

Mod Number	Policy/part of document	Organisation/name	Comment
-	6.2	Somerton Parish Council	<p>Broads Local Plan: On page 20 of the Modification consultation version, part 6.2 The Broads Authority and Duty to Cooperate Summary it states; The Localism Act states that relevant bodies must...'engage constructively, actively and on an ongoing basis...' The Broads Authority considers that it meets this duty in many ways, as set out in the Duty to Cooperate Statement etc.</p> <p>The Parish Council wishes to record that they consider that the Broads Authority continues to fail to engage constructively. This is demonstrated by the Authority's recent response to the National Park - Glover Review in which the Authority does not wish to have any representation in the future from local District Councils. Attached is a letter from Norfolk's District Councils to Defra ( Michael Gove MP) which clearly demonstrates the true picture regarding engaging constructively, actively and on an ongoing basis.</p> <p>Also, Parish Council Forum meetings held by the Authority are not minuted.</p>
M110	MODTSA2, central island part	Yare Boat Club	<p>Consider the proposed modifications to define 'low key' will limit development, growth and progress of their club. Acknowledge that this was not the intention of the Broads Authority when making the change. Preferred the original wording.</p>
M69	MODBEC1	Beccles Town Council	<p>Beccles Town Council welcomes the modifications to PUBBEC1: Former Loaves and Fishes, Beccles, to widen the possible uses of the building to include retail (A1,2,3) or business (B1), and supports the additional criteria imposed on any potential development of the building. Beccles Town Council also welcomes the addition of the word "character" (ref. M69) to ensure the area retains this.</p>
M71, M72, M73 and M74	MODBEC2	Beccles Town Council	<p>Beccles Town Council also supports changes to PUBBEC2, references M71, M72, M73 and M74, to allow for up to 5 new residential moorings, with safeguards to existing green infrastructure.</p>
-	Habitat Regulation Assessment	Andrew Alston	<p>Given that this plan is about development and some 70% of phosphate pollution in the Ant catchment is related to the number of people living in the catchment and the way they go about their daily lives (cars, urban dust etc), I find it strange that this proposed plan is compliant with its Habitat Directive assessment. The EA are stating that the Ant catchment needs to reduce its phosphate loading by 60% due to its effects on the protected sites in Ant Broads &amp; marshes. I therefore suggest that no developments should be permitted in the Ant catchment until phosphate levels are brought into line with EA targets as any development will increase numbers of people and as a consequence increase phosphate pollution.</p>

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			A solution could be to open up the floodplain within the Ant Broads & marshes SSSI and to manage the reedbeds traditionally cut cutting and removing the reeds. This will remove the phosphate from the system. Once the phosphate loading is below EA targets then developments could begin that did not increase the net phosphate loading.
M29	MODDM15	Andrew Alston	Please note that M29 Wind Turbines. This seems very restrictive for agriculture and I was wondering is it includes smaller wind turbines that farms use?
-	-	Lowestoft Town Council	The Town Council do not have any comments to make
M110	MODTSA2, central island part	Bill Knight, Yare Users Association	<p>This is an area which has been used for many years as private amenity space (there are a number of private moorings/leisure plots), together with the base for Yare Boat Club, a long established rowing and sculling club. Immediately downstream of this is a private mooring/leisure plot, with a large storage building which has been used for at least 60 years for storage of sculling boats.</p> <p>My understanding is that at this stage, I am not permitted to do anything more than comment on amendments and consequently, the previous policy (<i>Continued use of this area for low key recreation and private amenity space is supported</i>) is far less restrictive than the proposed amendment. If the policy could however be stronger in terms of supporting the further development of low key sporting facilities in this part of the Island, it would be helpful.</p> <p>I am happy for this email trail to be included in the information provided to the Inspector. I am in the process of arranging a pre-application site meeting with members of your team regarding this particular area, which is why the Amended Policy comment opportunity is so pertinent at this time</p>
M71, M72, M73 and M74	MODBEC2	Beccles Society	We have no objections to the addition limiting the number of residential moorings to 5, and the conditions applied are acceptable.
M69	MODBEC1	Beccles Society	In relation to the former Loaves and Fishes site, we would have preferred the original text, but accept the modifications proposed, though this will make it more likely that the pub element will not reopen.
M93	MODHOV3	Wroxham Parish Council	Support
M96	MODHOV5 policy and	Wroxham Parish Council	With due cognisance to Neighbourhood Plans and Conservation Areas in Wroxham

