

Planning Committee

Agenda 31 March 2023

10.00am

Yare House, 62-64 Thorpe Road, Norwich NR1 1RY

John Packman, Chief Executive – Friday 24 March 2023

Under the Openness of Local Government Bodies Regulations (2014), filming, photographing and making an audio recording of public meetings is permitted. These activities however, must not disrupt the meeting. Further details can be found on the [Filming, photography and recording of public meetings](#) page.

Introduction

1. To receive apologies for absence
2. To receive declarations of interest
3. **To receive and confirm the minutes of the Planning Committee meeting held on 03 March 2023** (Pages 3-12)
4. To note whether any items have been proposed as matters of urgent business
5. Chairman's announcements and introduction to public speaking
Please note that public speaking is in operation in accordance with the Authority's [Code of Practice for members of the Planning Committee and officers](#).
6. Request to defer applications included in this agenda and/or vary the order of the agenda

Planning and enforcement

7. **To consider applications for planning permission including matters for consideration of enforcement of planning control:**
 - 7.1. BA/2023/0015/FUL - Boat storage and hardstanding at Brundall Gardens Marina (Pages 13-28)
 - 7.2. BA/2023/0083/FUL Strumpshaw - Works to former pumping station culvert (Pages 29-36)
 - 7.3. BA/2023/0032/FUL Reedham - Replacement Ranger hut at quay (Pages 37-42)
 - 7.4. BA/2022/0357/FUL Ludham - Water storage reservoir for agriculture (Pages 43-45)

7.5. Enforcement – Berney Arms, Halvergate (Pages 46-52)

8. **Enforcement update** (Pages 53-58)
Report by Head of Planning

Policy

9. **Hemsby Neighbourhood Plan - proceeding to referendum** (Pages 59-61)
Report by Planning Policy Officer

10. **Local Plan - Issues and Options - representations** (Pages 62-103)
Report by Planning Policy Officer

11. **Local Plan - Preferred Options - bitesize pieces** (Pages 104-152)
Report by Planning Policy Officer

12. **Adopting the Revised Planning in Health Protocol – Norfolk and Waveney area**
(Pages 153-186)
Report by Planning Policy Officer

13. **Halvergate and Tunstall Conservation Area Appraisal - consultation** (Pages 187-220)
Report by Historic Environment Manager

14. **Department of Levelling Up, Housing and Communities - Increasing planning fees and performance - technical consultation** (Pages 221-230)
Report by Head of Planning

15. **Department of Levelling Up, Houses and Communities - Permitted development rights - consultation** (Pages 231-241)
Report by Head of Planning

Matters for information

16. **Appeals to the Secretary of State update** (Pages 242-247)
Report by Senior Planning Officer

17. **Decisions made by Officers under delegated powers** (Pages 248-252)
Report by Senior Planning Officer

18. **To note the date of the next meeting – Friday 28 April 2023 at 10.00am at Yare House, 62-64 Thorpe Road, Norwich**

Planning Committee

Minutes of the meeting held on 03 March 2023

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Present

Harry Blathwayt – in the Chair, Stephen Bolt, Nigel Brennan, Andrée Gee, Tony Grayling, Gail Harris, Tim Jickells, Leslie Mogford and Melanie Vigo di Gallidoro

In attendance

Natalie Beal – Planning Policy Officer, Jason Brewster – Governance Officer, Cheryl Peel – Senior Planning Officer, Cally Smith – Head of Planning and Sara Utting – Senior Governance Officer

Members of the public in attendance who spoke

Jack Young (agent) for item 7(1) – BA/2021/0456/FUL Horning - Extension to mooring basin

1. Apologies and welcome

The Chair welcomed everyone to the meeting.

Apologies were received from Bill Dickson, James Knight and Fran Whymark.

Openness of Local Government Bodies Regulations 2014

The Chair explained that the meeting was being audio-recorded. All recordings remained the copyright of the Broads Authority and anyone wishing to receive a copy of the recording should contact the Governance Team. The minutes remained the record of the meeting. He added that the law permitted any person to film, record, photograph or use social media in order to report on the proceedings of public meetings of the Authority. This did not extend to live verbal commentary. The Chair needed to be informed if anyone intended to photograph, record or film so that any person under the age of 18 or members of the public not wishing to be filmed or photographed could be accommodated.

2. Declarations of interest and introductions

Members provided their declarations of interest as set out in Appendix 1 to these minutes and in addition to those already registered.

3. Minutes of last meeting

The minutes of the meeting held on 03 February 2023 were approved as a correct record and signed by the Chair.

4. Matters of urgent business

There were no items of urgent business.

5. Chair's announcements and introduction to public speaking

Public Speaking: The Chair stated that public speaking was in operation in accordance with the Authority's Code of Practice for members of the Planning Committee and officers.

6. Requests to defer applications and/or vary agenda order

No requests to defer or vary the order of the agenda had been received.

7. Applications for planning permission

The Committee considered the following application submitted under the Town and Country Planning Act 1990 (also having regard to Human Rights), and reached the decision set out below. Acting under its delegated powers, the Committee authorised the immediate implementation of the decision.

The following minutes relate to additional matters of information or detailed matters of policy not already covered in the officer's report, which were given additional attention.

(1) BA/2021/0456/FUL Horning - Extension to mooring basin

Extend mooring basin, replace existing buildings with new reception, workshop & open-sided wetshed.

Applicant: Horning Pleasurecraft Limited

The Senior Planning Officer (SPO) provided a detailed presentation of the application that would involve the removal of two workshops and a derelict building within the site, an extension to an existing mooring basin resulting in the addition of 57 moorings (including 4 visitor moorings), new reception and workshop buildings, a new slipway, the installation of an open-sided wetshed and a new jetty, within the adjacent mooring basin, to provide a further 4 visiting berths.

The presentation included a location map, a site map, detailed site maps for both north and south areas of the site, floorplans and elevation diagrams of the new buildings (reception, workshop and wetshed) and photographs of the site from various points in and around the site.

The SPO explained that the site was located to the eastern end of the village of Horning, accessed by land via Ferry View Road, and by water from a dyke leading northwards from the River Bure.

The SPO indicated that the northern boundary of the site, along Ferry View Road, was fronted by residential properties and the southern boundary, along the River Bure, was also fronted by residential properties. The western boundary consisted of residential and holiday let properties. To the East of the site, there was a strip of land, owned by the applicant, which was directly adjacent to Horning Marsh Farm SSSI, part of the Bure Broads and Marshes SSSI, part of the Broadland Special Protection Area and included in the Broads Special Area of Conservation.

The SPO explained that the proposal was to extend the existing mooring basin at both its northern and southern ends. The northern extension would result in the removal of two workshops and the hard surfaced area between these buildings and the existing basin. This northern extension to the mooring basin would provide an additional 26 mooring berths and 4 new visitor moorings (30 in total).

The SPO explained that a new reception building, a new slipway and a new workshop would be provided to the north of the extended basin. A new open-sided wetshed would be provided on the eastern side of the extended basin from the side of the new workshop.

The southern extension of the mooring basin, the SPO continued, would result in the removal of the derelict property known as “Broadmead”, to provide an additional 23 moorings with a walkway flanking the western and southern sides of this extended basin. The boundary landscape, along the southern boundary of the site, had been suggested to be conditioned to ensure the correct tree planting before implementation.

The SPO confirmed the dimensions of the new buildings and explained that materials had been conditioned to confirm their exact colour and composition.

The SPO provided details of further responses received since the report was published:

- The occupants of Ferry View, having previously responded as indicated in the report, had provided another response that re-iterated some of the points previously raised; specifically, about amenity, ecological issues (including water voles/rats) and flood risk.
- The Broads Authority’s Ecologist, Landscape Architect and Tree Officer had all provided their final consultations indicating that they had no objections subject to the conditions and informatives as covered within the report’s recommendation (section 8.1 of the report).
- Essex and Suffolk Water had responded stating that they had no objections and no suggested conditions.

The SPO indicated that the only outstanding consultation was from Natural England (NE) who had requested some additional time to respond.

The SPO provided the assessment and indicated that the principle of the development was considered acceptable; this was an existing boatyard that provided dayboats, private moorings and boat repairs and maintenance. The proposal was considered to be in accordance with Policy DM33 (Moorings, mooring basins and marinas) of the Local Plan.

The SPO confirmed that the BA Ecologist had not objected to the scheme and it was deemed to be in accordance with Policy DM13 (Natural Environment).

The SPO indicated that NE had previously responded to an earlier iteration of this application. The Local Planning Authority (LPA) for the Broads believed that this updated proposal had addressed the comments previously raised by NE.

This new scheme had ensured a suitable separation between the extended basin and the Horning Marsh Farm SSSI to the East.

A water vole survey had been performed and water voles had been found within the site. This scheme included a proposal to relocate the water voles to an area of newly created fen

habitat to the East of the site. The BA Ecologist had no objection to this proposal. This proposal would be subject to licensing by NE.

The SPO indicated that 10,000m³ of spoil would be generated by excavating the basin extensions. This consisted of 1,300m³ of made-up ground (resulting from the northern basin extension), 1,500m³ of clay and 7,000m³ of uncut and secondary peat (from the southern basin extension).

The SPO explained that the applicant had amended the proposal to minimise the volume of peat excavated, had proposed to re-use some of the excavated peat to restore reeds along the site frontage and the remainder would be used on arable land. Despite not being able to find a solution that eliminated the removal of peat, the scheme had some benefits and, given the proposed mitigations, the SPO indicated that this proposal was not unacceptable with Policy DM13 (Peat Soils).

The proposed extension to the southern mooring basin would, the SPO explained, bring the boating activity closer to the properties on the southern boundary. However, there was already a lot of boat activity within the boatyard to the West, and the increase in boat activity associated with this scheme, was not considered sufficient grounds to justify refusal of planning permission.

The SPO highlighted that a soft landscaping scheme of the entire site including the southern boundary had been conditioned to provide a good barrier between the new moorings and the residential properties.

The SPO reported that in terms of Flood Risk the proposed scheme was deemed beneficial due to the larger mooring basin.

The SPO explained that Policy DM33 requested a certain amount of moorings to be available to new visitors. This scheme, in addition to the 4 new visitor moorings within the extended mooring basin, would provide a further 4 new visitor berths in the adjacent mooring basin to the West (8 new visitor moorings in total).

The SPO concluded by stating that:

- The proposed development would allow the applicants to expand their mooring business at Horning Marina site, and to consolidate the existing provision of workshop and reception services at the site.
- The proposed development would not have an adverse impact on either landscape character or appearance.

There would be an impact on ecology through the presence of water voles in the works area and the extraction of peat, these are considered to have been acceptably considered and addressed.

- There would be no adverse impact on designated sites.
- There would be no undue impact on the amenity of neighbouring residents.

In the absence of a consultation response from NE, the SPO suggested a revised recommendation of: Subject to no new issues raised by NE, that have not already been addressed by officers, to approve the application, subject to conditions as stated in section 8.1 of the report.

A member asked whether this scheme would provide a bio-diversity net gain. The agent responded that the ecology report did indicate a net gain to bio-diversity as a result of the restoration of fen habitat along the eastern boundary of the mooring basin.

Members were supportive of this scheme and acknowledged the benefit this development would be to an existing business within the Broads. A member regretted the loss of peat but felt this was justified in supporting the long-term viability of the applicant.

Members praised the proposed fen habitat restoration and were interested in the long-term outcome of this work.

A member believed the new reception was an improvement on the previous building but was concerned by the reported discrepancies between the site boundary and that of some of the neighbouring properties, questioning how could this situation arise. The Head of Planning (HoP) explained that the map associated with a property's deeds and that held by the Land Registry could differ for a number of reasons. The Land Registry map could be based on old data, on more recent LiDAR data, it may be based on survey data. The map associated with the deeds may date back decades. The HoP indicated that boundary disputes were a civil matter and not a planning matter. In this scheme the question from the objector about the boundary location not being where the applicant believed it was would, the HoP explained, have an impact on the ability of the applicant to provide the landscaping. The HoP suggested, assuming planning permission was granted, that the LPA arrange to meet the applicant and their agent on site to mark out where the screening would start and mark out the 3.5 metres required for the screening itself and record this perimeter. The agent, with the permission of the chair, added that the site map had been updated to reflect the existing fence line on site.

Tim Jickells proposed, seconded by Leslie Mogford and

It was resolved unanimously, provided there were no issues raised by Natural England that had not already been addressed by officers, to approve the application subject to the following conditions:

- i. Standard time limit**
- ii. In accordance with approved plans**
- iii. Details of method statement for piling and dredging works**
- iv. Details of Construction Environmental Management Plan**
- v. Details of materials**
- vi. Details of tree protection**
- vii. Details of replacement trees**

- viii. Details of landscaping
- ix. Details of ecological mitigation method statement, and an ecological management plan
- x. Details of extracted peat use. Spoil to be deposited in flood zone 1
- xi. Details of visitor mooring sign - position, size, and design
- xii. Water vole re-survey prior to works
- xiii. No residential mooring
- xiv. Short stay moorings provided and retained in perpetuity
- xv. No external lighting without agreement in writing
- xvi. Reuse of peat within 7 days of extraction
- xvii. Timber preservatives
- xviii. Highways condition as recommended

8. Enforcement update

Members received an update report from the Head of Planning (HoP) on enforcement matters previously referred to the Committee. Further updates were provided at the meeting for:

Land at the Beauchamp Arms (Two unauthorised static caravans): The statements were being finalised with the Solicitors and when this was completed the summonses could be issued.

Blackgate Farm, High Mill Road, Cobholm: The HoP confirmed that a further site visit was planned at the end of the month to ensure the remaining caravans had been removed.

A member asked whether the Cobholm site could be utilised to support the need for traveller sites identified by Great Yarmouth Borough Council. The HoP responded that the Cobholm site was within the functional floodplain and therefore was unsuitable for this purpose.

Land east of Brograve Mill: The agent had challenged the proposed method of restoring the scrape as stated on the Enforcement Notice and had proposed an alternative solution. The HoP indicated that the Local Planning Authority (LPA) for the Broads were satisfied with this proposal. The agent was near to finalising the detail of this alternative arrangement with the Environment Agency and the Broads Internal Drainage Board and once agreed the restoration work could commence.

A member asked whether the LPA had received an appeal for the Yurt at Blackwater Carr, Postwick (which had been refused permission at the last meeting). The HoP confirmed that the applicant had indicated their intention to appeal the decision and that they had 6 months since the decision was taken to lodge their appeal.

The report was noted.

9. Oulton Neighbourhood Plan - adoption

The Planning Policy Officer introduced the report on the adoption of the Oulton Neighbourhood Plan. The PPO confirmed that the plan had successfully completed its referendum and was ready to be made (adopted).

Leslie Mogford proposed, seconded by Andrée Gee and

It was resolved unanimously to endorse the Oulton Neighbourhood Plan and recommend to the Broads Authority that the Oulton Neighbourhood Plan be made (adopted).

10. Local Plan – Settlement Study update

The Planning Policy Officer introduced the report, which detailed updates to the Settlement Study to reflect comments received from the Local Plan- Issues and Options consultation. The PPO explained that the main change related to access to allotment provision.

Tim Jickells proposed, seconded by Melanie Vigo di Gallidoro and

It was resolved unanimously to endorse the amendments to the Settlement Study.

11. Consultation Responses

The Planning Policy Officer introduced the report, which documented the responses to the Great Yarmouth New Local Plan and South Norfolk Village Clusters Housing Allocations Plan (Reg 19 Version). The PPO proposed to discuss each consultation in turn and endorse the associated recommendation after each section.

Great Yarmouth New Local Plan – Issues and Options consultation

The PPO reported that Great Yarmouth Borough Council had chosen to include all their sites, irrespective of their suitability or not, at this early stage of the formation of a new Local Plan. Since the report was written, the PPO confirmed that she had received comments from the Broads Authority's Landscape Architect which indicated that at a few sites further development had some potential to adversely affect the setting of the BA area. The PPO agreed to circulate the final consultation response to members of the Planning Committee.

A member thanked the PPO for their diligence on this matter and was relieved to hear that this was an open call for sites and therefore there was no potential risk to designated sites.

Stephen Bolt proposed, seconded by Melanie Vigo di Gallidoro and

It was resolved unanimously to endorse the nature of the proposed responses to the Great Yarmouth New Local Plan.

South Norfolk Village Clusters Housing Allocations Plan

The PPO explained that this plan was intended to accommodate 1,200 new homes in more rural areas within various village clusters to enable the sharing of services. The PPO had

received comments from the Authority's Landscape Architect and they had indicated that the sites did provide adequate landscape visual impact assessments. Where the plan indicated there would be no adverse impact on the Broads and, where mitigations had been proposed, the Landscape Architect had indicated their support for these statements. The PPO agreed to circulate the final consultation response to members of the Planning Committee.

Andrée Gee proposed, seconded by Nigel Brennan and

It was resolved unanimously to endorse the nature of the proposed responses to the South Norfolk Village Clusters Housing Allocations Plan.

12. Appeals to the Secretary of State

The Committee received a schedule of appeals to the Secretary of State since the last meeting.

13. Decisions made by officers under delegated powers

The Committee received a schedule of decisions made by officers under delegated powers from 23 January 2023 to 17 February 2023 and any Tree Preservation Orders confirmed within this period.

14. Date of next meeting

The next meeting of the Planning Committee would be on Friday 31 March 2023 10:00am at Yare House, 62-64 Thorpe Road, Norwich.

The meeting ended at 10:53am

Signed by

Chair

Appendix 1 – Declaration of interests Planning Committee, 03 March 2023

Member	Agenda/minute	Nature of interest
Andrée Gee	9, 10	East Suffolk Councillor representing Oulton Broad Ward - other registerable interest

Planning Committee

31 March 2023

Agenda item number 7.1

BA/2023/0015/FUL Brundall- Boat storage and hardstanding at Brundall Gardens Marina

Report by Planning Officer

Proposal

Extension to existing boatyard to provide dry berths for boats and provision of hardstanding and car parking

Applicant

Mr Samuel Dacre

Recommendation

Approval with conditions

Reason for referral to committee

Major application

Application target date

18 April 2023

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1. Description of site and proposals

- 1.1. The subject site comprises a broadly rectangular area of grassland located between West Lane and the Norwich to Brundall railway line, and to the north-west of the Brundall Gardens Marina site which lies to the south of West Lane. It is a large site and covers 1.69 hectares.
- 1.2. The site is level aside from a few mounds and has a fairly uniform covering of grassland vegetation. It is noted that the site falls gently from north to south with a >2m change of level sloping down towards the river. The site is bordered by an area of woodland to the west, a tree lined road to the south, a mix of trees and open space with trees as the backdrop to the east, and the railway line to the north. It is noted that a heap of hardcore is at the site presently, located just north of the site entrance.
- 1.3. Between the proposed boat storage area and the railway line is a permissive (concessionary) footpath, which is separated from the proposed boat storage area by a hedge. To the north of the railway line is the Brundall Parish Allotments, to the immediate east of this is Brundall Countryside Park, and beyond the park is residential development at the westernmost part of Brundall.
- 1.4. To the south of West Road is an area of woodland, and beyond that the River Yare. The land on the opposite side of the river is designated comprising the Yare Broads and Marshes SSSI, Broadland SPA, the Broads SAC, Broadland RAMSAR, and Mid-Yare National Nature Reserve.

- 1.5. The Brundall Gardens Marina site is located between the river and West Lane, to the south-east of the subject site. The marina provides a variety of boat services, moorings, and holiday accommodation.
- 1.6. This application follows a previous application for the same proposal under planning reference BA/2022/0051/FUL. Issues were raised by Natural England and the BA Landscape Architect and requests for further information were made. The application was withdrawn to allow for the issues to be addressed.
- 1.7. The proposal is for the provision of 68 dry mooring berths on an existing area of grassland. A broadly rectangular area measuring 166m x 71m (approximately 1.2ha) would be finished with compacted hardcore to provide the boat storage area, to the outside of this would be a 2.3 metre tall green mesh fence, and to the outside of the fence would be areas of new planting along the entire northern, western, and southern boundaries, along with planting to parts of the eastern boundary. Access would be from West Lane via an existing access to the site. Parking for up to 10 vehicles would be provided to the north-east corner of the subject site.
- 1.8. It is noted that the application as originally submitted included details of proposed lighting, including floodlights. In response to the landscape consultation comments, the lighting has been removed from the application and is no longer a consideration in the assessment of the current proposal.

2. Site history

- 2.1. In 1992 planning permission was granted for the change of use of storage building to offices and land and boat house for retailing boats (BA/1992/4757/HISTAP).
- 2.2. In 2006 planning permission was granted for works to provide 15 moorings including quay heading (BA/2006/3712/HISTAP).
- 2.3. In 2012 planning permission was granted for the renewal of existing quay heading to east of existing basin. Extension of basin to north west with new quay heading. Renew central jetty and extension to south western side of existing basin with new quay heading and jetty. Retention of vehicle entrance barrier (BA/2012/0121/FUL).
- 2.4. In 2014 planning permission was granted for a temporary soil storage area, formation of bund to footpath and wet woodland and formation of North car park access track. (BA/2014/0166/FUL).
- 2.5. In 2014 planning permission was granted for the use of land for overflow car park, erection of gardeners' store, realign quay heading, repair replace quay heading (BA/2014/0300/FUL).
- 2.6. In 2015 planning permission was granted for the use of workshop / boat store for the storage, display and demonstration of marine equipment and small boats, incidental sales, and formation of new pedestrian entrance (BA/2015/0103/CU).

- 2.7. In 2022 a planning application was withdrawn for the extension to existing boatyard to provide dry berths for boats and provision of hardstanding and car parking (BA/2022/0051/FUL).

3. Consultations received

Parish Council

- 3.1. Brundall Parish Council (BPC) objects to the revised planning application (BA/2023/0015/FUL) in the following areas because of its:
- a) impact on environmental, ecological and biodiversity development of the site
 - b) provision of poor road access
 - c) visual impact on countryside park and nearby areas
 - d) provision of a high hedge and its narrow footpath path along the site
- 3.2. 1. The following is a summary of the main reasons for this objection
- Whilst Brundall Parish Council (BPC) notes that the 'Construction Environmental Management Plan' has been included in the latest 2023 application there needs to be more detailed planning and consideration of improvements in the following areas:
- 3.3. a) impact on environmental, ecological and biodiversity development of the site
- (i) Environmental
- Environmental improvements and continuous support need to be more in detail. This includes more information on noise reduction for construction phase machinery, disturbance reduction on land and adjacent areas, reduction of impact on wildlife and the environment. Reduction in pollution from expected increase in boat and machinery activity. Further sustainable plans need to be put in place to ensure continuous enhancement of this environment.
- (ii) Ecological
- Ecological improvements and continuous support improvements need to be in detail (more in-depth) for surrounding area. This greenfield site is surrounded on three sides by natural and semi natural woodland and while the ecological assessment did not identify any notable species it is an integral component of the ecological network along the River Yare corridor. The site is used for feeding by birds such as kestrel, hobby and barn owl.
- (iii) Biodiversity
- Brundall Parish Council notes basic 'development' of this site took place before the application has been agreed with the Broads Authority. Thus already, there has been a substantial loss to biodiversity in this area of the land. Appendix 1 (below) is an aerial

picture of the applicant's land before the dumping of rock/rubble and other items on the land. The site is already despoiled and there is already a loss of biodiversity.

Thus, Brundall Parish Council would like the application plans to provide more in-depth detail on how to improve biodiversity of the land. Further, BPC would welcome plans for continuous support and development of biodiversity. This needs to include how further to encourage a setting for a variety of animals, plants, fungi, and even microorganisms like bacteria that make up our natural world.

