads Authority is looking into.

Negative impacts or barriers:

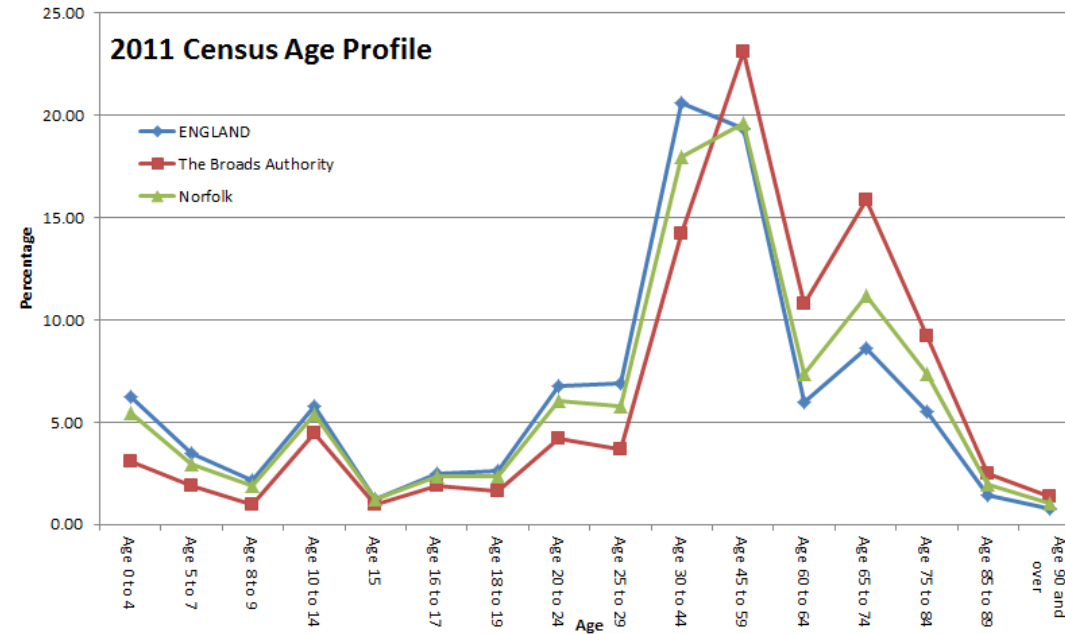
- There is no evidence to suggest that the Local Plan discriminates on the grounds of disability.

Positive impacts:

- Rights of Way Improvement Plan/Broads Public Rights of Way and Open Access Improvement Plan: includes assessment of needs for all user groups
- Broads Local Access Forum: Semi-independent body, established under the Countryside and Rights of Way Act, to advise on the improvement of public access to land within the Broads. It promotes closer liaison and understanding between the various groups and organisations with interest in access to the Broads and the adjacent parts of Norfolk and Suffolk.
- Information provision: The 'Easier Access in the Broads' leaflet provides information on land and water access opportunities for boating and boat trips, cycling, fishing, walking, visitor attractions, public facilities and public transport. The Barton Access Pack contains large print and Braille brochures, CD and audio cassette for people with disabilities visiting the accessible boardwalk at Barton Broad. In addition to the provision of information in large print and audiotape, Braille guides and interpretation boards are also available at a number of locations in the Broads.
- The Integrated Access Strategy (IAS), adopted by the Authority in March 2013 was shaped by the Local Access Forum and provides the overarching strategy for increasing sustainable access within the Broads for all users.
- Disabled Persons Transport Advisory Committee and Norfolk Coalition of Disabled People (Equal Lives) have been consulted on the Sites Specifics DPD.
- The design policy in the Local Plan refers to providing buildings designed to accommodate wheel chair users. It also refers to making buildings easily adaptable.
- The elderly and specialist needs policy is a criteria based policy to help determine such accommodation.
- The venues chosen for drop in sessions during the consultation stages of the Local Plan production had ramps and hand rails to help people access them.

