

Local Plan for the Broads
Main Modifications Schedule
19 August 2026
Version 1

Introduction

This schedule of Main Modifications replaces examination library document [A13 - Schedule of proposed changes \(PDF\)](#) and must be read alongside the schedule of Additional Modifications (H4) and Schedule of Policies Map Changes (H5) which can be found here: [Examination Library](#).

The following table sets out the proposed changes to the Local Plan as well as giving the reason for the proposed change.

The table is in order of the Local Plan – see page number column.

PLEASE NOTE – a version of the Local Plan with paragraph numbers has been produced. There are no other changes to the Local Plan at the moment – just paragraph numbers. This table refers to the page numbers and paragraph numbers in this version of the Local Plan: [Regulation 19 Local Plan with Paragraph Numbers](#).

MM Ref	Schedule of proposed changes Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
MM1	SPC6	16	Section 6.2 National Planning Policy Guidance (NPPG) (ongoing)	Remove list of what NPPG covers.	To make Plan more succinct.	Succinct
MM2	SPC7	18	Section 6.4 East Inshore and Offshore Marine Plans (2014)	6.4.1 The East Inshore Marine Plan area includes the coastline stretching from Flamborough Head to Felixstowe, extending from mean high water out to 12 nautical miles, including connected rivers such as those in the Broads, and covers an area of 6,000 square kilometres. The East Offshore Marine Plan area covers the marine area from 12 nautical miles out to the maritime borders with the Netherlands, Belgium and France, a total of approximately 49,000 square kilometres of sea. The two areas are incorporated into a single Marine Plan document. The Marine and Coastal Access Act 2009 requires all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area to do so in accordance with the relevant Marine Plans unless relevant considerations indicate otherwise. <u>At the time of adopting this Local Plan, the East Inshore and Offshore Marine Plan was being updated. The following is the vision taken from the 2014 Plan.</u> The Vision for East Marine Plan Areas in 2034: By 2034 sustainable, effective and efficient use of the East Inshore and East Offshore Marine Plan Areas has been achieved, leading to economic development while protecting and enhancing the marine and coastal environment, offering local communities new jobs, improved health and wellbeing. As a result of an integrated approach that respects other sectors and interests, the East Marine Plan areas are providing a significant contribution, particularly through offshore wind, to the energy generated in the United Kingdom and to targets on climate change.	To ensure the Local Plan is up to date.	Factual update
MM3	SPC14 and 15	30	Section 8 - Duty to Cooperate	8.1 The Duty 8.1.1 The Duty to Cooperate was created in the Localism Act 2011 and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on Local Planning Authorities, County Councils in England, and public bodies	To address comment BLP226. The Local Plan would have been adopted using Duty to Cooperate so reference to	REG19 representation. Factual update.

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				to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters. The Duty to Cooperate is not a duty to agree. However, Local Planning Authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination. Local Planning Authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans. If a Local Planning Authority cannot demonstrate that it has complied with the duty, then the Local Plan will not be able to proceed further in examination. The Localism Act states that relevant bodies must ‘...<i>engage constructively, actively and on an ongoing basis</i>...’. 8.2 How the Broads Authority meets the Duty 8.2.1 The Broads Authority meets the Duty to Cooperate in a number of ways (please note this list is not exhaustive, but gives a flavour of our activity): a) Commissions joint evidence bases, e.g. the Norfolk Recreational Impact Study and the Norfolk Older Persons Strategy. b) Regular officer level meetings, e.g. the Norfolk Strategic Planning Officers Group (attended by the Environment Agency), the Suffolk Planning Policy and Development Management Officers Group. c) Quarterly meetings with Great Yarmouth Borough Council and East Suffolk District Council. d) Production of Norfolk Strategic Planning Framework/Statement of Common Ground. e) Quarterly Norfolk Duty to Cooperate Member Group meetings. f) A member from each of the Authority’s constituent districts sits on the Broads Authority’s Planning Committee. g) Individual meetings with the Planning Policy Teams of the Authority’s constituent districts. h) Quarterly meetings with Norfolk and Suffolk Historic Environment officers. i) <u>Working with District Councils on bespoke, location specific cross-boundary issues, such as retail/village/district centre coordination where a centre spans the Broads Authority Executive Area and a neighbouring local planning authority (for example Hoveton Village Centre across the Broads Authority and North Norfolk District Council areas and Oulton Broad District Centre across the Broads Authority and East Suffolk Council), so that retail policy, including sequential and impact considerations, is applied to the centre as a whole rather than separately within each administrative area.</u> 8.2.2 The Authority therefore considers that it engages constructively and on an ongoing basis with relevant authorities. More detail can be found in the Duty to Cooperate Statement (May 2025). 8.3 — Planning White Paper and Levelling Up Act 8.3.1 The Levelling up and Regeneration Act 2023 indicates that the Duty to Cooperate will be scrapped. No details as to what precisely will take its places have been provided at the time of writing.	future ways of cooperating is not required.	
MM4	SPC251	40	Policy PUBDM1: Major Development in the Broads	3 d) that there are no <u>adverse impacts/effects on the integrity of</u> likely significant adverse effects on proposed or current habitats sites for nature conservation both within their boundaries and in areas that ecologically support the conservation objectives of the site. Project Level Habitats Regulation Assessments may be needed to assess implications on habitats sites. Measures to mitigate for the effects of new development may be required;	To address comment BLP140	REG19 representation
MM5	SPC22	45	Add to above Circular Economy	Add this to supporting text: <u>where demolition and waste removal is found to be justified, the waste must be treated at a suitably permitted site</u>	To address comment BLP28	REG19 representation

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MM6	SPC23 and SPC24	46	Policy PUBDM3: Pollution and Hazards in development and protecting environmental quality, part 6	6. Where proposals are within a close proximity (typically less than 400m, although this may vary based on local topography) to watercourses, there may be the potential for a hydrological link. <u>Development proposals that are within close proximity* to watercourses^ and/or that include the presence of shallow groundwater (which may or may not be hydraulically connected to surface watercourse)</u> should take into account the potential for pollutants and provide a strategy for preventing this reaching the watercourses untreated. <u>A site-specific risk assessment following the Land Contamination Risk Management (LCRM) guidance will be required.</u> This includes the design of Sustainable Drainage Systems (SuDS) which should comply with the CIRIA pollution assessment best practices. Associated footnotes: <u>* Typically less than 400m, although this may vary based on local topography. ^ There may be the potential for a hydrological link.</u>	To address comment BLP22 and BLP60	REG19 representation
MM7	SPC25	49	Policy PUBSP1: Responding to the Climate Emergency	Add a new criterion as follows: <u>5i) Avoiding development in areas at risk of future flood risk due to the impacts of climate change.</u>	To address comment BLP207	REG19 representation
MM8	SPC27	58	Policy PUBDM7: Water efficiency and re-use	See 90I/h/d topic paper for proposed changes. https://www.broads-authority.gov.uk/_data/assets/pdf_file/0014/221072/Water-usage-90-I-h-d-Topic-Paper.pdf	To address comment BLP249, 243, 158, 159, 160, 4	REG19 representation
MM9	SPC28 and 29	61	Policy PUBSP2: Strategic flood risk policy	1b) Will incorporate appropriate surface water drainage mitigation measures and will implement sustainable drainage (SuDS) principles that control runoff (quantity), treat surface pollutants (quality), and enhance biodiversity and amenity value of the development. <u>The preference being high quality, green open SuDS features over less sustainable solutions such as attenuation crates.</u> New development should not increase flood risk on site or to the surrounding areas. <u>1c) Will not increase flood risk on site or to the surrounding areas.</u>	To address comment BLP80. The new criterion is an important consideration and is lost at the end of 1b.	REG19 representation and improved wording.
MM10	SPC30, 31, 32, 33, 34, 35, 36, 37, 39, 41	62	Policy PUBDM8: Development and flood risk	A new part 1 and then renumber as needed. 1. All new development will be directed to the lowest area of located to minimise flood risk from all sources, mitigating any residual risk and deliver safe development through design and management measures, and ensuring that flood risk to other areas is not materially increased, taking into account climate change allowances 2a That the development is safe for its lifetime, taking into account the vulnerability of its users and climate change. <u>To increase resilience to flooding and coastal change, proposals should make allowances for climate change in the flood risk assessment.</u> 2b Whether the proposed development will make a significant contribution to achieving the objectives of the Local Plan; Part 5 of PUBDM8 could be removed and placed in PUBDM50 as a new point 5. 5. In the case of the replacement of an existing residential property in flood zone 3a, the replacement dwelling must be on a like-for-like basis, with no increase in the number of bedrooms, on the same sized footprint and wherever possible being relocated in a less vulnerable part of the site. 6a: The site is available to be developed (including considering site ownership or whether the owners of sites have any intention of them being developed); 12. Although the Exception Test is not required for water-compatible uses, these should still be designed and	To address comment BLP17, 198, 199, 200, 202, 203, 204, 206 and to reflect that the SPD will no longer be in place and that most of it is now within the emerging Local Plan.	REG19 representation and factual update

