

Local Plan for the Broads 2021–2042

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Examination Webpage:

<https://www.broads-authority.gov.uk/planning/planning-policies/local-plan-for-the-broads/local-plan-for-the-broads-review>

INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

1. We are L Fleming and S Edwards, chartered Town Planners appointed by the Secretary of State to examine the soundness of the Local Plan for the Broads: Review Plan period 2021 to 2042 Publication (Regulation 19) consultation document (A1A) (the Plan), which was published for consultation in September 2025 and for re-consultation in November 2025, and whether it meets the requirements of the Planning and Compulsory Purchase Act 2004 (the Act) and associated Regulations.
2. The examination of the Plan commenced with our appointment and to date we have undertaken an initial reading of the Plan. We have now identified the matters and issues and pose the key questions (MIQs) for the examination. These are set out in this document.
3. Please read and be familiar with the accompanying Inspectors Guidance Note which sets out important details of the organisation and conduct of the examination and the hearings, and regarding the preparation of hearing statements. We shall assume that the Guidance Note has been read by participants at the hearings.
4. In order to assess the legal compliance and soundness of the Plan, we pose many questions in this document. It is our hope that many of the questions set out in this document will be answered in written statements. Consequently, we will not need to consider all of them further at the hearings as we would have sufficient information, enabling us to focus on the outstanding matters. It is important to note that written representations and oral representations carry the same weight, and we will have equal regard to views put at a hearing or in writing.
5. The hearings will take place from **Tuesday 2 February to Thursday 4 February 2027** and from **Tuesday 9 February to Thursday 11 February 2027**. Friday 5 February and Friday 12 February are held as reserve days

should more hearing time be needed and they are unlikely to be required. The hearing sessions will be held in person without livestream at **The Broads Authority Offices, Yare House, 62-64 Thorpe Road, Norwich NR1 1RY**.

6. Whilst we have published a draft hearings programme alongside these MIQs, the scope and timing of specific hearing sessions will be confirmed via the examination website. Representors should only address those MIQs relevant to their original representations.
7. Any reply to our questions should be in accordance with the guidelines set out in the Guidance Note and should be sent electronically to the Programme Officer by **5.00 pm on Monday 7 December 2026**. It is expected that hearing statements will only be submitted electronically.
8. Only those who have made representations seeking to change the Plan have a right to appear before, and be heard by, the Inspectors. If you have a right to be heard, and you wish to exercise that right, you should contact the Programme Officer by **5.00 pm on Monday 2 November 2026** indicating the appropriate Matter(s) and the session(s) you wish to attend as set out in the draft hearing programme. You need to do this regardless of what you may have indicated on the representation form. Please note that if you do not contact the Programme Officer by that date, it will be assumed that you do not wish to appear and be heard, and you will not be listed as a participant.
9. The Plan is being examined under the National Planning Policy Framework December 2024 (NPPF) because it was submitted for examination on 16 February 2026, and both of the Regulation 19 consultations were undertaken after 12 March 2025. Please note that all references to the NPPF relate to the version of that document published in December 2024. However, a new NPPF was published on 17 August 2026 and clearly has effect for development management purposes now. It would therefore need to be applied alongside the Plan once adopted. The Authority has therefore been asked to produce a brief topic paper considering the implications of the new NPPF. This will be made available on the examination website shortly.

Main Modifications, Additional Modifications and Submission Policies Map Changes

10. The Authority has already asked that we recommend any Main Modifications (MMs) necessary to make the Plan sound or legally compliant (G1). In response to the representations or changes in circumstances, the Authority has also proposed a number of MMs to the Plan for our consideration (H3). These will be discussed as appropriate in relevant hearing sessions.
11. Many of the detailed questions below are asked because, following our initial review of the Plan, it is our initial opinion that even in light of the MMs proposed in H3, other MMs will be necessary to make a number of the Plan's policies

sound or legally compliant. Paragraph 16 d) of the NPPF states “Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” and many of our questions are seeking to ensure the Plan’s policies meet this requirement.

12. The Authority is therefore encouraged to suggest further MMs in response to these MIQs. Where the Authority proposes any new MMs to the Plan in its hearing statements in response to these MIQs, we also ask that these are clearly identifiable with an explanation of why they are considered necessary for legal compliance or soundness reasons. We also ask that where new MMs are suggested in the Authority’s statements in response to these MIQs, these are also set out in an updated version of the proposed MMs schedule (H3) for use during the hearing sessions.
13. The Authority has produced a Submission Policies Map as required by regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which comprises examination documents A4, A6a-A6c. It has also produced a schedule of proposed changes it intends to make to the policies map on adoption (H5). We are not examining the adopted policies map itself. However, where proposed changes to the submission policies map are necessary to make the Plan sound or legally compliant, they must be considered as part of the examination.
14. The Authority has also suggested a number of Additional Modifications (H4) it wishes to make to the Plan upon adoption. As explained in our Examination Guidance Notes, these are not before us, but we will read them alongside the Plan. However, it is recommended the Authority keeps this schedule up to date as necessary.

Matter 1 - Legal and Procedural Requirements

Issue 1: Whether all Statutory and Regulatory requirements have been met?

Questions

Sustainability Appraisal

1. Is the Sustainability Appraisal (A3) (SA) adequate and have the legal requirements of the 2004 Act and the 2012 Regulations been met? Does it provide a comprehensive and robust approach to inform the strategy and content of the Plan, having particular regard to the assessment of the likely effects of the Plan's policies and allocations and the consideration of reasonable alternatives?

Habitats Regulations Assessment

Note – The Plan and representations identify foul drainage and sewage treatment capacity concerns in the Horning Knackers Wood Water Recycling Centre catchment. The facility discharges to the River Bure, with potential pathways to downstream habitats sites.

2. Has the Habitats Regulations Assessment (A2) been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations)? Does the Plan include all safeguards and mitigation measures necessary to ensure that there would be no adverse effect on the integrity of habitats sites, either alone or in combination?
3. Does the Plan, read as a whole, include sufficient safeguards to ensure that development in the Horning Knackers Wood Water Recycling Centre catchment would not adversely affect the integrity of habitats sites, either alone or in combination? Are any MMs necessary to ensure the Plan is legally compliant and sound in this regard?
4. The Authority has proposed a number of MMs which appear to relate to comments made by the Environment Agency, Natural England and the RSPB on the HRA, habitats sites and related policy safeguards, including proposed MM4, MM20, MM21, MM23, MM24 and MM62. Do these MMs adequately address the relevant comments made by those organisations? Are they necessary to ensure that the Plan is legally compliant and/or sound? Are any further MMs necessary?

Local Development Scheme

Section 19(1) of the 2004 Act requires development plan documents to be prepared in accordance with the Local Development Scheme.

5. Was the Plan prepared in accordance with the Authority's adopted Local Development Scheme?

Community Involvement

6. Has the Authority complied with the requirements of section 19(3) of the 2004 Act with regard to conducting consultation in accordance with the Statement of Community Involvement?

Climate Change

7. Are the policies of the Plan designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the Act? Which specific policies?

Equalities

8. Is there any substantive evidence to indicate that the requirements of section 149 of the Equality Act 2010 have not been met?

Supplementary Planning Documents

Note - The Government has published the Levelling-up and Regeneration Act 2023 (Commencement No.11 and Saving and Transitional Provisions) Regulations 2026. Regulation 6(2) states that 'On and after the commencement date (25 March 2026), an authority may continue to prepare and make arrangements for the adoption of a proposed Supplementary Planning Document (SPD), provided that the document is adopted no later than 30th June 2026'.

9. What are the implications of these transitional provisions for the Plan, particularly where policies refer to SPDs or other guidance documents? Is the approach soundly based?
10. Do MM10, MM70 and MM78 remove any inappropriate reliance on SPDs or other non-development-plan documents? In particular, does MM10 bring all necessary flood risk policy requirements into the Plan, and is the reference to a future Flood Risk Guidance document sound?

Matter 2 - Vision, Objectives, Policy Context and Spatial Strategy

Issue 1: Are the Plan's Vision, Objectives and overall Spatial Strategy positively prepared, justified, effective and consistent with national policy in reflecting the special qualities of the Broads and contributing to the delivery of sustainable development?

Questions

11. Does the Plan demonstrably seek to further the statutory purposes of the Broads as required by the Norfolk & Suffolk Broads Act 1988? How do the vision and objectives seek to further the purposes of the Broads as a protected landscape?
12. How is the requirement in paragraph 189 of the NPPF to give great weight to conserving and enhancing landscape and scenic beauty, wildlife and cultural heritage within the Broads reflected in the Vision, Objectives and overall strategy?
13. What is the evidence that the Authority has maintained effective cooperation on strategic matters crossing administrative boundaries as per paragraphs 24 – 27 of the NPPF? Are there any substantive areas of disagreement or outstanding statements of common ground to be completed?
14. The Plan includes a number of strategic policies. Are these consistent with the requirements of paragraphs 20-23 of the NPPF? In particular, do they set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for the strategic priorities identified in paragraph 20, having regard to the statutory purposes and special qualities of the Broads? Is proposed MM3 necessary to ensure the Plan is sound in this regard?
15. Are proposed MM1 and MM2 necessary to ensure the Plan is effective and consistent with national policy and relevant marine planning considerations?