### 4.2 Age

According to the 2011 Census, the population of the Broads Executive Area is 6,300 which is 6.7% (400 people) greater than the 2001 Census. With an area of 290 km<sup>2</sup>, the population density is 21.7 per km<sup>2</sup>. The population is markedly elderly, as shown in the following graph.



Negative impacts or barriers:

- There is no evidence to suggest that the Local Plan discriminates on the grounds of age.

Positive impacts:

- Age UK has also been consulted during the production of the Local Plan.
- A group of Young People helped inform the vision and objectives of the Local Plan.
- The Design policy of the Local Plan refers to Building for Life and Lifetime Neighbourhoods as well as the needs of those with dementia.
- The Residential Ancillary Accommodation policy enables the provision of such accommodation for those who need assistance.
- The elderly and specialist needs policy is a criteria based policy to help determine such accommodation.
- There is a health and wellbeing policy in the Local Plan.
- The Clinical Commissioning Groups have been consulted throughout the production of the Local plan.
- The venues chosen for drop in sessions during the consultation stages of the Local Plan production had ramps and hand rails to help people access them.

#### 4.3 Race

Approximately 97% of residents in the Broads Executive Area are White British in origin<sup>3</sup>. Although about 10% of the national population are of an ethnic minority background, only about 1% of visitors to the National Parks and the Broads are from ethnic minorities.

Negative impacts or barriers:

<sup>3</sup> 2001 Census; ONS

- There is no evidence to suggest that the Local Plan discriminates on the grounds of race; however it is recognised that more could be done to encourage people from black and ethnic minorities to experience and enjoy the Broads more generally.

Positive impacts:

- MOSAIC is a partnership project led by the Campaign for National Parks to build links between black and ethnic minority (BME) groups and National Parks. MOSAIC is working with the Broads Authority to develop BME champions to promote understanding and enjoyment of the Broads
- The National Federation of Gypsy Liaison Groups and The Gypsy Council have been consulted throughout the production of the Local plan.

#### 4.4 Other equality groups

There is no evidence to suggest that the Local Plan discriminates on the grounds of gender re-assignment, marriage and civil partnership, pregnancy and maternity, religion and belief, sex or sexual orientation. The Plan's overarching objectives make a positive contribution to local rural economic sustainability.

Groups and organisations with knowledge and working experience relevant to equality target groups are represented on the Authority's consultation database and informed about the development of the Local Plan. This includes community and social groups including police authorities, town and parish councils, volunteer associations, Health and Safety Executive, education bodies, charities and trusts.

## **5. Assessment of Policies and Conclusion**

- 5.1 An assessment of each policy contained within the Local Plan against each of the protected characteristics has been carried out and is in Appendix 2 of this document.
- 5.2 There is no evidence to suggest that the Local Plan discriminates any of the protected characteristics. Wherever possible, the Local Plan has sought to positively benefit everyone in society.