We suggest, a small area of this field can be put aside for bio-diversity and/or for small-scale specialised crops.

3.4. b) Provision of poor road access

Safe access is a key issue in areas which use small country lanes. Thus, development will need to show more detail as to how the site will have easier, safe, access for large vehicles like fire engines.

3.5. c) Visual impact on countryside park and nearby areas

The development will be extremely visually obtrusive to parishioners using the countryside park and damage the qualities of the site that the PC has invested so much money creating. Some of the stored boats, based on what we have seen at other boatyards in Brundall, will sit 6 metres or more high so will be visible from the Countryside Park at least until the proposed shrub planting matures (more than 10 years) and some possibly even after that. The 12 floodlights on 12m poles will be visible indefinitely, rising higher than the tree canopy so visible against skyline, and when in use will create light pollution through reflected light.

3.6. d) Provision of a high hedge and its narrow footpath path along the site.

The visual impact will be worse along the footpath (currently permissive) from the Station along the south side of the railway, especially in winter when the shrubs are leafless and the entire area will be clearly visible. This footpath is increasingly important in providing access out of the W side of the village and towards Postwick Ferry without walking on the increasingly traffic ridden Postwick Lane.

Further, this high, enclosed, restrictive hedge along the permissive path excludes walkers' views and impacts on their personal security and safety. Furthermore, the foot path's width is restrictive and hinders people walking (and passing each other) as well as making mobility for people with disability very difficult.

3.7. 2. Conclusion

Appendix 1 below, shows in 2014 original views of walkers without the restrictive hedge and how the site was in a relatively natural state. Appendix 2 shows the state of the site now, via a picture of aggregate placed on the present site. Add this to the present proposed changes and the development will significantly damage the rural

character of this edge of the village that is so important to the enjoyment of the countryside park.

The BPC welcomes the Natural England email (8.2.23) to Mr Catherall of the Broads Authority. This email indicates the applicant may not have sufficient information to show they (will) have achieved the necessary Habitats Regulations Assessment in the following areas: Water Quality/Nutrient Neutrality, Surface Water Drainage Strategy, Pollution Control and Prevention Plan, Consideration of potential impacts on mobile species outside the SAC & SPA, A Construction Environmental Management Plan (CEMP) - to cover for example, reduction of noise and vibration; Protected Species; Development on Peat; and Local Sites and Priority Habitats and Species.

BPC notes 'The statutory purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public.' Source of quote: Natural England, email to the Broads Authority 8.2.2023.

BPC notes the strong objections from the local community and groups. For example: The Broads Society.

Finally, BPC looks forward to more detail from the applicant as to how the site can be improved visually, environmentally, and ecologically, and improved to increase biodiversity. BPC would like improvements in plans for easier road access, and for a safer, secure, permissive footpath with appropriate views for walkers.

Appendix 1 - aerial view showing Brundall Garden Marina land before the changes made by the owner.

Appendix 2 - Latest site picture

District Member

- 3.8. Thank you for drawing my attention to this revised planning application (BA/2023/0015/FUL) for development of a dry mooring boatyard with associate storage provision and car parking on the delineated site.

It is good to see the inclusion of a more detailed Environmental Impact Assessment and Biodiversity Net Gain Assessment. It is also positive to see mitigation measures suggested to reduce the impact of the development on wildlife in the area. I did observe that the figures for bird populations were taken from periods of time some years back. I hope this does not indicate a substantial loss of biodiversity in this area since those records were compiled. I note that this application triggers the Natural England SSSI Impact risk zone for consultation which is in progress.

I see that the development will achieve a biodiversity net gain of at least 10% through new habitat creation, in compliance with the Environment Act 2021 and a planting scheme has been provided for the development.

I also note that a construction Environmental Management Plan has been included in the documents. I have no objection to this application.

Environment Agency

- 3.9. No objection subject to flood risk standing advice.

Norfolk County Council (NCC) Highways

- 3.10. Thank you for your recent consultation with respect to the above which appears similar to a previously withdrawn application.

As traffic movements to and from this site are possible only via the private lane (Postwick PROW PO9) from Postwick Lane (C440), and with the railway bridge on this lane making access by large vehicles or high boats impossible, I consider it very unlikely that traffic engendered to and from the site will increase appreciably by this proposal.

On this basis the Highway Authority raise no objection to this application.

Natural England

- 3.11. Further information requested and provided. A second response from Natural England is anticipated, Members will be provided with a verbal update at the Planning Committee meeting.

BA Landscape

- 3.12. Objection received with the following conclusion:

There is a lack of information with regard to existing trees, proposed landscaping, drainage, and scale/appearance of stored boats. Although provision of additional information would be helpful, there are fundamental Landscape concerns with the proposals. This is a sensitive location within the BA area and close to designated sites. A number of sensitive receptors are present, and the areas' capacity for change of the scale proposed is low. The sensitivity of the site and surroundings suggest that they do not have the capacity to accommodate the scale of the proposals and intensive use of the site.

The proposals would alter the appearance and character of the site, replacing a semi-natural character with visually intrusive elements. Potential adverse visual effects from lighting and stored boats are of particular concern. Proposals for mitigation would neither adequately integrate the scheme into the area or the wider natural setting, nor offset significant adverse landscape and visual effects. Overall, the proposals would have adverse effects on Landscape character and are therefore not supported.

BA Ecologist

- 3.13. No objection subject to mitigation and enhancements

4. Representations

- 4.1. One response was received from The Broads Society who commented as follows:

The Broads Society maintains its objection to this revised scheme for the same reasons as set out in our previous objections to application no. BA/2022/0051/FUL. The application site lies outside of any development boundary and doesn't comply with policies in the Broads Local Plan. Whilst the Broads Society usually supports applications to support Broads Industries this site is effectively a green field location adjacent to the Norwich to Great Yarmouth railway line. We are also concerned as to the choice of proposed surface material in such close proximity to watercourses. Furthermore, the revised application now appears to include 12 lighting columns (all 12 metres in height), the positions of which don't appear to have been indicated on the submitted plans. Notwithstanding their exact locations, this seems contrary to the 'Dark Skies' protection policies set out in the current Broads Local Plan and the visual impact of such columns would also have a significant detrimental impact on the amenity enjoyed by the nearby Brundall Country Park.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
 - DM5 - Development and Flood Risk
 - DM6 - Surface water run-off
 - DM13 - Natural Environment
 - DM16 - Development and Landscape
 - DM21 - Amenity
 - DM22 - Light pollution and dark skies
 - DM23 - Transport, highways and access
 - DM25 - New employment development
 - DM43 - Design
- 5.3. Other material considerations
 - National Planning Policy Framework (NPPF)
 - Planning Practice Guidance (PPG)
 - Brundall Neighbourhood Plan
 - BA Landscape Character Assessment: 12 Yare Valley - Kirby/Postwick to Rockland/Strumpshaw River Yare

6. Assessment

6.1. The application is for an extension to an existing boatyard to provide 68 dry berths for boats and provision of hardstanding and car parking. The current application follows a previous proposal for dry boat storage which was withdrawn as the applicants sought to address issues raised through the previous consultation process. The following is a summary of how the current application differs to the withdrawn scheme:

- Revised site layout reducing the area of boat storage and increasing the area of landscaping to improve screening and increased wildlife migration corridors.
- Submission of traffic/transport management Plan
- Submission of construction management plan with reference to pollution control.
- Submission of flood risk assessment and drainage strategy.
- Submission of revised ecology report including bird data.

Principle of development

6.2. The consideration of a new storage area (use class B8) is primarily assessed with regard to Policy DM25 of the Local Plan for the Broads which addresses new employment development. The policy provides 11 criteria covered against which such a proposal would be assessed.

6.3. Criterion i) requires that the site is located within a development boundary or within or adjacent to existing employment sites or is a building used as an employment use. The subject site is adjacent to the established Brundall Gardens Marina and, although separated by West Lane, it is noted that the entrances to the existing and subject elements of the site are directly opposite each other. The applicant has explained that the use would wholly relate to the operations of the applicant's adjacent Broads based uses, and would be for storage only, not an area for boat repair or maintenance.

6.4. The proposal is considered to be in kind with the marina business as existing which provides mooring berths and has minor areas of dry boat storage adjacent to the workshop building at the site. The additional income from the proposed boat storage area would contribute to the vitality and viability of the existing business, helping to maintain a marina business which forms part of a network of waterside boat related businesses throughout the Broads. The different form of accommodation for boat storage in addition to existing moorings, increases the range of services provided by the applicant's business which contributes to the resilience of the business. Additionally, this increases the range on offer in this area as whilst Brundall Gardens and Brundall provides a large of moorings overall, the offer of dry boat storage is very limited. The proposal is therefore considered to accord with criterion i) of Policy DM25 and is acceptable in principle.

6.5. The remaining criterion of Policy DM25 will be discussed separately in the following assessment.

Impact upon the landscape

- 6.6. The area of land where the proposed dry berths for boats with associated hardstanding and car parking would be provided is currently an area of grassland with areas of scrub. In the past the land has appeared with more scrubby vegetation, and has been approved for use as temporary storage of excavated material (under planning ref BA/2014/0166/FUL). The present appearance is of a level site with short sward grass and scrub, aside from the occasional small mound.
- 6.7. The proposed scheme will result in a fundamental change to the use and appearance of the site, replacing 1.2 hectares of grassland with compacted hardcore, and the storage of up to 68 boats on that area, with a 2.3m high green mesh security fence to all sides. It is noted that the BA Landscape Architect has objected to the scheme, citing issues including impacts on a number of sensitive receptors, the area's capacity for change of the scale proposed being low, the scale of the proposals and intensive use of the site, and replacing a semi-natural character with visually intrusive elements, observing that stored boats, owing to their light reflective colours and materials would be particularly noticeable.
- 6.8. The subject site is well screened from public vantage points from the east and west, and well screened from views further to the south including from the river, although it is noted that views from West Lane where it passes to the south of site are fairly open, interrupted by a line of mature trees. The site is fairly open to views from the north via the permissive path and railway line, both of which run along the northern boundary of the site, and from the Brundall Parish Allotments and Brundall Countryside Park which are north of the railway line.
- 6.9. To the northern side of the subject site is an existing hedge, this runs parallel to the southern side of the permissive path, incorporating the occasional tree. Although a fairly young hedge, it provides an existing demarcation between the footpath and the proposed site area, along with some level of screening. To the immediate south of the hedge is a proposed 4.5m wide planting area which would extend across the full width of the northern boundary. Whilst proposed planting would take some time to establish, the existing hedge would provide a reasonable interim measure in softening the appearance of the site, particularly from the permissive footpath.
- 6.10. A scheme setting out how the landscape impact would be mitigated will be required, and this should show appropriate planting to the areas around the boat storage area. Initially there will be more obvious landscape impacts, and the 2.3m tall green mesh security fence will be more of a presence. Landscaping schemes are an integral part of numerous planning proposals, and whilst there is always a delay while planting becomes established, this is a conventional and customary practice which is accepted as bringing overall positive outcomes. In this case it is considered that a landscape scheme would contribute to the acceptability of the scheme and would be required by planning condition.

- 6.11. The existing hedge would not interrupt views from trains passing the north of the site, although the existing trees give an indication of how effective planting can be in this area once established. Regardless of this, views in a southern direction would include partial views of the boatyard beyond which would give the site some context, and does provide some link in the development of this area which is directly linked to the use of the water.
- 6.12. To the north of the railway line and directly north of the subject site is the Brundall Parish Allotments. The area of the allotments is bordered by a hedge, when to the north of the allotments this has the effect of limiting views to the south which would include the subject site. Within the allotments themselves the boats stored at the subject site would be visible, although this would be interrupted to some extent by the existing hedging. When the proposed planting along the northern border is established, this would provide a suitable area of vegetation which will help to mitigate any landscape impact in views from the north.
- 6.13. To the immediate east of the allotments, and north-east of the subject site is the Brundall Countryside Park. The park is fairly recently established, being the subject of a 2014 planning permission alongside the allotments. Planting in the different sections of the park is at different stages of maturity with, generally speaking, more established trees to the central and northern sections of the park, with a more sporadic and less established covering to the southern section.
- 6.14. For a good portion of the park area views to the south and the subject site area are limited due to the existing vegetation within the park. To the southern part of the park views of the site would be more open due to more sporadic planting and less mature specimens. In the central area between the park and the allotments is a north to south closely mown grass avenue with an approximately width of 5 metres. The southern part of the park sits lower overall due to the sloping nature of the land towards the river. By being sited lower, the views beyond the railway line to the subject site are more restricted when closer to the boundary, and the existing and proposed planting would adequately soften and partly screen the storage area. The effectiveness of the planting in providing mitigation will improve over time. The central avenue is maintained as an area of circulation, views to the south along this narrow corridor are fairly uninterrupted. Existing and proposed planting would provide some softening in views of the storage site, in addition the corridor allows partial views of the boatyard site beyond, which gives the boat storage a reasonable context and as noted above, provides a link between areas of development.
- 6.15. Overall it is accepted that there will be some local landscape impacts as a result of the storage of boats at the subject site, and the landscape objection is acknowledged. The composition and existing planting within the areas to the north of the railway line would limit the impact on the appearance of the site to some extent, and a well-considered planting scheme within the subject site would further reduce the visibility of the storage area. Including the existing hedge at the northern of the site there would be

a 6.5m wide planting strip along the full northern edge of the boat storage area, this is considered to provide sufficient space for a reasonable planting scheme which would sufficiently mitigate landscape impacts in views of the northern side of the site.

- 6.16. Some views of the boats stored at the site will still be possible, but taking into account the context of the site which would exist as an extension of the well-established boatyard beyond, the existing and proposed planting within the site, and the existing planting on areas to the north, it is considered that the use of the subject site for the storage of boats would not have an unacceptable impact on landscape appearance and character. The reduction in the hard-surfaced area over the previously withdrawn scheme, and provision of planting areas to the peripheries allow for an acceptable proposal. A detailed landscaping scheme will be necessary to ensure that any landscape impacts are sufficiently mitigated and the planting areas are efficiently utilised for this purpose. The proposal is therefore considered to be acceptable with regard to Policy DM16 and criteria ii) and vii) of Policy DM25 of the Local Plan for the Broads.
- 6.17. With regard to the loss of the large multi-stemmed Alder near the eastern boundary, although the loss of this tree is regrettable, its position near the site entrance make its retention difficult. The tree is a little isolated from the adjacent group of trees and it does lean noticeably towards the east. It would not be reasonable to insist on its retention, and the loss of this tree can be mitigated through a detailed landscaping scheme.

Ecology

- 6.18. The subject site comprises grassland and appears to have been maintained as such for a number of years. The application was accompanied by an Ecological Survey which has been considered by the BA Ecologist. No objection has been raised to the proposal subject to mitigation and enhancements which would be secured by planning condition. It will be necessary to require a reptile survey prior to any works commencing, and this may require further mitigation which again will be secured by condition.
- 6.19. There are no designations at the subject site, with the separation to the designated sites to the south of the river comprising 95 metres of land and 55 metres of river. However, the subject site is within the SSSI Impact Risk Zone and to this extent a Habitat Regulations Assessment (HRA) was carried out. The HRA concluded that there would be no significant impacts on sites or species.
- 6.20. Natural England did not object to the previous proposal although did make requests for additional information which has been provided as part of the current proposal. An objection from Natural England is not anticipated, Members will be updated at the meeting of any further comments from Natural England. Subject to these comments, the proposal is considered to be acceptable with regard to Policy DM13 and criterion ii), of Policy DM25 of the Local Plan for the Broads.

Amenity of residential properties

- 6.21. The site is over 140 metres from the nearest residential properties. Taking into the nature of the proposed development it is considered that there would be no undue impact on residential amenity. The proposal is therefore considered to be acceptable with regard to Policy DM21 and criterion iv) of Policy DM25 of the Local Plan for the Broads.

Highways and public rights of way

- 6.22. The proposal is for dry boat storage. Whilst there would be visitors to the site, given the nature of the proposed use of the site this would be infrequent and irregular, which is reflected in the provision of only 10 car parking spaces. Norfolk County Council as Local Highways Authority have considered the proposal and raised no objection, considering it very unlikely that traffic engendered to and from the site will increase appreciably by this proposal. They also note that the railway bridge on West Lane makes access by large vehicles or high boats impossible.
- 6.23. The layout of this site is such that there is adequate space for loading and unloading and operational movements around the site. There is consideration within Policy DM25 for the site being designed to promote user accessibility by walking, cycling and public transport, but this is not relevant to the subject proposal. The proposal is therefore considered to be acceptable with regard to Policy DM23 and criteria v), vi), and vii) of Policy DM25 of the Local Plan for the Broads.

Flood risk and drainage

- 6.24. The site lies predominantly within flood zone 1, with parts of the south-eastern quarter within flood zones 2 and 3. The Environment Agency were consulted and confirmed that the proposal is covered by Local Flood Risk Standing Advice, this confirming that the site is in flood zones 2 and 3A. The proposal is for boat storage which in terms of flood risk vulnerability classification is water compatible development, the nature of the development would not impede flood waters including the provision of permeable boundary treatments, and it is noted that river flood waters would not pass across or through the site, but would rise from the south before dissipating in that direction. Further to this the use of the site would not have an impact on flood storage capacity at the site. A flood response plan will be required by condition to ensure that the site is appropriately managed during flood events. The proposal is therefore considered to be acceptable with regard to Policy DM5 and criterion viii) of Policy DM25 of the Local Plan for the Broads.
- 6.25. Considering the sequential test as stipulated in paragraph 162 of the NPPF, this aims to steer new development to areas with the lowest risk of flooding from any source, with consideration for reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The proposal is for dry boat storage, this functioning as an expanded part of the established Brundall Gardens Marina. There is no available land in this area which would be suitable and appropriate for the proposed use. Taking into account the proposed water compatible use, the exceptions test is not

required for the proposed development. The proposal is therefore considered to be acceptable with regard to Paragraph 162 of the NPPF.

- 6.26. Drainage at the site would be altered by virtue of the change from grassland to compacted hardcore. The application was accompanied by a flood risk assessment which concludes that the surface water drainage strategy is to attenuate and discharge to the adjacent ditch, a range of SuDS may be incorporated in the development, and a detailed drainage strategy will ensure the site will sufficiently treat the surface water prior to discharging. A detailed drainage strategy will be secured by planning condition, subject to which the proposal is considered to be acceptable with regard to Policy DM6 of the Local Plan for the Broads.

Other issues

- 6.27. Considering the remaining issues to address under Policy DM25. The site is considered to be developed comprehensively in terms of planning, layout and servicing arrangements which would accord with criterion iii).
- 6.28. Criterion ix) considers the storage, handling or use of chemicals which is not applicable to this application.
- 6.29. The site is within agricultural land grade 3, criterion x) stipulates that versatile agricultural land (grade 3a and above) should not be used. Available mapping does not differentiate between grades 3a and 3b. Historically land to the north of the subject site, including the recently provided allotments and country park, has been in agricultural use, at the same time the subject site has only been grassland/scrubland. Given the lack of historic agricultural use it would not be reasonable to refuse the application on the loss of agricultural land, with regard to criterion x) of Policy DM25.
- 6.30. The requirement to make effective use of previously developed land is not considered to be applicable here taking into account the nature of the proposal, its links to the established business to the south, and the lack of previously developed land in this location, with regard to xi) of Policy DM25.
- 6.31. Security gates are proposed at the entrance to the site between two sections of the green mesh security fence, these would match in size and appearance the gates serving the main marina site directly opposite on West Lane. Taking into the siting of the gates and the existence of matching gates on the opposite side of the road, the installation of security gates is considered acceptable with regard to Policies DM16 and DM43 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The proposed development would allow the applicants to expand the boatyard activities through boat storage on a piece of land adjacent to the Brundall Gardens Marina site, and on land which has previously been used in conjunction with that business. The proposed development would not have an adverse impact on either landscape character or appearance, ecology and designated sites, and no undue impact

on the amenity of neighbouring residents. The proposed use of the site is considered to be acceptable in flood risk terms, and drainage can be suitably addressed through a drainage strategy. Consequently, the application is considered to be in accordance with Policies DM5, DM6, DM13, DM16, DM21, DM23, DM25 of the Local Plan for the Broads, along with the National Planning Policy Framework.

8. Recommendation

8.1. Subject to no new issues raised by consultees, to approve with the following conditions:

- i. Standard time limit
- ii. In accordance with approved plans
- iii. Details of proposed surfacing
- iv. Details of detailed drainage strategy
- v. Details of landscaping scheme and landscape management plan
- vi. Details of tree protection
- vii. Details of any proposed signage - position, size, and design
- viii. Ecological mitigation, management, and enhancements
- ix. Reptile survey prior to works
- x. No external lighting
- xi. Storage of boats only, no operational works of repair or maintenance

9. Reason for recommendation

9.1. The proposal is considered to be in accordance with Policies DM5, DM6, DM13, DM16, DM21, DM23, and DM25 of the Local Plan for the Broads, along with the National Planning Policy Framework which is a material consideration in the determination of this application.

Author: Nigel Catherall

Date of report: 21 March 2023

Background papers: BA/2023/0015/FUL

Appendix 1 – Location map

Appendix 1 – Location map

BA/2023/0015/FUL - Land At Brundall Gardens Marina, West Lane, Brundall



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Planning Committee

31 March 2023

Agenda item number 7.2

BA/2023/0083/FUL - Strumpshaw - Works to pumping station drainage channel and outlet pipe

Report by Planning Officer

Proposal

The repair of the existing drainage channel and extension to outflow pipe

Applicant

Andrew Farrell on behalf of Broads Authority

Recommendation

Approve subject to conditions

Reason for referral to committee

Broads Authority involved in application

Application target date

27 April 2023

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1. Description of site and proposals

- 1.1. The subject site is located within Strumpshaw Fen RSPB Reserve. Strumpshaw Fen sits on the north-east bank of the River Yare, to the south-east of Brundall. Strumpshaw Fen is a rural site which operates as a popular nature reserve with visitor trails, hides and a small visitor centre and forms part of a Site Special Scientific Interest (SSSI), RAMSAR Site, Special area of Conservation (SAC), Special Protection Area (SPA) and is a National Nature Reserve (NNR). The reserve is accessed via a carpark which sits to the north east of the site, on the opposite side of the Norwich to Lowestoft rail line which runs through the north-east side of the reserve. To the south of the site sits a Locally Listed steam engine house and chimney, formerly used as a pumping station, approximately 11 metres from the riverbank. Whilst a private track which is suitable for vehicles runs down from Station Road to the pumping station, the public can only access this by private footpaths within the reserve.
- 1.2. The subject of this application is the pumping station drainage channel and outflow pipe which are sited between the steam engine house and the river. The building was used to pump water from the marshes, with water travelling from the building, along the drainage channel and to the river through cast-iron water gates at the river's edge. Initially it was powered by steam, and then later by a diesel pump; it remains operational but is not the main drainage pump here. Improvements to flood defences as part of the BESL works has resulted in the installation of flood boards to either side of the channel, these being at a height above the channel walls.
- 1.3. In 2018 planning permission was granted for works to the chimney, the engine house, the moving of an irrigation pump and landscaping in the area. During that project it became apparent that the works required for the drainage channel repair were more extensive than originally anticipated and beyond the time and budget available. This element of the work was removed from that project and now forms the subject of this application.
- 1.4. The drainage channel has been in a poor state of repair for a number of years and is reliant on temporary timber supports. There is water ingress into the newly repaired building, water seepage into the flood bank and water seepage from the river into the drainage channel.
- 1.5. The proposal is to repair the drainage channel. The works proposed are as follows:
 - works to the drainage channel walls which would include the increase in height by approximately 2 brickwork courses, this is to match the height of the adjoining floodboards;
 - provision of new headwall within the drainage channel in line with the flood defences on either side and to the height of channel walls;
 - extension to the existing outflow pipe within the drainage channel up to and over the headwall;

- backfilling of drainage channel section between the building and the new headwall with Type 3 aggregate up to 800mm below the top of the channel walls.