Matter 3 – Climate Change, Pollution and Sustainable Construction

Issue 1: Is the approach to dealing with climate change, pollution and sustainable construction in the Plan justified and consistent with national policy, and would it be effective?

Questions

16. Are the energy and heating requirements in Policies PUBDM20, PUBDM53 and PUBDM54 consistent with the Written Ministerial Statement on local energy efficiency standards (the energy efficiency WMS)? Are proposed MM27, MM54, MM55 and MM56 needed to make them sound? Are further MMs needed to make them sound, particularly to ensure consistency with national policy?
17. Is Policy PUBSP1: Responding to the Climate Emergency sound?
 - a) Are criteria 1-3 effective, do they simply repeat national policy and other elements of the Plan?
 - b) Does criterion 4 and the Policy wording generally appropriately distinguish between the effect of climate change on developments and the effect of development on climate change?
 - c) What is meant by maximising energy efficiency of building fabric and systems? Is the approach consistent with the energy efficiency WMS?
 - d) Is it clear how developers/decision makers should react to the terms “positive action”, “reduce greenhouse gas emissions”, “use sustainable design principles”, “climate smart design” and “mitigation and adaptation”?
 - e) What local evidence is there to demonstrate that the requirements of this policy (design principles, energy efficiency, transport behaviour change, SuDS, small-scale renewables) are justified and feasible in the Plan area?
 - f) Why is proposed MM7 necessary to make it sound?
18. Is Policy PUBDM2: Embodied Carbon sound?
 - a) Is the term ‘embodied carbon’ clearly defined so that it is evident how a decision maker should react to development proposals?
 - b) The NPPF does not contain any policy requirements relating to embodied carbon. Please explain the national policy basis for the approach in PUBDM2, how it is considered to be consistent with national guidance on sustainable construction and climate mitigation, and what the evidence base is to justify this policy.
 - c) How does Policy PUBDM2 relate to national building regulations and the energy efficiency WMS? Does it impose any requirement relating to operational energy efficiency, or does it exclusively address embodied carbon, which is currently outside the scope of building regulations?
 - d) Is the requirement for a whole-life-cycle carbon assessment for proposals over 10 dwellings or greater than 0.5ha justified and how has this requirement been tested in the Authority’s Viability Assessment?
 - e) Is the need for development proposals to justify demolition necessary and justified? Does the presumption against demolition apply to all development or

just proposals over 10 dwellings or larger than 0.5 hectares? How is “significant part” interpreted? What level of structural condition evidence is expected as part of that justification and how has it been accounted for in the Authority’s Viability Assessment?

- f) Is the requirement for calculation of whole-life carbon emissions justified? How has the cost of such been factored into the viability evidence?
- g) Has the Authority assessed technical capacity to prepare, interpret and monitor lifecycle carbon assessments?
- h) Is the requirement for developers to submit a “waste reduction and circular economy statement” justified? Does this requirement unnecessarily duplicate those included in the relevant Minerals and Waste Plans?
- i) Are proposed MM5 and MM50 necessary to make the Plan sound in relation to demolition waste, circular economy principles and the treatment of waste at suitably permitted sites?

19. Is Policy PUBDM3: Pollution and Hazards in development and protecting environmental quality sound?

- a) Does this policy unnecessarily duplicate or conflict with other separate statutory regimes (e.g. environment permitting, hazardous substances, water protection)?
- b) Is it also duplicative of/consistent with the requirements of Policies PUBDM5, PUBDM9 and PUBSP2?
- c) Are terms such as “unacceptable hazards”, “significant risks” and “susceptibility to hazards” sufficiently defined so that developers/decision makers know how to react to them?
- d) Why is proposed MM6 necessary to achieve soundness?
- e) Is proposed MM15 necessary to make the Plan sound and effective in relation to contaminated land, including the relationship between the reasoned justification and Policy PUBDM3?

20. Is Policy PUBDM4: Climate Change Adaption and Resilience Checklist sound?

- a) This policy seems to apply to all proposals for new build, replacement, change of use or an increase in floorspace. This seems to mean almost all types of development must meet its requirements. Is this approach proportionate and justified?
- b) It requires submission of a Climate Smart Checklist (Appendix 4). Is all development required to complete the checklist? How does it relate to mandatory planning application validation requirements? How were the measures on the checklist determined? Particularly is there any evidence which justifies the adaptation measures in terms of their local viability and necessity having regard to specific challenges relevant to the Plan area?
- c) Is it clear what evidence developers are expected to provide in response to each checklist question?
- d) The policy only requires the checklist to be submitted, is this effective? How will the information submitted be assessed and used?

21. Is Policy PUBDM20: Energy Demand and Performance of New Buildings (including extensions) sound?
 - a) What does it mean to “meet or reduce at least 10% of predicted energy requirements”?
 - b) Is it clear how 10% will be calculated? Is the baseline compliant with the Building Regulations? Is it intended that the Target Emission Rate will be used for the calculation or another metric?
 - c) Is the approach justified having regard to the energy efficiency WMS?
 - d) Is it entirely clear what types of development this policy is applicable to? Does it apply to conversions and replacement dwellings?
 - e) Criterion 4 refers to part 10 of this policy and there is no part 10, does proposed MM27 address this?
 - f) Does this policy unnecessarily duplicate other policies of the Plan and national policy, particularly with regard to heritage assets?
22. Is Policy PUBDM21: Renewable and low carbon energy sound?
 - a) Does it appropriately balance support for renewable energy development with the requirement in paragraph 189 of the NPPF to give great weight to conserving and enhancing the landscape and scenic beauty of the Broads?
 - b) Do some of the criteria unnecessarily repeat those of other policies particularly k) relating to heritage?
 - c) Is the requirement to assess alternative locations for onshore wind outside of the Broads proportionate and justified?
 - d) Are sensitive or well used viewpoints appropriately defined so that it is evident how a decision maker should react to development proposals?
 - e) Is this policy applicable to any proposal for renewable energy irrespective of scale?
 - f) Why is proposed MM28 needed to make it sound?
23. Are Policies PUBDM53: Source of Heating and PUBDM54: Heat resilient design sound?
 - a) Are these policies effective when read alongside others in the Plan which have similar aims e.g. PUBDM52, PUBSP16, PUBDM11, PUBDM55?
 - b) Is the heating hierarchy in PUBDM53 justified by evidence, particularly regarding the rejection of oil heating? Overall is this policy too restrictive/onerous without justification? Does the approach risk guiding development to achieve sub optimal solutions?
 - c) Is it clear what heat pump ready means and have the costs of such been factored into the Authority’s Viability Assessment?
 - d) Is it clear what evidence will be required to demonstrate compliance with these policies?
 - e) Is PUBDM54 even necessary when read alongside Part O of the Building Regulations and other policies in the Plan particularly PUBDM55?
 - f) Why are proposed MM54, MM55 and MM56 needed to make them sound?
24. Is Policy PUBDM55: Non-residential development and BREEAM sound?

- a) Is the requirement for BREEAM Very Good justified by evidence and viability testing in the Broads context?
 - b) What is the justification for the 250 sqm threshold?
 - c) Is it clear what evidence developers should submit to demonstrate compliance?
25. Is Policy PUBDM56: Electric Vehicle Charging Points sound?
- a) Why is this specific policy needed for this form of development in the Broads?
 - b) Does it duplicate other policies, particularly those which require good design?
 - c) Why are proposed MM57 and MM58 needed to achieve soundness?
26. Is Policy PUBDM57: FTTP (Fibre to the Premises) sound? Proposed MM59 proposes deletion of this policy because it is unnecessary when read alongside the requirements of Part R of the Building Regulations. Is this modification needed for soundness?

Matter 4 – Water: Quality, Supply, Efficiency, Flooding and Drainage

Issue 1: Are the individual policies clear, justified and consistent with national policies, and will they be effective?