## **Appendix 1 – Protected Characteristics – Definitions**

**Age:** Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

**Disability:** A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

**Gender reassignment:** The process of transitioning from one gender to another.

**Marriage and civil partnership:** Marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

**Pregnancy and maternity:** Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

**Race:** This refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

**Religion and belief:** Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.

**Sex:** A man or a woman.

**Sexual orientation:** Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.

**Appendix 2 - Individual Policy Assessment.**

+	Positive
=	Medium
-	Negative

Policy	Race	Sex	Disability	Age	Gender reassignment	Religion and belief	Sexual orientation	Pregnancy and maternity	Marriage & Civil partnership
PUBSP1: DCLG/PINS Model Policy	=	=	=	=	=	=	=	=	=
PUBDM1: Water Quality and Foul Drainage	=	=	=	=	=	=	=	=	=
PUBDM2: Boat wash down facilities	=	=	=	=	=	=	=	=	=
PUBDM3: Water Efficiency	=	=	=	=	=	=	=	=	=
PUBSP2: Strategic Flood Risk Policy	=	=	=	=	=	=	=	=	=
PUBDM4: Development and Flood Risk	=	=	=	=	=	=	=	=	=
PUBDM5: Surface water run-off	=	=	=	=	=	=	=	=	=
PUBDM6: Open Space on land	=	=	=	=	=	=	=	=	=
PUBDM7: Green Infrastructure	=	=	=	=	=	=	=	=	=
PUBSP3: Climate Change	=	=	=	=	=	=	=	=	=
PUBDM8: Climate Smart Checklist	=	=	=	=	=	=	=	=	=
PUBSP4: Soils	=	=	=	=	=	=	=	=	=
PUBDM9: Peat soils	=	=	=	=	=	=	=	=	=
PUBSP5: Historic Environment	=	=	=	=	=	=	=	=	=
PUBDM10: Heritage Assets	=	=	=	=	=	=	=	=	=
PUBDM11: Re-use of Historic Buildings	=	=	=	=	=	=	=	=	=
PUBSP6: Biodiversity	=	=	=	=	=	=	=	=	=
PUBDM12: Natural Environment	=	=	=	=	=	=	=	=	=
PUBDM13: Energy demand and performance	=	=	=	=	=	=	=	=	=
PUBDM14: Renewable Energy	=	=	=	=	=	=	=	=	=
PUBSP7: landscape Character	=	=	=	=	=	=	=	=	=
PUBDM15: Development and Landscape	=	=	=	=	=	=	=	=	=
PUBDM16: Land Raising	=	=	=	=	=	=	=	=	=
PUBDM17: Excavated material	=	=	=	=	=	=	=	=	=
PUBDM18: Utilities Infrastructure Development	=	=	=	=	=	=	=	=	=
PUBDM19: Settlement fringe	=	=	=	=	=	=	=	=	=
PUBDM20: Amenity	=	=	=	=	=	=	=	=	=
PUBDM21: Light pollution and dark skies	=	=	=	=	=	=	=	=	=
PUBSP8: Getting to the Broads	=	=	=	=	=	=	=	=	=
PUBSP9: Recreational Access around the Broads	=	=	+	=	=	=	=	=	=
PUBDM22: Transport, highways and access	=	=	=	=	=	=	=	=	=
PUBDM23: Recreation Facilities Parking Areas	=	=	=	=	=	=	=	=	=
PUBSP10: A prosperous local economy	=	=	=	=	=	=	=	=	=
PUBSP11: Waterside sites	=	=	=	=	=	=	=	=	=
PUBDM24: New Employment Development	=	=	=	=	=	=	=	=	=
PUBDM25: Protecting General Employment	=	=	=	=	=	=	=	=	=
PUBDM26: Business and Farm Diversification	=	=	=	=	=	=	=	=	=
PUBDM27: Development on Waterside Sites	=	=	=	=	=	=	=	=	=
PUBSP12: Sustainable Tourism	=	=	=	=	=	=	=	=	=
PUBDM28: Sustainable Tourism	=	=	=	=	=	=	=	=	=
PUBDM29: Holiday Accommodation	=	=	=	=	=	=	=	=	=
PUBSP13: Navigable Water Space	=	=	=	=	=	=	=	=	=
PUBSP14: Mooring Provision	=	=	=	=	=	=	=	=	=