2. Site history

- 2.1. In 2004 planning permission was granted for flood defence works including bank strengthening, bank re-alignment, soke dyke excavation, temporary site compounds and access and associated engineering works (BA/2004/3867/HISTAP).
- 2.2. In 2018 planning permission was granted for works to chimney, the engine house, moving of irrigation pump and landscaping in the area (BA/2017/0496/FUL).
- 2.3. In 2021 planning permission was granted to extend footprint of works, reshape the adjacent ditch and relocate the irrigation pump hard-standing. This was a variation of the 2017 application (BA/2021/0015/COND).

3. Consultations received

Parish Council

- 3.1. Strumpshaw parish Council recommends the application should be approved.

District Member

- 3.2. This application can be determined by the Head of Planning (delegated decision)

Environment Agency

- 3.3. To be reported orally

Norfolk County Council (NCC) Highways

- 3.4. No objection subject to condition regarding construction access route

Natural England

- 3.5. No objection

Broads Drainage Broad

- 3.6. Advised on permitting regime

BA Heritage Planning Officer

- 3.7. No objection subject to conditions

BA Ecologist

- 3.8. No objection providing the ecological advice provided in the appraisal is followed at all times during the development.

BA Rivers Engineer

- 3.9. A Works Licence will be required before construction.

4. Representations

- 4.1. None received.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).

- 5.2. The following policies were used in the determination of the application:

- DM5 - Development and Flood Risk
- DM11 - Heritage Assets
- DM13 - Natural Environment
- DM16 - Development and Landscape
- DM21 - Amenity
- DM43 - Design

- 5.3. Other material considerations:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)

6. Assessment

- 6.1. The key issues in the determination of this application are the principle of the development, the landscape impact, impact on the locally listed heritage assets and flood risk.

Principle of development

- 6.2. The proposed works seek to address issues with the existing drainage channel. In alleviating these issues, the works would contribute to the long-term preservation of the recently repaired engine house and effective flood defence near the river's edge through the improvement in the function and maintenance of the drainage channel. The proposed works are therefore considered to be acceptable in principle, with regard to National Planning Policy Framework and Policies DM5 and DM11 of the Local Plan for the Broads.

Impact upon the landscape

- 6.3. The pumping station complex is a prominent and well-known feature in the local landscape, primarily due to its rather attractive chimney, along with its siting in an area largely devoid of buildings. The drainage channel in comparison is largely hidden and only really appreciated up close, where its simple form and clear functional role to the pumping station complex make a pleasing contribution to the overall appearance of the site.

- 6.4. The proposed works to the channel itself are relatively minor and there would be limited impact on the landscape's appearance through the raising of the channel sides. The addition of the headwall will read well given its siting as a continuation of the existing flood boards to either side of the channel.
- 6.5. The most obvious addition will be in the form of the extension to the outflow pipe. The existing outflow pipe is visible where it exits the engine house, but only extends into the drainage channel for a short distance. The proposed extension would take it along the drainage channel at the same level as the existing short section of pipe, but where it reaches the headwall it is necessary to rise up and go over the wall. The pipe diameter is 400mm, the pipe will only rise as high as is required to clear the wall so will extend approximately 400mm above the upper part of the drainage channel and headwall. The pipe stays close to the headwall so its protrusion is kept to the minimum required. Whilst being a clearly visible addition, given the setting next to an engine house and chimney, and its function as part of an existing drainage channel, it is not considered that the alteration is unacceptable in visual terms.
- 6.6. The proposed works are considered to have no adverse impact on landscape character and appearance, with regard to Policy DM16 of the Local Plan for the Broads.

Design and heritage

- 6.7. The drainage channel is an integral part of the pumping station complex, providing the outflow into the river. Due to the poor condition of the drainage channel and the numerous repairs and use of substitute materials which have taken place previously, it is considered that its significance as part of the complex results from its historic contribution to the function of the pumping station, rather than in its fabric.
- 6.8. The repairs proposed to the drainage channel walls and addition of the headwall are relatively low key and do not alter the historic location of the channel which will still be read as part of the overall complex. Furthermore, they do not have an impact on the significance of the Locally Listed structure. It is noted that the cast-iron water gates at the river's edge will be retained which will maintain the appearance when viewed from the river.
- 6.9. The majority of the extended outflow pipe will not be visible due to the infilling of the channel up to 800mm below the extended walls. Where the pipe rises up and over the proposed headwall this will be approximately 400mm above the headwall and will be a visible element. Taking into account the separation to the engine house, the siting as part of a well established drainage channel, and with regard to the contribution to the long term protection of the local heritage asset, the proposed outflow pipe is considered to be acceptable.
- 6.10. The BA Heritage Planning Officer has commented that, 'In order to repair the channel significant alterations and re-building are proposed but it is clear from the documentation submitted that the existing channel has undergone many alterations in the past, has become structurally unstable and in need of a high level of intervention to

help save the structure. The increase in height is also required due to higher water levels and to match up with the existing floodboards which is considered reasonable. The in-filling, whilst will change the character and function of the structure, will be at a low level in the landscape and will only be visible close up - interpretation of how this once functioned could also be provided in the interpretation secured under the 2017 application. The in-filling is required to help stabilise the structure further and stop wildlife become trapped in the channel which is considered reasonable. It is therefore considered that the alterations proposed, whilst significant in historic building terms, will have a minimal impact on the character of the wider building, are necessary and fully justified, and will help ensure the historic asset can be read and enjoyed by users of the RSPB reserve and river and can therefore be supported’.

- 6.11. The proposed works would not result in harm to the setting or significance of the Locally Listed heritage asset and would contribute to the long term health of those assets. The proposed works are therefore acceptable with regard to Policy DM11 of the Local Plan for the Broads.

Flood risk

- 6.12. The proposed works would improve the integrity of the existing drainage channel which has benefits to the Locally Listed heritage asset, and also contributes to the integrity of the flood defences on the northern bank of the River Yare. The existing flood boards stop either side of the channel, the provision of a headwall within the channel aligned with the flood boards would provide a level of continuity to the flood defences. In addition to this, the improvements to the drainage channel would significantly reduce and potentially prevent further seepage into the existing flood wall. Taking these points into account it is considered that the proposed works would be beneficial to the integrity and function of the flood defences and are therefore acceptable with regard to Policy DM5 of the Local Plan for the Broads.

Other issues

- 6.13. Norfolk County Council as Highways Authority have raised no objection to the scheme subject to use of the Construction Traffic Access Route only during the construction phase, this would be secured by planning condition. The proposed works are therefore acceptable with regard to Policy DM23 of the Local Plan for the Broads.

7. Conclusion

- 7.1. The proposed seeks to repair and improve the existing drainage channel serving the Locally Listed engine house and chimney, this would be beneficial to the long term preservation of those structures, and would contribute to the flood defences in this location. The works are reasonably low key and in keeping with the overall appearance of the drainage channel, and would not have an adverse impact on the heritage assets or landscape and river scene. The application is considered to be in accordance with Policies DM5, DM11, DM16, and DM23 of the Local Plan for the Broads, along with the National Planning Policy Framework.

8. Recommendation

- 8.1. Subject to no new issues being raised by consultees, to approve with the following conditions:
- i. Standard time limit.
 - ii. In accordance with approved plans.
 - iii. Details of alternative materials
 - iv. Submission of photographic survey.
 - v. Construction Traffic Access Route.
 - vi. Any damage created as a result of the work will be repaired as agreed by LPA.
 - vii. The works compound will cease 1 month following completion of the works.
 - viii. The land at the works compound will be put back to original condition within 3 months following completion of the works.

9. Reason for recommendation

- 9.1. The proposal is considered to be in accordance with Policies DM5, DM11, DM16, and DM23 of the Local Plan for the Broads, along with the National Planning Policy Framework which is a material consideration in the determination of this application.

Author: Nigel Catherall

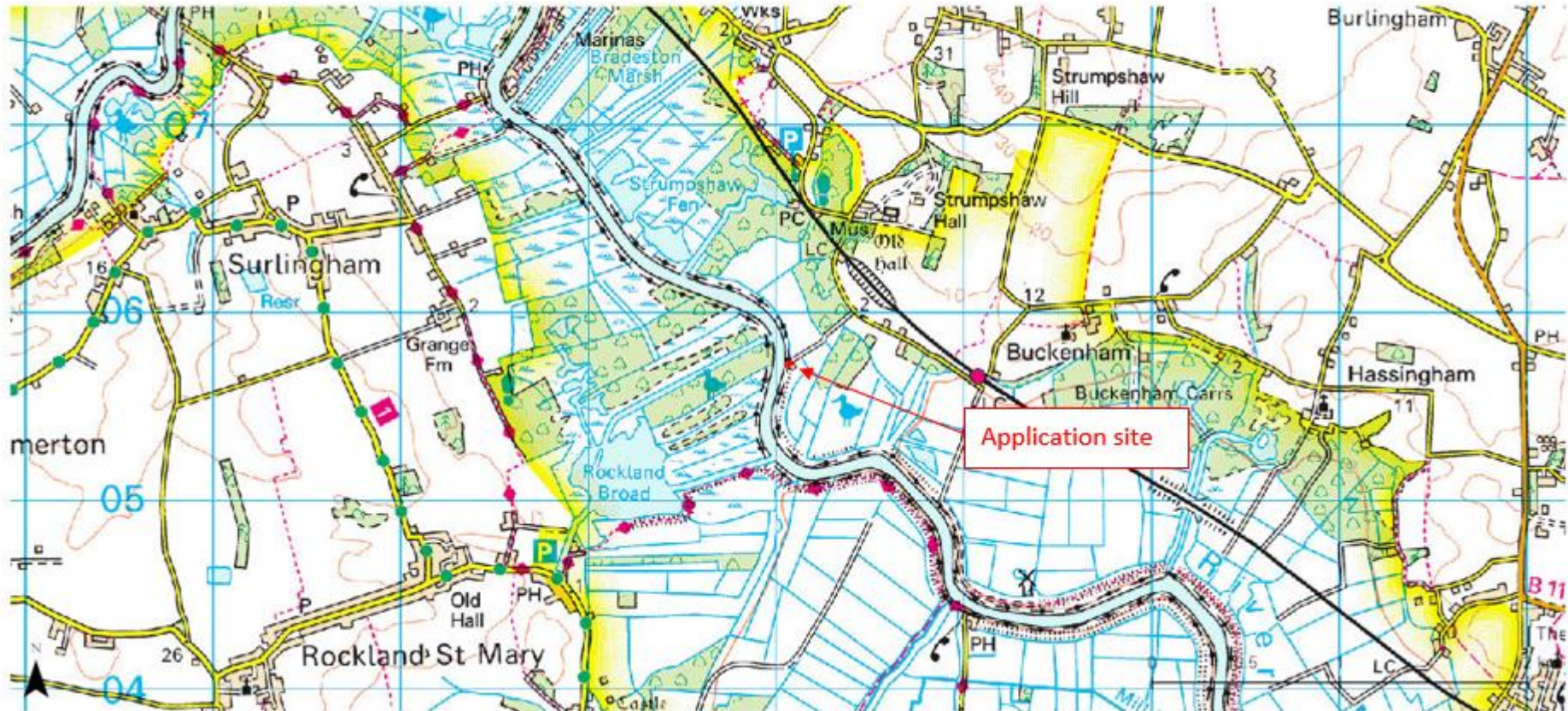
Date of report: 15 March 2023

Background papers: BA/2023/0083/FUL

Appendix 1 – Location map

Appendix 1 – Location map

BA/2023/0083/FUL – Pumping Station, Low Road, Strumpshaw



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Planning Committee

31 March 2023

Agenda item number 7.3

BA/2023/0032/FUL Reedham – Replacement Ranger hut at quay

Report by Planning Officer

Proposal

Replacement of 2.85m x 2.2m timber ranger hut with a 2.85m x 3.2m timber hut. Raise supporting brick plinth by 0.3m to raise it above the flood level.

Applicant

Mr Sam Bates, Broads Authority

Recommendation

Approve, subject to conditions

Reason for referral to committee

Broads Authority application

Application target date

24 March 2023

Contents

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1. Description of site and proposals

- 1.1. The application site comprises a small building located between the River Yare and the flood wall on the Broads Authority 24 hour moorings at Riverside in Reedham. The application site is situated within Flood Risk Zone 3. The building is used by Broads Authority staff members between the months of April and October to allow for shelter while aiding with mooring and provide an information service for visitors to Reedham Quay. The application is seeking permission for a replacement larger building, with the inclusion of a veranda to allow for more room for staff members when on duty.
- 1.2. The existing building measures 2.85m x 2.2m with a height to the roof ridge of 2.8m (including brick plinth) and the proposed replacement measures 2.85m x 3.2m with a height to the roof ridge of 3.1m (including brick plinth).
- 1.3. The hut will be constructed from feather edge timber, to be painted black on the exterior to match that of the existing building. The roof is to be cedar wood tiles and windows and stable door are to be timber painted black. The proposed building is to be raised from the ground level by an additional 0.3m to allow for further protection from flooding and includes a veranda on the river fronting elevation.

2. Site history

- 2.1. None.

3. Consultations received

Parish Council

- 3.1. The Parish Council had no objections and were supportive of the extra shelter to be provided for the Rangers. Their only concern was that the defibrillator would be stored safely and replaced on the hut once the work had finished.

Environment Agency

- 3.2. We have inspected the application as submitted, and have no objection to this planning application, providing that you have taken into account the flood risk considerations which are your responsibility.

BA Historic Environment Manager

- 3.3. The site sits on the front of Reedham Quay, close to the River Yare and within the Broads Authority Executive Area. The proposal is to replace the existing small Ranger's hut with a slightly larger hut, incorporating a veranda. The new building will be positioned on a slightly taller red brick plinth, to reduce the likelihood of flooding. I have no objection to the proposal. The traditional materials will match those used on the existing hut, as will the overall style of the simple building. The slight changes in

design are potentially an improvement to the appearance of the building and it should provide a much more useable facility for the Rangers to assist members of the public.

4. Representations

Broads Society

- 4.1. The Broads Society supports this application.

5. Policies

- 5.1. The adopted development plan policies for the area are set out in the [Local Plan for the Broads](#) (adopted 2019).
- 5.2. The following policies were used in the determination of the application:
- DM5 – Development and Flood Risk
 - DM16 – Development and Landscape
 - DM43 – Design
- 5.3. The National Planning Policy Framework (2022) (NPPF) is a material consideration.

6. Assessment

- 6.1. The main considerations in the determination of the application are the principle of the development, the design and impact on the surrounding area and flood risk.

Principle of development

- 6.2. The proposal is for a replacement building to be used by Broads Authority staff members typically between the summer season months of April and October, to allow for shelter while aiding with mooring, and to provide an information service for visitors to Reedham Quay. The existing building has been in place for some time and its replacement is considered to be acceptable.

Design and Impact on the Area

- 6.3. The proposed timber building is to measure 2.85m x 3.2m with a height to the roof ridge of 3.1m (including brick plinth).
- 6.4. In assessing the design of the proposed development, Policy DM43 states that all development will be expected to be of a high design quality and should integrate effectively with its surroundings, reinforce local distinctiveness and landscape character and preserve or enhance cultural heritage. The proposed building is to be constructed out of feather edge timber, to be painted black, a cedar wood tiled roof and timber windows and door, to be painted black. The proposed building is to be raised from the ground level by an additional 0.3m red brick plinth and includes a veranda design on the river fronting elevation. It is considered that the proposed design of the hut relates well to its location and does not detract from the special qualities of the area. The

proposal is in accordance with the requirements of Policy DM43 of the Local Plan for the Broads.

- 6.5. With regards to impact on the character and appearance of the area, the Broads Authority Historic Environment Manager has not raised any objection to the proposal development commenting that the traditional materials will match those used on the existing hut, as will the overall simple style of the building. It is considered that the changes from the design of the existing hut for example, the incorporation of the veranda are an improvement, and the replacement building will be more attractive, as well as providing improved functionality for the Rangers to assist members of the public. The development is therefore considered acceptable in terms of DM16 of the Local Plan for the Broads.

Flood Risk

- 6.6. The site is located within Flood Zone 3, with the development being situated on Reedham Quay forward of the flood wall and it is therefore susceptible to flooding during flood events. The new hut will be positioned on a slightly taller red brick plinth (increase of 0.3m), to reduce the likelihood of flooding during an event.
- 6.7. The Environment Agency has raised no objection to the proposed scheme subject to the Broads Authority taking account of flood risk considerations. The proposal is for a non-habitable room and classified as a water compatible development, therefore it is not considered the replacement hut would adversely affect flood risk. The proposal increase in footprint is considered minor and the development would not result in a loss of flood plain storage capacity. The development therefore is considered to comply with Policy DM5 of the Local Plan for the Broads.

7. Conclusion

- 7.1. Planning permission is being sought to replace the existing hut used by Broads Authority staff members at Reedham Quay with a slightly larger structure. The proposed hut materials are to match that of the existing building, while improving the flood reliance of the building by increasing the brick plinth the hut sits on by 0.3m. The design of the proposal is considered to be in accordance with Policy DM43, DM11 and DM16 of the Local Plan for the Broads and there will be no adverse impact on Flood Risk resulting from the development in accordance with DM5 of the Local Plan for the Broads. On this basis, it is considered that the application is acceptable.

8. Recommendation

- 8.1. Approve subject to the following conditions:
- i. Three-year time frame for commencement
 - ii. In accordance with the approved plans and material details

9. Reason for recommendation

- 9.1. The proposal for the replacement of the building (hut) at Reedham Quay is in accordance with NPPF guidance and Policy DM5, DM16 and DM43 of the Local Plan for the Broads.

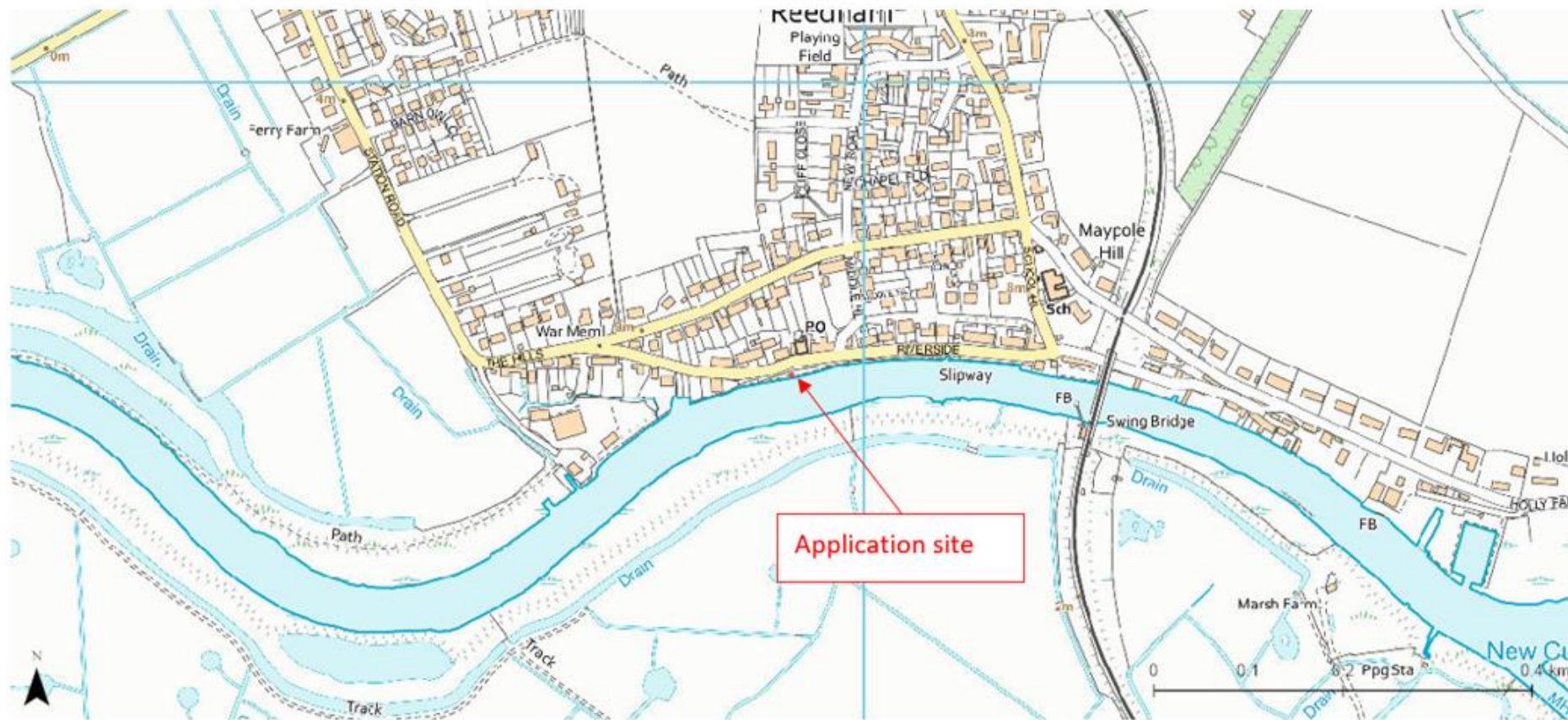
Author: Amy Hambling

Date of report: 16 March 2023

Appendix 1 – Location map

Appendix 1 – Location map

BA/2023/0032/FUL – Quay Ranger Hut, Reedham Quay



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Planning Committee

31 March 2023

Agenda item number 7.4

BA/2022/0357/FUL Ludham- Water storage reservoir for agriculture

Report by Senior Planning Officer

Proposal

A balanced cut and fill earth moving operation to create an irrigation reservoir for the storing of winter abstractions.

Applicant

Nicholas Collier

Recommendation

Members of the Planning Committee to visit the site.

Reason for referral to committee

Major application

Application target date

22 May 2023

1. Description of site and proposals

- 1.1. The application site is situated to the west of the village of Ludham on the east side of the River Ant. To the north is the How Hill estate and National Nature Reserve. To the south is How Hill Fen Nature Reserve. Much of the land to the northwest and south of the site is covered by a number of statutory designations, including as part of the Ant Broads and Marshes SSSI.
- 1.2. The application site is currently a grassed field measuring 6.2 hectares in total, located within a meander of the River Ant on raised land overlooking Buttles Marsh to the south. The nearest residential properties are located approximately 150m to the south-east of the site. A public footpath runs along the southern boundary of the site.
- 1.3. The proposal is for a new reservoir which will encompass the whole field except for a grass margin around the edge. The approximate footprint measured from the edges is 230m by 215m.

- 1.4. The boundary fencing will be 2.4m high green wire fencing to prevent animals and people gaining entry. Bunds approximately 4m high will be constructed inside the fence and these will be grassed to allow for sheep grazing.
- 1.5. Pipe work is proposed to be installed to fill the reservoir and then to remove the water. The fill pipe is 134.95m long and connects through the woodland to the north into the River Ant. It will be 0.9m below the ground surface in a 1.05m deep trench.
- 1.6. The irrigation pipe proposed is 3033.73m long and will connect to an existing pipe just south of Grove Farm on Goffins Lane. This will require the excavation to a depth of 1.05m but all surfaces will be reinstated after construction. The underground main route goes through gaps in hedges and therefore there should be no loss of hedgerow.