Questions

27. Is Policy PUBDM5: Water quality and foul drainage sound?
- a) This policy is not screened in as having a likely significant effect on water quality in the Habitats Regulations Assessment, are the references to the Habitats Regulations and the Water Framework Directive effective? Does it duplicate the requirements of Policy PUBDM18: Mitigating Nutrient Enrichment Impacts in this respect?
 - b) Given the identified capacity constraints at Horning Knackers Wood Water Recycling Centre, is Policy PUBDM5 sufficiently clear about how applicants and decision-makers should demonstrate adequate foul drainage and sewage treatment capacity before development is permitted? Are these assessments required at the outline planning application stage?
 - c) Is it clear which forms of development are expected to comply with each criterion of the policy, consistent with paragraph 16(d) of the NPPF? Do all criteria equally apply to all development?
 - d) Is it reasonable to expect any proposal involving an extension to improve the existing method of foul drainage of the entire property, in other words should mitigation be required and betterment encouraged and considered positively in the planning balance? Will it always be feasible (technically and viably)?
 - e) Is the requirement for developers to demonstrate adequate sewage treatment provision justified having regard to the role of Anglian Water as the sewage undertaker?
 - f) Is there local evidence demonstrating that reed-bed systems are viable for most sites in the Broads, and has feasibility/technical suitability been tested?
 - g) Should the Horning Knackers Wood Water Recycling Centre Catchment be identified on the submission policies map (A4, A6a-A6c)?
28. Is Policy PUBDM6: Boat wash down facilities sound? This policy appears identical to Policy DM2 in the adopted Plan. Was the need to update it considered?
29. Is Policy PUBDM7: Water efficiency and re-use sound?
- a) This policy requires new dwellings to meet the optional higher water-efficiency standard of 110 litres per head per day (l/h/d) reflecting the existing adopted Plan policy, however, the Authority has proposed MM8 to the Plan which seeks a higher standard of 90 l/h/d – why is this necessary for soundness having regard to evidence (need and feasibility) and national policy?
 - b) Has 90 l/h/d been adequately considered in the viability assessment?
30. Is Policy PUBDM8: Development and flood risk sound?
- a) Policy PUBDM8 restates several elements of national flood risk policy (including the sequential and exception tests). Why is it necessary/effective to

repeat these requirements rather than deferring directly to NPPF Chapter 14 and the Planning Practice Guidance on Flood Risk?

- b) Should this policy have thresholds which make clear what is expected of different scales and types of development e.g. major or minor development or land uses?
 - c) Why are proposed MM10 and MM79 necessary to make this policy sound?
31. Is Policy PUBDM9: Surface Water Runoff sound? In particular, are the surface water drainage hierarchy, runoff-rate requirements and references to Sustainable Drainage Systems (SuDS) standards and Lead Local Flood Authority/Internal Drainage Board guidance justified, effective and consistent with national policy? Why is proposed MM11 necessary to make the policy sound?
32. Is Policy PUBSP2: Strategic Flood Risk Policy sound?
- a) Why is it necessary/effective to repeat national policy requirements? What specific local requirements does this policy add?
 - b) Why is proposed MM9 necessary to make this policy sound?

Matter 5 – Natural Environment, Biodiversity, Soils, Landscape and Tranquillity

Issue 1: Are the individual policies clear, justified and consistent with national policies, and will they be effective?

Questions

33. Is Policy PUBSP5: Biodiversity sound?
- a) Do criteria 2 a), b), c) and e) of Policy PUBSP5 avoid the duplication of policies that apply to a particular area (including policies of the NPPF, where relevant)?
 - b) Is criterion 2c) of Policy PUBSP5 consistent with national policy?
 - c) Why is proposed MM20 necessary to make this policy sound?
34. Is Policy PUBDM15: Natural Environment sound?
- a) Do criteria 3, 4, 5 and 7 of Policy PUBDM15 avoid the duplication of policies that apply to a particular area (including policies of the NPPF, where relevant)?
 - b) Criterion 13 of Policy PUBDM15 requires development sited within or adjacent to the identified Local Nature Recovery Network to demonstrate how the proposal will maintain and enhance the ability of the network to restore habitat and provide eco-system services in line with the Local Nature Recovery Strategy. Is this consistent with national policy?
 - c) Why is proposed MM21 necessary to make this policy sound?
35. Is Policy PUBDM16: Biodiversity Net Gain (BNG) sound?
- a) Is the requirement to provide a 20% increase in BNG for all development types (unless meeting the criteria for an exemption) justified and consistent with national policy and guidance, as set out in the PPG (Biodiversity Net Gain, Paragraph: 006 Reference ID: 74-006-20240214)?
 - b) How would a 20% increase in BNG affect viability? What effect would this have on the affordability of new homes?
 - c) Is criterion 5 of Policy PUBDM16, which requires the Biodiversity Net Gain to be provided on site with habitats functionally linked to the wider habitat network creating coherent ecological networks, consistent with national policy?
 - d) Why is proposed MM22 necessary to make this policy sound?
36. Are Policies PUBSP3: Soils and PUBDM12: Peat Soils sound? Why are proposed MM14 and MM16 necessary to make these policies sound?
37. Is Policy PUBDM17: Mitigating Recreational Impacts sound?
- a) Are the requirements of Policy PUBDM17 clear and justified? How would potential recreational impacts be mitigated?

- b) Is the threshold of 50 units for the provision or enhancement of adequate green infrastructure on the development site or nearby appropriate and justified?
 - c) Why is proposed MM23 necessary to make this policy sound?
- 38. Is Policy PUBDM18: Mitigating Nutrient Enrichment Impacts sound?
 - a) Have the viability implications of Policy PUBDM18 been fully considered? If so, how?
 - b) Should the catchments of the Broads SAC and Broadland Ramsar site be shown on the submission policies map (A4, A6a-A6c)?
 - c) Why is proposed MM24 necessary to make this policy sound?
- 39. Is Policy PUBDM19: Trees, woodlands, hedges, scrub and shrubs and development sound?
 - a) Are the requirements of Policy PUBDM19 clear, justified and consistent with national policy?
 - b) Criterion 3 of Policy PUBDM19 requires replacement trees to be provided on-site unless the applicant can show exceptional circumstances which would justify replacement provision elsewhere. How would off-site replacement provision be secured? Should this be clarified in the policy for effectiveness?
 - c) What is the evidence supporting the specific quantity of compensatory trees set out in criterion 3? Is this requirement justified?
 - d) Why are proposed MM25 and MM26 necessary to make this policy sound?
- 40. Is Policy PUBSP6: Landscape character sound? If not, what MMs would be necessary to make it sound?
 - a) How does Policy PUBSP6 seek to further the purposes of the Broads as a protected landscape?
- 41. Is Policy PUBDM22: Development and landscape sound? If not, what MMs would be necessary to make it sound?
 - a) As set out in criterion 2 of Policy PUBDM22, development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Broads, or adjacent sensitive landscapes, that cannot be adequately mitigated. Is this consistent with national policy and does it provide an effective basis to ensure that the statutory purposes of the Broads as a protected landscape are met?
- 42. Are Policies PUBDM23: Land raising and PUBDM24: Excavated material sound? If not, what MMs would be necessary to make them sound? Is proposed MM29 necessary to ensure the Plan provides effective guidance on the disposal of excavated material and any need for Environment Agency permits?

43. Is Policy PUBDM25: Utilities infrastructure development sound? If not, what MMs would be necessary to make it sound? Why is proposed MM30 necessary to make the policy sound?
- a) Is criterion 1 a) which requires utilities infrastructure development proposals to have an essential role in the provision of a regional and national network, consistent with national policy?
 - b) For effectiveness, should criterion 2 make specific reference to 'above ground' utilities?
44. Are Policies PUBSP7: Tranquillity in the Broads and PUBDM28: Light pollution, dark skies and nocturnal character sound? If not, what MMs would be necessary to make them sound?
- a) Given that Policy PUBDM28 already provides a policy framework for protecting the dark skies and nocturnal character of the Broads, does Policy PUBSP7 serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area?
 - b) Why are proposed MM32 and MM33 necessary to make these policies sound?

Matter 6 – Design, Heritage, Amenity and Historic Environment

Issue 1: Are the individual policies clear, justified and consistent with national policy and will they be effective?