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				constructed to meet the following requirements, as set out in paragraph 079 of the NPPG. a) remain operational and safe for users in times of flood; b) result in no net loss of floodplain storage; c) remain operational and safe for users in times of flood; d) result in no net loss of floodplain storage; First paragraph under sequential test 15.23 Although the sequential test must be applied, due to the limited availability of sites in Flood Zone 1, the main objective, as applied to the Broads, is likely to be to reduce flood risk <u>(from all sources of flooding)</u> to new development through the application of the sequential approach and to maximise opportunities to build in resilience both at the site and buildings level through design. Fifth paragraph under Principles for development in flood zone 3 15.43 ...the over-riding principle in respect of development is that it should not increase <u>flood</u> risk now or in the future. Supporting text: Status of the 2020 Flood Risk Supplementary Planning Document on adoption of the Local Plan 15.62 The Broads Authority has a Flood Risk Supplementary Planning Document (SPD)34. The Government have indicated that they plan to stop SPDs being produced. They intend for Supplementary Plans to take their place. At the time of writing, this change had not been formally put in place. As such, the 2020 SPD remains in place. The review of the Local Plan as well as the potential for SPDs to not be relevant or not be produced any more, offer the opportunity to bring into the Local Plan relevant sections of the SPD. It is proposed that aspects of the SPD deemed not appropriate for this Local Plan become part of a new Flood Risk Guidance document that will be completed after the Local Plan is produced. Above Policy PUBDM9 Include reference to the LLFA's Developer Guidance on the Norfolk County Council website. Information for developers - Norfolk County Council Guidance on development and flood risk - Suffolk County Council		

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MM11	SPC42, 43, 44, 45, 46, 47, 48	76	Policy PUBDM9: Surface Water Runoff	1.All development proposals will need to incorporate measures to attenuate surface water run-off in a manner appropriate to the Broads. This will need to reflect the characteristics of the site. <u>The type of SuDS used needs to meet the requirements of the National Standards and any LLFA guidance.</u> - in accordance with a surface water drainage hierarchy so that, in order of priority, they: a) Continue natural discharge processes; b) Store water for later use; c) Adopt shallow infiltration techniques in areas of suitable porosity; d) Store water in open water features for gradual release to a watercourse; e) Store water in sealed water features for gradual release to a watercourse; f) Discharge direct to a watercourse; g) Discharge direct to a surface water drain (highways, Anglian Water or other body or within private ownership); h) Discharge direct to deep infiltration or borehole soakaways; or i) Discharge direct to a combined sewer 2.The surface water runoff rate that will occur as a consequence of the development is required to be no more than the existing pre-development greenfield runoff rate. <u>Brownfield sites must discharge at the original pre-development (greenfield) runoff rate.</u> Brownfield sites should aim to reduce runoff as close to greenfield rates as possible. The discharge rate for brownfield sites should be no more than the rate prior to any new development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals for brownfield sites. The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant, sewerage undertaker. 3. Sustainable Drainage Systems (SuDS) <u>that are proportionate to the nature and scale of the proposal shall be used unless, following adequate assessment, soil conditions and/or engineering feasibility dictate otherwise.</u> These should be designed and implemented to be multifunction and follow the general principles set out at Appendix 9 as well as any relevant guidance or standards that are in place such as Lead Local Flood Authority guidance on drainage design. 4d) any captured water should be filtered from pollutants to help avoid contamination <u>systems must not result in pollution of groundwater and shall incorporate appropriate pollution prevention appropriate to the environmental sensitivity.</u> Supporting text <u>The IDB have their own local surface water policy which takes precedence over national best practice (Development - Water Management Alliance (wlma.org.uk)). Watercourses in the Broads within Internal Drainage Boards; internal drainage districts (IDD) are regulated by the Internal Drainage Board (IDB) and maintained by private landowners or the IDB where designated as arterial. IDBs are regulators of surface water discharges within IDD's and have their own local surface water policy which takes precedence over national best practice (Development - Water Management Alliance (wlma.org.uk)). WMA officers are open to and actively support early engagement in the drainage design process to support developers in achieving sustainable drainage, as well as reducing the risk of conflict between the IDB's regulation and that of Local Planning Authorities. From the WMA website (https://www.wlma.org.uk/) you can access maps and contact details to determine which IDB area a development fall into, if any.</u> Under Designing SuDS <u>No surface water flows will be accepted into the foul drainage network.</u> Para 15.77 Update text to reference the new National Standard for SUDS. <u>National standards for sustainable drainage systems (SuDS) - GOV.UK</u>	To address comment BLP24, 51, 52, 192, 194, 195, 240, 196	REG19 representation
MM12	SPC49, 50, 51, 51A	82	Policy PUBDM10: Open space on land,	1a Development that would result in the loss of existing sport, recreational (including play space), allotment or amenity open space as (which may be identified on the policies maps and or identified by the Authority's constituent	To address comment BLP64 and BLP37.	REG19 representation,

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			play space, sports fields and allotments	district councils in their evidence base, <u>as well as such spaces not mapped or identified in evidence</u>) will only be permitted if it can be demonstrated (through a local assessment) that: 1b Proposals that meet the requirements of 1a above and improve the amenity or biodiversity value of the open space in an appropriate way, <u>provided they do not result in the loss, or prejudice the use of the open space</u>, will be supported. <u>2j As appropriate, open spaces and play need to address the needs and provide for children with disabilities.</u> <u>2k If a 3g pitch with infill (rubber crumb added to 3g pitches) is proposed, measures to minimise the migration of the infill/crumb from the pitch needs to be considered and addressed as part of schemes.</u>	Because some open space may be new or not mapped. We are currently dealing with an application for 3g football pitches. There is growing concern regarding the issue of the impact of the small black plastic/rubber pieces (infill/crumb) that are used on 3g pitches on waterways. Given that the Broads has an abundance of waterways with important associated biodiversity, it would seem prudent to refer to capturing the black pieces of rubber/plastic to prevent them entering waterways.	factual update and Consistent with national policy – thrust of the NPPF to support sustainable development and protect and enhance water quality. In particular NPPF para 187e.
MM13	SPC53A	85	A new final paragraph	And then in the supporting text: <u>In May 2025, the Department for Environment, Food & Rural Affairs (DEFRA) published a report that reviewed emissions of “intentionally added” microplastics in the UK and found that 3G pitches are the highest source of these found in the environment. Potential ways of addressing the issue are set out here: 2021 RMM - EN (https://estc-info.stackstaging.com/wp-content/uploads/2021/03/2021-RMM-English-1.pdf).</u> There is also the potential to direct players to contain the infill and instruct them regarding the use of equipment on site. Some extra information can be found here: RMM Research – Sustainable Sports Facilities (https://rmmresearch.co.uk/).	We are currently dealing with an application for 3g football pitches. There is growing concern regarding the issue of the impact of the small black plastic/rubber pieces (infill/crumb) that are used on 3g pitches on waterways. Given that the Broads has an abundance of waterways with important associated biodiversity, it would seem prudent to refer to capturing the black pieces of rubber/plastic to prevent them entering waterways.	Consistent with national policy – thrust of the NPPF to support sustainable development and protect and enhance water quality. In particular NPPF para 187e.
MM14	SPC56 and 57	92	Policy PUBSP3: Soils	3. The Authority will require all applications for development to include realistic proposals to demonstrate that soil resources were <u>are</u> protected and used sustainably in line with accepted best practice, including the DEFRA safeguarding soils strategy. Add a new part 4: <u>. Development that seeks to enhance biodiversity but may affect soils will still need to address criteria a) to g) and that the biodiversity benefit will outweigh impact on soils.</u>	To address comment BLP148 and a typo.	REG19 representation and typo.
MM15	SPC58	92	Paragraph 2	18.6 Where development is proposed on land that could be contaminated, a site investigation will usually be required <u>When dealing with land which could be affected by contamination, follow the risk management framework provided in Land Contamination Risk Management (LCRM) https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm. This guidance describes the type of information required to establish any potentially unacceptable risks. The responsibility for securing safe development on land affected by contamination rests with the developer and/or landowner. Policy PUBDM3 might also be of relevance.</u>	To address comment BLP23	REG19 representation