2. Considerations

- 2.1 The main considerations in the determination of the application are likely to be landscape impact, ecological impact and flood risk.
- 2.2 The Code of Practice for Members of the Planning Committee and officers (September 2021) states at paragraph 13.1 that:

“A committee site visit will be held if there is a significant benefit in doing so. Reasons may include where the impact of the proposed development is difficult to visualise, where applicant and objector comments cannot be expressed adequately in writing and a site visit would show that members have listened to the arguments, or where the proposal is particularly contentious”.
- 2.3 The location of the proposed reservoir is remote from usual public viewpoints and the topography is such that it would be difficult to illustrate this fully with photographs. It is also a major development with the potential for a significant impact on a number of important considerations. It would be useful for members to see the site prior to considering the application.

3. Recommendation

- 3.1. That Members undertake a site visit.

Author: Cheryl Peel

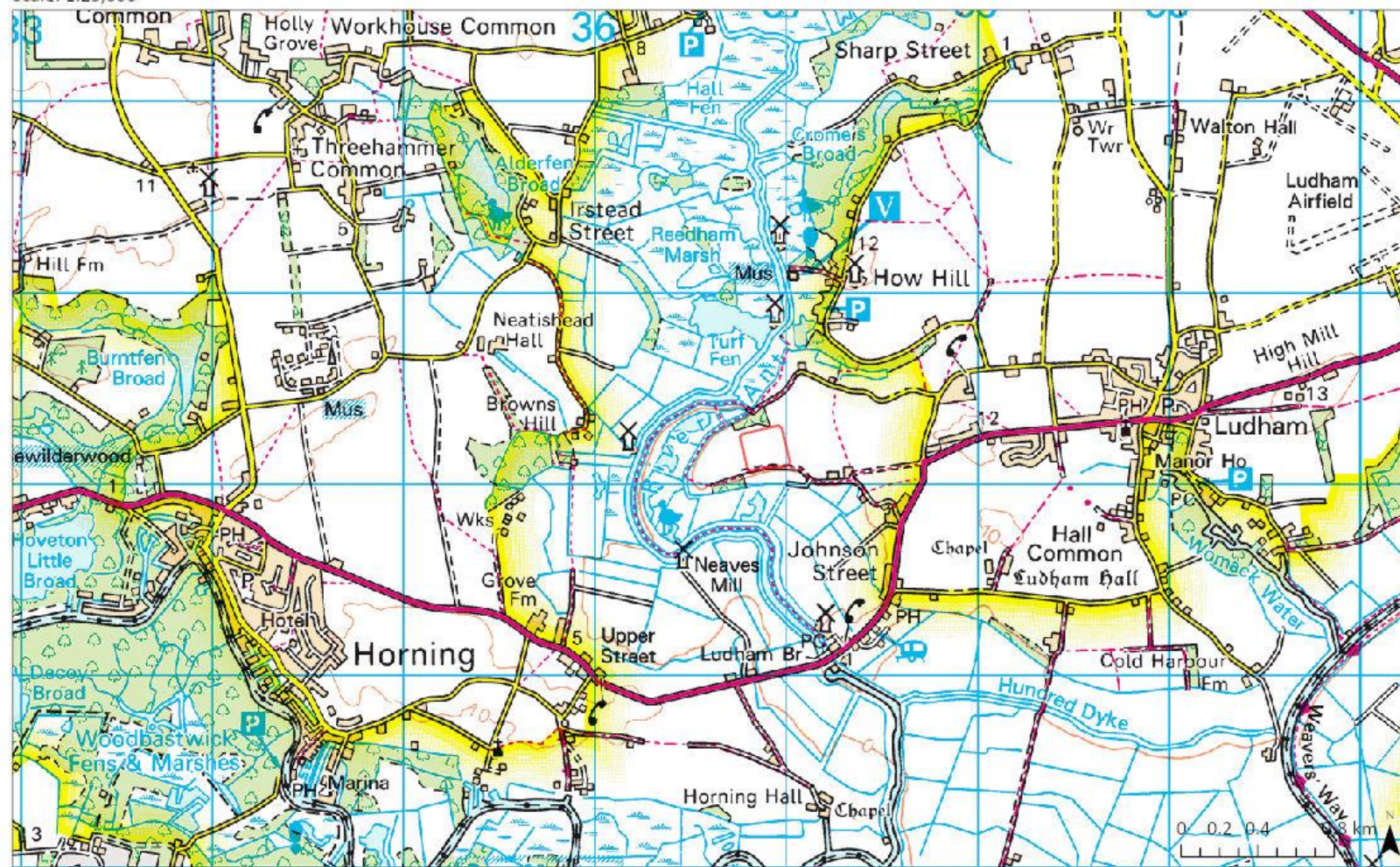
Date of report: 15 March 2023

Appendix 1 – Location map

Appendix 1 – Location map

BA/2022/0357/FUL - Field 500M West Of, Limes Farm, Blind Lane, Ludham

Scale: 1:25,000



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Planning Committee

31 March 2023

Agenda item number 7.5

Enforcement – Berney Arms, Halvergate

Report by Head of Planning

Summary

Two caravans and one wooden building are being used for residential purposes on land to the rear of Berney Arms. There is no planning permission for this use, the development is contrary to planning policy and permission could not be granted.

Recommendation

To serve an Enforcement Notice.

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1. Site location and description

- 1.1. The Berney Arms is situated on the River Yare at the western end of Breydon Water. It is a remote location with few buildings nearby, and those that do exist relate primarily to historical activities and land uses in the area. The Grade 1 listed Berney Arms Drainage Mill is located to the west, and beyond this are the buildings of Ashtree Farm, now owned by the RSPB. There is a further mill and listed Hall on the land opposite, on Haddiscoe Island, and beyond these, on the other side of the River Waveney, is Burgh Castle which is the closest settlement by distance. The surrounding land is marshes, most of it managed for conservation purposes.
- 1.2. Access to the site is limited. There is a road across the marshes, but it is privately owned and not a public highway. It is understood that there is a right of vehicular

access to the Berney Arms, but this is restricted to the landlord/licensee or similar in connection with its use as a pub only and this is not a general right of access. As the site directly fronts the River Yare there is good access from the water, as well as extensive mooring provision. The Norwich to Great Yarmouth railway line crosses Halvergate Marshes to the west of the site and the Berney Arms halt is located 650m to the west of the site.

- 1.3. The Berney Arms sits within a substantial curtilage which stretches both north and south of the main building. The main pub building is unused. There is a separate building to the south which was previously operated as a shop and café and is now registered as a bistro, although it serves only cold drinks and packaged snacks. There are a number of outbuildings and sheds to the rear of the site and two dilapidated static caravans. The buildings and structures on the site are in relatively poor condition.
- 1.4. There are also two touring caravans located on land to the south of the main buildings.

2. The unauthorised development

- 2.1. The two static caravans and one of the outbuildings to the rear of the property are being used for residential purposes. There is no planning permission for this use.
- 2.2. Planning Contravention Notices (PCN) were served in February 2023 to obtain further information on the uses on the site.
- 2.3. The information provided shows that the two static caravans are currently being rented out for residential use on Assured Shorthold Tenancies which commenced on 1 September 2019. One of the outbuildings is also being rented out for residential use and the Assured Shorthold Tenancy for this unit commenced on 15 August 2021. The PCN responses stated that the services provided are bottled gas, electricity (direct or from extension lead) and bottled water. The outbuilding is connected to the on-site septic tank.
- 2.4. Whilst the use of land for the standing of a caravan does not necessarily constitute development for which planning permission is needed, where the caravan is occupied this becomes a material change of use. The occupation of the outbuilding as a dwelling is also a material change of use. In this case, the unauthorised development on the site has resulted in a change of use from land ancillary to the former public house to a mixed-use ancillary to the former public house, the stationing and residential occupation of static caravans and the material change of use of the outbuilding to a residential use.
- 2.5. Planning permission is required and there is no planning permission for this use.

3. The planning issues

- 3.1. The Broads Authority has a Local Enforcement Plan which sets out its approach to dealing with enforcement matters. It was reviewed and updated in July 2022. At

paragraph 3.7 it states that “Whilst the law gives a Local Planning Authority strong legal powers to deal with breaches of planning control, in most cases the first choice of approach is to use negotiation to reach a satisfactory resolution in a timely manner. The negotiations would aim to achieve one of the following outcomes:

- To apply for retrospective planning permission if the development is acceptable and would have got planning permission in the first place; or
- To amend the development so it is acceptable and then apply for retrospective planning permission if the development is capable of being acceptable; or
- To amend the development so it is in accordance with the approved plans if the amendments are acceptable; or
- To remove the unauthorised development or cease the unauthorised use if the development is unacceptable and incapable of being made acceptable.”

- 3.2. In determining how to take this matter forward, the LPA must, therefore, first consider whether the unauthorised development is acceptable in planning terms, whether it is capable of being made acceptable, or whether it is unacceptable. If the unauthorised development is not and cannot be made acceptable, then the LPA must consider the expediency of enforcement action.

The acceptability of the development

- 3.3. Looking first at the acceptability of the existing unauthorised development, Adopted Local Plan Policy SP15 sets out the spatial strategy for the provision of new housing and this is further developed in policy DM35 which states:

“New residential development will only be permitted within defined development boundaries, and must be compatible with other policies of the Development Plan.”

There is no development boundary in this area and the development is therefore contrary to DM35 and SP15.

- 3.4. Adopted Local Plan policy DM21 requires that all development provides occupiers with satisfactory level of amenity, including internal accommodation and external amenity space. The caravans are in poor condition, are unlikely to offer adequate levels of heating and/or insulation and have no amenity space. The outbuilding which is being occupied is a simple timber building, with no adequate provision for insulation or heating or with proper facilities for cooking or hygiene. The requirements of DM21 are not met.
- 3.5. Adopted Local Plan policy DM5 requires that all development is appropriate for the flood risk zone in which it is located and that a site specific flood risk assessment is provided where necessary to demonstrate this. The advice in Planning Practice Guidance (PPG) is that “Caravans, mobile homes and park homes intended for permanent residential use” are classified as ‘highly vulnerable’ in terms of flood risk and are only considered appropriate in Flood Risk Zone 1, or in Flood Risk Zone 2 where an

Exceptions Test can be satisfied. This site is located in Flood Risk Zone 3 so the use of the static caravans for residential purposes is therefore inappropriate and conflicts with DM5.

- 3.6. With regard to the outbuilding, if it can be treated as a dwelling house it would be classified as 'more vulnerable' in terms of flood risk and would only be considered appropriate in Flood Risk Zones 1 or 2, or in Flood Risk Zone 3A where an Exceptions Test can be satisfied. The Exceptions Test would need to demonstrate community or other benefits sufficient to outweigh the flood risk and it is not considered that this could be concluded here, particularly given the overriding in principle objection under policy DM35. On this basis the use is therefore inappropriate and conflicts with DM5.
- 3.7. Adopted Local Plan policy DM43 requires all development to meet a high standard of design. The two static caravans are standard units in poor condition, whilst the outbuilding is a standard timber building with windows, also in poor condition. None of these units meet the requirements of policy DM43 and all are unacceptable.

The expediency of enforcement action

- 3.8. When a breach of planning control has taken place and the LPA is considering what action is appropriate, it will need to look carefully at a number of factors. The factors are expediency, proportionality and consistency.

Expediency

- 3.9. Expediency may be explained as an assessment of the harm that is being caused by the breach. Harm may arise through a range or combination of factors, for example adverse impact on visual amenity due to poor design or materials, and this would be an example of direct harm arising from the unlawful development. There is also the generic harm which arises from a development which is in conflict with adopted policies and which, if it were not addressed, would undermine the policies in the development plan as well as the principles of the NPPF and NPPG. Furthermore, a failure to address non-compliant development would undermine the integrity of the planning system and paragraph 59 of the NPPF emphasises the importance of this when it states "Effective enforcement is important to maintain public confidence in the planning system", demonstrating that this is a valid objective in itself.
- 3.10. The harm resulting from the unauthorised development arises from the clear conflict with planning policy, both national and local. It is considered that this harm is significant because the conflict relates to the fundamental principles of the location of new residential development. There will be costs associated with enforcement action, however, when balanced against the need to ensure, amongst other matters, the protection of the planning system it is considered that enforcement action is likely to be expedient given the benefits of securing a cessation of the development.

Proportionality

- 3.11. The second test is one of proportionality; enforcement action should always be proportionate to the seriousness of the harm being caused. In this case, again, the main

objection to the development is the 'in principle' conflict with the approach to the location of new residential development as set out in the NPPF and adopted planning policies. Where it is accepted that an LPA has a responsibility to protect the planning system in order to maintain public confidence in it, it follows that the extent of the action should be directly proportionate to the extent of the breach. In this case, as there is a fundamental conflict with planning policy only a full cessation of the unauthorised use can be justified.

- 3.12. It is noted that both the two static caravans and the outbuilding are being occupied as dwellings, with the users enjoying the benefits of this and the landowner deriving a financial benefit from renting them out. These, however, are private benefits and should not override the public benefits associated with upholding the planning system.
- 3.13. Overall it is considered that enforcement action to secure the cessation of the unauthorised development is proportionate.

Consistency

- 3.14. The third test is consistency and the Local Enforcement Plan identifies the need to ensure consistency so that a similar approach is taken in similar circumstances to achieve similar outcomes.
- 3.15. The LPA has already served Enforcement Notices in respect of three caravans being occupied on a permanent basis on land to the rear of the Beauchamp Arms, as well as against two caravans on land at Loddon Marina. Both of these sites are in the same ownership as Berney Arms, albeit under a different parent company.
- 3.16. It is considered that enforcement action against the breaches identified here would be consistent with the approach taken elsewhere and therefore meets the requirements of the Local Enforcement Plan.
- 3.17. Finally, it is noted in the Local Enforcement Plan that whilst the law gives an LPA strong legal powers to deal with unauthorised development, the preferred approach is always to seek to negotiate a solution and the fourth test considers whether this approach has been applied. In negotiating a solution, the outcome will either be that the development is (or is made) acceptable and planning permission is granted, or, where the development is not and cannot be made acceptable, that the breach is stopped. In this case, for the reasons outlined above, the development cannot be made acceptable and there is no prospect of planning permission being granted. The solution will therefore require the cessation of the development.
- 3.18. Members will be aware of the history of breaches of planning control on land owned and/or managed by this operator, across whose sites there has been a disregard for planning regulations. Previous experience indicates that it is very unlikely that compliance could be achieved by negotiation. Consequently, the LPA has not sought to engage with the landowner on this matter as it is considered that this would not be the best use of resources and is likely only to delay resolution.

- 3.19. In considering expediency it is also necessary to take account of the impacts and costs of taking action, which would include the resources required to do this, as well as what is likely to be achieved. The more harm that is being caused then the more likely it is that it will be expedient to take enforcement action due to the need to stop the harm. Conversely, if there is little harm it may not be expedient to pursue the matter, particularly if the costs are high. In this case, there is significant harm to interests of public importance from development which is intrinsically unacceptable. The service of Enforcement Notices, as a first step, incurs little cost other than officer time; if further action is needed to secure compliance this will need to be considered.
- 3.20. In conclusion, it is considered that the development is unacceptable and enforcement action can be justified as expedient.

4. Financial implications

- 4.1. The service of Enforcement Notices will require officer time; any costs associated with administration will be met from the existing planning service budget.
- 4.2. If compliance is not achieved voluntarily there will be costs associated with enforcing this. Members will be advised of progress through the regular update to Planning Committee, so there will be the opportunity to consider any additional costs.

5. Conclusion

- 5.1. The unauthorised development at the site is contrary to development plan policy and could not be granted planning permission.
- 5.2. The Local Enforcement Plan explains that where an unauthorised development is unacceptable and cannot be made acceptable, the LPA should seek to negotiate a solution. There is no realistic prospect of a negotiated solution here and it is recommended that an Enforcement Notice is served requiring the cessation of the unauthorised use. A compliance period of four months would be appropriate.

Author: Cally Smith

Date of report: 15 March 2023

Background papers: Enforcement file

Appendix 1 – location map

Appendix 1 – location maps

The Berney Arms Inn, Berney Arms, Gt Yarmouth

Scale: 1:25,000



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Planning Committee

31 March 2023

Agenda item number 8

Enforcement update

Report by Head of Planning

Summary

This table shows the monthly updates on enforcement matters. The financial implications of pursuing individual cases are reported on a site by site basis.

Recommendation

To note the report.

Committee date	Location	Infringement	Action taken and current situation
14 September 2018	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravans (Units X and Y)	<ul style="list-style-type: none"> Authority given to serve an Enforcement Notice requiring the removal of unauthorised static caravans on land at the Beauchamp Arms Public House should there be a breach of planning control and it be necessary, reasonable and expedient to do so. Site being monitored. October 2018 to February 2019. Planning Contravention Notices served 1 March 2019. Site being monitored 14 August 2019. Further caravan on-site 16 September 2019.

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> • Site being monitored 3 July 2020. • Complaints received. Site to be visited on 29 October 2020. • Three static caravans located to rear of site appear to be in or in preparation for residential use. External works requiring planning permission (no application received) underway. Planning Contravention Notices served 13 November 2020. • Incomplete response to PCN received on 10 December. Landowner to be given additional response period. • Authority given to commence prosecution proceedings 5 February 2021. • Solicitor instructed 17 February 2021. • Hearing date in Norwich Magistrates Court 12 May 2021. • Summons issued 29 April 2021. • Adjournment requested by landowner on 4 May and refused by Court on 11 May. • Adjournment granted at Hearing on 12 May. • Revised Hearing date of 9 June 2021. • Operator pleaded 'not guilty' at Hearing on 9 June. Trial scheduled for 20 September at Great Yarmouth Magistrates Court. • Legal advice received in respect of new information. Prosecution withdrawn and new PCNs served on 7 September 2021. • Further information requested following scant PCN response and confirmation subsequently received that caravans 1 and 3 occupied on Assured Shorthold Tenancies. 27 October 2021 • Verbal update to be provided on 3 December 2021

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> • Enforcement Notices served 30 November, with date of effect of 29 December 2021. Compliance period of 3 months for cessation of unauthorised residential use and 4 months to clear the site. 6 Dec. 2021 • Site to be visited after 29 March to check compliance – 23 March 2022 • Site visited 4 April and caravans appear to be occupied. Further PCNs served on 8 April to obtain clarification. There is a further caravan on site. 11 April 2022 • PCN returned 12 May 2022 with confirmation that caravans 1 and 3 still occupied. Additional caravan not occupied. • Recommendation that LPA commence prosecution for failure to comply with Enforcement Notice. 27 May 2022 • Solicitor instructed to commence prosecution. 31 May 2022 • Prosecution in preparation. 12 July 2022 • Further caravan, previously empty, now occupied. See separate report on agenda. 24 November 2022 • Planning Contravention Notice to clarify occupation served 25 November 2022. 20 January 2023. • Interviews under caution conducted 21 December 2022. 20 January 2023
8 November 2019	Blackgate Farm, High Mill Road, Cobholm	Unauthorised operational development – surfacing of site, installation of services and standing and use of	<ul style="list-style-type: none"> • Delegated Authority to Head of Planning to serve an Enforcement Notice, following liaison with the landowner at Blackgate Farm, to explain the situation and action. • Correspondence with solicitor on behalf of landowner 20 Nov. 2019. • Correspondence with planning agent 3 December 2019. • Enforcement Notice served 16 December 2019, taking effect on 27 January 2020 and compliance dates from 27 July 2020.

Committee date	Location	Infringement	Action taken and current situation
		5 static caravan units for residential use for purposes of a private travellers' site.	<ul style="list-style-type: none"> • Appeal against Enforcement Notice submitted 26 January 2020 with a request for a Hearing. Awaiting start date for the appeal. 3 July 2020. • Appeal start date 17 August 2020. • Hearing scheduled 9 February 2021. • Hearing cancelled. Rescheduled to 20 July 2021. • Hearing completed 20 July and Inspector's decision awaited. • Appeal dismissed with minor variations to Enforcement Notice. Deadline for cessation of caravan use of 12 February 2022 and 12 August 2022 for non-traveller and traveller units respectively, plus 12 October 2022 to clear site of units and hardstanding. 12 Aug 21 • Retrospective application submitted on 6 December 2021. • Application turned away. 16 December 2021 • Site visited 7 March 2022. Of non-traveller caravans, 2 have been removed off site, and occupancy status unclear of 3 remaining so investigations underway. • Further retrospective application submitted and turned away. 17 March 2022 • Further information on occupation requested. 11 April 2022 • No further information received. 13 May 2022 • Site to be checked. 6 June 2022 • Site visited and 2 caravans occupied in breach of Enforcement Notice, with another 2 to be vacated by 12 August 2022. Useful discussions held with new solicitor for landowner. 12 July 2022. • Further site visited required to confirm situation. 7 September 2022

Committee date	Location	Infringement	Action taken and current situation
			<ul style="list-style-type: none"> Site visit 20 September confirmed 5 caravans still present. Landowner subsequently offered to remove 3 by end October and remaining 2 by end April 2023. 3 October 2023. Offer provisionally accepted on 17 October. Site to be checked after 1 November 2022. Compliance with terms of offer as four caravans removed (site visits 10 and 23 November). Site to be checked after 31 March 2023. 24 November 2022
8 January 2021	Land east of Brograve Mill, Coast Road, Waxham	Unauthorised excavation of scrape	<ul style="list-style-type: none"> Authority given for the service of Enforcement Notices. Enforcement Notice served 29 January 2021. Appeal against Enforcement Notice received 18 February 2021. Documents submitted and Inspector's decision awaited. September 2021 PINS contacted; advised no Inspector allocated yet. 20 October 2022. Appeal dismissed 9 January 2023 and Enforcement Notice varied. Compliance required by 9 October 2023. 20 January 2023.
13 May 2022	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised operation development comprising erection of workshop, kerbing and lighting	<ul style="list-style-type: none"> Authority given by Chair and Vice Chair for service of Temporary Stop Notice requiring cessation of construction 13 May 2022 Temporary Stop Notice served 13 May 2022. Enforcement Notice and Stop Notice regarding workshop served 1 June 2022 Enforcement Notice regarding kerbing and lighting served 1 June 2022 Appeals submitted against both Enforcement Notices. 12 July 2022

Committee date	Location	Infringement	Action taken and current situation
21 September 2022	Land at Loddon Marina, Bridge Street, Loddon	Unauthorised static caravans	<ul style="list-style-type: none"> • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravans. • Enforcement Notice served. 4 October 2022. • Enforcement Notice withdrawn on 19 October due to minor error; corrected Enforcement Notice re-served 20 October 2022. • Appeals submitted against Enforcement Notice. 24 November 2022
9 December 2022	Land at the Beauchamp Arms Public House, Ferry Road, Carleton St Peter	Unauthorised static caravan (Unit Z)	<ul style="list-style-type: none"> • Planning Contravention Notice to clarify occupation served 25 November 2022. • Authority given to serve an Enforcement Notice requiring the cessation of the use and the removal of unauthorised static caravan • Enforcement Notice served 11 January 2023. 20 January 2023. • Appeal submitted against Enforcement Notice. 16 February 2023.

Author: Cally Smith

Date of report: 15 March 2023

Background papers: Enforcement files

Planning Committee

31 March 2023

Agenda item number 9

Hemsby Neighbourhood Plan- Proceeding to Referendum

Report by Planning Policy Officer

Summary

The Hemsby Neighbourhood Plan, and the representations received on the submitted Plan during the publication stage, have been subject to an independent examination by a suitably qualified individual who endorsed the Plan, with some changes, for referendum.