Policy	Race	Sex	Disability	Age	Gender reassignment	Religion and belief	Sexual orientation	Pregnancy and maternity	Marriage & Civil partnership
PUBDM30: Access to the Water	=	=	=	=	=	=	=	=	=
PUBDM31: Riverbank stabilisation	=	=	=	=	=	=	=	=	=
PUBDM32: Moorings, mooring basins and marinas.	=	=	=	=	=	=	=	=	=
PUBSP15: Residential development	=	=	+	+	=	=	=	=	=
PUBDM33: Affordable Housing	=	=	+	=	=	=	=	=	=
PUBDM34: Defined Development Boundaries	=	=	=	=	=	=	=	=	=
PUBDM35: Gypsy, Traveller and Travelling Show People	+	=	=	=	=	=	=	=	=
PUBDM36: New Residential Moorings	=	=	=	=	=	=	=	=	=
PUBDM37: Rural Enterprise Workers	=	=	=	=	=	=	=	=	=
PUBDM38: Residential Ancillary Accommodation	=	=	+	+	=	=	=	=	=
PUBDM39: Replacement Dwellings	=	=	=	=	=	=	=	=	=
PUBDM40: Elderly and Specialist Needs Housing	=	=	+	+	=	=	=	=	=
PUBDM41: Custom/self-build	=	=	=	=	=	=	=	=	=
PUBDM42: Design	=	=	+	+	=	=	=	=	=
PUBSP16: New Community Facilities	=	=	=	=	=	=	=	=	=
PUBDM43: Visitor and Community Facilities and Services	=	=	+	+	=	=	=	=	=
PUBDM44: Designing Places for Healthy Lives	=	=	+	+	=	=	=	=	=
PUBDM45: Safety by the Water	=	=	=	=	=	=	=	=	=
PUBDM46: Planning Obligations	=	=	=	=	=	=	=	=	=
PUBDM47: Conversion of Buildings	=	=	=	=	=	=	=	=	=
PUBDM48: Advertisements and Signs	=	=	=	=	=	=	=	=	=
PUBDM49: Leisure plots and mooring plots	=	=	=	=	=	=	=	=	=
PUBACL1: Acle Cemetery Extension	=	=	=	=	=	=	=	=	=
PUBACL2: Acle Playing Field Extension	=	=	=	=	=	=	=	=	=
PUBBEC1: Former Loaves and Fishes, Beccles	=	=	=	=	=	=	=	=	=
PUBBEC2: Beccles Residential Moorings	=	=	=	=	=	=	=	=	=
PUBBRU1: Riverside chalets and mooring plots	=	=	=	=	=	=	=	=	=
PUBBRU2: Riverside Estate Boatyards	=	=	=	=	=	=	=	=	=
PUBBRU3: Mooring Plots	=	=	=	=	=	=	=	=	=
PUBBRU4: Brundall Marina	=	=	=	=	=	=	=	=	=
PUBBRU5: Land east of the Yare public house	=	=	=	=	=	=	=	=	=
PUBBRU6: Brundall Gardens	=	=	=	=	=	=	=	=	=
PUBCAN1: Cantley Sugar Factory	=	=	=	=	=	=	=	=	=
PUBCHE1: Greenway Marine Residential Moorings	=	=	=	=	=	=	=	=	=
PUBDIL1: Dilham Marina (Tyler's Cut Moorings)	=	=	=	=	=	=	=	=	=
PUBDIT1: Maltings Meadow Sports Ground, Ditchingham	=	=	=	=	=	=	=	=	=
PUBDIT2: Ditchingham Maltings Open Space	=	=	=	=	=	=	=	=	=
PUBFLE1: Broadland Sports Club	=	=	=	=	=	=	=	=	=
PUBGTY1: Marina Quays (Port of Yarmouth Marina)	=	=	=	=	=	=	=	=	=
PUBHOR1: Car Parking	=	=	=	=	=	=	=	=	=
PUBHOR2: Horning Open Space (public and private)	=	=	=	=	=	=	=	=	=
PUBHOR3: Waterside plots	=	=	=	=	=	=	=	=	=
PUBHOR4: Horning Sailing Club	=	=	=	=	=	=	=	=	=
PUBHOR5: Crabbett's Marsh	=	=	=	=	=	=	=	=	=
PUBHOR6: Horning - Ferry Rd. & Ferry View Rd.	=	=	=	=	=	=	=	=	=
PUBHOR7: Woodbastwick Fen moorings	=	=	=	=	=	=	=	=	=
PUBHOR8: Land on the Corner of Ferry Road, Horning	=	=	=	=	=	=	=	=	=
PUBHOV1: Green Infrastructure	=	=	=	=	=	=	=	=	=
PUBHOV2: Station Road car park	=	=	=	=	=	=	=	=	=