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	Map of Hoveton Town Centre		
P7	MODHOV1	Jenny Mickelburgh Landamores Boat Builders	<p>We would like to register our objection to the proposed addition of a parcel of privately owned land to the previously proposed areas of 'Green Infrastructure' in Hoveton and Wroxham, this objection relates to policy MODHOV1. The land in question (circled in red on the attachment) belongs to a number of parties (I know of the art and glass gallery and classic car showroom on Norwich Road, Network Rail, and E C Landamore and Co Ltd.) and I am writing on behalf of E C Landamore and Co Ltd. The other parties are likely to be unaware of the proposed designation, which is in itself a concern.</p> <p>We object to the proposed designation on the following grounds:</p> <ol style="list-style-type: none"> <li>1. Lack of consultation – we were not consulted about this proposal and were only notified of the inclusion of our land very late on the in the process. I believe that the other parties have not been notified at all. Wroxham Parish Council have informed us that they submitted their comments proposing the inclusion of this land in January 2018.</li> <li>2. Section 32.15 lists the areas of proposed Green Infrastructure to be included in the Local Plan and gives justification but it does not mention the area in question.</li> <li>3. The designation is unnecessary. The large area of woodland (behind the Art and Glass gallery and the car showroom) is already a 'protected woodland' and will therefore be protected from development or habitat destruction. The smaller attached areas (along the railway embankment and Norwich Road) have little significance in comparison to the larger wooded area.</li> <li>4. The designation is arbitrary. There and many other parcels of 'green' land (i.e. grassland, trees, or scrubland) in Wroxham and Hoveton that have not been included in the Green Infrastructure designation. No justification of why this particular parcel of land has been chosen has been offered.</li> <li>5. We do not believe that all of the proposed land fully meets the definition of Green Infrastructure, defined in the policy as <i>'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'</i>.</li> </ol> <p>The land is not accessible and most of it is not visible to the public, so does not currently delivery 'quality of life benefits' for the local community.</p>

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			We are open to discussion on this matter and it may be that some of the land would appropriate as Green Infrastructure, subject to consultation and amendments to the current proposals.
-	-	EDF Energy	We do not have any comments to make on this document
M29	MODDM15	Norfolk County Council	<p>2.1 The Sustainability team is not sure the statement saying that there are 'no sites suitable for wind turbines', suggesting it comes from statements in the 'Renewable Energy Topic Paper' is correct. The paper nowhere concludes with the statement suggesting that there are no sites suitable within the Executive Area.</p> <p>2.2 It is suggested that this reference section M29 uses text at the end of the topic paper that states 'The Authority's Landscape Character Assessment will be used to assist in assessing the impact of individual proposals'.</p> <p>2.3 Section M29 might also want to mention any views outside the Executive Area, given the planning permission (after appeal) granted to the 125m turbine near Beccles (which is just outside). The topic paper states opposition, so perhaps that needs to be reflected.</p>
M4	DM1	Norfolk County Council	<p>The modifications the County Council propose to DM1 are a wording addition to simply identify that DM1 will not apply to proposals covered by PUBSSA47, the approach proposed has several benefits;</p> <ul style="list-style-type: none"> <li>• It keeps the wording of PUBSSA47 as agreed in the SoCG</li> <li>• It clarifies the relationship between the policies</li> <li>• There is minimal change to the policy wording of DM1</li> <li>• It prevents overlap between policies DM1 and PUBSSA47</li> </ul> <p>The County Council at the request of the inspector submitted a revised version of policy DM1 for consideration in September 2018. In addition to the modifications set out above, for information appended to this schedule of comments is the County Councils version of Major Development Policy DM1 submitted to the Inspector.</p>
-	Dark Skies Policies Map	Somerton Parish Council	<p>Can the map (MODDM22 Light Pollution and dark skies) be changed as it has no reference points i.e. name of villages/towns on it?</p> <p>Unfortunately, in its current form it is not a map as such but merely a diagram and therefore completely unsuitable for a Local Plan.</p>
-	-	Chedgrave Parish Council	This matter was considered by Chedgrave Parish Council at their meeting on 7th March 2019. No further comments were made.
M4	MODDM1	Campaign for National Parks	As we have limited capacity and we focus primarily on national policy, we have not commented on previous stages of consultation but we wanted to provide a view on the Plan before it is finalised. In particular, we