Recommendations

To support the Examiner's report and support the Hemsby Neighbourhood Plan proceeding to referendum.

1. Introduction

- 1.1. The submitted Hemsby Neighbourhood Plan was approved by the Broads Authority at Planning Committee in September 2022. This was followed by a statutory publication period between 27 September 2022 and 08 November 2022 in which the Plan and its supporting documents were made available to the public and consultation bodies.
- 1.2. During the publication period, representations from various different organisations/ individuals were received. [Reg. 16 Publication Consultation Responses Report](#).
- 1.3. These representations were submitted, along with the Neighbourhood Plan and supporting information, to the independent Examiner, Tony Burton. The examination was conducted via written representations during late 2022/early 2023 (the Examiner deciding that a public hearing would not be required).
- 1.4. Legislation directs that an Examiner considers whether:
 - a) the draft plan meets the 'basic conditions'¹ of a Neighbourhood Development Plan,
 - b) the draft plan complies with the definition of a Neighbourhood Development Plan and the provisions that can be made by such a plan,
 - c) the area for referendum should extend beyond the neighbourhood area, and

¹ [Basic conditions for neighbourhood plan to referendum \(www.gov.uk\)](https://www.gov.uk)

- d) the draft plan is compatible with the Convention rights.
- 1.5. Planning legislation states that once a local planning authority has been issued with an Examiner's report, they must consider the recommendations. If the authority is satisfied with the Examiner's recommendations then any specified modifications should be made before the Plan proceeds to referendum.
 - 1.6. If the Broads Authority and Great Yarmouth Borough Council are satisfied then they will need to publicise their decision (a decision statement) and move to a referendum (should that be what the examiner recommends). If they are not satisfied, then they must refuse the plan proposal and publicise their decision. This decision would be subject to a further six-week consultation, with a possibility of a further independent examination.

2. The Examiner's report

- 2.1. The [Examiner's Report \(great-yarmouth.gov.uk\)](https://great-yarmouth.gov.uk) concludes that, subject to amendments (as set out in the report), the Neighbourhood Plan can proceed to referendum. The Examiner also concluded that the area of the referendum does not need to be extended beyond the parish of Hemsby.
- 2.2. It is therefore recommended that Planning Committee support the Examiner's report and support the Hemsby Neighbourhood Plan proceeding to referendum.

3. Next steps

- 3.1. Should the Examiner's recommendations be met with full approval by Great Yarmouth Borough Council and the Broads Authority, then a decision statement will be produced which will be published, along with the Examiner's report, on the Broads Authority and Great Yarmouth Borough Council's website and made available in the other locations. Great Yarmouth Borough Council will make the appropriate amendments to the plan as set out in the Examiner's Report.
- 3.2. Should the recommendation be to proceed to a referendum, then the next steps will involve Great Yarmouth Borough Council publishing information and giving at least 28 days' notice of the referendum (not including weekends and Bank Holidays). Again, this information will be made available on the Great Yarmouth Borough Council and Broads Authority websites and likely made available by Great Yarmouth Borough Council.
- 3.3. The referendum is set for 22 June 2023.
- 3.4. If more than half of the people who vote in this referendum vote in favour of the proposal then Great Yarmouth Borough Council and Broads Authority must adopt/make the Neighbourhood Plan as soon as reasonably practicable, unless it considers that this would breach or be incompatible with any EU obligation or the Human Rights Convention.

- 3.5. This means that, should the referendum result support the Neighbourhood Plan, then the Plan would be subject to Great Yarmouth Borough Council and the Broads Authority ratification before it is 'made', although the NPPG says that 'A neighbourhood plan comes into force as part of the statutory development plan once it has been approved at referendum'.
- 3.6. Should the local planning authority propose to make a decision that differs from the Examiner's recommendations (and the reason for the difference is wholly or partly as a result of new evidence or a new fact or a different view taken by the authority about a particular fact) then:
 - 3.6.1. They are required to notify all those identified in the consultation statement about this position and invite representations;
 - 3.6.2. They may refer the issue to an independent examination if they think it appropriate.

4. Financial Implications

- 4.1. Officer time in assisting Great Yarmouth Borough Council with the Neighbourhood Plan process. Referendum and examination costs have been borne by Great Yarmouth Borough Council.

Author: Natalie Beal

Date of report: 16 March 2023

Planning Committee

31 March 2023

Agenda item number 10

Local Plan - Issues and Options - representations

Report by Planning Policy Officer

Summary

The Issues and Options consultation ran from 3 October to 4pm on 9 December 2022. We received around 600 comments and these are reported in this paper. The appendix includes the comment, name of respondent and the proposed response from the Authority.

Members' views on the comments and responses are welcomed.

Recommendation

To endorse the responses, subject to any comments made at committee.

1. Introduction

- 1.1. The Issues and Options consultation ran from 3 October to 4pm on 9 December 2022. A report was presented to the Planning Committee meeting on 3 February 2023, summarising the key headlines and this is available here: [Issues and Options - summary of consultation \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/issues-and-options-summary-of-consultation).
- 1.2. Included at Appendix 1 are the comments, name of respondent as well as the proposed response from the Authority.
- 1.3. Members are asked to consider the comments and responses, provide feedback and ultimately endorse the responses. The document will then be shared with those who provided comments and the comments themselves will be used to inform the preparation of policies.
- 1.4. The comments received are useful and helpful and will help us as we produce Local Plan policies. The Authority appreciates the time taken by the respondents to give us their thoughts.

Author: Natalie Beal

Date of report: 10 March 2023

Appendix 1 – Issues and Options consultation - Comments received and proposed Broads Authority responses

Appendix 1 - Issues and Options consultation - Comments received and proposed Broads Authority responses

Part of document (numbers denote the question number)	Organisation	Comment	Response	Action for next version of the Local plan
1	Anglian Water	3.2.Anglian Water recognises that the Broads is an important area for biodiversity and that a landscape scale approach to nature recovery, delivered through Local Nature Recovery Strategies, provides opportunities to ensure wetland habitats are resilient over the longer term.	Background information noted.	No further action
1	Anglian Water	3.3.Given the tightly drawn boundary of the Broads Executive Area, we note that close working with neighbouring local planning authorities is imperative for the Authority, and ensures that appropriate levels of growth can, if required, be located outside the Executive Area to help sustain local businesses such as by meeting local housing needs to provide longer term resilience.	Background information noted.	No further action
1	Anglian Water	3.4.IIIThe 'Pressures on the Broads' section identifies a range of environmental issues which we recognise and require a multi-stakeholder approach. Our Biodiversity Strategy has been informed by consultation with key environmental stakeholders including government agencies and NGOs and emphasises our reliance on the natural environment to help maintain water quality and quantity. For these reasons we recognise our role in protecting the natural environment within our region, and addressing issues such as habitat loss, invasive non- native species, unsustainable abstraction, pollution, and climate change.	Background information noted.	No further action
1	Anglian Water	3.5.IIIAnglian Water has the biggest natural environment programme in the sector (WINEP – Water Industry National Environment Programme) with over £811 million worth of projects aimed at environmental enhancement between 2020-2025. We are also leading the way in the design and delivery of natural wetlands that perform the dual purpose of delivering net zero water treatment and habitat creation for biodiversity. This summer we announced the building of 26 new wetlands across the region, to be modelled on our flagship River Ingol wetland that opened in 2019 in partnership with the Norfolk Rivers Trust.	Background information noted.	No further action
1	Bradwell Parish Council	We would like to see it maintained as an area of natural beauty, with more careful monitoring of the boats and pleasure craft that present a clear danger to this habitat.	Noted. That is the general aim of the policies in the Local Plan - to protect and enhance the area. But we do need to allow appropriate development to happen in appropriate locations.	No further action.
1	Broads Society	Challenges exist for attracting new generational visitors into areas such as National Parks whilst also fewer younger or new customers are engaging in leisure marine activities. This demographic is looking for, and using, new entry areas such as variations and niche versions of accommodation experiences, canoeing, surfing and paddle boarding. Their digital communication preferences and their desire for activities are aligned to short burst experiences to enjoy and share online and are being termed 'Pay & Play'. The British Marine Futures report states brands and organisations must empower this audience to 'do, feel and share' to remain relevant.	Noted. Not directly relevant to land use planning, but could be weaved into the context section. Will also pass comment on as part of the review of the Broads Sustainable Tourism Strategy.	Weave into context section and pass on comment as part of the review of the Broads Sustainable Tourism Strategy
1	Broads Society	The following new diverse leisure industry classifications have also emerged. •IIIConsidered, occasional (being, higher cost & occasional activities) •IIIFrequent, habitual (being, lower cost & frequent activities)	Noted. Not directly relevant to land use planning, but could be weaved into the context section. Will also pass comment on as part of the review of the Broads Sustainable Tourism Strategy.	Weave into context section and pass on comment as part of the review of the Broads Sustainable Tourism Strategy
1	Broads Society	The challenge must now be to help Broads businesses rapidly establish the offering that will engage the audience who will help shape, support and participate within the Broads National Park. This help being agile planning and planning support from joined up Authorities enabling the capture of rapidly changing economic opportunities. This demographic will be the one to provide the long-term tourism and visitor revenue, the time, energy and volunteering pool vital for the sustainability and resilience needed for the challenges ahead.	Noted. Not directly relevant to land use planning, but could be weaved into the context section. Will also pass comment on as part of the review of the Broads Sustainable Tourism Strategy.	Weave into context section and pass on comment as part of the review of the Broads Sustainable Tourism Strategy
1	Broads Society	The British Marine report provides a framework to aid organisations and businesses to attract this participation: •IIIEngage & Promote •IIIImproved marketing / targeted diversity / adventure & challenge / strategic partnerships •IIIPathways & Locations •IIIDemand led / Broader delivery / Strengthen pathways & access routes •IIISTaying Active & Connected •IIIEncourage participation / Benefits of club membership / Volunteering	Noted. Not directly relevant to land use planning, but could be weaved into the context section. Will also pass comment on as part of the review of the Broads Sustainable Tourism Strategy.	Weave into context section and pass on comment as part of the review of the Broads Sustainable Tourism Strategy
1	East Suffolk Council	While it is for the Broads Authority to set out an appropriate context and explain the history of the area, East Suffolk Council welcomes the explanation of the relationship between the Broads Authority area and the constituent district and county councils. It is important that this continues to form part of any future Local Plan documents.	Noted.	No further action
1	Historic England	Historic England support paragraph 7.8 which describes in helpful detail, the unique nature of the Broads as a result of human activity and makes clear that the landscape forms a defining element of the historic environment in the area.	Support noted.	No further action.
1	RSPB	Page 23 7.6 (and sections 7.8, 7.9 and 7.10) seems to overstate the importance of boats vs land activities. We agree that access by water is a unique feature in the Broads, but evidence shows a change in focus and what visitors are looking for and pace needs to be kept with this change.	These sections provide context and highlight how the Broads are important in different ways. There is no evidence provided in the representation to propose changes to the text.	No further action.
1	RSPB	7.7 – Norfolk hawker is no longer as rare or threatened. Is there an opportunity to select another ambassador species e.g., fen orchid, which is only found in the Broads?	Noted. Will amend text.	Amend text.
1	RSPB	Given the emphasis currently being placed on landscape scale conservation (from individual eNGO's to for example LNRS) is there merit in making mention of this to bring to life the sentiment described in the final para? Follows on from section 7.5 where mention needs to be made about integrating interests and important assets to enhance the whole without adverse impact on any individual interest/aspect. We contacted RSPB for clarification and they said: Only through greater collaboration and joint planning can beneficial landscape scale change for biodiversity and agriculture be achieved.	Noted and in delivering the Broads Plan, there is greater collaboration.	No further action for the Local Plan.
1	South Norfolk Council	In general Principle 1 and 2 appear consistent with the Norfolk Strategic Planning Framework (NSPF) in relation to recognising the very distinct issues facing the Broads Authority Area and its importance in bringing to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity. The Council would question whether “full scientific certainty” is a reasonable threshold to apply. In this respect the Council notes that the Planning Practice Guidance on appropriate assessments talks about ensuring that there is “no reasonable scientific doubt” and considering whether plans or is likely to result in “significant harm”. It is suggested that having “no reasonable scientific doubt that there will be significant harm” would be a better, and more realistic principle to apply instead of “full scientific certainty”, which would, on first appearances, appear to be a particularly high, and possibly unachievable threshold.	Comments noted. This section is called 'policy context' and refers to other policy documents that are relevant to the Local Plan. These are quotes from another document - the Broads Plan. That is the Management Plan for the Broads. That is now adopted and had its own consultation process over the last two years or so.	No further action.
1	South Norfolk Council	Principle 3 is consistent with the NSPF in relation to effective plan making and the Council welcomes the opportunity to work in partnership with the Broads Authority in respect of the production of its local plan.	Support noted.	No further action.

Part of document (numbers denote the question number)	Organisation	Comment	Response	Action for next version of the Local plan
1	Suffolk County Council	Suffolk County Council would welcome further detail on the historic and particularly archaeological background of the Broads in this section. Section 7.8 touches on the unique quality and distinctiveness of the built environment of the Broads but could go into more detail on the significance of this and how this distinctiveness has evolved historically. More emphasis on the area's archaeological potential and importance, to help develop understanding of and protect the historic evolution of the Broads would be welcomed. We note reference to the exceptional potential for waterlogged archaeology, this could be expanded upon. The Suffolk County Council Archaeological Service (SCCAS) would welcome further engagement and could provide additional guidance if required.	Noted. Will weave this suggestion into the text.	Weave into context section.
1	Suffolk County Council	Suffolk County Council would also welcome expansion of section 7.11. The National Census 2011 data provided gives a good overview of the demographics of the Broads community. We also welcome reference to the 2019 Indices of Multiple Deprivation and that these maps have been assessed as part of the separate Deprivation Topic Paper. The areas identified as more deprived will require specific attention in terms of supporting access to services (including health services), access to open space and play space (including to the excellent recreational opportunities available within the Broads), provision of good quality housing and opportunities for active travel.	Noted. Will weave this suggestion into the text.	Weave into context section.
1	Suffolk County Council	Additional health outcome data for the Broads population is available from both the Suffolk Observatory and Public Health England's Fingertips Tool. The County Council would draw attention to the Joint Strategic Needs Assessment for Suffolk which aims to accurately assess the health needs of a given local population with a view to improving the physical and mental health and wellbeing of individuals and communities. There are also a number of place-based needs assessments, including for Lowestoft and South Waveney which provide further information on housing, education and poverty that affect health and wellbeing in these communities. These are often referred to as the 'wider determinants' of health. The County Council's Public Health team would welcome further engagement throughout the preparation of the Local Plan and can provide further area specific data and advice as required. The County Council supports recognition of the need for good access to recreation opportunities provided by the Broads as this supports the health and wellbeing of communities both within the Broads and beyond. Policies should support improvements to public rights of way throughout the Broads to improve and maintain access.	This is useful information, especially for the health section of the Local Plan and Sustainability Appraisal.	Use information in health section and engage with Suffolk CC about the health section of the Local Plan.
1	Woodbastwick Parish Council	There are insufficient public footpaths to encourage locals and visitors to enjoy the Broads landscape.	Comments noted.	Pass comment to Waterways and Recreation Officer.
1	Woodbastwick Parish Council	Easy access by and emphasis on water-based activities limits enjoyment of the Broads to those who have the financial means to hire or own water craft. It is not readily accessible to people from deprived communities;	Comments noted. Think the comment should read "those who do not have the financial means".	Pass comment to Waterways and Recreation Officer.
1	Broadland Council	In general Principle 1 and 2 appear consistent with the Norfolk Strategic Planning Framework (NSPF) in relation to recognising the very distinct issues facing the Broads Authority Area and its importance in bringing to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity. The Council would question whether "full scientific certainty" is a reasonable threshold to apply. In this respect the Council notes that the Planning Practice Guidance on appropriate assessments talks about ensuring that there is "no reasonable scientific doubt" =. It is suggested that "no reasonable scientific doubt" would be a better, and more realistic principle to apply instead of "full scientific certainty", which would, on first appearances, appear to be a particularly high, and possibly unachievable threshold.	Comments noted. This section is called 'policy context' and refers to other policy documents that are relevant to the Local Plan. These are quotes from another document - the Broads Plan. That is the Management Plan for the Broads. That is now adopted and had its own consultation process over the last two years or so.	No further action.
1	Broadland Council	Principle 3 is consistent with the NSPF in relation to effective plan making and the Council welcomes the opportunity to work in partnership with the Broads Authority in respect of the production of its local plan.	Support noted.	No further action.
2	Anglian Water	Engagement with stakeholders is an iterative process through plan preparation, including through the Duty to Cooperate and Statements of Common Ground. We welcome continued dialogue with the Broads Authority and will support the plan process through providing information and advice to underpin the evidence base and enable the adoption of a sound local plan. The Plan and SA objectives also aim to ensure that there are positive social outcomes for local communities, and the health and wellbeing of people living, working and visiting The Broads.	Support noted.	No further action.
2	Anglian Water	3.6. Whilst Anglian Water is not a prescribed body in relation to the Duty to Cooperate, we actively engage with Local Planning Authorities in the preparation of their Local Plans through providing advice and data to inform preparation of evidence base documents and responding appropriately to consultations on Local Plans or other local development documents.	Noted.	No further action.
2	Bradwell Parish Council	We think it would be a mistake to remove the duty to Cooperate.	Noted. It will be down to Government reforms. But we work closely with our districts and other DTC Authorities regardless of the Duty.	No further action.
2	Broads Society	The Society would hope that the strength of the current legislation is retained to ensure that cross-border cooperation with other local authorities is retained to the same extent. This could be particularly critical when dealing with issues relating to 'residential moorings' and 'liveaboards' when there might be a number of agencies involved in planning and 'non-planning' issues resulting from these activities.	Noted. It will be down to Government reforms. But we work closely with our districts and other DTC Authorities regardless of the Duty.	No further action.
2	Brooms Boats	Broom Boats believes in the strength of cross border cooperation and that the current legislation promoting this should be retained.	Noted. It will be down to Government reforms. But we work closely with our districts and other DTC Authorities regardless of the Duty.	No further action.
2	East Suffolk Council	East Suffolk Council welcomes the recognition of the relationship between the Broads Authority area and the northern part of East Suffolk and is satisfied that the Broads Authority is meeting the Duty to Cooperate insofar as East Suffolk Council is concerned. We look forward to continued co-operation with the Broads Authority in progressing the preparation and implementation of the new Local Plan. In particular we welcome continued liaison on cross boundary matters such as housing, water resource management, sustainable transport and habitats and biodiversity.	Support noted.	No further action.
2	RSPB	As presented in the Issues and Options 'a requirement to assist' seems an appropriate way to proceed.	Noted.	No further action.
2	Suffolk County Council	Suffolk County Council consider the Authority's approach to the Duty to Cooperate to be appropriate and appreciate the engagement that has taken place so far.	Support noted.	No further action.
2	Woodbastwick Parish Council	People who live within the boundaries of the Broads have no elected representative contributing to decisions made by the Broads Authority on issues that directly affect them. A representative on the Broads Executive from the District Council and County Council are not elected by and does not represent the residents.	The constitution of the Broads Authority is defined in the Broads Act, which the Broads Authority must comply with Norfolk and Suffolk Broads Act 1988 https://www.legislation.gov.uk/ukpga/1988/4/section/1 . It would be for the Parliament to agree on a different constitution for the Broads Authority. There is no provision under the Act for directly elected members, but the 9 appointments from the constituents councils are elected representatives from their respective councils.	No further action.

Part of document (numbers denote the question number)	Organisation	Comment	Response	Action for next version of the Local plan
2	Woodbastwick Parish Council	We do not agree that there is any constructive engagement with the Parish Council and local community;	About the Duty to Cooperate which Question 2 refers to, we consult far and wide on the local plan, including with drop-in sessions where the public is invited to attend and where officers are available to respond to queries. The Planning Inspector will assess how the BA has met its duty to cooperate requirements at the Local Plan examination stage. More widely that the Duty to Cooperate, we consult the public when producing/reviewing other key strategic plans, such as the Broads Plan which was consulted upon during the summer 2022. We send regular briefings to all parish councils lying partly within the Broads, and officers will continue to engage with individual parish councils on local issues of concern. Here are more details about how to contact us: https://www.broads-authority.gov.uk/about-us/how-we-work/broads-engage	No further action.
2	Great Yarmouth Borough Council	The Borough Council is satisfied by the co-operation undertaken by the Broads Authority, particularly with respect to the commissioning of joint studies such as the Great Yarmouth and Broads Local Housing Needs Assessment 2022 and the Great Yarmouth and Broads Gypsy, Traveller & Residential Caravans Accommodation Assessment, and looks forward to continuing to cooperate on strategic and other issues of mutual interest.	Support noted.	No further action.
3	Anglian Water	3.7.The SWOT analysis in the Issues and Options document demonstrates the challenges in preparing a Local Plan to deliver long term sustainable and resilient development and supporting infrastructure in The Broads Executive Area, which is consistent with its three statutory purposes.	Noted.	No further action.
3	Bradwell Parish Council	The SWOT analysis raises some important issues and the threats are very worrying. A need to focus on sea defences and for us all to adopts a low carbon lifestyle is obvious.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Broads Society	Threat Threat to Hire Boat operators where new qualification demands (ie QAB) are imposed at additional costs by using single source suppliers hence non-market competitive based pricing.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Broads Society	Threat Threat to Hire Fleet operators if a level playing field is not guaranteed by audit regarding Hire Fleet minimum time spent per standard for safe operation of the vessel and of navigation irrespective of experience or other factors. The appropriate level of resources must be applied accordingly by each Hire Boat operator.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Broads Society	Threat Non agile planning processes and policies threaten the ability for organisations to react to environmental impacts such as flooding or market conditions such as economic opportunities of increased tourism (whilst these could be planned and enabled to be green and sustainable) and endanger the survival of businesses which threaten not only the livelihoods of existing staff and the loss of heritage skills but also apprentices learning old and new skills.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Broads Society	Threat Lost opportunity to engage agile planning processes with local authority partners and organisations to enable energy saving opportunities as a priority and as demanded by Government and UN.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Brooms Boats	Threat Threat to Hire Boat operators where new qualification demands (ie QAB) are imposed at additional costs by using single source suppliers hence non-market competitive based pricing.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Brooms Boats	Threat Threat to Hire Fleet operators if a level playing field is not guaranteed by audit regarding Hire Fleet minimum time spent per standard for safe operation of the vessel and of navigation irrespective of experience or other factors. The appropriate level of resources must be applied accordingly by each Hire Boat operator.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Brooms Boats	Threat Non agile planning processes and policies threaten the ability for organisations to react to environmental impacts such as flooding or market conditions such as economic opportunities of increased tourism (whilst these could be planned and enabled to be green and sustainable) and endanger the survival of businesses which threaten not only the livelihoods of existing staff and the loss of heritage skills but also apprentices learning old and new skills.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Brooms Boats	Threat Lost opportunity to engage agile planning processes with local authority partners and organisations to enable energy saving opportunities as a priority and as demanded by Government and UN.	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	East Suffolk Council	East Suffolk Council do not have any specific comments on the SWOT analysis, it provides a sensible analysis of the strengths, weaknesses, opportunities and threats in relation to the Broads Plan.	Support noted	No further action.
3	RSPB	Strengths – a good and extremely varied selection of bullet points Complementary to 9.2 c) is the fact that a high proportion of the SSSI units in the Broads are in favourable or unfavourable recovering condition, which signifies mostly appropriate actions and management operations are being undertaken – but clearly more can and should be done. Additional – a mix of accessible locations and less accessible locations promoting a range of enjoyment opportunities to suit audience needs and avoid unnecessary disturbance of fragile habitats and secretive species	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	RSPB	Weaknesses a)I'llChange 'many' to 'a proportion' and add 'conflicting water regimes – species and habitats vs agriculture leading to complex and costly hydrological interventions.' y) Suggest change to 'Susceptible to climate change impacts such as variable rainfall patterns and increased incidence of saltwater incursion leading to significant habitat and landscape change' Add – adverse pressure and hence deterioration of natural assets resulting from 'over-patronisation' by visitors. An example might be Horsey/Winterton dunes	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.