Questions

45. Is Policy PUBSP16: Strategic Design Policy sound?
- a) As a strategic policy, does Policy PUBSP16 meet the relevant criteria set out in the NPPF and the Planning Practice Guidance (PPG)?
 - b) Is the policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, having particular regard to criterion c) which requires proposals to be resilient to a changing climate and minimise carbon emissions and waste?
46. Are Policies PUBDM52: Design and PUBDM52A: Proposals for residential extensions sound?
- a) Criterion 4 g) of Policy PUBDM52 states that where a thatched building is proposed to be replaced, the new building must also have a thatched roof, except in exceptional circumstances where sufficient justification can be provided, and an acceptable alternative has been proposed. What is meant by exceptional circumstances?
 - b) What is the justification for the application of the M4(2) accessible and adaptable dwellings standard for all new homes (Policy PUBDM52, criterion 4 i))?
 - c) What is the evidence that the Authority has considered the impact of accessible and adaptable dwellings standards in terms of Local Plan viability and any effects on the affordability of new homes?
 - d) What is meant by requiring proposals to fundamentally be sustainable (Policy PUBDM52, criterion 4 k))?
 - e) Is Policy PUBDM52A consistent with national policy, with regard to flood risk?
 - f) Why are proposed MM52, MM53 and MM55 necessary to make these policies sound?
47. Are Policies PUBSP4: Historic Environment and PUBDM13: Heritage Assets sound?
- a) Policy PUBSP4 states that the historic environment of the Broads will be protected and enhanced. Is Policy PUBSP4 consistent with national policy?
 - b) Is Policy PUBDM13 consistent with national policy, having particular regard to 'identified and unidentified non-designated heritage assets' (criterion 3)?
 - c) Is criterion 7 of Policy PUBDM13, which relates to 'loss of heritage assets and demolition', consistent with national policy?
 - d) Why are proposed MM17 and MM18 necessary to make these policies sound?
48. Is Policy PUBDM14: Re-use, Conversion or Change of Use of Historic Buildings sound? Why is proposed MM19 necessary in relation to the

requirement for a Heritage Statement, and how does Policy PUBDM14 relate to Policy PUBDM62?

49. Is Policy PUBDM27: Amenity sound? In particular, is it consistent with the agent of change principle set out in paragraph 200 of the NPPF?
 - a) Why is proposed MM31 necessary to make this policy sound?
50. Is Policy PUBDM62: Re-use, Conversion or Change of Use of Historic Buildings sound? In particular, is it consistent with chapter 16 of the NPPF?

Matter 7 – Transport, Accessibility, Recreation Access, Navigation and Moorings

Issue 1: Are the individual policies clear, justified and consistent with national policies, and will they be effective?

Questions

51. Are Policies PUBSP8: Accessibility and Transport and PUBSP9: Recreational access around the Broads area sound?
 - a) Are criteria relating to habitats, heritage and landscape etc, effective when read alongside other policies?
 - b) Why is proposed MM34 necessary to make Policy PUBSP8 sound?
52. Are Policies PUBSP9: Recreational access around the Broads area and PUBDM29: Transport, highways and access sound?
 - a) Are the thresholds for requiring a Transport Assessment or Transport Statement clear? Is it also clear what should be addressed within each of them?
 - b) Do the details on electric vehicle charging points unnecessarily duplicate Policy PUBDM56: Design and location of electric vehicle charging points?
 - c) Why is proposed MM35 necessary to make Policy PUBDM29 sound?
53. Is Policy PUBDM30: Recreation facilities parking areas sound?
 - a) Why is proposed MM36 necessary to make Policy PUBDM30 sound?
54. Are Policies PUBSP13: Navigable water space, PUBDM38: Access to water, PUBDM39: Bank stabilisation, PUBSP14: Mooring provision, PUBDM40-42 (Mooring and Quay detailed policies) and PUBDM42A: Safety by the water sound?
 - a) Why is proposed MM42 necessary to make Policy PUBSP13 sound?

Matter 8 – Economy, Retail, Tourism and Waterside Employment

Issue 1: Are the strategy and approach to economy, retail, tourism and waterside employment effective, justified and consistent with national policy?

Questions

55. The Plan does not identify employment land or floorspace requirements for the Broads. The Topic Paper (B14) states “district-wide studies do not require this”. What specific studies is this referring to and, having regard to paragraph 87 of the NPPF, which requires planning policies to recognise and address the specific locational requirements of different sectors of the economy, is the Plan's approach in this regard sound?
56. Is Policy PUBSP10: A Prosperous Local Economy sound?
- a) Should PUBSP10 explicitly reference the cross administrative boundary economic influences particularly the relationship with Hoveton and Wroxham?
 - b) Does this policy sufficiently recognise the importance of digital infrastructure and home working?
 - c) Should this policy make specific reference to opportunities and risks associated with traditional Broads industries and skills?
57. Is Policy PUBDM31: New Employment Development sound?
- a) Are the requirements for a Water Resource Assessment justified? Is it clear what information such an assessment should contain and how it will be used? Should early engagement with the statutory undertakers be encouraged for proposals requiring such assessments and can such assessments be undertaken without engaging?
 - b) Should the circumstances in which a Water Resource Assessment is required, and the information it should contain, be clarified in the policy for effectiveness?
 - c) Why is proposed MM37 necessary to make Policy PUBDM31 sound?
58. Is Policy PUBDM32: Protecting general employment sound?
- a) Are “employment uses” clearly defined for the purposes of this policy?
 - b) Does this policy provide sufficient clarity on what viability and marketing evidence is required as part of any proposal seeking to justify the loss of an employment use? Are details provided in the Marketing Guide or elsewhere?
 - c) Why is proposed MM38 necessary to make Policy PUBDM32 sound?
59. Is Policy PUBDM33: Farm Diversification sound?
- a) Do criteria 1a-k only apply to diversification to provide employment uses? Should this, and what employment uses are for the purposes of this policy, be clarified?

- b) Do criteria 2 and 3 apply to any development proposals which would result in farm diversification? Is criterion 3 necessary when read alongside other policies of the Plan?
 - c) Do all proposals, irrespective of scale, require an agricultural diversification statement? Would criterion 4 be better placed/addressed earlier in the policy wording on the assumption that the statement will need to demonstrate compliance with the relevant policy criteria?
 - d) Are the requirements for farm shops sufficiently precise? Is it clear what a “significant proportion of goods” means and what evidence will need to be provided in support of proposals?
 - e) Do points a-l on page 179 unnecessarily duplicate some of the requirements expressed in the policy and is there any risk of conflicting wording?
60. Are Policies PUBSP11: Waterside Sites and PUBDM34: Development on waterside sites in employment or commercial use, including boatyards sound?
- a) Are “waterside”, “employment uses” and “commercial uses” clearly defined for the purposes of this policy?
 - b) Should these policies more fully recognise that most waterside sites will be in Flood Zone 3, and is the relationship with Policy PUBDM8 sufficiently clear?
 - c) Are the references to climate change and design in these policies necessary when read alongside other policies in the Plan?
 - d) Why is proposed MM39 necessary to make Policies PUBSP11 and PUBDM34 sound?
61. Is Policy PUBDM35: Retail development in the Broads sound?
- a) Is this policy sufficiently clear in how sequential and impact tests should be applied across administrative boundaries, particularly for Hoveton/Wroxham?
 - b) Should the relevant local/district centres referred to in criterion 1 be identified in the Plan and/or on the policies map?
 - c) What is meant by “retail and other town centre development” in criterion 2, and should the definition of main town centre uses be clarified with reference to the NPPF?
 - d) Is the geographical application of criterion 2 e) clear – could this be applicable to any centre anywhere?
 - e) Is criterion 7 justified? If it is, should the circumstances within which it may be applicable be clarified for effectiveness?
 - f) Why is proposed MM40 necessary to make Policy PUBDM35 sound?
62. Are Policies PUBSP12: Sustainable tourism, PUBDM36: Sustainable Tourism and Recreation Development and PUBDM37: Holiday/tourism accommodation – new provision and retention sound?
- a) Are these policies effective when read and applied together?
 - b) Is it clear what evidence is required in support of proposals seeking to demonstrate compliance with these policies?
 - c) Why is proposed MM41 necessary to make Policies PUBSP12, PUBDM36 and PUBDM37 sound?

Matter 9 – Housing (Strategy, Need, Requirement, Supply)

Issue 1: Is the proposed approach to residential development positively prepared, justified, effective, and consistent with national policy?

Questions

Spatial Strategy

63. What is the justification for the spatial strategy as set out in Policy PUBSP15? Is it positively prepared, consistent with national policy and would it be effective?

Development Boundaries

64. Is the principle of using development boundaries to direct and control the location of new development sound?
65. Is the approach to define and review development boundaries justified and effective?
66. Are the specific development boundaries for the settlements justified and appropriately drawn in all instances?
67. Does proposed map change MC1, which would amend the Filby Development Boundary by removing area y and land west of Broad Lane, raise any issues of soundness or legal compliance? Is the resulting development boundary justified and effective?
68. Do the development boundaries as drawn provide flexibility to enable windfall development?
69. Is the approach to residential development proposals within defined Development Boundaries as set out in Policy PUBDM44 justified?
70. Is the approach set out in Policy PUBDM44 consistent with other policies in the Plan with regard to development proposals outside defined development boundaries? Should Policy PUBDM44 make it clear that that new residential development will not be permitted outside defined development boundaries unless it accords with one of the specific exceptions in other policies of the Plan?
71. Where settlements lie partly within neighbouring authority areas, is the Broads' strategy relating to development boundaries consistent with that of adjoining Local Planning Authorities? Does it provide a coherent approach for that settlement?