Policy	Race	Sex	Disability	Age	Gender reassignment	Religion and belief	Sexual orientation	Pregnancy and maternity	Marriage & Civil partnership
PUBHOV3: Brownfield land off Station Road, Hoveton	=	=	=	=	=	=	=	=	=
PUBHOV4: BeWILDerwood Adventure Park	=	=	=	=	=	=	=	=	=
PUBHOV5: Hoveton Town Centre	=	=	=	=	=	=	=	=	=
PUBL0D1: Loddon Marina Residential Moorings.	=	=	=	=	=	=	=	=	=
PUBNOR1: Utilities Site	=	=	=	=	=	=	=	=	=
PUBNOR2: Riverside walk and cycle path	=	=	=	=	=	=	=	=	=
PUBORM1: Ormesby waterworks	=	=	=	=	=	=	=	=	=
PUBOUL1: Boathouse Lane Leisure Plots	=	=	=	=	=	=	=	=	=
PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site	=	=	=	=	=	=	=	=	=
PUBOUL3 - Oulton Broad District Shopping Centre	=	=	=	=	=	=	=	=	=
PUBPOT1: Bridge Area	=	=	=	=	=	=	=	=	=
PUBPOT2: Waterside plots	=	=	=	=	=	=	=	=	=
PUBPOT3: Green Bank Zones	=	=	=	=	=	=	=	=	=
PUBSOL1: Riverside area moorings	=	=	=	=	=	=	=	=	=
PUBSOL2: Land adjacent to A143 Beccles Road and New Cut	=	=	=	=	=	=	=	=	=
PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)	=	=	=	=	=	=	=	=	=
PUBSTO1 Land adjacent to Tiedam, Stokesby	=	=	=	=	=	=	=	=	=
PUBTSA1: Cary's Meadow	=	=	=	=	=	=	=	=	=
PUBTSA2: Thorpe Island	=	=	=	=	=	=	=	=	=
PUBTSA3: Griffin Lane – boatyards and industrial area	=	=	=	=	=	=	=	=	=
PUBTSA4: Bungalow Lane – mooring plots and boatyards	=	=	=	=	=	=	=	=	=
PUBTSA5: River Green Open Space	=	=	=	=	=	=	=	=	=
PUBTHU1: Tourism development at Hedera House, Thurne	=	=	=	=	=	=	=	=	=
PUBWHI1: Whitlingham Country Park	=	=	=	=	=	=	=	=	=
Policy PUBSSTRI: Trinity Broads	=	=	=	=	=	=	=	=	=
PUBSSUT: Upper Thurne	=	=	=	=	=	=	=	=	=
PUBSSCOAST: The Coast	=	=	=	=	=	=	=	=	=
PUBSSROADS: Main road network	=	=	=	=	=	=	=	=	=
PUBSSMILLS: Drainage Mills	=	=	=	=	=	=	=	=	=
PUBSSPUBS: Waterside Pubs Network	=	=	=	=	=	=	=	=	=
PUBSSSTATIONS: Railway stations/halts	=	=	=	=	=	=	=	=	=
PUBSSTRACKS: Former rail trackways	=	=	=	=	=	=	=	=	=
PUBSSLGS: Local Green Space	=	=	=	=	=	=	=	=	=
PUBSSSTAITHES: Staithes	=	=	=	=	=	=	=	=	=
PUBSSA47: Changes to the Acle Straight (A47T)	=	=	=	=	=	=	=	=	=

+ Positive  
 = Medium  
 - Negative