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3	RSPB	<p>Opportunities</p> <p>a) Transition to more brackish conditions provide opportunity to create saltmarsh which could trap Carbon.</p> <p>We question whether option e) is viable in terms of freight on rivers given the rate of sedimentation and potential obstructions? It would be helpful to understand where freight would be off-loaded. Plus, to facilitate freight access on rivers might require dredging which would increase potential for saline incursion to move further upstream.</p> <p>g) is critical add the word 'future' before complementary. Early investigations are needed to prepare for impacts resulting from climate change as are agreeing design and a 'landscape development plan.'</p> <p>i) does this sit better under the 'strengths' section as it is a statement of fact?</p> <p>n) agree. Could this have additional comment such as '... and their role in preserving these qualities.'?</p> <p>u) Add 'promoting greater focus on environmental enhancements...'</p> <p>New – gradual transition to vehicles powered by non-fossil fuels, leading to reduction in pollution, quieter transport modes.</p>	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	RSPB	<p>Threats</p> <p>Suggest altering iv) – change in grazing regimes as floodplain grassland becomes unable to support grazing animals, economically and on welfare grounds (increased salinity, lack of drinking water for stock resulting from drought).</p> <p>Suggest rewording to place emphasis on 'marked changes to rainfall patterns from too much to too little making it hard to plan for, and manage businesses, traditional industries and the landscape alongside coping with proposed increase in housing.'</p> <p>New under c) or modify ii) – deterioration/change in the landscape character of the area as saline impacts become more prominent and spread upriver.</p> <p>Would there be merit in ordering the most important opportunities and threats, so they appear at the top to focus effort and application of resources, rather than just providing a long list of possibilities?</p>	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Suffolk County Council	<p>Suffolk County Council suggest the SWOT analysis could highlight the following as strengths:</p> <ul style="list-style-type: none"> •III The Broads represent a significant area for outdoor recreation and access to green space, supporting the mental and physical wellbeing of residents and visitors of all ages, through provision of open space for physical activity and creation of opportunities for social engagement. 	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Suffolk County Council	<p>We suggest the SWOT analysis could highlight the following as opportunities:</p> <ul style="list-style-type: none"> •III Improvement of access to the Broads for residents and visitors with limited mobility, contributing to a reduction in isolation for vulnerable groups •III Potential for making the Broads 'Dementia Friendly' both for residents and visitors living with dementia 	Comments and suggestions are noted. We will consider them as we produce the Preferred Options version of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
3	Woodbastwick Parish Council	There is a danger that the Broads is seen as a recreational area for white middle-class communities.	Comment noted.	Pass to Waterways and Recreation Officer
3	Woodbastwick Parish Council	Insufficient regard to develop an improved network of footpaths at a low cost, environmentally friendly, healthy, affordable activity that is accessible to all communities and all socio-economic groups	Comment noted.	Pass to Waterways and Recreation Officer
4	Anglian Water	The Local Plan includes a number of objectives that aim to protect the highly valued natural environment of The Broads, address climate change impacts and conserve and enhance water quality and resources. It is considered that the Sustainability Appraisal (SA) objectives will provide a sound basis for assessment of Local Plan objectives and policy options for the next stage.	Noted.	No further action.
4	Anglian Water	The strategic objectives of the existing Local Plan include reference to a buoyant and successful economy and supporting a prosperous and sustainable tourism economy. The SA objective SOC5 to maximise opportunities for new/additional employment is compatible with the plan objectives where they underpin the statutory purposes for the Broads Authority.	Support noted.	No further action.
4	Anglian Water	3.14. We are supportive of the Vision for The Broads regarding biodiversity, nature recovery and meeting the challenges of climate change. Further commentary is included in our responses to the specific sections of the document which address these topics.	Support noted.	No further action.
4	Anglian Water	3.15. We agree with the proposed changes to the objectives, to support the vision and policies as they emerge. We agree that nature-based solutions should factor in OBJ6 regarding water quality and such solutions also provide benefits for biodiversity and nature recovery, resilience to the impacts of climate change, carbon sequestration, and health and well-being. 3.16. We support the proposed inclusion of net zero and adaptation to climate change in OBJ7 given the vulnerability of The Broads to the impacts of climate change.	Support noted.	No further action.
4	Bradwell Parish Council	We agree with the objectives and also feel the issue of second homes needs to be addressed.	Suggestion about addressing second homes noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	Broads Society	With regard to the potential changes to the objectives, the Society has no problem with including specific mention of Dark Skies under Objective 2. There are some concerns about the inclusion of 'warm, energy efficient homes' under Objective 9 as it is felt that this should be down to Building Regulations legislation and not Planning legislation.	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	Broads Society	OBJ14 – potential to refer to the tension between tourism and sustainability? It is important to recognise that as in the response to Question 1, without attracting visitors, and specifically new generational visitors, to the Broads, revenues supporting the eco system that is The Broads will only place pressure on what is possible in the protection of The Broads. It is impossible to react to 'Tensions between tourism and sustainability' with an approach of non-approval of planning, of embracing visitors to the area for fear of increased traffic movements, of stopping businesses adapting to market conditions and market requirements. Instead, the approach should be collaborative, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism. Broom Boats believes that Building Regulations should be the foremost advisory for building design and ensuring that appropriate materials and technologies are used relevant to the significant impact environmental effects are having.	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	Brooms Boats	OBJ14 – potential to refer to the tension between tourism and sustainability? It is important to recognise that as in the response to Question 1, without attracting visitors, and specifically new generational visitors, to the Broads, revenues supporting the eco system that is The Broads will only place pressure on what is possible in the protection of The Broads. It is impossible to react to 'Tensions between tourism and sustainability' with an approach of non-approval of planning, of embracing visitors to the area for fear of increased traffic movements, of stopping businesses adapting to market conditions and market requirements. Instead, the approach should be collaborative, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.	Concerns noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	Designing Out Crime Officer, Norfolk Police	Agree with OBJ2 the mention of Dark Skies specifically and OBJ9 – could include warm, energy efficient homes – I think this should go further to include 'safe' i.e. specifically Secured by Design standard safe in both the physical security of the homes and CPTED (crime prevention through environmental design) principles applied to the development as a whole.	Suggestions to OBJ9 seem logical.	Weave into Objective 9 reference to warm, energy efficient and safe homes.

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4	East Suffolk Council	The Council, earlier in the year, responded to the draft Broads Management Plan and commented that it supports the vision. East Suffolk support the additional objectives as outlined in the consultation document (dark skies, nature recovery, net zero, energy efficient homes, second homes, tensions between tourism and sustainability). Many of these issues link to the context of the Broads Authority area and reflect emerging or recently established national policy which Local Plans should take account of.	Support noted.	No further action.
4	Historic England	Support. OBJ8 specifically addresses address the need to protect, maintain and enhance the historic environment, and is very much welcomed. This strong objective will help positively shape the Plan's strategic policies. Overall the objectives demonstrate an integrated approach to the conservation of the historic environment which sees the interrelationship between conservation and other spatial planning goals recognised within several different policies rather than in isolation. For example, OBJ3 and 14 embody a wider understanding of the historic environment has helped inform these objectives which will also help deliver the conservation and enhancement of the historic environment.	Support noted.	No further action.
4	RSPB	Is it possible to mention in the Vision or Objectives how these statements are going to be realised, by whom and how progress is going to be monitored and resources applied to achieve them? Is there an opportunity to amend the objectives so they're a little smarter? Suggested subtle changes to consider would be: 1.For the lifetime of this plan retain the Broads as a regional, national and internationally important landscape asset, valued and respected by people who live and work here and those who visit. 2.To create and maintain at least 10 areas and locations which provide true tranquillity, dark skies and wildness and offer a tangible sense of being remote and distant from the day-to-day world 3.To protect, maintain where needed and enhanced where feasible the landscape character and setting of the Broads to retain the unique, highly valued, and attractive environment.	Regarding the vision - the Broads Plan and Local Plan for the Broads as well as other related strategies, are the ways to achieve the vision. Suggestions for amending the objectives noted.	Consider this comment as produce Preferred Options version of the Local Plan.
4	South Norfolk Council	In broad terms the objectives appear consistent with the NSPF. The key issue for the Broads, as it is elsewhere, is ensuring the plan resolves the difficult balance of protecting and enhancing the environment whilst enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Noted. Representation does not suggest changes or highlight issues.	No further action.
4	Suffolk County Council	We note the vision sets the Authority's target of achieving 'net zero' carbon by 2040. Suffolk County Council has declared a climate emergency with the aim of achieving net zero by 2030.	Noted.	No further action.
4	Suffolk County Council	Suffolk County Council supports the potential change to OBJ9 to include reference to warm, energy efficient homes. Good quality housing has a direct relationship with improved health outcomes for residents. We would draw attention to the Marmot Review, (2020) The Marmot Review 10 Years On – Health Equity in England. This review states that 'poor quality housing harms health and evidence shows that exposure to poor housing conditions (including damp, cold, mould, noise) is strongly associated with poor health, both physical and mental.'	Support noted.	Weave into Objective 9 reference to warm, energy efficient and safe homes.
4	Suffolk County Council	We would also support the inclusion of a specific reference to archaeology in OBJ8 in addition to the area's historic environment and cultural heritage.	Agreed.	Weave into Objective 8 reference to archaeology.
4	Suffolk County Council	In addition, Suffolk County Council would support reference to nature recovery in OBJ4.	Support noted.	No further action.
4	Woodbastwick Parish Council	Easier access is required to fulfil objective 11	Noted. We have and will be reviewing the Integrated Access Strategy.	Pass on comment to Recreation and Waterways Officer.
4	Broadland Council	In broad terms the objectives appear consistent with the NSPF. The key issue for the Broads, as it is elsewhere, is ensuring the plan resolves the difficult balance of protecting and enhancing the environment whilst enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Noted. Representation does not suggest changes or highlight issues.	No further action.
5	Anglian Water	3.17.Anglian Water is the statutory sewerage undertaker for the Broads, and the statutory water provider for part of the Broads. We therefore have a network of assets throughout the Executive Area which we maintain and invest in improvements where necessary. Our Drainage and Wastewater Management Plan (DWMP) is in preparation with a view to publish by the end of May 2023 and highlights the known and expected future risks to drainage and identifies solution strategies to mitigate these. In addition, we are also preparing our Water Resources Management Plan (WRMP24) which will be available for consultation soon – and will set out how we intend to achieve a secure supply of water for our customers whilst protecting and enhancing the environment from 2025 to 2050. The WRMP24 will align with the draft Water Resources East Regional Water Resources Plan which addresses the future needs and aspirations for water across all sectors – this is currently open for consultation. 3.18.Both the DWMP and WRMP set out a long-term vision for future management and investment of our assets and will inform our Price Review (PR24) and our Long-Term Delivery Strategy. 3.19.We agree that the Local Plan should focus on previously developed land where it is not vulnerable to flood risk and existing infrastructure can be utilised.	Support noted.	No further action.
5	Designing Out Crime Officer, Norfolk Police	Option F) What kind of development, if any do you think your part of the broads would benefit from Norfolk Constabulary request that as a condition of planning and to support partnership working for any new developments that they are in line SBD standards and guidelines to ensure that the Broads towns and villages remain safe and do not see an increase of crime and disorder due to poor design.	Noted. This is more for design policy.	Ensure design policy refers to SBD standards and guidelines.
5	East Suffolk Council	East Suffolk Council have provided some analysis of most relevant areas in response to question 40 below. Other points have been picked up under other responses as appropriate.	Noted.	No further action.
5	RSPB	c) Are there any other issues that affect your community/your part of the Broads that you would like to be considered in the preparation of the new Local Plan? Recognition that the Broads is a sink for many unwanted adverse inputs e.g., pollutants, nutrients etc., which originate outside the area. Thus, a tightly joined up approach is essential to ensure down-stream or down- contour isn't affected by adverse inputs brought into the Broads by gravity.	Noted. We do work on a catchment basis. Indeed, Nutrient Neutrality is a key aspect of the comment.	Continue partnership working.
5	RSPB	d) What changes do you expect to see over the next twenty years in your part of the Broads that the Local Plan may need to cater for? As a result of climate change the water resource and its availability will change. To make wise use of this commodity we need to encourage users to save and not waste and be respectful of this precious asset.	Agreed. We asked about future development and water use in this consultation document.	See responses to water use questions.
5	RSPB	f) What kind of development, if any, do you think your part of the Broads would benefit from? Green infrastructure to promote access to specific parts of the Broads, nominally referred to as honey pot sites, thereby focusing visitor pressure to allow retention of other, remote places where very few or no visitors go to, and a sense of remoteness and wilderness is maintained.	Noted and there is a role for the Broads Plan, Integrated Access Strategy and Sustainable Tourism Strategy in addressing this.	Share comment with other officers at the Broads Authority.

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5	Sequence UK LTD/Brundall Riverside Estate Association	2.11The Brundall Riverside Estate Association does not wish to comment in detail in response to this question and some of the matters raised are covered in more detail in response to other questions. 2.12As set out above, the Riverside Estate comprises boatyards, marinas and other businesses and a number of private residential and holiday homes. It is a relatively large mix of businesses and residential/holiday use, directly adjacent to the current settlement limit for Brundall and a sustainable location, particularly in relation to Brundall railway station. Therefore, as set out in our response below, the Association would consider that this should be recognised by inclusion within a development boundary. 2.13The nature of the estate continues to evolve, particularly challenges to the more traditional boatyard and marina uses and therefore the Local Plan, and draft Design Guide should be flexible and allow for appropriate change and diversification, not being overly-prescriptive as it is difficult to predict for 20 years in advance. 2.14The Brundall Riverside Estate Association would also make the point that recent developments and the extension or replacement of chalets with more modern construction has been a positive, In particular this has rejuvenated some more tired looking plots and this has had a knock-on effect of greater pride in the location and further enhancements such as roads, boundary treatments and planting/landscaping, as well as further investment.	Noted. The Brundall Riverside Estate area has policies addressing various parts of the area and these will be checked, amended if needed and rolled forward.	Liaise with Sequence when looking at the Brundall policies.
5	Upton Parish Council	a) the area of the broads within the boundaries of Upton is much valued. The area of open space is mostly managed by the Norfolk Wildlife Trust and the Environment Agency. The space to walk and sit quietly is appreciated, and the opportunities to see wildlife and flora.	Noted. Good to hear how the Broads is much valued by the local community.	No further action.
5	Upton Parish Council	b) the cutting of footpaths in the area is not frequent enough. Some become almost impassable by mid summer. There seems to be cutting of access to fishing platforms by the EA but very infrequent cutting for walkers.	The following specific stretches of footpath in the Upton/Acle area are cut by the Broads Authority: •III Acle Bridge to Upton on the south side of the river. •III Footpath along the south side of Upton Dyke. •III Acle Bridge to Acle. Any issues relating to grass cutting along these stretches, please contact the Broads Authority via the website https://www.broads-authority.gov.uk/contact-us All other footpaths are cut by Norfolk County Council, as can be viewed via this link http://maps.norfolk.gov.uk/highways/ Any issues on these paths, please use Norfolk County Council's reporting form https://www.norfolk.gov.uk/roads-and-transport/roads/report-a-problem#nrowicons	None
5	Upton Parish Council	c) Given that the BA receives tolls from boat users, it would seem fair that the BA should help with the cost of litter removal from the boat dyke car park and staithe. In the summer, people moor up and put bags of rubbish next to the litter bin that is provided by Broadland DC. There are clearly insufficient refuse collection points in the BA area.	The Broads Authority are not responsible for boat waste but the responsibility lies with the relevant local authorities within the Broads area.	None
5	Upton Parish Council	d) the BA needs to plan for increased numbers of tourists - refuse collection, parking and public toilets.		Dan H
5	Wroxham Parish Council	a) "When asked what is special about Wroxham, residents repeatedly noted its waterside location and community spirit. The combination of setting, size and natural beauty, combine to make Wroxham a unique place to live. For more than 100 years Wroxham has been regarded as The Capital of The Norfolk Broads. It lies at the heart of the Broads National Park and has a range of housing in woodland and waterside settings. Adjacent to a thriving hub of tourism it nevertheless offers areas of tranquillity for those seeking a high quality of living." Wroxham Neighbourhood Plan (WNP).	Information noted.	Consider this comment as produce Preferred Options version of the Local Plan.
5	Wroxham Parish Council	b) The Council would like to see the former Windboats site on the Norwich Road developed into a residential development that provides housing for older people as permanent residences with attractive public spaces and a public right of way from Staithe way Road to the Norwich Road. In addition, the Council would like the boundary along the Norwich Road with Bridge Broad to be improved. It is currently an unattractive dilapidated fence. The regular flooding in this area also needs to be addressed. Flooding often blocks the footpaths on either side of the Norwich Road adjacent to Bridge Broad and Norfolk Broad Direct and also at the entrance of Bridge Broad Close. Pedestrians, particularly those from the nearby sheltered housing complex, are often prevented from accessing the facilities over the bridge in Hoveton due to this flooding. The Parish Council have been in correspondence with Highways on the matter but have been told a scheme to raise the road is too expensive.	Noted and we will treat this as a suggested site to be considered.	Add to sites to look into for allocation.
5	Wroxham Parish Council	c) Housing for older people (WNP policy HB5), new small retail outlets (BUS1), new businesses that diversify employment opportunities (BUS2), small scale sustainable tourist developments (BUS3), improvement in the public space around the Wroxham-Hoveton river bridge and the condition of the river bridge itself (COM1), improved community amenities especially space for leisure activities and pre-school provision (COM2), riverside/Broad public open spaces (COM3 & ENV1), a reduction in traffic congestion (TRA1), improved walking and cycling in particular the provision of a Green Loop providing a safe and pleasant walking and cycling route off the A1151 (TRA3).	Reference to Wroxham Neighbourhood Plan noted.	Consider all Neighbourhood Plans as produce the Preferred Options.
5	Wroxham Parish Council	d) Switch to electric vehicles and therefore a need for charging points both residential and public. An increase in extreme weather creating hot dry and then very wet periods which could be mitigated by an increase in trees and planting and flood ready infrastructure. Also better working practices by the BA to work together with the EA on water abstraction licencing to prevent the rivers running dry. An increase in traffic created by large developments on the A1151 at Rackheath and on the NDR at Salhouse etc.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
5	Wroxham Parish Council	e) See point b.	Noted.	See point b
5	Wroxham Parish Council	f) See point c	Noted.	See point c
5a	Bradwell Parish Council	Parks and natural habitats such as Bluebell Woods. Community Centres and Recreation facilities.	Following further conversations, this site is not in the Broads Authority Executive Area. We have policies relating to community centres and recreation facilities.	No further action.
5b	Bradwell Parish Council	We would like to see the Bluebell Woods area improved to be more of a community recreational area.	Following further conversations, this site is not in the Broads Authority Executive Area.	No further action.
5c	Bradwell Parish Council	The poorly thought-out plan to imprison Bluebell woods, Bradwell in the middle of an industrial estate.	Following further conversations, this site is not in the Broads Authority Executive Area.	No further action.
5d	Bradwell Parish Council	Rising sea levels causing more localised flooding. More problems with drought type conditions.	Noted.	No further action.
5e	Bradwell Parish Council	None,	Noted.	No further action.
5f	Bradwell Parish Council	More open spaces and natural habitats for wild life.	Noted.	No further action.
6	Bradwell Parish Council	It seems eminently sensible to plan for climate change to minimise the impact.	Support noted.	No further action.