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			<p>wanted to comment on the new major development policy in Appendix S: Policy MODDM1: Major Development in the Broads.</p> <p>We particularly welcome the fact that this policy provides a clear local interpretation of the major development test in national planning policy and that major development is defined in terms of the impact it will have on the special qualities of the Broads.</p> <p>In 2016, we commissioned Sheffield Hallam University (SHU) to undertake research about planning policy related to major development in National Parks (full details of the research findings are available here: <a href="http://www.cnp.org.uk/SHU-planning-research">http://www.cnp.org.uk/SHU-planning-research</a>). One of the key findings from the research was the importance of NPAs having clear policies in their local plans about how the major development test should be applied in relation to the special qualities of the National Park. What is considered small scale with little impact in one area of one National Park, could be considered to have major impacts on the special qualities in another part of the same Park or in another National Park. Having a locally defined policy which relates the major development test to the Parks' special qualities is one of the most effective ways of protecting a National Park against inappropriate development. The research found that such policies provide greater clarity for developers and help reinforce support and understanding among NPA Members.</p> <p>For consistency and to avoid any misunderstanding, a reference to the development's impact on the special qualities of the Broads should be added to the list of criteria included as part the reasoned justification (on p90 of the 'Schedule of Main Modifications' document) and which are to be used to assess whether something is major development.</p> <p>There is a typo in point 2. of the policy: the words 'they are' are not needed before 'the development' and should be deleted.</p>
M1	MODHOR8: Horning Residential Moorings	EA	<p>We are satisfied that HOR9 is in keeping with PUBDM1, specifically for ensuring that the moorings are not brought forward until such time as Knackers Wood Water Recycling Centre has been demonstrated to have sufficient capacity. The given milestone could be clarified to "Delivered after provision of wastewater infrastructure, anticipated to be 2024".</p>
M10	MODDM2: Water Quality and Foul Drainage	EA	<p>Thank you for removing the reference to septic tanks in this section, as reed beds are not sufficient treatment for septic tank effluent to enter a watercourse.</p>

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M12	MODDM5: Development and Flood Risk	EA	Thank you for modifying PUBDM4 to clarify that a Flood Risk Assessment is required irrespective of our Flood Risk Standing Advice. The SFRA section accurately describes the role of Indicative Flood Zone 3b.
M13	MODDM6: Surface Water Run-Off	EA	Thank you for modifying PUBDM5, this will help to prevent contaminants from entering the water environment.
M16	MODDM7: Open Space on Land, Play, Sports Fields and Allotments	EA	We support the approach of clarifying how appropriate sites for cemeteries can be determined. We advise that the named document has now been withdrawn, but guidance can be found in the Planning Practice Guidance, under Cemeteries and burials: Prevent Groundwater Pollution. For a cemetery extension, we require a Tier 1 risk assessment and for new cemeteries we require a Tier 2 risk assessment.
M30	MODDM17: Land Raising	EA	Thank you for modifying PUBDM16 to clarify that DM4 must be adhered to for land raising activities, and that land raising is not appropriate within Flood Zone 3b.
M40	MODDM28: Development on Waterside Sites in Employment or Commercial Use, including Boatyards	EA	Thank you for clarifying that an environmental permit may be required for works near a main river.
M70	MODBEC1: Former Loaves and Fishes, Beccles	EA	We support the stipulation that the ground floor may not be converted to a residential use because the pub is in Flood Zone 3 and it may not be possible to adequately mitigate the risk of flooding. Residential use on the first floor may be acceptable subject to a site-specific Flood Risk Assessment.

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M90	MODHOR6: Horning – Boatyards, etc. at Ferry Road. And Ferry View Road	EA	We support the reference to PUBDM5 in relation to Horning Knackers Wood Water Recycling Centre capacity issues.
-	Policy MODDM37: New residential moorings	TSA Town Council	The Town Council would like to see an additional requirement for new residential moorings to have access by road to the moorings for emergency service vehicles. The tragedy of the medical emergency at the eastern end of Thorpe Island in late 2018, necessitated a response by the three emergency services and the coastguard with boats, due to a lack of emergency road access. This created an unacceptable delay in treatment, a significant investment of emergency service time, and we believe demonstrates the need for emergency road access to new residential mooring sites.
M110	Policy PUBTSA2: Thorpe Island Central Part	TSA Town Council	<p><u>Central part of Thorpe Island</u></p> <p>The use of this part of the island for the storing of craft and rowing club facilities dates back to 1913. The boathouse style of the existing structures is a feature of the traditional built environment of the area and the Club caters for people of all ages.</p> <p>In our first consultation response to the Broads Local Plan, the Town Council sought to protect recreation on the Island. Given the planning history on the Island, the positive use of the site for recreation should be supported.</p> <p>The Broads Authority confirmed policy (PUBTSA2 2) viii)) would not “jeopardise appropriate development /expansion of recreational/club facilities”. However, the proposed change to the policy for the central part of the Island to restrict the “expansion of recreation/club facilities” is <b>objected</b> to.</p> <p>In the previous draft of the Local Plan, the term “low key” was used for both the ‘western’ and ‘central’ parts of the island. In clarifying the meaning of “low key”, the latest draft of the Local Plan defines it as “no built development” for the western part and “no significant extensions to the existing buildings and replacements on a like for like basis” in the centre. This prevents meaningful development on a site with buildings equally with one without any built development.</p>