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MM16	SPC58A	96	At the end of first paragraph under reasoned justification.	Add a second paragraph to the reasoned justification to refer to the map at Appendix 10 as well as these two links: A new peat map for England – Natural England (https://naturalengland.blog.gov.uk/2025/05/12/a-new-peat-map-for-england/) and the map is here: England Peat Map (EPM) Portal (https://england-peat-map-portal-ncea.hub.arcgis.com/).	Natural England has produced a peat map. Reference to the map in the policy would aid understanding and implementation of the policy.	Justified – this provides another source of evidence to support the delivery of this policy.
MM17	SPC60 and 61	102	Policy PUBDM13: Heritage Assets	3. Identified and unidentified non-designated heritage assets Where local heritage assets (identified or unidentified) are affected by development proposals, their significance should be retained within development. Development resulting in harm to or loss of significance of a locally identified asset will only be acceptable where: i. there are demonstrable and overriding public benefits associated with the development; and ii. it can be demonstrated that there would be no reasonably practicable or viable means of retaining the asset within a development. <u>Development proposals that would result in harm to the significance of a non-designated heritage asset (identified or unidentified) will be considered in the context of national policy.</u> <u>A balanced judgement will be made having regard to:</u> <u>• the significance of the heritage asset,</u> <u>• the scale of any harm or loss, and</u> <u>• the public benefits of the proposal.</u> <u>Applicants should consult the Historic Environment Record and provide an appropriate assessment of the asset's significance and the potential impact of the development. Proposals should demonstrate how harm has been avoided or minimised, and where appropriate, how the asset's significance will be preserved or enhanced.</u> 4. Archaeology c) There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets <u>that are demonstrably of equivalent</u> significance. d) Development proposals that will result in unavoidable harm to, or loss of, an archaeological heritage asset's significance <u>will be considered in the context of national policy, having regard to the significance of the asset.</u> Harm to, or loss of, an Scheduled Monument's significance will only be permitted where there is a clear justification in terms of public benefits arising from the development which outweigh that harm and, In the case of substantial harm/loss <u>of a Scheduled Monument and other archaeological heritage assets that are demonstrably of equivalent significance, proposals must</u> also meet the following requirements: i. There is no less harmful viable option; ii. The amount of harm has been reduced to the minimum possible; and iii. Satisfactory provision is made for the evaluation, excavation, recording interpretation, dissemination and archiving of the remains and then interpretation, dissemination and archiving before the commencement of development.	To address comment BLP32 and 33	REG19 representation
MM18	SPC59	107	Under the title 'Demolition'	Add this to supporting text: <u>where demolition and waste removal is found to be justified, the waste must be treated at a suitably permitted site</u>	To address comment BLP29	REG19 representation

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MM19	SPC62	109	Policy PUBDM14: Re-use, Conversion or Change of Use of Historic Buildings, under delivery and implementation	19.29 a Heritage Statement (<u>which could be</u> included within the Design and Access Statement where required)	A Heritage Statement may be required and a D and A statement not. Or the Heritage Statement might be submitted separate to the D and A Statement.	Improved wording
MM20	SPC63, 64, 65	111	Policy PUBSP5: Biodiversity	2a) protect the value and integrity of nature conservation interest and objectives of international, national and local (such as County Wildlife Sites and Local Nature Reserves) <u>sites designated for nature conservation. nature conservation designations. Functionally linked land, i.e. land outside of designated site boundaries, but integral to their function, will also be protected.</u> Biodiversity Net Gain (BNG) sites shall also be protected. 2b) protect against the loss of <u>protected</u> Section 41 habitats and species 2e) <u>utilise the Mitigation Hierarchy when considering potential impacts on the natural environment avoid likely significant effects on the natural environment wherever possible and then after following the relevant tests set out in National Policy, mitigate any likely significant effects</u>	To address comment BLP81, 221, 50	REG19 representation
MM21	SPC67, 68, 69, 70 and 251, SPC71 and 72 and 73, 74, 75, 76, 77, 81.	113	Policy PUBDM15: Natural Environment and supporting text	1e) Assist in the delivery of <u>Take account of the</u> Local Nature Recovery Strategies (Norfolk and Suffolk) 2. Depending on the nature and location of the scheme, the applicant may be required to assess the impact of proposals on the natural environment. <u>Applicants may be required to undertake and submit a Preliminary Ecological Appraisal (PEA)/Ecological Impact Assessment (EclA) to provide information regarding the habitats and species present on site, to consider the potential impacts of the development and recommend appropriate mitigation measures.</u> 7. Development that may adversely affect the special interest of a Site of Special Scientific Interest (SSSI) (which is not also subject to an international designation), the zones of impact around SSSI or a National Nature Reserve will only be permitted in exceptional circumstances where: 13. Where development is sited within or adjacent to <u>an area</u> the identified in the Local Nature Recovery Network <u>Habitats Maps of the Local Nature Recovery Strategies as an 'Area that Could Become of Particular Importance for Biodiversity'</u> and/or has a Potential Measure mapped to it, it will demonstrate how the proposal will maintain and enhance the ability of the network to restore and enhance habitats and provide eco-system <u>ecosystem</u> services in line with the Local Nature Recovery Strategy.' Delete first sentence and delete 'also' in second sentence. Protected sites and species 20.12 Protecting and enhancing the natural environment is a statutory purpose of the Broads Authority. The Authority also has a legal duty under the Natural Environment and Rural Communities Act 2006⁶⁵ and the Wildlife and Countryside Act 1981⁶⁶ to protect and enhance biodiversity. Development proposals will therefore be expected to consider the protection and enhancement of biodiversity from the outset. In particular, proposals should take opportunities for the restoration and enhancement of the core opportunity areas for nature areas <u>that will deliver the priorities for and priority</u> habitats and species identified in the Local Nature Recovery Strategy and incorporate appropriate beneficial biodiversity conservation features	To address comment BLP267, 221, 140, 124, 46, 47. Repeats the previous paragraph. BLP 125, 126, 127, 188, 267. To ensure the Local Plan is up to date.	Improved wording. REG19 representation. Factual.

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				In supporting text, under Impact Risk Zones: 20.17 Consideration of the extent of other potential likely significant effects upon <u>adverse impacts/effects on the integrity of</u> habitats sites, not included in the SSSI IRZ data, must be done in a bespoke manner when applying the Habitats Regulations. 20.21 Species prioritised in the Norfolk Biodiversity Action Plan or in the Norfolk or Suffolk Local Nature Recovery Strategies, should be included in the surveys where relevant, even if not legally protected, and will be given particular regard in the context of their conservation objectives. <u>This includes Key Species and all of the species included in habitat species assemblages.</u> 20.25 e) <u>site identified as a priority area within the Local Nature Recovery Strategy by being mapped as an ‘Area that Could Become of Particular Importance for Biodiversity’ and/or has a potential measure relating to the habitat mapped to it, habitat prioritised by the Norfolk or Suffolk Nature Local Nature Recovery Strategies</u> Update as LNRS is adopted Local Nature Recovery Strategy 20.27 Norfolk County Council and Suffolk County Council have been formally appointed by Government as responsible authorities for preparing a <u>prepared</u> Local Nature Recovery Strategies Strategy for their respective counties. This means that they will be working together to help improve wildlife habitats and reverse the decline of biodiversity across the region, working with local communities to develop a tailored nature recovery strategy for their areas. They will also work with other local planning authorities, the Broads Authority, Natural England, and a wide range of stakeholders and partners, including farming and landowner groups. The Strategies will focus on how to improve habitats and protect the natural environment across the region, with local approaches tailored to the specific circumstances of each area. Applications will be required to address the requirements <u>take account of the Local Nature Recovery Strategy</u>. The LNRS for both counties can be found here: Local Nature Recovery Strategy (LNRS) - Suffolk County Council and Local Nature Recovery Strategy - What a Local Nature Recovery Strategy is - Norfolk County Council. 20.28 d) Incorporation of wildlife friendly features such as swift bricks, bird and bee houses built into the fabric of buildings and hedgehog tunnels. In particular, an average of at least one integral bird box <u>(e.g. swift bricks which are a universal nest brick for small bird species)</u> per residential unit should be incorporated in the fabric of all new housing developments, with flats, hotels, care/nursing homes, commercial and public buildings considered on a case-by-case basis, <u>with reference to best-practice guidance such as BS 42021 or equivalent.</u>		

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MM22	SPC79, 80, 82	121	Policy PUBDM16: Biodiversity Net Gain	4. Exempted developments must achieve no net loss of biodiversity. They will be required to provide biodiversity enhancements (see the Natural Environment policy (PUBDM15)). Combine points 5 and 6 as follows the renumber: 5. The Biodiversity Net Gain will be provided on site with habitats functionally linked to the wider habitat network creating coherent ecological networks. 6. Where a proposal adequately demonstrates in the Biodiversity Gain plan that the DEFRA mitigation hierarchy has been followed and it is proven the required net gain cannot be achieved onsite within the site boundary, it must provide for the Biodiversity Offsetting of any habitat types to be lost alongside the percentage gain required in the following hierarchical manner. This will need to take into account the metric multiplier associated with provision off site: a) Offsite delivery: should prioritise contributing to nearby habitat recovery and creation strategies as identified within adopted mitigation strategies, strategic wildlife corridors, Local Nature Recovery Strategies (Norfolk and Suffolk) and, where relevant throughout the Broads which is a core area for nature and its recovery as guided by the Broads Nature Recovery Strategy 2024-29 and the relevant District Council's Green and Blue Infrastructure Strategy. b) Statutory Credits: as a last resort, and where it is agreed by the local planning authority no suitable alternatives exist, through the purchase of an appropriate amount of national biodiversity units / credits. 8: Biodiversity gain sites need to avoid the best and most versatile agricultural land and thoroughly justify using BMV land and show why land of other soil grades cannot be used.	To address comment BLP66 and BLP149, BLP161 and BLP44.	REG19 representation
MM23	SPC84, 85, 86, 87 ,88, 89A	124	Policy PUBDM17: Mitigating Recreational Impacts and supporting text	1. Any development which results in a net increase in residential development and / or overnight tourism accommodation will need to put in place adequate measures to avoid and mitigate potential adverse recreational impacts on the integrity of habitats sites which are identified within the following strategies and Zones of Influence (ZOI) <u>(or successor documents or subsequent iterations):</u> a) Norfolk Recreational disturbance Avoidance and Mitigation Strategy (Norfolk RAMS) <u>Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (' Norfolk GIRAMS' for short) (and any successors) – covers the whole of Norfolk.</u> b) <u>Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (Suffolk RAMS) (and any successors) - 13 km ZOI around the relevant Habitats Sites in the Suffolk Coast area.</u> 2. Planning permission will be granted subject to demonstrating no adverse effect on the integrity of Habitats Sites from recreational disturbance when considered alone or in combination. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitats Regulations at application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the application will be refused unless it passes the tests set out in Regulation 62, and any necessary compensatory measures will need to be secured. 3. <u>Proposed adequate measures must be delivered prior to occupation of development, in perpetuity and agreed with Natural England the Broads Authority. This will include the payment of a contribution towards the cost of mitigation measures at the protected sites, in line with 1a) and 1b) above.</u> 4. <u>For development over 50 units, the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of residents as an alternative to visiting the habitats sites is required. This will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace Standard.</u> Supporting text, 20.52	To address comment BLP130, 131, 132, 133, 43 and broken link.	REG19 representation, broken link.