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6	East Suffolk Council	East Suffolk Council welcome the inclusion of the climate change checklist. However, the checklist asks what the impact level is (small, medium, significant etc) which could be rather subjective. Therefore you may want to consider if there is value in providing more space on the checklist for applicants to demonstrate how they have considered and mitigated for future climate changes. A section could also be added regarding the related time impacts – i.e. ‘immediate / future impact, plus the frequency (e.g. annually / every 10 years), as some mitigation measures may require ongoing maintenance or investment.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
6	RSPB	The approach is limited to built development. Given the intrinsic link between built development and development/management elsewhere in the Broads we suggest comment is made and planning undertaken to describe the predicted impact on floodplain habitats. There is a link here to both agriculture and focus of questions 30 and 31 and the aspiration to make the Broads an attractive and viable place to visit and enjoy. This could be compromised if development either directly or indirectly leads to the deterioration of the landscape and natural assets.	Comment noted. However, all the Local Plan can really cover is built development. Whilst there is benefit in making information available about wider issues, this is better done through other documents such as the Broads Plan the Local Nature Recovery Strategy.	No further action.
6	Sequence UK LTD/Brundall Riverside Estate Association	2.16No objection to the climate change checklist being rolled forward from the current local plan. We welcome the suggested amendments to making the questions clearer but the reserve the right to comment further when those amendments are published.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
6	South Norfolk Council	Whilst this would bring awareness to climate change in new developments and in turn be consistent with Agreement 20 of NSPF, the overall aim and justification for the climate change checklist needs further detail and justification. For example it would be useful to clarify who would be filling this checklist in and whether this needed to be an environmental specialist? It would be beneficial to understand what type of development would require a checklist. In addition, the impact seems to be measured by ‘nil, small, medium, significant’ but the Council couldn’t identify where there was guidance on what each category meant. Again, further clarity on who would be completing this element in order to make a judgement would be beneficial as would explanation of what evidence, or what types of evidence, would be required to demonstrate the judgements made. Overall, it is considered that further information is required to understand what the checklist would achieve and its specific impact on decision making e.g. if a development falls within the ‘nil’ category would this warrant a refusal, or is this just an aid to understanding of the extent to which the development has specifically considered climate change?	Noted. The checklist is not new; it was part of the currently adopted Local Plan. But comments are useful and will be considered as we produce climate change policies.	Consider comments we produce climate change policies.
6	Suffolk County Council	Suffolk County Council supports the Local Plan’s position on climate change and the use of the accompanying climate change checklist.	Support noted.	No further action.
6	Broadland Council	Whilst this would bring awareness to climate change in new developments and in turn be consistent with Agreement 20 of NSPF, the overall aim and justification for the climate change checklist needs further detail and justification. For example it would be useful to clarify who would be filling this checklist in and whether this needed to be an environmental specialist? It would be beneficial to understand what type of development would require a checklist. In addition, the impact seems to be measured by ‘nil, small, medium, significant’ but the Council couldn’t identify where there was guidance on what each category meant. Again, further clarity on who would be completing this element in order to make a judgement would be beneficial as would explanation of what evidence, or what types of evidence, would be required to demonstrate the judgements made. Overall, it is considered that further information is required to understand what the checklist would achieve and its specific impact on decision making e.g. if a development falls within the ‘nil’ category would this warrant a refusal, or is this just an aid to understanding of the extent to which the development has specifically considered climate change?	Noted. The checklist is not new; it was part of the currently adopted Local Plan. But comments are useful and will be considered as we produce climate change policies.	Consider comments we produce climate change policies.
7	Anglian Water	3.23.IIIWe support the approach to energy efficient buildings including embodied energy of buildings – this aligns with advice in The Broads Design Guide. However, there is an opportunity to also reference water efficient buildings to emphasise the benefits of minimising potable water demand from new developments, as this helps to minimise energy use (and carbon) in wastewater treatment and potable water treatment and distribution, but also helps to reduce the energy consumption of new buildings particularly for hot water if water efficient fittings are utilised.	Noted. The issue of water efficiency was discussed elsewhere in the Issues and Options.	See water efficiency section.
7	Bradwell Parish Council	The movement towards net zero energy supply needs to be accelerated.	Support for net zero noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Broads Society	The Society agrees with the approach to not set a standard for energy design of new buildings in the new Local Plan for the Broads at this time.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Brooms Boats	Broom Boats believes that Building Regulations should be the foremost advisory for building design and ensuring that appropriate materials and technologies are used relevant to the significant impact environmental effects are having.	Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Designing Out Crime Officer, Norfolk Police	Research conservatively estimates the carbon cost of crime within the UK to be in the region of 6,000,000 tonnes of CO2 per annum. This is roughly equivalent to the total CO2 output of 6 million UK homes. The environmental benefits of Secured by Design are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage. It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows, and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.	Noted. This is more for design policy.	Ensure design policy refers to SBD standards and guidelines.
7	East Suffolk Council	It is important for the Local Plan to emphasise that Building Regulations set the legal minimum standards and for the Plan to encourage developers to deliver homes that exceed these standards for energy performance. Norwich City Council has delivered the Goldsmith Street development to Passivhaus standards and East Suffolk Council is developing the former Deben High School site in Felixstowe to provide 61 Passivhaus homes. These could be cited as examples, albeit of larger scale development, to inspire and promote good design and to show it is realistic and achieved. Clarification of the approach to residential solar PV installations (alongside heat pump installations) would also be useful.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	East Suffolk Council	It is worth noting that East Suffolk Council have recently adopted a Sustainable Construction Supplementary Planning Document (April 2022), which is available to view here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf . This SPD includes information about how sustainable construction methods and materials used in new development can reduce the construction and operational impact on our environment, wildlife, climate change and health and wellbeing. It also provides guidance on how the operating efficiency of existing buildings can be improved through retrofitting.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Norfolk Wildlife Trust	Whilst not directly asked in this question, we also support the plan including policy which would require progressive increased energy efficiency measures and reference the best practice set out in the joint publication by the Royal Town Planning Institute and the Town and Country Planning Association, The Climate Crisis – A Guide for Local Authorities on Planning for Climate Change https://tcpa.org.uk/wp-content/uploads/2021/11/tcpartpiclimateguide_oct2021_final.pdf	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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7	Norfolk Wildlife Trust	we are supportive of policy changes to deliver low and zero carbon new build, and believe that the inclusion of a zero carbon new build policy would be an achievable and deliverable policy that would bring clear benefits for climate change mitigation. We refer to the adopted zero carbon new homes policy in Reading City Council's local plan as evidence of the deliverability of such a policy.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	RSPB	The statement 'CO2 emissions from new build homes must be around 30%...' needs tightening as developers tend to aim for the minimum figure. Incentivising developers to aim above 30% should be investigated. We don't understand why the reduction figure of 27% for shops and offices, is different from homes?	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Sequence UK LTD/Brundall Riverside Estate Association	2.18 Agree with the approach set out within the consultation to not set a specific policy as this is covered within the building regulations.	Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	South Norfolk Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV changing points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Suffolk County Council	To support Suffolk County Council's ambition of achieving carbon neutrality by 2030, the Suffolk Climate Emergency Plan was produced. This in turn is supported by a table of key actions which include supporting the county's Local Authorities to develop policies requiring new homes to be built in line with the 2025 Future Homes and PAS 2035 standards, including heat pumps or new heat networks or connection to existing heat networks. We would therefore support the inclusion of policies that embed these requirements for new homes in the Broads.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
7	Broadland Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV changing points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
8	Bradwell Parish Council	If electric vehicle charging points can be provided without a major impact on the broads then they should be implemented.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
8	Broads Society	The Society agrees with the approach to not set a standard for electric vehicle charging points in the new Local Plan for the Broads. However, it is important that electric vehicle points, where proposed, are viewed positively within planning applications where sustainable travel is being encouraged to enable businesses to react to changing market conditions and environmental impacts.	Noted. Support to the approach of not setting a standing in the Local Plan noted.	Consider this comment as produce the Preferred Options and any policy on parking.
8	Brooms Boats	Standards for electric vehicle charging should be outside of the Local Plan.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
8	Brooms Boats	It is important that electric vehicle points, where proposed, are viewed positively within planning applications where sustainable travel is being encouraged to enable businesses to react to changing market conditions and environmental impacts.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
8	Designing Out Crime Officer, Norfolk Police	Residential parking spaces should be perpendicular and to the front of dwellings they are meant to serve, in order to maximise the opportunities for natural surveillance. This feature will become more relevant with the increase of the electric charging of vehicles on driveways. This should be factored in when designing new housing developments in line with SBD guidelines.	Noted. This is more for design policy.	Ensure design policy refers to SBD standards and guidelines.
8	East Suffolk Council	As is correctly set out in the consultation document, under Building Regulations a new residential building with associated parking is required to provide an EV charging point. However we would still recommend requiring EV charging points on developments with on-plot parking as part of planning policy. Consideration could also be given for EV charging provision in community buildings, e.g. village halls and public car parks. A position on on- street/ lamppost EV chargers could also be included.	Noted.	Consider this comment as produce the Preferred Options and any policy on parking.
8	RSPB	Will this be incentivised? If electric vehicle charging points aren't developed in line with proposed removal of fossil fuel powered vehicles there is likely to be competition for this service.	Noted, but this seems more a national issue and not one which the Local Plan can address.	No further action.
8	Sequence UK LTD/Brundall Riverside Estate Association	2.20Agree with the approach set out within the consultation to not set a specific policy as this is covered within the building regulations.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
8	South Norfolk Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV changing points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
8	Suffolk County Council	Suffolk County Council suggests reference is made to the Suffolk Guidance for Parking which provides further information on electric vehicle charging points.	Noted. Refer to Suffolk and Norfolk CC parking guidance.	Refer to Suffolk and Norfolk CC parking guidance.
8	Broadland Council	Agreed, existing legislation is in place. Building Regulations will ensure energy efficiency in new buildings including EV charging points. In addition, NCC Highways have updated their standard guidance to now require EV changing points and future proof any expansion.	Support to the approach of not setting a standing in the Local Plan noted.	No further action.
9	Broads Society	The Society feels that it is helpful to have a preferred hierarchy approach particularly for new development but does not think that any proscribed approach is necessary which would require new development and extensions to be 'heat-pump ready'. This could add an unnecessary financial burden on developers and residents. Instead, the approach should be collaborative and viewed positively within planning applications, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	Brooms Boats	The approach should be collaborative and viewed positively within planning applications, to embrace the technologies available to provide electric charging and water/ground/air source pumps, to join up infrastructures for sustainable visitor travel, enable a joint marketing approach to encourage sustainable tourism.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	Designing Out Crime Officer, Norfolk Police	Option c) Yes reducing / eradicating oil tanks which are vulnerable to theft and criminal damage (when not locked or surrounded by the recommended layers of security) and replaced with other heating sources would be supported by Norfolk Constabulary to reduce crime.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	Sequence UK LTD/Brundall Riverside Estate Association	2.22The Brundall Riverside Estate Association do have concerns with regard to the energy hierarchy set out above. Such an approach would go beyond the building regulations requirements and it is not clear from the consultation as to who would make the assessment as to whether a development is acceptable in terms of the hierarchy. 2.23IIIIt is presumed this would be undertaken by Broads Authority's Planning Officers unless a specialist role is created but this would create a further pressure on planning resource and it is not clear whether there is appropriate in-house expertise to make judgements on the proposed hierarchy. 2.24By contrast, the drainage hierarchy is implemented by specialist officers within the Lead Local Flood Authority (LLFA) at Norfolk County Council. Even then, this can be problematic even where applicants have legitimate grounds to justify a drainage solution further down the hierarchy where 'higher' options are not viable. 2.25There is a concern that such an approach could be overly restrictive and place a burden on developers, in going beyond building regulations requirements. In particular the reference to extensions meeting the hierarchy would seem inappropriate if it is required to be of a higher standard than the main dwelling. 2.26We would therefore suggest that the proposed heating hierarchy is not appropriate.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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9	South Norfolk Council	Consistent with the Agreement 3 of the NSPF. However, there is no reference to domestic wind power sources and whether there are any circumstance in which this may be deemed an appropriate solution within the Broads. The Council also considers that there may be a significant opportunity to encourage the use of water source heat pumps and this should be given due consideration in the policies of the Local Plan.	There is reference in the Issues and options to wind and small scale wind - section 18. Noted regarding watersource heat pumps.	When reviewing the renewable energy policy, consider how to address water source heat pumps.
9	Suffolk County Council	Addressing the way homes are heated in Suffolk is considered an important component of reaching carbon neutrality across the Suffolk. In addition to supporting policies that require new buildings to include heat pumps or new heat networks, Suffolk County Council also supports the uptake of heat pumps in existing buildings in line with the actions accompanying the Suffolk Climate Emergency Plan. We support the heating hierarchy set out at section 13.5 and would support the requirement for new developments to be heat pump ready.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9	Broadland Council	Consistent with the Agreement 3 of the NSPF. However, there is no reference to domestic wind power sources and whether there are any circumstance in which this may be deemed an appropriate solution within the Broads.	There is reference in the Issues and options to wind and small scale wind - section 18. Noted regarding watersource heat pumps.	When reviewing the renewable energy policy, consider how to address water source heat pumps.
9a	RSPB	Looks sensible. Are you differentiating between ground source and air-source heat pumps? Either way it makes sense to make clear both methods should be considered as valid.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9a	Bradwell Parish Council	We only agree with a-d.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9a	East Suffolk Council	East Suffolk Council's view is that planning policy should support low carbon and renewable energy but should not be setting detailed requirements. Building Regulations should set the requirements for energy performance at the national level. Building Regulations set carbon emission standards without specifying the type of heating/hot water system required. This approach allows for new technologies to come forward that are more energy efficient/low carbon. Given the timeframes of Local Plans, it is important that there is sufficient flexibility to accommodate technological advances in this area. As above, clarification of the approach to residential solar PV installations (alongside heat pump installations and potentially geothermal) would be useful.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9b	RSPB	It would make sense to work towards phasing out fossil fuel source systems and again incentivise with Government grants or other.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9b	Bradwell Parish Council	The approach should be for net zero emissions.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9b	East Suffolk Council	Notwithstanding our more general comments against question a) above, the principal behind the introduction of some form of heating hierarchy sounds sensible. As noted in the consultation document, any new Local Plan will need to consider the impact that any new standards may have on the feasibility of installing oil and gas boilers in new homes in the future.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9c	RSPB	An essential approach to take to smooth the transition. Perhaps impossible to predict but design and installation should allow adaptation at a future date if new technology arrives to further enhance efficiency.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9c	Bradwell Parish Council	We should move to a situation where all developments are heat pump ready.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
9c	East Suffolk Council	As outlined in our response to question a) above, East Suffolk Council's view is that Building Regulations, not planning policy, are best placed to specify requirements for heating and/or hot water systems. Building Control Officers have the knowledge and expertise to assess the technical information submitted alongside applications and can carry out the necessary onsite checks to ensure work has been carried in accordance with plans. Developments being 'heat network ready' where viable is expected to be a future national requirement – this could also be added as a consideration, but may be less relevant to the Broads due to the generally lower heat and population density.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Anglian Water	3.24.III We support the approach relating to embedded carbon. Anglian Water's Net Zero Strategy seeks to be net zero by 2030 and reduce capital (embedded) carbon by 70% from a 2010 baseline. This reinforces the need for sustainable, resilient development and supporting infrastructure to minimise carbon emissions and avoid future redundancies/abandonment.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Bradwell Parish Council	Yes, we should strive for less embodied carbons.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Broads Society	The Society feels that this could have an adverse impact on the design quality of new build or replacements/extensions. Also it should be another element that could be usefully incorporated into Building Regulations legislation rather than Planning legislation if felt necessary.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Brooms Boats	Broom Boats believes that Building Regulations should be the foremost advisory for building design and ensuring that appropriate materials and technologies are used relevant to the significant impact environmental effects are having.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	East Suffolk Council	As the Broads Authority will be aware, there can be a significant time gap between a development receiving planning permission and work starting on site, and some larger developments can take years to complete. As such, developers may require a degree of flexibility to enable them to source alternatives when there are material shortages, supply chain delays, or changes in price. The RICS Whole life Carbon assessment for the built environment is recommended as an approach for identifying opportunities to reduce emissions over the course of a building's lifetime. www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessment-for-the-built-environment-november-2017.pdf The Construction Material Pyramid produced by the Centre for Industrialised Architecture is also a useful tool understanding the impact of different building materials and calculating the carbon emissions. www.materialepyramiden.dk	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Historic England	As a general rule traditional building materials have lower embodied carbon than modern materials. For example, timber-framed buildings have masses of carbon locked up in their component parts, and the longer they are with us the better this figure becomes. Brick buildings are generally the product of charcoal firing, again considered relatively low carbon although there were always emissions associated with this. Stone buildings are again zero carbon particularly as the stone was quarried by human graft. Most modern building materials now come with a much higher carbon footprint, mainly because of mechanisation, but also because of high temperature kilns which burn high carbon fuels. To this end traditional building materials should be encouraged where appropriate, particularly where development could impact on the setting of historic buildings. This will also help development integrate with the local character and vernacular of the Broads.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	RSPB	Sensible stance to take to drive the message home about importance of the approach.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.

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10	Sequence UK LTD/Brundall Riverside Estate Association	2.28The Issues and Options document picks up on the main challenge here which is the need to balance the use of materials with embodied carbon, with design constraints. In this context, there is the potential for conflict with the draft Design Guide and quite prescriptive materials preferences, which we in turn have concerns with, covered within Section 3 of this response. 2.29Again noting the requirements of building regulations which already set a high standard for sustainable construction, we are concerned with the reference to ‘requiring’ applicants to choose materials that have less embodied carbon and would therefore recommend the use of the phrase ‘encourage’ rather than ‘require.’	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	South Norfolk Council	As previously noted within the plan, there is existing legislation in place i.e., Building Regulations which covers energy design of new buildings and the requirement of EV charging points. On this basis, the Council has some reservations about the appropriateness of included a separate planning policy requiring the use of less embodied carbon materials. In addition, it is unclear what the implications of that assessment would be in terms of determining application i.e. is a minimum threshold proposed? Careful consideration would also need to be given to the viability and deliverability implications of such an approach taking into account proposed objectives 9, 12.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Suffolk County Council	Suffolk County Council supports the approach of requiring applicants to choose materials that have less embodied carbon as a key element of achieving carbon neutrality by 2030. Assessments of embodied carbon should also include demolition of existing buildings.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
10	Broadland Council	As previously noted within the plan, there is existing legislation in place i.e., Building Regulations which covers energy design of new buildings and the requirement of EV charging points. On this basis, the Council has some reservations about the appropriateness of included a separate planning policy requiring the use of less embodied carbon materials. In addition, it is unclear what the implications of that assessment would be in terms of determining application i.e. is a minimum threshold proposed? Careful consideration would also need to be given to the viability and deliverability implications of such an approach taking into account proposed objectives 9, 12.	Comments noted and will be considered as we work up the design and materials approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Anglian Water	3.25.We agree that greywater recycling should be included in the Local Plan Review in conjunction with rainwater harvesting as an integrated water management approach to ensure resilience, particularly with increased risks of drought as a result of climate change.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Bradwell Parish Council	We agree with a-c especially c when houses could be built with a southerly aspect.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Broads Society	The Society has no objection to the topic areas set out in this section. The extent of ‘Encouraging retrofit over re-build – the re-use and improvements to buildings could be included in DM40 and DM48’ – although this is generally supported, it is important that the economic viability of buildings within a business has to be understood and considered thoroughly as part of the planning consideration process.	Noted. Will consider this as we produce the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Brooms Boats	The extent of ‘Encouraging retrofit over re-build – the re-use and improvements to buildings could be included in DM40 and DM48’ within planning approval would need to be defined as the economic viability of buildings within a business, for example, has to be understood and considered thoroughly.	Noted. Will consider this as we produce the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
11	East Suffolk Council	East Suffolk Council support the proposed additions to the existing policies. There will be significant retrofit projects being delivered across the region from which there will be learning and potential opportunities for collaboration. The Suffolk & Norfolk ‘Reclaim the Rain’ project could be a reference point for other water related sections beyond greywater.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	East Suffolk Council	The Council would support and encourage the Local Plan seeking to implement recommendations in the recently adopted East Suffolk Cycling and Walking Strategy (www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/). The Strategy identifies cycling and walking infrastructure improvement recommendations for the whole of East Suffolk including the part within the Broads. The Broads Authority have endorsed the Cycling and Walking Strategy at their Planning Committee meeting in November 2022, and this could therefore form a key piece of evidence for the Local Plan. Whilst this comment is made under the climate change section of the consultation document, it should be acknowledged that the Cycling and Walking Strategy also seeks to improve health and wellbeing and contribute to other objectives (see paragraph 1.1 of the Strategy).	Noted. We will use this comment as we produce the transport section of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
11	RSPB	Yes, need to encourage retrofit over rebuild. There should also be a move to encourage and promote improvement of buildings already constructed as these structures will have a disproportionate negative impact on climate change. Needs to become mainstream and for householders to become aware – along the same lines as battery powered cars. Yes, for grey water recycling and harnessing rainfall, not just for gardens but if treated with UV for first time (not recycled per se) household use. Yes, to household orientation to make the most of solar energy generation.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Sequence UK LTD/Brundall Riverside Estate Association	2.31No specific comment on these matters. Repeating comments above, greywater recycling can be encouraged but should not be mandatory, particularly if this goes above building regulations requirements. 2.32With regard to retrofit vs re-build, each case needs to be considered on its own merits and therefore we would not consider it appropriate to restrict the demolition and rebuild of properties. Indeed there may be very good reasons for demolition on structural and safety grounds, and/or issues of viability. 2.33Whilst the intentions with regard to design are noted in terms of passive solar gain etc. care needs to be taken as to how this would be incorporated into any design policy as this is one of a number of design considerations which would be relevant for development. For example the siting and orientation of a building needs to consider the site context and residual amenity as well as potential for solar gain.	Noted. Will consider this as we produce the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Suffolk County Council	We support the inclusion of policies encouraging retrofit, greywater recycling and the positioning of buildings for solar gain. These are all measures which would contribute positively towards Suffolk County Council’s aim of achieving carbon neutrality by 2030.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
11	Designing Out Crime Officer, Norfolk Police	Secured by design guidance’s supports both retrofit and rebuilds.	Support noted.	Consider crime with any approach that looks to address retrofit.
12	Anglian Water	3.26.As previously indicated, we consider that the carbon implications for the spatial distribution of development should inform sustainable locations for new development, i.e., focussing development in locations that require less infrastructure to deliver growth such as where there is existing capacity/headroom within our sewerage network and water recycling centres, which will reduce both capital (embedded) and operational carbon.	Noted. Access to services and facilities is a key consideration when we assess sites put forward through the call for sites. AWS have been consulted on the sites that have been put forward.	No further action.
12	Bradwell Parish Council	Build more homes with a southerly aspect with more focus on net zero heating systems.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.

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12	British Sugar/Rapleys	The adopted policies on renewable energy proposals (Policies DM14 and DM15) require development proposals to maximise the energy efficiency and energy conservation measures. In response to Question 12, we consider that the Local Plan Review should go further to encourage and support existing businesses seeking to reduce carbon emissions for their operations through renewable energy development.	Noted. We already have a policy on renewable energy which could be used. So would other topic-based policies like landscape impact and the natural environment. But we do ask as part of this, about changes to the approach to wind power and you respond to question 20. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Note this suggested amendment to DM14 and DM15 and consider changes as policy is drafted for the Preferred Options.
12	East Suffolk Council	As the Broads Authority will be aware, East Suffolk Council, at its Full Council meeting on Wednesday 24 July 2019, voted unanimously to declare a recognition of the climate emergency and to step up its positive work on environmental issues to help fight climate change. Further detail on the work being undertaken by East Suffolk Council is available on our website at: https://www.eastsuffolk.gov.uk/environment/climate-change/our-climate-commitment/	Noted.	No further action.
12	East Suffolk Council	Local Plans and planning policy are key to helping deliver development which can adapt to and mitigate the effects of climate change on people and wildlife. To support policies in both Local Plans East Suffolk Council recently adopted a Sustainable Construction Supplementary Planning Document (April 2022), which is available to view here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf . The Broads Authority may wish to consider if a similar approach would be appropriate for the Broads Authority Area. Additionally, The Broads Authority may want to consider the Net Zero Carbon Toolkit when looking at the design of new homes and the retrofitting of existing homes: www.greensuffolk.org/net-zero-carbon-toolkit-housing/	Noted. We are aware of the SPD. We do have a guide, but that is likely to need to be updated and we will use the ESC experience in doing that.	Take into account the two documents suggested when working up policies in the Local Plan.
12	Historic England	Historic England (Heritage Counts) research shows that sympathetic refurbishment and retrofit can reduce the carbon emissions of historic buildings by over 60% by 2050. The UK's Committee on Climate Change has identified retrofitting existing homes as one of five priorities for government action (CCC, 2019). The Heritage Counts research also demonstrates that the speed at which carbon is reduced in buildings has a greater impact than the scale of retrofit showing that the sooner actions are taken the more effectively we can address carbon in buildings.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
12	Historic England	Embodied carbon is a significant source of carbon emissions that is largely overlooked. Buildings contribute to global warming over their whole lives and the Heritage Counts research confirms that if we do not count embodied carbon we underestimate the emissions of a new building by up to a third.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
12	Historic England	When a typical historic building - the Victorian Terrace - is sympathetically refurbished and retrofitted, it will emit less carbon by 2050 than a new building. But only if the whole life carbon of the building is considered. Retrofit, refurbishment and conversion also generate embodied carbon emissions, so the amount of materials used, the carbon content of materials and how retrofit is carried out need to be key considerations of any retrofit project.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
12	RSPB	Yes. Creation of corridors for nature like the B-lines proposals, where road edges aren't mown, where native, flowering plants are seeded in, where houses, streets, public places, spaces, and allotments all contribute towards creating and managing habitat for wildlife to enhance the urban environment, allow residents to better manage their health and welfare and create an attractive, cared-for urban zone.	Noted. Will consider this comment as we produce the natural environment policy.	Consider this comment as produce Preferred Options version of the Local Plan.
12	South Norfolk Council	Overall, this section appears generally consistent with the aims of the NSPF in relation to climate change and renewables. However, careful consideration will need to the risks of duplication or repetition when imposing, and future proofing, local standards where other legislation requires certain industry standards, for example in relation to energy efficiency, including in terms of the viability and deliverability of development.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
12	Suffolk County Council	It is recommended that the Natural Capital Evidence Compendium for Norfolk and Suffolk is included as part of the evidence base for the plan. The compendium presents information on the wealth of natural assets in the counties, including land, soils and sub surface, habitats and species, freshwater, coastal and marine, and atmosphere. It was developed by Norfolk and Suffolk County Councils and the University of East Anglia. The compendium has been compiled to present publicly available data on the natural environment in one place. While the information is presented at a regional scale, and online, a GIS based version which will allow for a more local interrogation of the information, is being developed.	This was assessed as part of the Literature Review for this Sustainability Appraisal Scoping Report.	No further action.
12	Suffolk County Council	The compendium also sets out the risks to these assets, and lists priorities for the Norfolk and Suffolk 25 Year Environment Plan. The Broads Local Plan should reflect these priorities in strategic objectives and policies, where appropriate.	This was assessed as part of the Literature Review for this Sustainability Appraisal Scoping Report.	In light of no specific proposed amendments to objectives and policies, no further action.
12	Suffolk County Council	Suffolk County Council has declared a climate emergency with the aim of achieving net zero by 2030. The Suffolk Climate Change Partnership commissioned Ricardo Energy and Environment to produce a report identifying the actions that can be taken across a variety of sectors to meet net zero and the challenges presented.	Noted.	No further action.
12	Suffolk County Council	The Local Plan should seek opportunities to facilitate sustainable travel, including support for improvements to key walking and cycling infrastructure and bus priority routes. Policies should support the provision of travel plans for new development.	Noted. We do have such policies in our transport section.	No further action.
12	Broadland Council	Overall, this section appears generally consistent with the aims of the NSPF in relation to climate change and renewables. However, careful consideration will need to the risks of duplication or repetition when imposing, and future proofing, local standards where other legislation requires certain industry standards, for example in relation to energy efficiency, including in terms of the viability and deliverability of development.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Anglian Water	3.27. Whilst recognising that evidence for local plans should be proportionate, planning measures to address climate change mitigation and adaptation should, if possible, provide a complete policy position that would set out the current baseline of emissions within the Broads and show the pathway to reducing emissions by 78% 2035 and to net zero by 2050 as set out in the Climate Change Act. We note that The Broads Authority has recognised a climate emergency with a 2030 target to be carbon neutral for its own operations and has already implemented strategies and plans for climate adaptation and mitigation.	The BA have calculated the baseline emissions. And as AWS identify, there are other plans and strategies and workstreams looking into carbon emission for the Broads and the BA. Planning is an element of that, but development is also guided by national standards, in particular the building regulations.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Bradwell Parish Council	Fundamentally we need more trees to counteract greenhouse gases, so we need a positive programme of planting more evergreen trees in the area.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Designing Out Crime Officer, Norfolk Police	Yes maintenance of vegetation as to not negatively impact surveillance opportunities, including inhibiting lighting from nearby streetlights, or to provide hiding places along footpaths is encouraged.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	East Suffolk Council	Of the options put forward, East Suffolk Council would support either option b (amend policies DM8 and DM13 to include a greater emphasis on trees, woodlands, hedges, and shrubs) or option c (a new policy on the subject of trees, woodlands, hedges and shrubs). Option b may be the most logical considering the existing policies, especially DM13. A separate policy on the issue of trees etc. does not appear to be explicitly needed and could be covered by amendments to DM13, however this will depend on the level of detail the Broads Authority considers appropriate.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.