Local Housing Need

Note - The PPG for housing and economic development needs assessments (Paragraph: 040 Reference ID: 2a-040-20241212) explains that the housing requirement is the minimum number of homes that a plan seeks to provide during the plan period. It adds that once local housing need has been assessed, authorities should then make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.

72. Policy PUBSP15 states that the objectively assessed housing need (OAHN) throughout the Plan period (2021 to 2042) is 1,077 dwellings. Has local housing need been assessed in a way that is consistent with national policy and guidance, as set out in the PPG?
73. As the Plan is not seeking to meet housing need within the Broads Authority administrative area, what is the evidence that the Broads' housing need will be accommodated by the constituent Authorities? To what extent is the unmet need of the Broads being accommodated by the constituent Authorities through the plan-making process?

Housing Requirement

74. Policy PUBSP15 refers to an objectively assessed need (OAN) of 1,077 dwellings throughout the Plan period (2021 to 2042) but does not clearly identify a housing requirement. Is this approach justified and consistent with national policy? Would proposed MM43 and MM80 address this, or are further MMs necessary?
75. Agreement 11 of the Norfolk Strategic Planning Framework (September 2025) states that 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.
Has the Authority undertaken a thorough capacity-based assessment of the amount of housing which is expected to be delivered within the Broads Authority area over the plan period? If so:
 - a) What sources of supply have been included?
 - b) What assumptions have been applied to commitments, allocations and windfalls?
 - c) What is the resulting housing capacity over the Plan period?
 - d) Should a robust housing capacity assessment inform a housing requirement for the Broads?
 - e) What would be the implications for the Broads and the relevant Districts if the Plan included a capacity based housing requirement?

76. Are MMs needed to provide sufficient clarity for the overlapping District Authorities regarding the housing requirement for the Broads? Would proposed MM43 address this?
77. What role will the development plans of the constituent districts have in meeting housing needs from the Broads? Is this clear and to what extent is this agreed, other than through the Norfolk Strategic Planning Framework?
78. Taking the above considerations into account, is the overall approach to housing provision and meeting housing needs justified and consistent with national policy?

Housing Land Supply

79. The Authority's Housing Land Supply Topic Paper – May 2026 (H2) indicates that a five year land supply statement for the Local Plan for the Broads has not been produced because the requirement is zero. Is the Authority's approach to the calculation of land supply robust, justified and consistent with national policy?
80. What is the up-to-date supply of specific, deliverable housing sites in the Broads Authority to be considered in the five-year supply from the intended date of adoption? Is it likely that the Authority will be able to identify a five year supply of deliverable housing sites on adoption of the Plan?

Allocations/Planning permissions

81. The Housing Trajectory included in Appendix 11 shows two sites (PUBTHU1 and PUBOUL2) that already have planning permission, and includes estimated trajectories. What is the evidence that there is a reasonable prospect of these sites being either deliverable or developable, as per the definitions included in the NPPF? What is the evidence supporting the expected timescales and build out rates, and are these realistic?
82. What is the evidence that the existing planning permissions are either deliverable or developable as per the definitions set out in the NPPF?

Windfall

83. Should a windfall rate be included as part of the supply?
84. Policy PUBSP15 does not make reference to mitigation measures required to ensure that there would be no adverse impacts on the integrity of habitats sites as a result of residential development. Is Policy PUBSP15 clearly written and consistent with national policy? Would any proposed MMs in H3 address this?

Issue 2: Whether affordable housing needs and the housing needs of other groups have been appropriately assessed and addressed in the Plan, and whether the policies are justified, effective, consistent with national policy and positively prepared?

Questions

Affordable Housing

85. The Broads Local Housing Needs Assessment Update 2025 (B6b) identifies the affordable housing need being 325 dwellings over the 21 year period. What is the expected rate of delivery of affordable housing in the Broads over the plan period? Will there be a shortfall of supply against need?
86. Is the Authority's Affordable Housing Need clearly defined in the submitted Plan, having particular regard to Policies PUBSP15 and PUBDM43?
87. Are the thresholds for the provision of affordable housing set out in Policy PUBDM43 justified, and will they be effective in meeting the affordable housing needs of the area? Are the affordable housing requirements supported by robust evidence of financial viability?
88. Having regard to the Local Plan Viability Assessment, will Policy PUBDM43 be effective in helping to meet the need for specialist housing for older people?
89. Are the proposed thresholds applicable to residential schemes to provide commuted sums towards affordable housing justified and supported by robust evidence of financial viability?
90. Why is proposed MM44 necessary to make the Plan sound and up to date in relation to affordable housing, including the treatment of designated rural areas, older persons' housing, district affordable housing standards and references to district affordable housing SPDs?

Gypsies and Travellers and Travelling Showpeople

91. Is the assessment of Gypsies and Travellers and Travelling Showpeople needs, as set out in the Great Yarmouth and Broads Authority Gypsy, Traveller and Residential Caravans Accommodation Assessment - June 2022 (GTAA) (B5), the GTAA Update Final Report - September 2024 (B22) and the GTAA Final Report – April 2025 (B22a) justified and consistent with national policy?
92. Is the approach to the provision of sites for Gypsies and Travellers and Travelling Showpeople positively prepared, justified and consistent with national policy, and will it provide a sufficient and suitable supply to meet identified needs?
93. The Plan period for meeting the objectively assessed Gypsy and Traveller and Travelling Showpeople need is indicated to be 2021 to 2042, whilst the GTAA

Final Report (April 2025) refers to the period 2025 to 2042 for the Broads Authority. What account has been taken of differences in these time periods?

94. Is there up-to-date evidence that there would be a supply of specific, deliverable sites for five years following the intended date of adoption of the Plan, and a supply of specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period?
95. Is proposed MM45 necessary to make the Plan sound in relation to flood risk for temporary or permanent accommodation, having regard to the need to ensure the safety of occupants and the transient nature of such accommodation?
96. Is Policy PUBDM45 as drafted justified and effective? Will the proposed policy criteria be effective in bringing forward sites necessary to meet the identified need for residential moorings? Is the policy consistent with national policy and guidance, with regard to flood risk?

Boat Dwellers

97. Paragraph 11b of the NPPF states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. Are the Authority's Boat Dwellers need, requirement and supply clearly defined in the submitted Plan?
98. Is the assessment of boat dwellers needs in the Broads, as set out in the Broads Authority Boat Dwellers Accommodation Assessment - August 2022 (BDAA) (B7a), robust and justified? Is there a degree of overlap between the objectively assessed housing need and the identified need for permanent residential moorings?
99. The plan period for meeting the objectively assessed residential moorings need is indicated to be 2021 to 2042, whilst the BDAA refers to the Authority's Local Plan period of 2021 to 2041. What account has been taken of differences in these time periods? As per the requirements of paragraph 32 of the NPPF, are the policies in the Plan affecting residential moorings underpinned by relevant and up-to-date evidence?
100. How were potential residential mooring sites identified? Were proposed sites subject to a robust assessment of site suitability and sustainability appraisal? Does the evidence show clear reasons for accepting certain sites and rejecting others? Will the Authority's approach provide a future supply that is sufficient and suitable to meet identified needs?
101. Is there up-to-date evidence that there would be a supply of specific, deliverable sites for five years following the intended date of adoption of the Plan, and a supply of specific, developable sites or broad locations for growth,

for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period?

102. Is Policy PUBDM46 as drafted justified and effective? Will the proposed policy criteria be effective in bringing forward sites necessary to meet the identified need for residential moorings? Why is proposed MM46 necessary to make the policy sound, particularly in relation to the use of conditions, management plans, registers of boat dwellers and the definition of a residential mooring?
103. The reasoned justification to Policy PUBDM46 requires 'images of what is intended to be moored at the residential moorings to be submitted with planning applications'. Is this justified?

Other Housing needs

104. Is Policy PUBDM50: Replacement dwellings sound? Why is proposed MM49 necessary to make the policy sound, particularly in relation to site-specific flood risk assessment, safe access and occupation, design and mitigation for current and future flood risk, and ensuring no increased flood risk elsewhere?
105. Is the Authority's approach to custom/self-build dwelling proposals justified and consistent with national policy? Will it be effective to meet the identified need for custom/self-build? Why is proposed MM51 necessary to make Policy PUBDM51 sound, particularly in relation to the circumstances in which unsold custom/self-build plots may be built out as conventional market housing?
106. Is the Authority's approach to housing for rural enterprise workers justified and consistent with national policy? Why is proposed MM47 necessary to make Policy PUBDM47 sound, particularly in relation to marketing evidence and the proposed footnote concerning temporary permissions?
107. Is the Authority's approach to elderly and specialist needs housing justified? Will it be effective to meet the needs of an ageing population? Why is proposed MM48 necessary to make the Plan sound and effective in relation to specialist housing and housing for older people, including the relationship with affordable housing and Policy PUBDM43?