MM Ref	Schedule of proposed changes Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
				Replace Suffolk RAMS link with Habitats Regulations Mitigation (RAMS) East Suffolk Council		
MM24	SPC90, 91 92, 93 and 251	126	Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	1. <u>Within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site:</u> •Any residential development proposal for that results in an increase in the level of overnight accommodation stays; - and •any non-residential development that by virtue of its scale and type may draw people from outside the above catchments; •and/or may generate unusual quantities of surface water; •and/or, by virtue of the processes undertaken, may contain unusual pollutants within surface water run-off; which is located within the catchments of The Broads Special Area of Conservation (SAC) and Broadland Ramsar site, must provide evidence to enable the Authority to conclude through a Habitats Regulations Assessment that the proposal will not have an adverse effect increase nutrient loads, such that it will have likely significant effects <u>adverse impacts/effects</u> on the integrity of sites. This can be demonstrated through nutrient neutrality. 2. Planning permission will be granted subject to demonstrating no adverse effects on the integrity of <u>the above-named</u> habitats sites from nutrient enrichment when considered alone or in combination. 3. The Norfolk Nutrient Calculator or the Natural England Nutrient Calculator <u>or successor calculators</u> will need to be <u>completed for all qualifying development proposals</u>. If the calculator concludes an impact from nutrients, these impacts will need to be mitigated using appropriate mitigation, likely secured through a local or national mitigation scheme. The Authority may<u>will</u> use legal agreements to ensure this mitigation is secured and in place and will be delivered.	To address comment BLP134, BLP135 and BLP136 and BLP140 as well as in case the calculators are updated.	REG19 representation and improved wording.
MM25	SPC96, 97, 99 and SPC100	128	Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development	1. Trees, woodlands and significant hedge and shrub masses and areas of scrub that make a positive landscape contribution and/or are of biodiversity/ecological importance will be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition or where there are exceptional and overriding benefits in accepting their loss, such as restoration of appropriate areas of fen. 5. Details of appropriate measures for the establishment and long-term maintenance of new tree planting will need to be provided. <u>It is expected that planting will follow current best practice, including BS 8545:2014 and other relevant British Standard guidance. Where new tree planting is proposed, an Aftercare and Maintenance Plan will need to be submitted covering a minimum of 5 years, including watering, mulching, staking and replacement of failed specimens. Where trees are lost within the establishment period, they must be replaced on a like-for-like basis in the next planting season.</u> 6. Where proposed development affects existing trees, woodlands or hedgerows, an Arboricultural Impact Assessment and Arboricultural Method Statement, in line with BS5837 – Trees in relation to design, demolition and construction – Recommendations <u>(or successor standard)</u>, will need to be submitted. This will detail all existing trees, woodlands and hedgerows, the associated tree constraints, implications of the proposed development and associated mitigation throughout the duration of the development to ensure that development works do not have a harmful impact. 7. ...and a suitable compensation strategy is provided <u>and agreed</u>.	To address comment BLP218 and 168 and to clarify requirements.	REG19 representation and improved wording.
MM26	SPC103	128	A new 20.71a) and then re-letter the rest of the bullet points at part 20.71.	20.71 <u>a) Choose native species. Some of the following criteria refer to species and tolerance to climate change and certain locations. There are native species that are more drought tolerant, hardy to changing conditions etc.</u>	To address comment BLP212a.	REG19 representation

MM Ref	Schedule of proposed changes Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
MM27	SPC104	132	Policy PUBDM20: Energy demand and performance of new buildings (including extensions) part 4.	Refer to section 8 of the policy as there is no part 10. 4. Applicants will be required to demonstrate what measures they have taken to achieve energy efficiency beyond the building regulation standards (see part 8 10 of this policy).	Correct wording.	Typo
MM28	SPC106, 107, 108, 109, 111, 112, 113	134	Policy PUBDM21: Renewable and low carbon energy	Amend title to: Policy PUBDM21: Renewable and low carbon energy <u>and battery storage</u> <u>Check numbering and reference to numbering within the policy is correct following these changes.</u> Throughout: Renewable/low carbon energy/<u>battery storage</u> proposals General principles 12c) 8 <u>The potential for impacts on birds and bats must be fully assessed and avoided and mitigated.</u> 12d) 9 <u>Information relating to the vehicle routing associated with construction activities for wind farms renewable and low carbon schemes must be provided. The proposed site access arrangements and access routes will be suitable for the construction phase, including the delivery of turbine components and construction materials, the operational phase, and the decommissioning of the proposed renewable and low carbon schemes wind farm;</u> Additional criteria for solar 10. 12. <u>If part 8 10 is passed, proposals needs to allow for continued agricultural use and/or biodiversity improvements around solar arrays which are supported by a biodiversity management plan.</u> 12. 14. <u>Proposals for onshore wind energy development are required to address each of the following criteria:</u> a) Justification for the turbine(s) being within the Broads; b) Information will be required that sets out alternative locations considered and why these were not pursued; c) The potential for impacts on birds and bats must be fully assessed and avoided and mitigated. This assessment needs <u>An assessment</u> to address the potential effect the colour of turbines can have on biodiversity; d) Information relating to the vehicle routing associated with construction activities for wind farms must be provided. The proposed site access arrangements and access routes will be suitable for the construction phase, including the delivery of turbine components and construction materials, the operational phase, and the decommissioning of the proposed wind farm; e) Landscape impact will be assessed using the Landscape Sensitivity Study (or successor document). The landscape must have capacity to accommodate the proposed development without unacceptable negative effects on its character and qualities likely to be affected; f) The scale of the turbine(s) must be justified; g) There must be no unacceptable adverse impact on local amenity as a result of noise, shadow flicker and visual intrusion or conflict with public safety. To protect visual amenity, there will be a presumption against development within a distance of six times the turbine blade tip height of residential properties unless it can be demonstrated that the presence of turbines would not have an unacceptable impact on living conditions; h) Potential interference to television and/or radio reception and information and telecommunications systems will be avoided and/or mitigated; i) The proposed wind turbines shall be located appropriate distances from highways, and railway lines to provide a safe topple distance. A minimum topple distance of the turbine height plus 10% is recommended; j) There must be no unacceptable adverse effects on sensitive or well used viewpoints;	To address comment BLP26 and 223	REG19 representation and improved wording.