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			<p>There have been no concerns raised about the central section of Thorpe Island in any local plan comments and therefore the restriction seems un-necessary.</p> <p>The Town Council expectation would be for any future extensions or new buildings to be in keeping with the character of a site associated with rowing/sculling. We contend that existing planning policies provide adequate control and that any planning application could be determined on its merits. By deleting the term 'low key' in the first draft, the policy would read that 'continued use of this area for recreation and private amenity space is supported'. We believe this would provide adequate policy control, with any planning application being determined accordingly.</p>
M110	Policy PUBTSA2: Thorpe Island Western end	TSA Town Council	<p><u>Western end of Thorpe Island (including the basin)</u></p> <p>The Town Council query whether 'no built development' is in keeping with the need for 'refuse storage and disposal' and 'upgrades to the bridge'. There is no assessment or statement as to how the needs for 25 privately moored boats could be delivered without any 'built development'.</p> <p>If removing the term 'no built development' is considered, the expectation would be that any planning application would describe how the significant constraints of the sites can be overcome.</p>
-	Jeff Crowder	-	<p>Both living in and using the Norfolk broads for both boating and angling activities over the past 50 plus years, I like most of you, have noticed many changes some good, other less so.</p> <p>The use of the Broad serves both the ecological and recreation communities and the balance must be difficult to serve.</p> <p>Unfortunately in a cash strapped society the loss of income from the once prosperous boating community to include BA tolls, riverside pubs, shops and infrastructure has resulted in a loss of investment and facilities in all but the more obvious centres of Wroxham, Horning and Brundall.</p> <p>One of the issues I have encountered in the Broad Navigation Area is the lack of cruising range.</p> <p>When I came down many years ago for a Broad boating holiday it was to spend a week or two cruising from the northern to southern broads and back again, taking in not only the more popular built up areas but also the quiet and tranquil areas.</p>



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			<p>Now it seems that is something very few people do, limiting their range to either the north or the south, avoiding Yarmouth Yacht Station and Breydon Water with all its associated dangers and wasted time travelling the less attractive areas of the waterway.</p> <p>The idea of dropping off and a visit into Great Yarmouth town or down to the beach is not what the boating fraternity are looking for!</p> <p>On my numerous boating holidays, before moving to Norfolk, we learnt to avoid the Yacht Station stretch, it was seen as a very dangerous zone not only for boats but also their occupants having to negotiate at low water to gain access under the bridges. I hated it!</p> <p>I believe this view was held by many as was seen in the decline of boatyards in the southern rivers especially on the River Waveney due to the passage necessary to get to more interesting areas in the north.</p> <p>Even Norwich City is limited due to its railway bridge except for very low air draught hire boats.</p> <p>So anything of any size is limited to the rat run from Brundell down to Oulton Broad and back, unless you fancy a boring trip around an offshore sand bank!</p> <p>Having described why the industry is dying, its not foreign holidays, or the British weather, it the lack of accessibility and the boredom of having to use the same venues.</p> <p>So please two things, improve the access into Norwich City with a mooring basin and footpath access into the City just before the railway bridge, there are plenty of brown field areas that could be better utilised.</p> <p>Secondly, obtain the necessary investment to create a loop from the River Yare at Berney Arms across the marshes to the River Bure at the Stracey Arms on the Acle Straight, thereby cutting out Breydon and Yarmouth Yacht Station. Not dissimilar to the New Cut at Reedham.</p> <p>Yes it would mean a road and railway bridge but surely our National Park needs such investment, bringing</p>