Matter 10 – Community Facilities, Open Space, Green/Blue Infrastructure, Local Green Space, Other development management policies and Developer Contributions

Issue 1: Are the individual policies clear, justified and consistent with national policies, and will they be effective?

Questions

Note - The Plan appears to carry forward a number of Local Green Space designations from the adopted Local Plan. However, the Plan also appears to identify at least one new Local Green Space designation at Chedgrave Carr, and it is not entirely clear whether any changes are proposed to the boundaries of existing Local Green Space designations. In addition, the submission policies map appears to show some Local Green Spaces designated through made Neighbourhood Plans, which do not themselves appear to be listed in Policy PUBSSLGS.

108. Is Policy PUBSP17: Community facilities sound?
- a) As a strategic policy, does Policy PUBSP17 meet the relevant criteria set out in the NPPF and the Planning Practice Guidance (PPG)?
 - b) Does this policy unnecessarily duplicate other policies of the Plan?
109. Is Policy PUBDM58: Visitor and community facilities and services sound? If not, what MMs would be necessary to make it sound? Why is proposed MM60 necessary to make the policy sound, particularly in relation to the requirement for marketing evidence over a sustained period of 12 months?
110. Is Policy PUBDM59: Designing places for healthy lives sound? Is the policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, including in relation to the Norfolk and Waveney Health Protocol and Appendix 12, which do not themselves form part of the development plan? Why are proposed MM61 and MM81 necessary to make the policy and Appendix 12 sound and effective?
111. Are Policies PUBDM10: Open space on land, play space, sports fields and allotments and PUBDM11: Green and blue infrastructure and Public Rights of Way sound? If not, what MMs would be necessary to make them sound? Why are proposed MM12 and MM13 necessary to make Policy PUBDM10 sound, including in relation to unmapped open space, play provision for children with disabilities, 3G pitch infill/crumb migration, and reasoned justification on microplastics?
112. Is Policy PUBSSLGS: Local Green Space sound having regard to paragraphs 106 to 108 of the NPPF?
- a) Which Local Green Spaces listed in Policy PUBSSLGS are carried forward from the adopted Local Plan, which are newly designated through this Plan, and which, if any, reflect designations made through Neighbourhood Plans?

- b) Is each Local Green Space designation supported by robust evidence, having regard to the criteria for Local Green Space designation in paragraph 107 of the NPPF?
 - c) Is the policy wording sufficiently clear about the types of development that would be regarded as inappropriate within or adjacent to a Local Green Space, having regard to paragraph 108 of the NPPF?
 - d) Is the policy effective in relation to development adjacent to Local Green Space, including in explaining how harm to the reasons for designation would be assessed?
113. Do proposed map changes MC2, MC4 and MC6 raise any issues for the soundness or effectiveness of the Plan's approach to Local Green Space and open space designations, including the clarity of map titles, the extent of designated areas and the treatment of Local Green Spaces allocated in made Neighbourhood Plans?
114. Is Policy PUBDM61: Advertising & signage sound? If not, what MMs would be necessary to make it sound? Is it necessary when read alongside the Advertisement Regulations and national policy?
115. Is Policy PUBDM60: Planning Obligations sound? Is there sufficient clarity on when developer contributions will be sought, including relevant thresholds? Is reliance on district and county standards justified? Is the approach to viability testing clear?

Matter 11 – Site-Specific Policies (Chapters 36–58)

Issue 1: Are the proposed allocations justified, effective and consistent with national policy?

Questions

Note - Questions 116-121 should be answered for all site-specific policies detailed in Chapters 36 to 58 of the Plan.

116. Does each site-specific policy provide clarity to developers, local communities and other interested parties about the nature and scale of development?
117. Is the geographical application of each policy clearly illustrated on the submission policies map?
118. Is it effective or justified to specify that proposals should meet the requirements of documents which are not part of the development plan such as SPDs and Design Guides?
119. Is it effective to say that each site should meet the requirements of other policies in the Plan?
120. To what extent are the criteria contained within each site-specific policy necessary, justified and effective, given that many repeat or paraphrase requirements already set out in other policies of the Plan e.g. design, heritage, landscape, habitats sites, flood risk and transport policies and does each site-specific policy add clear, locally-distinctive, site-specific requirements which avoid ambiguity through inconsistency?
121. What MMs or changes to the submission policies map would be necessary to address any issues identified?

Note - The Plan area overlaps other local planning authority areas and several settlements are split by administrative boundaries. In some instances, some of the Plan's allocations and designations appear to overlap with allocations and designations in other development plans. E.g. PUBOUL2, PUBNOR1 and PUBHOV5.

122. Which allocations, site-specific policies and designations overlap with, or are affected by, allocations and designations in neighbouring development plans? In such cases, how has the Authority ensured that policy requirements are not inconsistent or duplicative? In this regard, is the relationship between the various plans sufficiently clear for decision-makers and applicants?

Settlement Based Policies

Acle

123. Policy PUBACL1: Acle Cemetery Extension
 - a) Is it clear how the allocation will be accessed?

- b) Is the scale of the allocation justified? Should the site area and estimated number of burial plots be identified?
- c) Is the land intended to be used for additional burial plots only or are any ancillary buildings/uses proposed e.g. parking?
- d) The representations refer to an alternative site which has been granted planning permission for the use – is this allocation still sound in light of that permission? Overall, is this site deliverable?
- e) Is this allocation sufficiently justified and effective having regard to the statutory purposes of the Broads as a Protected Landscape?

124. Policy PUBACL2: Acle Playing Field Extension

- a) Is it clear how the allocation will be accessed?
- b) Is the scale of the allocation clear and justified?
- c) Should the use of the site be more clearly specified having regard to the evidence on need, particularly what specific recreational needs does the extension seek to address, and should these be defined in the policy?
- d) Is the site demonstrably available, given that land purchase negotiations are still ongoing?
- e) Does the policy adequately address lighting given the Dark Sky Zone 2 designation?

Brundall

125. Policy PUBBRU1: Riverside Chalets and Mooring Plots

- a) Should the policy specify a measurable threshold for undeveloped plot area as part of criterion 4 d) i)?
- b) Should geographical application on the policies map be more clearly referenced?
- c) Is the wording for criterion 5 effective?
- d) Is criterion 4 c) i) justified given SPD and design codes are not part of the development plan?
- e) Is criterion 4 c) iv) necessary/effective?

126. Policy PUBBRU2: Riverside Estate Boatyards (including land adjacent to the railway line)

- a) PUBBRU2 is not shown in the key on Inset Map 2A, does the policy provide sufficient clarity on the extent and location of land to which it applies?

127. Policy PUBBRU3: Brundall Mooring Plots

- a) PUBBRU3 is not shown in the key on Inset Map 2A, does the policy provide sufficient clarity on the extent and location of land to which it applies?
- b) What is meant by “defined area” in criterion 2?

128. Policy PUBBRU4: Brundall Marina

- a) PUBBRU4 is not shown in the key on Inset Map 2A, does the policy provide sufficient clarity on the extent and location of land to which it applies?

- b) Are sufficient details provided on what information is necessary to demonstrate compliance with criterion 2?

129. Policy PUBBRU5: Land east of the White Heron Public House

- a) PUBBRU5 is not shown in the key on Inset Map 2A, does the policy provide sufficient clarity on the extent and location of land to which it applies?
- b) Should the policy define more precisely what is meant by “generally free of built development”?

130. Policy PUBBRU6: Brundall Gardens Marina Residential Moorings

- a) Is the wording relating to cabinets/storage being “kept to a minimum” effective, or should it be more precisely defined?

Cantley

131. Policy PUBCAN1: Cantley Sugar Factory

- a) Is criterion 5 effective – should it be “prejudice the current and future use of the site as a sugar works”?
- b) Why is proposed MM63 necessary to make Policy PUBCAN1 sound, particularly in relation to residential amenity, the neighbouring pub, public rights of way, water efficiency, carbon emissions and future zero-emission vehicle infrastructure?

Chedgrave

132. Does proposed submission policies map change MC10, which would amend the area in Chedgrave classed as settlement fringe, raise any issues of soundness or legal compliance? Is the revised boundary justified by the evidence and effective in applying the relevant settlement fringe policy?

133. Policy PUBCHE1: Greenway Marine Residential Moorings

- a) Is criterion 1 b) effective – what would be a “satisfactory solution” to address visibility?

Dilham

134. Policy PUBDIL1: Dilham Marina (Tyler’s Cut Moorings)

- a) Is the term “generally free of buildings and above-ground structures” sufficiently clear to be effective?
- b) What is meant by no adverse impacts on any designated sites downstream? Is it necessary to say this?