MM Ref	Schedule of proposed changes Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
				k) There must be no unacceptable adverse impacts on the setting of heritage assets as well as views to and from the asset. 10. 13. Proposals for turbines or access routes located on peat soils are likely to not be supported. <u>Please see Policy PUBDM12: Peat soils.</u> <u>Supporting text - Under Battery storage</u> <u>To mitigate the risks to groundwater and surface water, as well as proposing appropriate measures to manage activities, applicants should consider whether BESS battery containers should be located away from vulnerable receptors. Applicants are encouraged to engage with Local Fire & Rescue Services to ensure issues of siting and location of BESS are dealt with before applications are made. Applicants should also refer to guidance published by The Department for Energy Security and Net Zero: Health and safety in grid scale electrical energy storage systems https://www.gov.uk/government/publications/grid-scale-electrical-energy-storage-systems-health-and-safety/health-and-safety-in-grid-scale-electrical-energy-storage-systems-accessible-webpage.</u>		
MM29	SPC115	147	First paragraph	22.30 When disposing of material, the Environment Agency needs to be contacted as a licence may be required. <u>Applicants should be aware that in accordance with the Environmental Permitting Regulations 2010 there is a need to obtain an Environmental Permit from the Environment Agency for flood risk activities for work or structures in, under, over or within 16m from a main river and from any flood defence structure or culvert. The works may fall under one or more of the following categories: Exemption, Exclusion, Standard Rules Permit, Bespoke permit. Anyone carrying out these activities without a permit where one is required is breaking the law.</u>	To address comment BLP21	REG19 representation
MM30	SPC116, SCP117, SCP118	147	Policy PUBDM25: Utilities infrastructure development	1a) <u>The need for the infrastructure being located in the Broads is fully justified and there are no suitable alternative locations outside the Broads protected landscape; The proposal has an essential role in the provision of a regional and national network</u> 1b) <u>For electricity infrastructure</u>, there is no opportunity for undergrounding or no suitable alternative locations outside the Broads protected landscape; 2. The operator will also be required to remove any <u>above ground</u> utilities equipment when it is redundant.	To address comment BLP156 and BLP237	REG19 representation
MM31	SPC119	152	Policy PUBDM27: Amenity, part 1	development will not be permitted if it would have an unacceptable impact on the amenity of existing or potential neighbouring properties or uses	To address comment BLP271	REG19 representation
MM32	SPC120	154	Policy PUBSP7: Tranquillity in the Broads	Add new part 4 to policy as follows: <u>Proposals will also need to consider and address impacts on dark skies, tranquillity and amenity of areas outside of the Broads as relevant.</u> Then in supporting text, refer to the Norfolk Coast National Landscape as an area of dark skies and tranquillity.	To address comment BLP1	REG19 representation
MM33	SPC121 and SCP122 and 123	155	Policy PUBDM28: Light Pollution, Dark Skies and Nocturnal Character	Add new part 4 to policy as follows (and then re-number rest of policy): 4. <u>Proposals will also need to consider and address impacts on dark skies of areas outside of the Broads as relevant.</u> 15 g) <u>Lighting uses the warmest colour with the lowest Correlated Colour Temperature [CCT] possible.</u> Then in supporting text, refer to the Norfolk Coast National Landscape as an area of dark skies under delivery and implementation. <u>Schemes will also need to ensure they do not affect the darkness of the Norfolk Coast National Landscape.</u>	To address comment BLP2 and BLP68	REG19 representation

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MM34	SPC124	162	Policy PUBSP8: Accessibility and Transport	1. Development will be well located and designed to maximise the use of sustainable forms of transport appropriate to its particular location. <u>Safe and suitable access is required for all.</u> 2 All new development is required to address the transport implications of that development. <u>The development impacts on the highway network need to be suitably assessed to prevent a severe cumulative impact on the highway network and/or unacceptable impacts on highway safety.</u> 6. Integration between all modes of transport will be sought to encourage the community and visitors to arrive and travel within the Broads via sustainable modes of transport. <u>Development should give priority first to pedestrian and cycle movements and second to public transport.</u>	To address comment BLP82	REG19 representation
MM35	SPC126, SCP127, SCP128	165	Policy PUBDM29: Transport, highways and access	3. In appropriate cases, either a Transport Assessment (TA) or Transport Statement (TS) will be required to demonstrate the potential impact of development proposals on the highway and how those impacts might be mitigated. <u>These assessments need to consider all modes of travel and ensure sustainable and active travel objectives are at the centre of the assessments.</u> Mitigation can take the form of infrastructure improvements and/or travel planning. 7. The provision of electric vehicle charging points is supported, subject to the design and location being appropriate. <u>Some of our districts set their own standards for electric vehicle charging and we will consider those as we assess applications.</u> 8. When determining development proposals, the Authority will safeguard public rights of way and ensure that future routes are not compromised. Development will not be acceptable where it would result in the severance or loss of an existing public route, <u>without a legally undertaken diversions under the relevant Act.</u> The Authority, in liaison with relevant partners, will consider proposals for suitable, safe and convenient diversions.	To address comment BLP70, BLP224, BLP272	REG19 representation
MM36	SPC129	171	Policy PUBDM30: Recreation facilities parking areas, part 3	iii) High quality design of surface, landscaping and boundary treatments including to address management of water (run off and avoiding pollution) <u>and integration of high-quality SuDS features</u>	To address comment BLP69	REG19 representation
MM37	SPC130 and 131	175	Policy PUBDM31: New employment development	Amend j) to say: <u>non-household developments that require significant non-domestic water use need to undertake early discussions with the relevant water company (Anglian Water or Essex & Suffolk Water) to ascertain water availability and feasibility of their scheme, and also demonstrate how they will reduce water demand.</u> l) The proposal does not use the best and most versatile agricultural land (grade 3a and above) (also see peat policy (PUBDM12)); <u>and</u> m) The proposal does not have an adverse impact on the viability or functionality of farms;and	To address comment BLP254 and typo	REG19 representation and typo.
MM38	SPC132A	178	Policy PUBDM32: Protecting general employment, part 1a	Add: The re-use for employment uses in the first instance or, subject to demonstrating (through a statement to accompany planning applications, see supporting text) that such uses are unviable. <u>Marketing evidence will need to be provided which demonstrates that the premises have been marketed for a sustained period of 12 months.</u>	Bring 12 months marketing into relevant policies in a similar way to Policy PUBSSPUBS: Pubs network for consistency. Currently the 12-month period is in supporting text.	Effective – the 12 months period is not in policy currently.

MM Ref	Schedule of proposed changes Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
MM39	SPC133 and 132B	186	Policy PUBDM34: Development on waterside sites in employment or commercial use, including boatyards	5. Proposals for a redevelopment of a waterside site which will result in a significant change to the use of the site will only be permitted subject to b, c, d, and e above and provided that: i) It is demonstrated that the existing use is not viable. <u>Marketing evidence will need to be provided which demonstrates that the premises have been marketed for a sustained period of 12 months.</u> 8. <u>Where</u> storage of potentially polluting material, for example oils, is proposed, <u>this will be</u> and implemented in such a way that pollution is avoided, including during flood events	Bring 12 months marketing into relevant policies in a similar way to Policy PUBSSPUBS: Pubs network for consistency. Currently the 12-month period is in supporting text and better wording.	Effective – the 12 months period is not in policy currently and better wording.
MM40	SPC134	191	Paragraph under reasoned justification	<u>Proposals for retail and main town centre uses should be considered in the context of the joint approach established across both the Broads Authority and relevant district council Local Plans.</u>	To address comment BLP229	REG19 representation
MM41	SPC135A	198	Policy PUBDM37: Holiday/tourism accommodation – new provision and retention and supporting text	Clarify that when this refers to marketing for 12 months, it is about putting the property up for sale. New footnote to part 3 and to part 4 of the policy to say: <u>'Marketed' means put up for sale.</u> Under delivery and implementation in supporting text: 58.19 Evidence of a robust marketing campaign <u>(i.e. putting the property/site up for sale)</u> of at least 12 months will be required that clearly demonstrates that there is no market demand for the premises - see the Marketing and Viability Guide produced by the Broads Authority for more details.	Whilst determining a recent planning application, it has become apparent that one can <u>market</u> tourist accommodation in terms of advertising it for rent/use as well as <u>market</u> it for sale. The change would seek to clarify things.	None – this is clarifying terminology.
MM42	SPC138	201	Policy PUBSP13: Navigable water space part 4	Include reference to the Waterways Management Strategy Action Plan (or successor document)	To address comment BLP182	REG19 representation
MM43	SPC140, 142, 143, 144, 145, 146, 147, 148, 149, 150	219	Section 30.1 and policy wording and supporting text to PUBSP15: Residential development	Update to reflect any monitoring period that has passed prior to adopting of the Plan. And in section 30.1 para 2 add reference to sites with permission granted prior to 2021 but not yet developed are excluded from the housing numbers set out in the plan to be planned for over the plan period but will nevertheless make a contribution to housing supply: 30.2 The need to be addressed in the Local Plan is 1,077 dwellings. Please note that completions and permissions granted since April 2021 will count towards the need; as set out in the supporting text to PUBSP15, taking permissions and completions into account, the residual housing need is 1,034 <u>1,009</u> dwellings. <u>Please also note that there are some dwellings that have been permitted prior to 2021, with extant planning permission and not yet developed. These are excluded from the housing numbers set out in the plan to be planned for over the plan period but will nevertheless make a contribution to housing supply.</u> Add site names to para 3 of section 301. 30.3 No sites for residential dwellings are allocated in the Local Plan. Please note that PUBTHU1 <u>at Hedera House, Thurne</u> (16 dwellings) and PUBOUL2 <u>Former Pegasus Site, Oulton Broad</u> (76 dwellings) already have planning permission and were not assessed in the HELAA but will still be included in the Local Plan until they are built out. The Utilities Site, <u>Norwich</u> (PUBNOR1) is allocated for mixed use, with housing being a potential option. PUBSP15 Meeting the Objectively Assessed Gypsy and Traveller and Travelling Show People Need 4. The Authority will endeavour to enable Gypsy and Traveller pitch delivery to meet its assessed need throughout the Plan period (2021 to 2042) which is a 5-Year need for the Broads part of Great Yarmouth is for <u>of</u> 10 pitches. Future (beyond 6 years) need for the Broads part of Great Yarmouth borough is for 4 pitches.	Typo, to ensure the Local Plan is up to date, to address comment BLP49, error in calculations, some missing text	Typo, factual, REG19 representation,