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			<p>back the life blood needed, otherwise it will become just a naturalist's water park and playground for the mast-dipping sailing fraternity.</p> <p>Here's hoping!</p>
A20	Page 40	BRASCA	<p>Thank you. I found the modifications and everything seems fine.</p> <p>Despite this, there is one error on Page 40 where it states;</p> <p>"The majority of the watercourses in the Broads are regulated and maintained by the Internal Drainage Board"</p> <p>I am afraid this statement is incorrect. Drainage Boards maintain agreed 'Board adopted dykes/drains' on private land which are clearly identified on maps available from the IDB's. Can I suggest you have a word with Caroline Laburn at the Broads Drainage Board. She will confirm that the overwhelming majority of dykes/water courses on private land are maintained at the landowners' expense. The same applies with dykes/watercourses in the Broads reed &amp; sedge beds. Since these do not require drainage as such, the Drainage Boards have no responsibility and therefore the landowners have to maintain them.</p> <p>Blocked dykes in the Broads present enormous problems to Brasca members. I wish the dykes were maintained by the IDB's but sadly they are not.</p> <p>Could you please confirm that the statement will be removed from the plan?</p>
M40	MODDM28	BASG/BA Member	<p>I have discussed with the BASG Access committee and we are happy with this amendment to PUBDM27 as per our previous consultation.</p>
-	-	Norfolk Constabulary	<p>There are no further comments from Norfolk Constabulary regarding the proposed changes and your consultation thereon.</p>
M2	MODSOM1	Sommerleyton Estate/Evolution Town Planning	<p>We support the new policy MODSOM1 Sommerleyton Marina Residential Moorings and the revised marina policy map. We are pleased at the proposal in the Local Plan to allocate 10 permanent residential moorings. The Sommerleyton Marina is an existing marina with good services including water and electricity and existing parking areas. The marina can accommodate permanent residential moorings with little visual impact.</p>

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-	-	National Grid/Wood PLC	We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.
-	-	Lowestoft Civic Society	Just to let you know that I have been to Lowestoft Library and spent time looking through the changes, I don't have any observations other than most seem to be saying the same thing.
M1	New Policy	Anglian Water	<p>We note that it proposed to include an additional site for 6 residential moorings at Hopes Hill, Horning in the new Local Plan. With a specific allocation policy to be used in the determination of planning applications for this site. This policy cross refers to Policy PUBDM1 of the Publication Version Local Plan and the requirement to demonstrate that there is adequate capacity at Horning Knackers Wood Water Recycling Centre in Anglian Water's ownership to serve the site.</p> <p>There have been a number of recorded incidents of flooding within the Horning sewerage catchment from surface water, groundwater and fluvial sources which are the responsibility of multiple agencies. This reduces the available capacity of foul sewerage network for additional foul flows from additional development within the catchment as outlined in the Joint Position Statement (examination document EB41) submitted by the Broads Authority.</p> <p>Anglian Water has undertaken CCTV surveys of the existing public sewerage network at Horning to investigate the cause(s) of these flooding incidents. Following the completion of surveys we have undertaken repairs in February/March 2018 to mitigate surface water ingress where it interacts with the foul sewerage network in Anglian Water's ownership.</p> <p>We have also been actively working with relevant (flood) risk management authorities to address historic flooding in the Horning sewerage catchment where it relates to Anglian Water's assets. As part of which we been liaising with North Norfolk District Council to enable the removal of existing surface water connections to the foul sewerage network from existing residential and commercial properties so that existing surface water flows can be discharged to suitable alternatives e.g. watercourses. Further works are anticipated in the next few months to remove water from the Broads entering a private manhole and redirecting surface water to the Broads.</p> <p>The Environment Agency has also committed to undertaking threshold surveys within the sewerage catchment to establish flood risk from the Broads for every household within the catchment.</p> <p>As set above work relating to Horning catchment is currently on-going to resolve existing issues but the conclusion of the Joint Position Statement relating to the available capacity of Horning Knackers Wood Water Recycling Centre within the Joint Position Statement remains valid.</p>