Ditchingham Dam

135. Policies PUBDIT1: Maltings Meadow Sports Ground, Ditchingham and PUBDIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck

- a) Does proposed submission policies map change MC3, which would amend the area to which Policy PUBDIT1 applies to include the football pitch, raise

any issues of soundness or legal compliance? Is the amended policy boundary justified and effective?

- b) Is the minerals-safeguarding requirement sufficiently clear to ensure compliance with Norfolk County Council Policy CS16 – should it be referenced in PUBDIT2?
- c) Is PUBDIT1 consistent with paragraph 104 of the NPPF with regard to sports facilities?
- d) Why is proposed MM64 necessary to make Policy PUBDIT1 sound, particularly in relation to flood risk, the possible need for an Exception Test at application stage and minerals safeguarding?
- e) Why is proposed MM65 necessary to make the Plan sound and up to date in relation to the expected delivery timing of the residential moorings at Ditchingham? What is the evidence that the moorings will be delivered by 2030?

Fleggburgh

136. Policy PUBFLEG1: Broadland Sports Club

- a) Is it consistent with paragraph 104 of the NPPF with regard to sports facilities?
- b) Should the policy include explicit requirements for flood-evacuation or safe-refuge planning given its Flood Zone 2/3/3b context?
- c) Is the reference to “designated nature sites” effective?
- d) Is the policy’s approach to transport effective? Should criteria vi and vii be combined or defer to transport policies in the Plan?
- e) Why is proposed MM66 necessary to make Policy PUBFLEG1 sound, particularly in relation to the possible need for an Exception Test at application stage, flood risk and clarification of the dwelling and grounds included within the policy area?

Gillingham

137. Policy PUBGIL1: Gillingham Residential Moorings (H.E. Hipperson’s Boatyard)

- a) Is it clear how the site would be accessed?
- b) Is the proposed maximum of five residential moorings justified? If it is, is there a need for criterion a) which requires evidence existing businesses nearby will not be compromised?
- c) Should it be made clear the site is not within the Conservation Area which is on the other side of the river?
- d) Is the requirement for cabinets and storage to be “kept to a minimum” sufficiently precise to ensure effective control of visual clutter?
- e) Does the policy need to specify additional flood-risk resilience or safe-refuge measures given the Flood Zone 3 / indicative 3b context?
- f) Is the approach to habitats consistent with other policies in the Plan?
- g) Why is proposed MM67 necessary to make the Plan sound and up to date in relation to the expected delivery timing of the residential moorings at

Gillingham? What is the evidence that the moorings will be delivered within the timescale identified?

Great Yarmouth

138. Policy PUBGTY1: Marina Quays (Port of Yarmouth Marina)

- a) Should the policy define more clearly what constitutes “appropriate redevelopment” and specify acceptable land uses?
- b) Is it clear how the site would be accessed?
- c) The land allocated for redevelopment seems to overlap the PUBDM10 Open Space Designation on the submission policies map. Is this justified and effective?

Horning

139. Policy PUBHOR1: Horning Car Parking

- a) What does this policy aim to achieve? Is it to encourage redevelopment of the car park to improve it whilst ensuring no net loss in parking provision?
- b) Does it duplicate the provision of other policies of the Plan e.g. EV charging points?

140. Policy PUBHOR2: Horning Open Space (public and private)

- a) What is the purpose of this policy when read alongside others in the Plan which protect open space?
- b) Is the distinction between “public open space” and “private open space” effective?

141. Policy PUBHOR3: Waterside Plots

- a) Is this policy positively prepared?
- b) Is this policy clear on what type of development will be supported on waterside plots – what is meant by “low key and lightweight forms of building”?
- c) Is the expectation for increased tree and planting provision (subject to avoiding wind obstruction affecting sailing) effective?
- d) Is it envisaged that new dwellings would be permitted on waterside plots and how does this policy relate to windfall development allowed for in the Plan?

142. Policy PUBHOR4: Horning Sailing Club

- a) Should criterion 1 refer to sailing facilities including associated parking?
- b) Is it clear what is meant by “general openness of the area” and “limit the height, bulk and extent of building”?

143. Policy PUBHOR5: Crabbett’s Marsh

- a) Should the policy more explicitly define what constitutes “intermittent and very low-level private leisure use” to ensure clarity for decision-makers and landowners?
- b) Is this site open space?

144. Policy PUBHOR6: Horning – Boatyards, Ferry Road and Ferry View Road

- a) Should this policy more explicitly state that it seeks to retain and positively support the development of boatyard / marine employment uses at this site?
- b) Should the constraints associated with Horning Knackers Wood Water Recycling Centre be more explicitly referenced in Policy PUBHOR6 and/or its reasoned justification, including any safeguards needed to ensure development does not proceed unless adequate foul drainage and sewage treatment capacity has been demonstrated?
- c) Are any more details required with regard to site access?

145. Policy PUBHOR7: Woodbastwick Fen Moorings

- a) Is this site open space?
- b) Does the policy provide sufficient clarity regarding the intended mechanism and circumstances for removing existing houseboats and residential moorings?
- c) Is “generally free of buildings” effective?

146. Policy PUBHOR8: Land on the Corner of Ferry Road, Horning

- a) Should criterion 1 refer to the contribution of the local economy and meeting housing needs?

Hoveton and Wroxham

147. Policy PUBHOV1: Green Infrastructure, Hoveton

- a) Why is there a need for a specific policy on green infrastructure in Hoveton and Wroxham?

148. Policy PUBHOV2: Station Road Car Park, Hoveton

- a) What is the policy seeking to achieve? Does it sufficiently address the role of Station Road Car Park in supporting the village centre’s vitality and sustainable transport network and is this why the car park should be retained?

149. Policy PUBHOV3: Brownfield Land off Station Road, Hoveton

- a) Does proposed submission policies map change MC9, which would remove the northern part of HOV3 from the area to which Policy PUBHOV3 applies, raise any issues of soundness or legal compliance? Is the amended policy boundary justified and effective, having regard to the role and status of the existing car park?
- b) Should this policy specify the proposed use or mix of uses for which the site is allocated, in light of the PPG’s expectation that site allocations identify their intended land-use category and scale of development? Having regard to criterion 4, is residential development proposed on this site? If so, how many dwellings could the site deliver?
- c) Why is proposed MM68 necessary to make Policy PUBHOV3 sound, particularly in relation to the treatment of ancillary car parking, justification for any parking use and the clarity of the buildings or land within the policy area?

150. Policy PUBHOV4: BeWILDerwood Adventure Park

- a) Should it be clarified what “modest” or “ancillary” development means in criterion 2?

151. Policy PUBHOV5: Hoveton Village Centre and Adjacent Areas

- a) Is the geographical application of the policy/parts of this policy clear? Is there a clear geographical distinction between the “village centre” and “areas adjacent to the village centre”?
- b) Does this policy adequately deal with seasonal traffic?
- c) Should the policy specify the type and scale of public-realm improvements expected in the village centre?
- d) Is criterion 4 justified?
- e) Why is proposed MM69 necessary to make Policy PUBHOV5 sound, particularly in relation to the coordinated approach with North Norfolk District Council to decision-making and monitoring across the wider village centre?

Norwich, Thorpe St. Andrew, Trowse and Whitlingham

152. Policy PUBNOR1: Utilities Site, East Norwich

- a) Should this policy identify the proposed use or mix of uses that the site is allocated for and the scale of development expected to be delivered? Does this site seek to deliver new dwellings, in addition to custom/self-build? If so, how many dwellings could the site deliver?
- b) Is it expected that the development of this site would fund the delivery of the Riverside Walk and Cycle Path (PUBNOR2)?

153. Policy PUBNOR2: Riverside Walk and Cycle Path

- a) How does delivery rely on the Utilities Site (PUBNOR1)?

154. Policy PUBTSA1: Cary’s Meadow

- a) How does this policy relate to other landscape character, biodiversity and open space policies in the Plan?
- b) Is further clarification needed on what constitutes “enhancement”, “openness” and “no negative impact” for effectiveness?

155. Policy PUBTSA2: Thorpe Island

- a) Do terms such as “significant increase”, “low-impact”, “informal layout” and “poor structures” require clarification for effectiveness?

156. Policy PUBTSA3: Griffin Lane – Boatyards and Industrial Area

- a) Is it clear what objectives are referred to in criterion 2?

157. Policy PUBTSA4: Bungalow Lane - Mooring Plots and Boatyards

- a) Do terms such as “modest height”, “significant unbuilt plot area” and “essential operational needs” sufficiently require clarification for effectiveness?
- b) Is criterion 2 effectively worded?

158. Policy PUBTSA5: River Green Open Space

- a) Given that Policy PUBDM10 already provides a policy framework for protecting and managing open space, will this duplication give rise to inconsistency or confusion about which policy applies when assessing development proposals affecting designated open space? Is the approach effective?