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				Amend so total on table on page 221 is divided by 21 rather than 22 years. <table><tr><th>District</th><th>Objectively Assessed Housing Need</th><th>Annual average from 2021 to 2042 (22 21 years)</th></tr><tr><td>Broadland</td><td>316</td><td>14.37 15.05</td></tr><tr><td>North Norfolk</td><td>293</td><td>13.32 13.95</td></tr><tr><td>Norwich</td><td>17</td><td>0.77 0.81</td></tr><tr><td>South Norfolk</td><td>204</td><td>9.27 9.71</td></tr><tr><td>Great Yarmouth</td><td>177</td><td>8.05 8.43</td></tr><tr><td>East Suffolk</td><td>70</td><td>3.18 3.33</td></tr><tr><td>Total:</td><td>1,077</td><td>49.51 51.29</td></tr></table> Page 222, a new 30.10 <u>The need for residential caravans (non-Gypsy and Traveller) was identified as 12 in the Broads part of Great Yarmouth.</u> And then a footnote to this study: https://www.broads-authority.gov.uk/data/assets/pdf_file/0019/132553/Great-Yarmouth-and-Broads-Authority-GTRCAA-Report-June-2022.pdf Page 223 30.13.1 Completions and permissions between April 2021 and April 2025 2026 as well as allocations in this Local Plan (that have not commenced). This shows a residual need of 1,034 1,099 dwellings. To confirm, the allocations at Thurne and Oulton Broads for residential dwellings that are later in this Local Plan already have planning permission (prior to April 2021) and are therefore not included in the table below. Policy PUBNOR1 (Utilities Site) is also not included in the table below as this is allocated for mixed use development that could include housing. These figures have been checked to ensure that a permission that has been completed is not in the table twice. <table><tr><th>District</th><th>Completions</th><th>Permitted</th><th>Allocations</th><th>Total</th></tr><tr><td>Broadland</td><td>0-11</td><td>5-4</td><td>0</td><td>5-15</td></tr><tr><td>North Norfolk</td><td>5-5</td><td>4-4</td><td>0</td><td>9</td></tr><tr><td>Norwich</td><td>0</td><td>0</td><td>0</td><td>0</td></tr><tr><td>South Norfolk</td><td>7-8</td><td>1</td><td>0</td><td>8-9</td></tr><tr><td>Great Yarmouth</td><td>1-22</td><td>12-0</td><td>0</td><td>13-22</td></tr><tr><td>East Suffolk</td><td>3-6</td><td>5-7</td><td>0</td><td>8-13</td></tr><tr><td>Totals</td><td>16-52</td><td>27-16</td><td>0</td><td>43-68</td></tr></table> 30.13.2 Three call for sites This <u>The</u> Preferred Options version of the Local Plan 30.13.3 - cooperating with Neighbouring Districts Refer to the updated NSPF 2025, including the agreements	District	Objectively Assessed Housing Need	Annual average from 2021 to 2042 (22 21 years)	Broadland	316	14.37 15.05	North Norfolk	293	13.32 13.95	Norwich	17	0.77 0.81	South Norfolk	204	9.27 9.71	Great Yarmouth	177	8.05 8.43	East Suffolk	70	3.18 3.33	Total:	1,077	49.51 51.29	District	Completions	Permitted	Allocations	Total	Broadland	0-11	5-4	0	5-15	North Norfolk	5-5	4-4	0	9	Norwich	0	0	0	0	South Norfolk	7-8	1	0	8-9	Great Yarmouth	1-22	12-0	0	13-22	East Suffolk	3-6	5-7	0	8-13	Totals	16-52	27-16	0	43-68		
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				It is important to note that the need for the Broads is part of the need for the districts, and not additional to. It should be noted that the Norfolk Strategic Planning Framework - September 2025 Norfolk Strategic Planning Framework¹²⁹ includes these two agreements: i. Agreement 10 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities. i. Agreement 11 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan. Footnote 129: At the time of writing, the NSPF was being updated, but the agreements were still included. As and when the NSPF is endorsed, this section will need updating. 30.13.4 Windfall Update text to reflect adoption version of the Local Plan. a) The Authority does not include future windfall in its housing supply calculations. This is because the numbers are so low that even a variation of up to 5 is large percentage of housing permitted each year. The Authority does and will continue to approve planning applications for residential dwellings that align with local and national policy. In terms of completions up until the adoption of the Local Plan, given that there is going to be at least one (maybe two) more monitoring period before the Local Plan is adopted, there are likely to be some more completions and permissions that can be subtracted from the residual need of 1,034 dwellings. New paragraph above 'Map 3 Key Diagram' <u>For residential caravans</u> <u>Again, despite three calls for sites, no suitable sites came forward for allocation. There are 4 areas with development boundaries within the Broads where such caravans would be appropriate, subject to details, which could result in more caravans over the plan period.</u>		
MM44	SPC151, 152, 153, 154	231	Supporting text	Footnote 136: It is important to note that the part of North Norfolk that is in the Broads is a designated rural area. Whilst current North Norfolk District Council (NNDC) policy is not to introduce a lower threshold, the Council may do this in future. At the time of writing this Local Plan NNDC were reviewing their Local Plan. Policy HOU2 of North Norfolk Local Plan (adopted December 2025) sets out affordable housing for sites of 6-9 dwellings or sites larger than 0.2ha in the Designated Rural Area. New paragraph: <u>Older person’s housing</u> <u>The affordable housing policy also applies to schemes for older person’s housing. The standards of our districts will be used. Any schemes that are considered not viable will need to meet the policy requirements set out in the policy (mainly section 5 of the policy).</u> Add to end of paragraph above ‘Assessing Viability’. <u>There are some SPDs that have been produced by some of our District Councils that relate to affordable housing and these will be relevant and will help determine housing applications:</u>	To ensure Local Plan is up to date. To address comments BLP152 and 45. To address typos.	Factual, REG19 representation and typo.

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				- East Suffolk: https://www.eastsuffolk.gov.uk/sites/default/files/2026-05/Affordable%20Housing%20Supplementary%20Planning%20Document.pdf - Norwich City Council: https://www.norwich.gov.uk/sites/default/files/2026-07/Affordable-Housing-SPD-Adopted-2026.pdf Top of page 231, para 30.31 This is because the opportunities for schemes of 10 9+ dwelling are significantly diminished by the rural character of the area and the environmental constraints. However, there is a clear need for affordable housing and all possible reasonable measures should be taken to address the deficiency. To be clear, the policy goes further than the NPPF by requiring off-site contributions to affordable housing for schemes of fewer than 9 or fewer dwellings.		
MM45	SPC156	236	Flood risk paragraph	30.69 Any Flood Risk Assessment for such accommodation (<u>temporary or permanent</u>) would need to show how the safety of the occupants would be managed and ensured, considering the transient nature of the site and its potential effects on the occupant's ability to receive flood warnings.	To address comment BLP18	REG19 representation
MM46	SPC157 and SCP158	241	PUBMD46: New residential moorings	9: Conditions will be used to restrict the number, scale and size of boats using the residential moorings. A management plan for the site and a register of those who live on boats will be required and will be covered by a planning condition imposed on any planning permission granted. <u>A condition will also be used to ensure the vessel will be the sole and principal residence of the occupier.</u> Supporting text page 246: Definition of a residential mooring and what can moor there. 30.82 Amend definition as follows; For the purposes of this policy, a 'residential mooring' is a mooring where someone lives aboard a vessel <u>as their sole and principal residence and</u> the vessel is capable of navigation, where the vessel is used as the main residence, and where the vessel is moored in one location for more than 28 days in a year. The vessel may occasionally/periodically go cruising and return to base.	Related to comment BLP38a	REG19 representation
MM47	SPC159A and 160	248	Policy PUBDM47: Permanent and temporary dwellings for rural enterprise workers	5b <u>Marketing evidence is provided which demonstrates that the premises have been marketed for a sustained period of 12 months.</u> In part 3, footnote 2 is missing. Add footnote to say: <u>The NPPG (Use of planning conditions - GOV.UK (www.gov.uk)) says 'It will rarely be justifiable to grant a second temporary permission (except in cases where changing circumstances provide a clear rationale, such as temporary classrooms and other school facilities). Further permissions can normally be granted permanently or refused if there is clear justification for doing so. There is no presumption that a temporary grant of planning permission will then be granted permanently'.</u>	Bring 12 months marketing into relevant policies in a similar way to Policy PUBSSPUBS: Pubs network for consistency. Currently the 12-month period is in supporting text and also missing footnote.	Effective – the 12 months period is not in policy currently. And missing footnote.
MM48	SPC162	253	Add to delivery and implementation	<u>Some types of accommodation that fall under this policy may be required to provide affordable housing. The standards of our districts will be used. Any schemes that are considered not viable will need to meet the policy requirements set out in the policy (mainly section 5 of PUBDM43).</u> 30.109 Of relevance to specialist housing and housing for older people are the following policies of the Local Plan: <u>The adaptable and accessible design elements of PUBDM52 may be of relevance.</u>	To address comment BLP73 and 152	REG19 representation
MM49	SPC164	257	Policy PUBDM50: Replacement dwellings	New point 5: <u>Replacement dwellings will have to provide a site-specific flood risk assessment demonstrates clearly that the proposed layout, design, and mitigation measures would ensure that occupiers and users would remain safe and operable from all sources of current and future flood risk for the lifetime of the development without increasing flood risk elsewhere.</u>	To address comment BLP199	REG19 representation
MM50	SPC165	259	First paragraph	Add this to supporting text: <u>where demolition and waste removal is found to be justified, the waste must be treated at a suitably permitted site</u>	To address comment BLP30	REG19 representation