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			<p>Currently it is not clear when capacity will be made available at Horning Knackers Wood Water Recycling Centre to serve the additional allocation site.</p> <p>Anglian Water working with partner organisations will continue to monitor the available capacity of Horning Knackers Wood Water Recycling Centre and will review the position based upon the outcome of any further works being undertaken within this catchment.</p>
M2	New Policy	Anglian Water	<p>Anglian Water is the sewerage undertaker for Somerleyton, Ashby and Herringfleet Parish. Essex and Suffolk Water who provide water services should also be consulted on the proposed residential moorings at Somerleyton Marina.</p> <p>We note that it proposed to include an additional site for 10 residential moorings at Somerleyton Marina, Somerlyton in the new Local Plan. With a specific allocation policy to be used in the determination of planning applications for this site.</p> <p>We welcome the reference made to the applicant being required to demonstrate that capacity is available within the foul sewerage network or can be provided in time to serve this development consistent with the requirements of Policy PUBDM1.</p>
M10	Policy MODDM2	Anglian Water	<p>Anglian Water is supportive of Policy PUBDM1 of the Broads Local Plan as submitted. The proposed amendment to the policy to address comments made by the Environment Agency is consistent with the objectives of this policy and is supported.</p>
M14	Policy MODDM6	Anglian Water	<p>The Broads Authority has proposed changes to the wording of the second paragraph of PUBDM5 of the Publication Version Local Plan following previous discussions with Anglian Water, Environment Agency and Norfolk County Council as Lead Local Flood Authority.</p> <p>The proposed changes to Policy PUBDM5 would address our previous concerns relating to this policy</p>
M53	MODDM35 supporting text	Anglian Water	<p>Please see comments relating to the inclusion of additional residential moorings at Horning and Somerleyton as set above.</p>
M89	MODHOR6	Anglian Water	<p>It is noted that it is proposed to include reference to an existing sewage pumping station in Anglian Water's ownership as a potential constraint to residential moorings at this site.</p> <p>The proposed modification to add reference to the pumping station to the first paragraph of Policy</p>

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			PUBHOR6 is supported.
M90	MODHOR6 supporting text	Anglian Water	<p>It is noted that it is proposed to include reference to the requirements of Policy PUBMD1 of the Publication Version Local Plan in relation to the Horning sewer catchment.</p> <p>The proposed modification to add reference to Policy PUBDM1 in the second paragraph of the supporting text for this policy is supported.</p>
M91	MODHOR6 Constraints and features	Anglian Water	<p>It is noted that it is proposed to include reference to an existing sewage pumping station in Anglian Water's ownership as a potential constraint to residential moorings at this site.</p> <p>The proposed modification to add reference to the pumping station to the supporting text of Policy PUBHOR6 is supported.</p>
M120	Appendix K (amended residential moorings trajectory)	Anglian Water	<p>We note that it is anticipated that the proposed additional residential moorings at Hopes Hill, Horning will come forward from 2024/25 as outlined in Appendix A.</p> <p>Currently it is not clear when capacity will be available at Horning Knackers Wood Water Recycling Centre to serve the additional allocation site.</p> <p>Anglian Water working with partner organisations will continue to monitor the available capacity of Horning Knackers Wood Water Recycling Centre and will review the position based upon the outcome of any further works being undertaken within this catchment.</p>
A20	PUBDM5 – Supporting Text	Anglian Water	<p>Reference is made to a number of documents of relevance to surface water management including those produced by the LLFAs for the Broads area. Applicants can also put forward SuDs features for adoption by Anglian Water.</p> <p>We would ask that reference is made to Anglian Water's Surface Water Policy and SuDS Design Handbook (or successor document) particularly as this will become increasingly important with the introduction of Sewers For Adoption Version 8 which includes SuDs for the first time.</p> <p>It is therefore suggested that the following text be added to the bullet point list:</p> <p>'Anglian Water's Surface Water Drainage Policy and SuDs Design Manual (or successor document) where</p>