159. Policy PUBWHI1: Whitlingham Country Park plus adjacent Land

- a) Should the policy criteria and/or policies map distinguish between the adjacent land and the country park?
- b) Are terms such as “positive river valley contribution” and “improve visitor experience” sufficiently clear to be effective?
- c) Is criterion 5 justified? Is a master plan a realistic prospect?

160. Policy PUBWHI2: Land at Whitlingham Lane

- a) Does proposed submission policies map change MC7, which identifies Cary’s Meadow as a Local Nature Reserve, raise any issues of soundness or legal compliance? Is the designation accurately and effectively reflected in Policy PUBTSA1 and on the submission policies map?
- b) Is it clear how this site is accessed?
- c) Is it clear what type of development would be supported?
- d) Are terms such as “landscape enhancement”, “compatible with parkland character” and “visitor enjoyment” sufficiently clear to be effective?
- e) Is criterion 5 clear on the circumstances within which Class E uses may be permitted? Is the reference to use of conditions to restrict changes of use justified?

Ormesby St. Michael

161. Policy PUBORM1: Ormesby Waterworks

- a) Why is Policy PUBORM1: Ormesby Waterworks necessary? Does it need to do anything other than safeguard the works and then rely on other policies in the Plan? Why is proposed MM71 necessary to make the policy sound, particularly in relation to the functioning of the water treatment works, landscape contribution and visual impact?

Oulton Broad

162. Policy PUBOUL1: Boathouse Lane Leisure Plots

- a) Is criterion 3 effectively worded?
- b) Should criteria 1 and 2 be combined to more clearly articulate what the policy aims to achieve?

163. Policy PUBOUL2: Former Pegasus/Hamptons Site

- a) Should this policy specify the intended scale and quantum of uses allocated? Should the policy explicitly state that the site is allocated for housing, given that the housing trajectory includes 76 dwellings to be delivered from this site?

- b) Does the wording of the policy provide sufficient clarity regarding the relationship between boatyard uses and enabling housing development?
- c) Is it clear how this site will be accessed? And should reference to the need to not exacerbate congestion north of Mutford Lock be made in the policy?
- d) Why is proposed MM72 necessary to make Policy PUBOUL2 and its reasoned justification sound and up to date, particularly in relation to the existing planning permission, expected delivery of 76 dwellings and the relationship between the allocation and the housing trajectory?

164. Policy PUBOUL3: Oulton Broad District Shopping Centre

- a) Should criterion 1 refer to main town centres uses?
- b) Are criteria 2, 3 and 4 justified by evidence?
- c) Is the policy clear with regards to its approach to housing in the centre?
- d) Why is proposed MM73 necessary to make Policy PUBOUL3 sound, particularly in relation to flood risk and the possible need for an Exception Test at application stage?

Potter Heigham/Repp with Bastwick

165. Policy PUBPHRB1: Bridge Area

- a) Is the wording of Policy PUBPHRB1: Bridge Area effective? What is it seeking to achieve? Why is proposed MM74 necessary to make the policy sound, particularly in relation to flood risk and the possible need for an Exception Test at application stage?

166. Policy PUBPHRB2: Waterside plots

- a) Are terms such as “rural/holiday character”, “over development”, “suburbanisation”, and “lightweight building forms” sufficiently clear to be effective?
- b) Are the 70% plot width and plot coverage justified by evidence?

167. Policy PUBPHRB3: Green Bank Zones

- a) How does this policy relate to others in the Plan which seek to preserve landscape character or protect open spaces?

St Olaves

168. Policy PUBSOL1: St Olaves Riverside area moorings

- a) Do terms such as “incidental uses”, “semi-natural character” and “sensitive design” require clarification for effectiveness?

Somerleyton

169. Policy PUBSOM1: Somerleyton Marina Residential Moorings

- a) Is it clear how the site will be accessed?

- b) Is the policy sufficiently clear on what constitutes “minimal storage structures”, “sensitive lighting”, and “not compromising business activity”, or is further clarification necessary for effectiveness?
- c) Given that 15 residential moorings at Somerleyton Marina are included in the residential-mooring trajectory for 2032, is the policy wording sufficiently clear that this is an allocation intended to meet identified need? What is the evidence to demonstrate these moorings will be delivered by this time?
- d) Why is proposed MM75 necessary to make Policy PUBSOM1 and its reasoned justification sound and up to date, particularly in relation to the number of residential moorings, cumulative impacts, education contributions and the delivery assumptions in the residential moorings trajectory?

Stalham

170. Policy PUBSTA1: Land at Stalham Staithe (Richardson’s Boatyard)

- a) Are the terms “minimal storage”, “central area of the marina”, and “not compromising business activity” sufficiently clear to be effective?
- b) The site is expected to deliver 10 residential moorings by 2032. Is the policy wording sufficiently clear that this is a formal allocation contributing to identified need? What is the evidence to suggest the moorings will be delivered when envisaged?
- c) Is the geographical application of the elements of the policy which apply to the boatyard and the moorings accurately represented on the policies map?
- d) Why is proposed MM76 necessary to make the Plan sound and up to date in relation to the expected delivery timing of residential moorings at Stalham? What is the evidence that the moorings will be delivered within the timescale identified?

Thurne

171. Policy PUBTHU1: Tourism development at Hedera House, Thurne

- a) Is it clear what is meant by “tourism uses”?
- b) Is it clear how this site will be accessed?
- c) What is meant by “proportionate amount of general market housing”? Is further clarity needed regarding the meaning of “only as needed for viability”?
- d) The housing trajectory suggests 16 dwellings would be delivered from this site in 2026, should the policy be clearer about the quantum and timing of the enabling housing for effectiveness?
- e) Why is proposed MM77 necessary to make Policy PUBTHU1 sound, particularly in relation to foul water disposal, water recycling centre capacity, flood risk, sequential location within the site and protection of nearby habitats sites?

Non-Settlement Based Policies

172. Policies PUBSSTRI: Trinity Broads and PUBSSUT: Upper Thurne

- a) Is criterion 1 of both policies consistent with other Broads conservation policies?

- b) Are terms such as “quiet recreation”, “strict boating controls”, “temporary permissions” and “compatibility with aims” sufficiently clear to be effective?

173. Policy PUBSSPUBS: Pubs Network

- a) Are terms such as “exceptional circumstances” and “subservient diversification” sufficiently clear to be effective?
- b) Is the requirement to use the CAMRA Public House Viability Test unduly prescriptive when national policy does not mandate a specific methodology?
- c) Is the section on Assets of Community Value justified and consistent with national policy? Are the tests relevant for the purposes of Asset of Community Value designation and the associated legislation which sets out specific requirements with regard to disposal?

174. Policy PUBSSROADS: Main Road Network

- a) Is it clear what is meant by “Primary Route Network”, “Main Distributor Route” or “Identified Lorry Route” and is their geographical application identified on the policies map?
- b) Are the terms “highway safety”, “network impact” and “adverse environmental impact” sufficiently clear to be effective?
- c) Is criterion 1.iii) covered in greater detail in other policies such that it is ineffective?

175. Policies PUBSSTRACKS: Former Rail Trackways and PUBSSSTATIONS: Railway Stations/Halts

- a) Does proposed submission policies map change MC5, which relates to the correct mapped reference and base layer for PUBSSTRACKS, raise any issues of soundness or legal compliance? Is the geographical application of Policy PUBSSTRACKS clearly and accurately shown on the submission policies map?
- b) Given that these policies primarily relate to accessibility and transport, are they effective when read alongside Policies PUBSP8 and PUBDM29?

176. Policy PUBSSTAITHES: Staithes

- a) Should this policy be more explicitly worded to be concerned with development which may affect staithes?
- b) Should this policy refer to a geographical application on the policies map? If not, is the term “staithe” appropriately defined for them to be identified on a case-by-case basis?

177. Policy PUBSSCOAST: The Coast

- a) Is the term “operational development” correct for the purposes of criterion 1?

178. Policy PUBSSMILLS: Drainage Mills

- a) Given that Policy PUBSSMILLS duplicates many of the requirements already contained within Policies PUBDM13 (Heritage Assets), PUBDM14 (Re-Use of Historic Buildings) and PUBDM62 (Re-Use and Conversion), and that

drainage mills are primarily heritage assets requiring conservation, is this policy effective as a standalone policy?

Matter 12 – Monitoring

Issue 1: Whether the Plan would be able to be monitored effectively to ensure timely delivery and trigger the need for review?

Questions

179. How would the implementation of the Plan policies be achieved? What mechanisms are there to assist development sites to progress?
180. How would the implementation of the Plan be monitored? Would it be effective? How would the results of any monitoring be acted upon?
181. Overall does the Plan deal adequately with uncertainty?