MM Ref	Schedule of proposed changes Ref	Page	Part of Local Plan	Proposed change	Reason	Type of change
MM51	SPC166	259	Policy PUBDM51: Custom/self-build, unsold plots part.	Could make it clearer as follows: ... <u>then</u> these <u>unsold</u> plots may be built out as conventional market housing subject to detailed permission being secured and the Authority being satisfied that e) and f) and g) have been satisfactorily concluded.	To address comment BLP75	REG19 representation
MM52	SPC169	263	Policy PUBDM52: Design	Amend 4f) provision for the <u>secure</u> storage of bicycles	To address comment BLP76	REG19 representation
MM53	SPC173	271	Policy PUBDM52A: Proposals for residential extensions, PART 1	Add this text to the policy: new part <u>e) consider and address flood risk issues in line with the flood risk section of the Local Plan and National Policy.</u>	To address comment BLP20	REG19 representation
MM54	SPC174	272	Policy PUBDM53: Source of heating	Add a new part 5 to policy that says: <u>where heat pumps are proposed (or the overall system is to be heat pump ready), the type of heat pump (ground, air, water source) and any in combination effects as a result of other heat pumps nearby needs to be carefully considered. Water source heat pumps need to ensure no damage to the river or the river ecology. Where technically and environmentally viable, air source heat pumps should be the preferred option over water source heat pumps.</u>	To address comment BLP11	REG19 representation
MM55	SPC175	272	Supporting text to PUBDM52A, located above Policy PUBDM53	Add this text to the reasoned justification: <u>In terms of flood risk, where extensions fall under householder development or small non-residential extensions (with a footprint of less than 250m2), applicants should refer to National Flood Risk Standing advice for guidance and recommendations on Flood Resilience measures. Where the extensions are greater than 250 m2, the application may require a site-specific flood risk assessment. For further information, refer to Flood risk assessments: applying for planning permission - GOV.UK.</u>	To address comment BLP20	REG19 representation
MM56	SPC176 and 177	273	Supporting text to PUBDM53, located above Policy PUBDM54	Add supporting text that says: <u>The potential for in-combination effects from multiple water source heat pumps (WSHPs) presents a genuine risk of damaging river ecology and WFD status, and applications may therefore be refused on these grounds. Even a single WSHP has the potential to harm river ecology and WFD status and must be carefully assessed before approval. There may also be a need for abstraction licence, permit and engage with the Environment Agency.</u> <u>Closed loop ground source heating and cooling systems: exemption conditions (https://www.gov.uk/guidance/closed-loop-ground-source-heating-and-cooling-systems-exemption-conditions) may be of relevance to schemes.</u>	To address comment BLP11 and 27	REG19 representation
MM57	SPC178	276	Policy PUBDM56 - Electric Vehicle Charging Points	Amend PUBDM56 to include wording as follows. These will come after point 1 so the rest of the policy needs to be renumbered. <u>Design</u> <u>Proposals where vehicle parking is incorporated will include appropriate provision for electric vehicle charging points, taking account of the development type and size, the level of parking provision and its context and location. Electric vehicle parking spaces should be counted as part of the total parking provision, and bays should be clearly marked on a layout plan. The delivery of charge points should include parking space provision for people with disabilities. Proposals should specify the type of charge points to be installed.</u> <u>Management</u> <u>For developments of over 10 dwellings or larger than 0.5 hectares, details of how the required electric vehicle charging points will be allocated, located and managed, including the mechanism/procedure for taking payments, will be detailed in the relevant Transport Assessment or Transport Statement.</u> <u>Sub-station capacity</u> <u>Developments with dedicated electricity sub-stations should specify the sub-station to a sufficient capacity to fully cater for all electric vehicle charging requirements.</u>	To address comment BLP224	REG19 representation

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MM58	SPC180 and 182	272	PUBDM56 supporting text.	31.49 EV charging points for vehicles on land and water are generally welcomed and supported in the Broads, subject to appropriate location, lighting, and design. <u>Approved Document S sets out the building regulations in England for the installation of electric vehicle charge points or cable routes and this policy does not change that.</u> 31.55 If, during the production of this Local Plan, regulations are put in place that address the locations of charging points, the policy may not be required.	To address comment BLP224 and to make sure Local Plan up to date.	Factual and REG19 representation.
MM59	SPC181	278	Policy PUBDM57: Fibre to the Premises (FTTP)	NNDC Inspector deleted it and replaced with HC5. This may need to follow that. Potentially amend policy as per North Norfolk Local Plan. <i>On further initial discussions with the Planning Inspector, it is proposed to delete the policy.</i>	To address comment BLP151 <i>Following discussions with the Inspectors, this policy is likely to be ineffective when read alongside Building Regulations and so is proposed to be deleted.</i>	REG19 representation <i>Discussion with Planning Inspector examining the Local Plan.</i>
MM60	SPC182A	282	Policy PUBDM58: Visitor and community facilities and services, part 1b	<u>Marketing evidence is provided which demonstrates that the premises have been marketed for a sustained period of 12 months.</u>	Bring 12 months marketing into relevant policies in a similar way to Policy PUBSSPUBS: Pubs network for consistency. Currently the 12-month period is in supporting text.	Effective – the 12 months period is not in policy currently.
MM61	SPC813, 184, 185, 186, 187, 188	287	PUBDM59 supporting text.	33.5 <u>In terms of part 2b of the policy</u> , working with health colleagues, we have produced a small sites checklist to reflect smaller development...' 33.5 ...although if the threshold for <u>undertaking the Planning in Health</u> Protocol is met, then that will take precedence. 33.7 All new housing, commercial and recreational development are required to produce a statement saying how their proposal addresses <u>supports and promotes</u> : After 33.7 Add title: <u>Further Guidance</u>	To address comment BLP78 and 79 and to ensure Local Plan is up to date.	Factual and REG19 representation.
MM62	SPC251	294	Third paragraph	35.11 The policy also seeks to ensure that conversion works aim to maintain and enhance, restore, or add to biodiversity. If a proposal is considered in the context of this policy to potentially have a likely significant effect <u>adverse impacts/effects on</u> alone or in combination with other plans and projects on <u>the integrity of a habitats site</u> , it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken.	To address comment BLP140	REG19 representation
MM63	SPC190, 191 and 192, SPC193, 194, 195	312	Policy PUBCAN1 - Cantley Sugar Factory	Policy part 2c) Protects or enhances the amenity of nearby residents <u>(see Policy PUBDM27: Amenity)</u> ; Policy part 2d) Does not negatively impact on the neighbouring pub (The Reedcutter which is covered in policy PUBSSPUBS) <u>(see Policy PUBDM27: Amenity)</u> ; Policy par 2k): Add a new footnote as follows: <u>This refers to footpaths 20, 22 and 19 (the part that is along the river) as well as any vehicular access rights from Station Road along the track to the pub/staithe/slipway. The Authority notes that at the time of writing, British Sugar are seeking the diversion of part of footpath 19 that passes through the factory.</u>	To address comment BLP260, 262, 263, 264, 265 and 248	REG19 representation