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			SuDs feature are to be adopted by Anglian Water.'
-	MODCAN1	Network Rail	<p>Thank you for sending your Local Plan consultation to Network Rail. While Network Rail doesn't have any specific comments to make on the Plan something drew our attention under the section for the Cantley Sugar Factory (MODCAN1), page 158-159. Within this section there is reference to a Cantley Transport Feasibility Study. Would it be possible to send a copy of this if this investigates rail freight use as the paragraph suggests?</p> <p>This is on page 159 of the consultation document, and I've copied the paragraph below for your ease of reference.</p> <p><b>The potential for recommencing use of the river and or railway to transport freight to and from the explored in the Cantley Transport Feasibility Study. Although there is no immediate prospect of this achieved, it remains an aspiration should circumstances permit.</b></p>
-	-	Great Yarmouth Borough Council	I am emailing this morning to confirm that Great Yarmouth Borough Council has no objections to the proposed modifications to the Local Plan for the Broads.
-	-	Historic England	Thank you for consulting Historic England on the post-EiP Modifications to the Broads Authority Local Plan. We regret that we do not have the capacity to comment specifically at this time. We would refer you to our previous detailed representations and correspondence regarding the Local Plan and proposed modifications.
-	Cantley Policies Map	British Sugar (agents Rapley)	<p>Cantley Sugar Factory is subject to a site specific policy (reference MODCAN1), which seeks to protect and enhance the successful operation of the site. Our client is in support of this policy and the proposed modifications.</p> <p>It has come to our attention however, that there is an intrinsic area of the Cantley Sugar Factory site that is not contained within the policy area. Please see Site Location Plan attached, which illustrates the sugar factory policy and the area in question.</p> <p>The area currently excluded from the Cantley policy is the Sugar Factory car and truck park, 4 large silos, and the entrance to the site. The area therefore forms a fundamental component of the successful operation of the site and is within the same land ownership as the Sugar Factory, which is owned by my client.</p> <p>As such, we would request that the policy boundary is amended to include this area, in order to ensure that it is recognised by the policy and to secure its protection. The amendment of the policy area would not be material to the Local Plan, but merely represents a technical adjustment. We trust this can therefore be accommodated prior to the adoption of the Local Plan.</p>

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M58	MODDM37	James Knight	<p><b>1. Development boundaries</b></p> <p>1.1. The continued reference to development boundaries in this policy is regretted.</p> <p>1.2. Development boundaries define existing built-up settlements, and assist in planning further housing provision within those defined areas. PUBDM34 says:</p> <p>1.3. As a consequence, development boundaries are unlikely ever to include areas which are immediately adjacent to water. The proposed Local Plan identifies just 4 development boundaries, and only fractional parts of these encompass - or are adjacent to - rivers, dykes or broads. The number of development boundaries in adjoining local authority areas which are adjacent to the waters of the Broads is also vanishingly small.</p> <p>1.4. Development boundaries were never intended to guide the provision of residential moorings, and proximity to a physically built up settlement is not, in itself, an indicator of suitability for mooring vessels - whether residential or not.</p> <p>1.5. None of the allocated sites in the proposed plan sits within or adjacent to a development boundary, and there are so few possible sites that could ever comply with this requirement that its continued inclusion is illogical and unsound.</p> <p><i>“Development Boundaries have the twin objectives of focusing the majority of development towards existing settlements while also protecting the surrounding countryside.”</i></p> <p><b>2. Planning considerations for residential moorings</b></p> <p>2.1. For moorings of all kinds, the planning unit is the mooring itself - not the boat. It has been successfully argued at planning appeals that there is often no distinction in planning terms between a boat lived on all year, and one only occasionally occupied. The intensity of use of the mooring itself is unchanged, because the boat is moored regardless of whether someone lives aboard it.</p> <p>2.2. The critical factors for residential use of boats from a planning perspective, therefore, do not relate to the use of the boat or the mooring, but the needs of the residents - primarily access to services, facilities and utilities.</p> <p>2.3. These needs are not necessarily the same as for those living a more mainstream lifestyle, and treating residential moorings as though the demands they place on local services are similar to those of traditional housing is not a realistic position to adopt.</p> <p>2.4. The inclusion of additional policy tests such as being within a prescribed distance of three or more key services is arbitrary and likely to result in undesirable outcomes. In particular, many sites which are considered suitable on an objective assessment will either be dismissed as non-policy compliant, or officers will have to find ways of contorting and working around an overly-prescriptive policy in order to achieve a desirable outcome.</p> <p>2.5. It is argued, therefore, that applications for significant numbers of residential moorings (say 6 or more)</p>