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				Policy part 2n): Uses water efficiently, with potential for water re-use (<u>see Policy PUBDM55: Non-residential development and BREEAM</u>); Page 314 39.3 The works are a major emitter of carbon dioxide within the Broads, and the heavy road freight associated with the works has negative impacts on residents' amenity, and on highway safety and capacity. The policy recognises that Cantley is a significant emitter of carbon dioxide in the area and seeks betterment and that schemes should be designed with minimal carbon dioxide emissions in mind. It is recognised that, in recent years, significant investments have been made to the existing plant at Cantley Sugar Factory to reduce carbon emissions through the installation of a new Combined Heat and Power (CHP) plant, which has enabled the use of natural gas and the decommissioning of previous coal boiler. Page 314 39.4 Cantley Sugar factory receives substantial amounts of raw material from local farms, requiring substantial amounts of HGV movements <u>during the Campaign period. Where the business is required to transition to zero-emission vehicles by law in future, depending on the type of vehicles and use of technology, the provision of appropriate on-site infrastructure may be necessary.</u> There will be required by law to move to zero-emission vehicles, potentially Battery Electric or Hydrogen powered. As these vehicles may have shorter range than existing diesel vehicles, new refuelling equipment may be needed at the site. Footnote 169 169 <u>For example, they have installed a system to use waste condensate water in the cooling processes in the factory. More information can be found here: Improving Processes to Save Water at British Sugar Case study</u>		
MM64	SPC198, 199	320	Policy PUBDIT1: Maltings Meadow Sports Ground, Ditchingham, 2g	2g: an Exception Test may be needed as part of <u>any</u> planning application 5: Amend as follows: The site lies on a safeguarded mineral resource (sand and gravel) and any development proposals will need to address this (see Norfolk County Council's <u>Minerals and Waste Local Plan Policy MP11 – mineral safeguarding areas and mineral consultation areas</u> Core Strategy Policy CS16 – Safeguarding mineral and waste sites and mineral resources or successor policy/document).	Typo and to address comment BLP34	REG19 representation and typo.
MM65	SPC197	318	Last paragraph	40.16 It is anticipated that the moorings will be in place after 2025 , by 2030.	Plan will be adopted after 2025	Factual update
MM66	SPC200 and 201	323	Policy PUBFLE1: Broadland Sports Club	Policy part 2, iv) an Exception Test may be needed as part of <u>any</u> planning application Add to supporting text under delivery and implementation: <u>Please note that there is a dwelling that is linked to the Broadland Sports Club which cannot be sold off separately - the area which this policy covers also includes that dwelling and its grounds.</u>	To explain the area to which the policy applies and typo	Factual update and typo
MM67	SPC203	327	First paragraph	44.8 It is anticipated that the moorings will be in place after 2025 , by 2030.	Plan will be adopted after 2025	Factual update
MM68	SPC207 and 208	342	Policy PUBHOV3: Brownfield land off Station Road, Hoveton	2i) Proposals to provide car parking <u>ancillary to a proposed use of the site</u> must be thoroughly justified and if the need is proven, must be well designed Clarify which building is which using an annotated map/plan.	To clarify that this located site, between the station and town centre, overlooking the river, that is part of the town centre, could have some car parking ancillary to the proposed use and to provide clarity.	Improved wording and clarity

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MM69	SPC210	347	Policy PUBHOV5 Hoveton Village Centre and areas adjacent to the Village Centre, part 5	Add text to HOV5 that refers to decisions and monitoring will continue to be coordinated across BA/NNDC. 5. Proposals in Hoveton Village Centre will be considered in the context of the entire village centre and the policies of the relevant North Norfolk District Council Development Plan so that retail and main town centre uses proposals address the village centre in its entirety. <u>Decisions and monitoring will continue to be coordinated across BA/NNDC area and authorities.</u>	To address comment BLP228	REG19 representation
MM70	SPC214	353	Policy PUBNOR1: Utilities Site, 2d	design guide <u>SPD</u>	To ensure the Local Plan is up to date.	Factual update
MM71	SPC216	359	Policy PUBORM1: Ormesby waterworks	1. Ormesby water treatment works will be protected from development which adversely affects the proper functioning of the waterworks and its contribution to the landscape and visual amenity of the locality. 2. Development reasonably required for the operation of the water treatment works, and the operator's statutory duties as a water supply undertaker, will be supported where: a) it is designed to make a positive contribution to <u>avoid detrimental impact</u> on the <u>character and quality of the local landscape</u> or to minimise any negative visual impact, particularly when viewed from Ormesby, Ormesby Little, and Rollesby Broads.	To address comment BLP165	REG19 representation
MM72	SPC17 and 18	363	PUBOUL2 supporting text	50.4 Please note that this allocation received planning permission in 2012 2014 for 76 market dwellings, office accommodation, and moorings. 50.17 It is anticipated that the dwellings <u>permitted as part of the extant planning permission</u> will be delivered as follows: End 2028: 15 End 2029: 15 After 2030: 46	To address comment BLP85	REG19 representation
MM73	SPC219	364	Policy PUBOUL3: Oulton Broad District Shopping Centre, part 6	an Exception Test may be needed as part of <u>any</u> planning application	Typo	Typo
MM74	SPC221	368	Policy PUBPHRB1: Bridge Area, 6bii	an Exception Test may be needed as part of <u>any</u> planning application	Typo	Typo
MM75	SPC223 and 224	374	Policy PUBSOM1: Somerleyton Marina Residential Moorings, 1a	1a) site singular rather than plural. Refer to the permission for ten resi moorings and talk about how a permission for an extra five will be cumulated to require 1 pupil place: 53.18 Please note that Suffolk County Council have indicated that the 15 residential moorings are likely to generate 1 extra pupil, and they would request developer contributions for the improvement and enhancement (including increasing the pupil admission number) of primary school provision serving the development, in line with the SCC Developers Guide to Infrastructure. <u>At the time of writing, ten residential moorings had been permitted – so any future application for the remaining 5 residential moorings would mean that the cumulative impact of the 15 residential moorings would require this contribution.</u>	Typo and factual update.	Typo and factual update.
MM76	SPC227	381	Last paragraph	Delete reference to 2025 54.10 The residential moorings will <u>likely</u> be delivered after 2025 and likely by 2032.	Plan will be adopted after 2025	Factual update

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MM77	SPC228, 229 and SCP30	390	Policy PUBTHU1: Tourism development at Hedera House, Thurne	1 iv) Demonstration of a suitable and appropriate foul water disposal method that is in conformity with Policy PUBDM5 that there is adequate capacity in the water recycling centre (sewage treatment works) and the foul sewerage network to serve the proposed development, and that proposals demonstrate they will not have an adverse impact on surface or ground water in terms of quality and quantity; 1 v) A sequential test may be required, and development will be sequentially location <u>located</u> on site to reflect the flood risk. 1 x) Proposals must ensure no adverse effects on the conservation objectives and qualifying features of the nearby <u>Broadland SPA and associated</u> SSSI. Under constraints and features: Ludham Walton Hall Water Recycling Centre capacity issues.	To address comment BLP247 and BLP44	REG19 representation and correct a typo
MM78	SPC238, 239, 240, 241	418	Policy PUBSSA47: Road schemes on the Acle Straight (A47T)	Supporting text changes as follows: Background to the A47 and Acle Straight, para 58.62 New Anglia Local Enterprise Partnership's Economic Strategy considers this route of strategic importance. Page 419, 58.64 – delete Over the last five years (to end October 2023) there were 74 collisions recorded on the Acle Straight, of which 3 were fatal and 16 resulted in serious injuries. National Highways identified in their Route Strategy for the East of England that the Acle Straight has an iRAP star rating of 1189 (2020). The higher the rating, the safer the road. Page 419, 58.68 a new <u>walking and cycling</u> route alongside a dualled road, Surface water, 58.91, part a Surface water disposal location, prioritised in the following order: <u>reuse and harvesting of water</u>, disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration.	To update, to reflect advice from Planning Inspector, to clarify and to address comment BLP87.	Factual, improved wording and REG19 representation.
MM79	SPC244	449	Appendix 7: Flood Risk Assessment Tick Sheet	Replace tick sheet with: https://www.broads-authority.gov.uk/data/assets/pdf_file/0021/217740/APPENDIX-F-November-2025-Flood-Risk-tick-sheet.pdf .	To address comment BLP19	REG19 representation
MM80	SPC245	455	Appendix 11: Update housing and resi moorings trajectories	To reflect monitoring periods that have gone by before adoption.	To ensure the Local Plan is up to date.	Factual update
MM81	SPC246, 247, 248	453	Appendix 12	First paragraph A12.1 This checklist is based on the Norfolk <u>Planning in</u> Health Protocol checklist but amended to be more applicable to the types and scale of schemes we see in the Broads. It is a self-assessment checklist that will be required as part of relevant applications. A12.2 The checklist is split into two – the first part is to be filled in for all new housing, commercial and recreational development (that does not meet the threshold relating to the Norfolk and Waveney Health Protocol). As well as filling out the first part of the checklist, schemes for one or more dwelling(s), but less than 50 dwellings, need to fill out the second part.	To address comment BLP88, 89 and 90	REG19 representation

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				<u>When to use this checklist</u> Part 1: must be completed for all new housing, commercial, and recreational developments (unless the Planning in Health Protocol applies). Part 2: in addition, developments of 1–49 dwellings must also complete Part 2. Third paragraph <u>If any of the above apply, use the Planning in Health Protocol (see Policy PUBDM59: Designing places for healthy lives).</u> A12.3 You can get some additional guidance from these two resources: <u>Guidance and resources:</u> Sport England offers guidance on designing and adapting where we live to encourage activity in our everyday lives (Sport England, Active Design Sport England) a) Building for a Healthy Life (2020). b) Housing and health needs assessment (2024) - Healthy Suffolk Exemptions A12.4 This checklist does not apply if any of these criteria are met: <u>This checklist does not apply to:</u> a) Developments of over 50 dwellings b) developments of less than 50 dwellings but which are deemed to impact health services potentially significantly c) development that includes care homes, housing for the elderly, or student accommodation d) development that involves the significant loss of public open space A12.5 If the above criteria are met, the Norfolk and Waveney Health Protocol shall apply (see Policy PUBDM59: Designing places for healthy lives in this Local Plan). A12.6 Some of the questions in the checklist also have related policy requirements. your scheme may address those issues. Your response <u>Where this is the case, your application may include the cross refer to relevant policies in this Local Plan (or indeed Neighbourhood Plan) and detail how your proposal address meets their requirements.</u>		