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			<p>should be considered on a case-by-case basis, rather than requiring applicants to jump through artificially contrived hoops. For smaller numbers of residential moorings, it may be the case that there is no material change of use.</p> <p><b>3. Meeting the objectively assessed need for residential moorings</b></p> <p>3.1. The Accommodation Needs Assessment for houseboats identifies a need for 63 residential moorings over the plan period, and as at today's date there are just 11 'authorised' residential moorings.</p> <p>3.2. Further, the Authority's own research suggests an actual demand for over 100 residential moorings, based on the number of 'under the radar' residential moorings already in use.</p> <p>3.3. The Local Plan as proposed makes two unrealistic assumptions when presenting its expected residential mooring trajectory: a) that all of the allocated sites will be taken up in the next 3 years; and b) that further as-yet-unknown windfall sites will make up the remainder.</p> <p>3.4. The policy remains largely unchanged from the version in the previous Local Plan, which itself delivered only one residential mooring throughout its lifetime. The only "authorised" residential mooring location was granted despite being contrary to strand (a) of the policy (the site was not near a development boundary)*.</p> <p>3.5. Every mooring location on the Broads is well known to the Broads Authority, and yet it has been unable to identify any further sites which could comply with the policy as proposed. In fact, the number of potential sites has been reduced due to highways concerns.</p> <p>3.6. The policy as proposed, therefore, continues to have no prospect of delivering residential moorings in the numbers required either by the OANA, or the Authority's own research.</p> <p><b>4. Summary</b></p> <p>4.1. There is no sound justification for any reference to development boundaries in this policy.</p> <p>4.2. The policy should refer simply to the desirability of access to local facilities and services, without the use of arbitrary policy tests such as specific limitations on travel distance.</p> <p>4.3. The policy should be non-prescriptive and aspirational in nature, aiming to meet and even exceed the assessed need for residential moorings.</p> <p>4.4. Applications for residential moorings should be considered on their merits, on a case by case basis, with due regard to established planning principles of whether residential occupation constitutes a material change of use.</p>
M110	MODTSA2	James Knight	<p><b>1. Eastern end of Thorpe Island (part a)</b> 1.1. It is agreed that the reference to PUBDM36 is superfluous and can be removed.</p> <p><b>2. Central part of Thorpe Island (part b)</b> 2.1. the proposed wording is capable of being interpreted to imply that there will be no significant extensions, <b>or replacements</b> - even on a like for like basis. The following alternative wording is suggested:</p>



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			<p><i>This part of the island will be retained in its current use with no significant extensions to the existing buildings; replacements on a like for like basis will be supported.</i></p> <p><b>3. Western end of Thorpe Island (part c)</b> 3.1. The proposed alteration removing the prohibition on residential moorings is welcomed</p> <p>3.2. The proposed alteration removing the prohibition of moorings on the river bank is also welcomed.</p> <p>3.3. Page 26 of the summary of changes table should reflect these significant changes which go beyond “aiding clarity”.</p> <p>3.4. This is a missed opportunity to create an aspirational policy which promotes the site as the single most suitable and sustainable site for residential moorings anywhere on the Broads network.</p>
-	MODDM3	Royal Yachting Association	MODMM3: As a partner of the Check Clean Dry campaign, the RYA recognises the importance of biosecurity. The proposed insertion is fine, barring minor grammatical corrections. With regards to the deleted texts, we consider that the Broads Authority should acknowledge that there is a burden placed on clubs. Without having specific examples, there may be some circumstances where the policy is not viable, or the potential risk does not warrant such action, though we appreciate this should be the exception.
-	MODHOR4	Royal Yachting Association	The RYA broadly supports this policy. No substantive changes are proposed.
-	MODDM46	Royal Yachting Association	The RYA broadly supports this policy. No changes are proposed.
M58	MODDM37	Royal Yachting Association	The RYA broadly supports this policy. We consider that the word ‘endeavour’ could reasonably be removed from the first insertion to create a more tangible objective. We have no further comments on proposed changes.
M48, M49, M50	MODDM33	Royal Yachting Association	The RYA broadly supports this policy. Parts n, o, and p of the policy reference facilities that should be provided. We consider that the Broads Authority might include a statement relating to fees being commensurate with the average charges in the local area, as it has done with the mooring fees. We have no further comments on proposed changes.
-	MODSP14	Royal Yachting Association	The RYA broadly supports this policy. No changes are proposed.
M44 and	MODDM31	Royal Yachting	The RYA broadly supports this policy. No substantive changes are proposed.

<b>Mod Number</b>	<b>Policy/part of document</b>	<b>Organisation/name</b>	<b>Comment</b>
M45		Association	
A45	MODSP13	Royal Yachting Association	The RYA broadly supports this policy. No substantive changes are proposed.
-	MODSP9	Royal Yachting Association	The RYA broadly supports this policy. No changes are proposed.
A41 and A42	MODSP11	Royal Yachting Association	The RYA broadly supports this policy. No changes are proposed.
M40	MODDM28	Royal Yachting Association	The RYA broadly supports the policy, and considers the changes to provide additional clarification.
-	-	Suffolk County Council	Thank you for consulting Suffolk County Council in respect of the modifications to the Broads Authority Local Plan. The County Council has no further comments to make, and thanks the Broads Authority for the modifications made at the County Council's suggestion.