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13	RSPB	14.4 c) is the best option and enhancing planting (making sure the right species of tree is planted in the right place) to create both a carbon sink and provide a cooling mechanism in urban environments. There needs to be a longer-term approach so that previous policies to remove hedges and then 20 years later incentivise replanting are no longer followed. Trees, hedges and woodland need to be viewed less as field boundaries and more of a biodiversity asset and as means of mitigation for climate impacts. Native species, exemplary management and thoughtful planning and location to enhance the environment and creating habitat and corridors facilitating the movement and flux of wildlife.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Sequence UK LTD/Brundall Riverside Estate Association	2.37The cited policies DM8 and DM13 do not make specific reference to trees, hedges etc. and therefore it would seem sensible to either update those policies or include references within a new policy. Care should be taken that any policy is not overly prescriptive and consistent with national planning guidance such as the Framework, as well as the British Standard (BS) on trees.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Suffolk County Council	Suffolk County Council would support having a new policy for trees, woodlands, hedges and shrubs which covers management, maintenance and protection of existing as well as creation of new. However, the Authority should consider how such a policy would be enforced and how administration of it, including any monitoring, would be resourced. In the event that the Hedgerow Regulations are withdrawn, as part of the Government's Agricultural Transition Plan, the Authority would need to consider how it would resource any enforcement or monitoring responsibilities which may result from replacement regulations or national policy on the protection of trees and hedgerows.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Suffolk County Council	Suffolk County Council is in the process of preparing the Local Nature Recovery Strategy (LNRS). Trees and hedges will feature strongly in the mapping requirements for the strategy. Existing trees and hedges will be mapped to establish a baseline from which opportunities for enhancement to tree, hedge and scrub habitat can be agreed collaboratively (between the Broads Authority and Suffolk County Council) as nature recovery priorities. These enhancements will then be included in the county-wide LNRS.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
13	Wroxham Parish Council	WPC support a separate policy for trees etc. Trees are second only to water as a feature of the Broads. Trees featured heavily in feedback from residents during the WNP consultation and continue to be really important to residents. Trees are more and more important in addressing climate breakdown.	Comments noted and will be considered as we work up the trees approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Bradwell Parish Council	We should give strong consideration to options c and d,	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	East Suffolk Council	East Suffolk does not have a policy that specifically relates to the use of peat. However (as already highlighted under other answers) East Suffolk Council has declared a climate emergency and is committed to helping communities become sustainable and protecting habitats and biodiversity. The introduction of Biodiversity Net Gain, and the unique properties of peat as a habitat highlight the need for this resource to be protected even more, therefore a stronger policy direction would be beneficial. Due to the potential impacts of peat excavation, option d (change the emphasis to reduce significantly the amount of peat excavated in the first place) appears to be the most favourable as it provides a balanced approach to providing greater controls whilst not preventing small scale development where needed. Reference to the Peatland Code could be considered.	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Historic England	We welcome the direct reference to waterlogged heritage and archaeology. While we recognise that there would need to be circumstances where some small-scale development would be considered, we would welcome a change in emphasis to reduce the amount of peat excavated in the first place by making the policy stance stronger (option d).	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Mrs S Lowes	Peat to stay where it is.	Support for a policy to address the excavation of peat noted.	Other than continuing to consider the peat policy, no further action, .
14	Norfolk Wildlife Trust	we support the cessation of peat extraction, which does not appear to be directly reflected in the options for this question. We would also support the creation of new peat areas in the future, so support option f.	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	RSPB	Options d and f in combination. Excavating peat to commence development is untenable and there should be a presumption against this. The only acceptable circumstance where surface peat might be 'excavated' is within fens and reedbeds to create shallow turf ponds with the express aim of restoring habitats to benefit certain species. By inference excavating peat only occurs in very low-lying areas, which would be extremely susceptible to flooding and at the forefront of the impacts of climate change. Need to take a firm stance now to prevent development at the expense of peat. Instigating projects to start the process of reinstating peat should also start, but care needs to be taken on sites chosen. Any site likely to be flooded in the future should be prepared for another climate change mitigation solution, such as creation of wet woodland or if nearer the coast, saltmarsh as both these habitats have positive Carbon sequestration abilities. OF equal importance is ensuring sufficient water is available to maintain peat soils at an appropriate level of wetness to optimise Carbon capture and prevent formation of methane (which happens when peat soils are submerged).	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Suffolk County Council	As Minerals Planning Authority, Suffolk County Council would support a firmer stance on the excavation of peat so that less peat is excavated and there is a stronger requirement to dispose of peat in a way that prevents it drying out. Paragraph 210 of the NPPF prohibits policies that allow for new sites or extensions to existing sites for peat extraction and goes onto prohibit the granting of planning permission for peat extraction from new or extended sites.	Noted. This is not about peat extraction, but excavating a soil that happens to be peat as part of a development. Support for firmer stance noted.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Suffolk County Council	Consideration of the potential for creating new areas of peat is also supported. Peatlands function as carbon sinks, capable of absorbing and storing large quantities of carbon dioxide. The creation of additional peat would support Suffolk County Council's commitment to achieving carbon neutrality.	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Suffolk County Council	Suffolk County Council would also support the protection of peatland where it provides important biodiversity habitat and where there is exceptional archaeological potential. Any policies relating to the protection or creation of peatland should be linked to the LNRS which, when complete, should inform Local Plans and will carry weight as a mandatory mechanism of the Environment Act 2021.	Comments noted and will be considered as we work up the soils approach for the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
14	Woodbastwick Parish Council	It is not clear from the text whether peat is being extracted for commercial horticultural use. If this is the case it should cease.	The Local Plan does not talk about extraction of peat, it talks about excavation as part of development. Agreed that peat is not to be extracted.	No further action.
15	Bradwell Parish Council	We should look carefully at higher energy efficiency for existing house stock.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Broads Society	the Society feels that the Authority should not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Brooms Boats	Local or National Government approaches together with Building Regulations should prevail.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Designing Out Crime Officer, Norfolk Police	(regarding extensions) where required Norfolk Constabulary will continue work with applicants and planning officers to ensure that any significant re-builds or extension to existing premises for the purposes of reduction in energy use (both commercial and domestic) are also meeting security standards detailed in Secured by Design guidance.	Noted. So if we were to have a retrofit policy, it could include security.	If include a retrofit policy, consider including secured by design principles.

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15	East Suffolk Council	Given the current cost-of-living/ energy crisis, it is likely that more people will be looking for advice on how to improve their home's thermal efficacy and reduce energy consumption. Where appropriate, there may be opportunities to include such advice (or links to advice) within the Local Plan or in supporting documents (SPDs). The Net Zero Carbon Toolkit and information provided on Energy Saving Trust website may be of use regarding the retrofitting of existing homes. www.greensuffolk.org/net-zero-carbon-toolkit-housing/ https://energysavingtrust.org.uk/energy-at-home/	Support for an advisory approach to address this issue noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	East Suffolk Council	Some thermal upgrades may not require planning permission but will require Building Regulation Approval. East Suffolk Building Control provide an advice sheet on thermal upgrades: www.eastsuffolk.gov.uk/assets/Planning/Building-Control/Common-projects-guidance/Thermal-upgrades-to-your-house.pdf	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Norfolk Wildlife Trust	we support this in principle due to the benefits it will bring for the conservation of Norfolk's wildlife in the future, but are unable to offer any technical comments on how this would be achieved.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	RSPB	Yes. Comments as for Q11 above. Householders need to be encouraged morally and supported financially to plan for and bring about change in how they use and provide energy for their homes. Currently ground and air source heat pumps are probably too expensive for most homeowners to consider installing (even with grant support). As time passes and technological advances are made leading to reduced cost, householders need to be persuaded to convert. Creating model households as exemplars and case studies for householders to follow will be essential.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Sequence UK LTD/Brundall Riverside Estate Association	2.41This would appear to be a matter that would fall outside the scope of planning, and is more of a campaign or financial support that could be brought forward by the Broads Authority. However the current planning system cannot, and in our view should not, look to impose standards upon existing houses.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	South Norfolk Council	Improving the energy efficient of housing stock is clearly important, both in terms of the cost to the individual and in terms of achieving climate change objectives. However, it is unclear how this could or would be achieved through the authority's development plan policies. It may be that this is something that needs to be achieved through other interventions of the authority. There are limitations to how much can be achieved directly through a local plan and management of development that requires planning permission.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Wroxham Parish Council	yes, needs to be more focus on insulating existing properties and grants need to be open to more people. We understand that this is the case at Norwich City Council.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
15	Broadland Council	Improving the energy efficient of housing stock is clearly important, both in terms of the cost to the individual and in terms of achieving climate change objectives. However, it is unclear how this could or would be achieved through the authority's development plan policies. It may be that this is something that needs to be achieved through other interventions of the authority. There are limitations to how much can be achieved directly through a local plan and management of development that requires planning permission.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Bradwell Parish Council	Plans to extend should have a requirement for higher energy retention.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Broads Society	the Society feels that the Authority should not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Brooms Boats	Local or National Government approaches together with Building Regulations should prevail.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	East Suffolk Council	East Suffolk council would support the inclusion of support, encouragement and guidance on improving the existing buildings energy use in either the Local Plan or a supporting Supplementary Planning Documents.	Support for an advisory approach to address this issue noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	RSPB	Yes. For older build these situations might provide an opportunity for a complete rethink of energy provision for such houses where an extension is proposed.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Sequence UK LTD/Brundall Riverside Estate Association	2.43It is noted that any extension is likely to be built to higher energy performance standards than the host, where there have been advances in the building regulations. However again there is no mechanism within the planning process to allow for upgrades to the host building and we would suggest it would not be reasonable in any event. Such a policy is likely to have to be administered by a condition on any extension planning approval but such a condition would not meet the tests under paragraph 56 of the Framework as they would not be necessary (to make the development acceptable), relevant to the development to be permitted, enforceable and reasonable in all other respects.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	South Norfolk Council	As with question 10, careful consideration will need to the risks of duplication or repetition when imposing, and future proofing, local standards where other legislation requires certain industry standards, for example in relation to energy efficiency, including in terms of the viability and deliverability of development. This is particularly relevant given the high house prices referred to in the threats section of the SWAT analysis that may limit resident's ability to move within their local area in order to meet changing housing needs and demands, that might otherwise be address through the extension of their existing home.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Wroxham Parish Council	yes, see WNP ENV5, although this needs updating to reflect the rapidly changing climate situation. WPC will look to review the WNP in 2023 after the May elections.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
16	Broadland Council	As with question 10, careful consideration will need to the risks of duplication or repetition when imposing, and future proofing, local standards where other legislation requires certain industry standards, for example in relation to energy efficiency, including in terms of the viability and deliverability of development. This is particularly relevant given the high house prices referred to in the threats section of the SWAT analysis that may limit resident's ability to move within their local area in order to meet changing housing needs and demands, that might otherwise be address through the extension of their existing home.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Bradwell Parish Council	Ideally all homes should have an A EPC so the minimum requirement should be for a improvement of one level e.g. a D to a C rate EPC.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Broads Society	the Society feels that the Authority should not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Brooms Boats	Local or National Government approaches together with Building Regulations should prevail.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	East Suffolk Council	Again, East Suffolk council would support the inclusion of support, encouragement and guidance on improving existing buildings EPC levels either the Local Plan or a supporting Supplementary Planning Documents.	Support for an advisory approach to address this issue noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	RSPB	Yes. This provides another opportunity to educate and influence homeowners to adopt the best ways to power and insulate their homes.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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17	Sequence UK LTD/Brundall Riverside Estate Association	2.45For the same reasons as question 16 above, this policy could not be enforced as it would fall outside the scope of planning and it would not meet the tests for conditions. As a general principle, conditions and planning obligations can only be used to make the development that is being applied for acceptable. It is therefore not appropriate to use that planning permission to resolve existing issues, for example the energy performance of the host property.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	South Norfolk Council	As with other questions in this section, it is slightly unclear how the authority is proposing to achieve the change it is seeking through the local plan. Even if this could be achieved, without knowing the differences between the different levels of EPC ratings, including cost implications, then it is considered that it would be difficult to understanding what would be reasonable in terms of setting a standard, again taking account of housing affordability challenges and effects on viability. The Council also considers that careful consideration would need to be given to ensuring that any requirement would comply with the relevant test for conditions and obligations.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
17	Broadland Council	As with other questions in this section, it is slightly unclear how the authority is proposing to achieve the change it is seeking through the local plan. Even if this could be achieved, without knowing the differences between the different levels of EPC ratings, including cost implications, then it is considered that it would be difficult to understanding what would be reasonable in terms of setting a standard, again taking account of housing affordability challenges and effects on viability. The Council also considers that careful consideration would need to be given to ensuring that any requirement would comply with the relevant test for conditions and obligations.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Bradwell Parish Council	Adopt option B and C.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Broads Society	the Society feels that the Authority should not seek to address the energy efficiency of the existing housing stock through the Local Plan – instead, rely on any Local or National Government approaches.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Brooms Boats	Local or National Government approaches together with Building Regulations should prevail.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	East Suffolk Council	The Committee on Climate Change ‘UK housing: Fit for the future?’(2019) report outlines that decarbonising and adapting the UK’s housing stock is critical for meeting legally binding emissions targets by 2050. As already outlined in other answers, East Suffolk Council recently adopted a Sustainable Construction Supplementary Planning Document (April 2022), which is available to view here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf . This SPD includes specific guidance on energy efficiency but does note the difficulties of applying new standards to the existing housing stock when retrofitting works generally sits outside of the planning system and is therefore not affected by planning policy. The East Suffolk SPD encourages developers to be aware of the requirements of the Building Regulations in this regard.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Mrs S Lowes	Many properties in the area have old heating systems and the residents rarely have the funds to change these. How many people have the funds to make their existing homes efficient? Some may need extra room but not have sufficient funds to do both.	Noted. Although could improving energy performance of a dwelling save money in the long term?	Consider this comment as produce Preferred Options version of the Local Plan.
18	RSPB	Option b) is our preferred choice	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Sequence UK LTD/Brundall Riverside Estate Association	2.47We would suggest that option a is appropriate here to await other initiatives as options b and c cannot be delivered through the current planning system and indeed we would consider it unreasonable to do so.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	South Norfolk Council	Overall, the Council is minded that in many instances the best option is to rely on Local or National Government changes. Any proposal to extend an existing regulatory regime would need to be carefully considered to ensure that it is reasonable and proportionate and does not result in undesirable consequences, such as making it less desirable or affordable for local people to remain in their existing house and community.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Suffolk County Council	As set out above under section 13 – Climate Change, Suffolk County Council would support policies aimed at improving the energy efficiency of existing homes in line with the aims and actions set out in the Suffolk Climate Emergency Plan. Improving the energy efficiency of houses would also improve the quality of these homes, particularly in terms of heat retention and reduction of damp. This in turn is known to have significant benefits for the physical and mental wellbeing of residents. Policies could also support renewable energy generation, with caveats for historic buildings to account for impacts to historic fabric, setting and significance of heritage assets.	Support for addressing existing stock and the benefits noted.	Consider this comment as produce Preferred Options version of the Local Plan.
18	Broadland Council	Overall, the Council is minded that in many instances the best option is to rely on Local or National Government changes. Any proposal to extend an existing regulatory regime would need to be carefully considered to ensure that it is reasonable and proportionate and does not result in undesirable consequences, such as making it less desirable or affordable for local people to remain in their existing house and community.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Anglian Water	3.28.Anglian Water works closely with LPAs and developers to encourage the use of Sustainable Drainage Schemes (SuDS) and surface water attenuation wherever possible, minimising the amount of water entering our foul drainage network. Anglian Water has also opted to adopt surface water systems since 2009, incorporating them into our own network so that we can ensure they are properly maintained and operated. We positively approach opportunities for partnership working to deliver SuDS that deliver protection of our assets and wider benefits for existing buildings and communities.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Bradwell Parish Council	Option B	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Broads Society	The Society considers that ‘Option b’ would be a sensible option to ensure that at least some element of future proofing has been considered.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Brooms Boats	Option B	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	East Suffolk Council	Of the options put forward in the consultation document, East Suffolk Council considers option b (require the applicant to detail what measures they will take to improve the existing situation) to be reasonable so long as it is done in a manner proportionate to the proposed development. In addition, the Broads Authority may want to consider extending the application of the policy to cover flooding from surface water and other sources, in addition to Flood Zone 3.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Norfolk County Council	The Lead Local Flood Authority (LLFA) would support option B of the 2 options set out in 17.5 “Require the applicant to detail what measures they will take to improve the existing situation, with the level of improvement proportionate to the scale of new development proposed (if indeed the property does not have resilience measures or may benefit from more).” Where finished floor levels cannot be raised above the flood level and properties are in areas where there is known historic flooding or risk of flooding shown on surface water/ rivers and sea flood maps for planning.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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19	Norfolk County Council	Information on where flooding has been reported historically within the Broads Area can be found within the following published Section 19 reports, see table 1 below, these also contain recommendations which, in some cases, include resilience measures. FIR/037 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/fir037-broadland-various-2013-2017.pdf FIR/036 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/south-norfolk-2013-2016-fir-036.pdf FIR/010 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/hemsby-and-ormesby-st-margaret-great-yarmouth-2014.pdf FIR/008 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/norwich-and-broadland-2014.pdf FIR/048 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/norfolk-6-october-2019-fir048-amended-sept-2020.pdf FIR/056 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/norfolk-6-october-2019-additional-properties-fir056.pdf FIR066 https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/flood-investigation-reports/fir066-south-norfolk-winter-flood-event-2020-21.pdf	Information noted and thanks.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Sequence UK LTD/Brundall Riverside Estate Association	2.49 Given that this is existing housing stock, any enhancements to flood resilience could only come forward with planning applications for those properties, which would then be subject to the normal requirements in meeting current standards for flood resilient construction. Therefore we would suggest there is no requirement for a policy on his matter (option a). 2.50 The above however does give a further ground to a more flexible approach to extended or replacement chalets as these would be constructed to a better level of flood resilience than the current property.	Comment against the Local Plan addressing retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	South Norfolk Council	It will be important to ensure that any approach is proportionate. It is likely to be reasonable for the authority to expect flood risk measures to be incorporated in replacement buildings. This may well also be the case for extensive rebuilds or refurbishments. However, the Council has reservations about whether it would be proportionate or reasonable to expect extensive improvements to the fabric of an existing building where the extensions or alteration to a building are limited or minor in nature, have themselves incorporated proportionate flood risk mitigation measures and do not otherwise exacerbate existing flood risk.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Suffolk County Council	As a Lead Local Flood Authority (LLFA), Suffolk County Council consider development should be located away from areas at highest flood risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. It may be appropriate to implement a policy that any permitted development in an area at risk of flooding must be flood resilient or flood compatible and demonstrate that it will not increase flood risk.	Support for retrofit noted.	Consider this comment as produce Preferred Options version of the Local Plan.
19	Broadland Council	It will be important to ensure that any approach is proportionate. It is likely to be reasonable for the authority to expect flood risk measures to be incorporated in replacement buildings. This may well also be the case for extensive rebuilds or refurbishments. However, the Council has reservations about whether it would be proportionate or reasonable to expect extensive improvements to the fabric of an existing building where the extensions or alteration to a building are limited or minor in nature, have themselves incorporated proportionate flood risk mitigation measures and do not otherwise exacerbate existing flood risk.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
20	Bradwell Parish Council	Fundamentally we need to look at and use other forms of energy generation including wind other than burning fossil fuel.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced, being aware of any Government policy change.
20	British Sugar/Rapleys	We consider that the current approach to wind energy not to allocate suitable areas for wind turbines is restrictive, as it would effectively rule out wind energy development by existing businesses wishing to reduce carbon emissions from their operations. We note that this approach is based on the Renewable Energy Topic Paper (2016) which focused on commercial scale turbines rather than domestic microgeneration and assessed landscape sensitivities of small scale (up to 20m) and medium scale (20-50m) wind turbines within broad area segments.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced, being aware of any Government policy change.
20	British Sugar/Rapleys	The current approach, which is not based on a site specific assessment, will result in a blanket ban on any size of wind energy developments, including those which are smaller than 20m and/or can be sensitively designed and located. As such, we request that the Local Plan Review process assesses the suitability of wind turbines on a site specific basis where existing businesses are seeking to adapt to climate change and reduce carbon emissions from their existing operations. In the context of the significant industrial development within the Cantley Sugar Factory area, it is considered that wind turbine proposals of appropriate scale and siting could be accommodated without causing significant harm to amenity and views. We therefore consider that an opportunity to reduce carbon emissions should not be overlooked by a blanket ban without site specific considerations.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced as well as policy CAN1 is checked and produced (see comments from British Sugar on CAN1), being aware of any Government policy change.
20	East Suffolk Council	The current approach seems reasonable in relation to commercial scale wind turbines, and East Suffolk welcome the strong link to the Landscape Sensitivity Study which provides an evidence base to justify the position taken. The position regarding small scale turbines is not as clear, and the Broads Authority should consider what additional evidence may be needed in order to support a policy approach in these circumstances.	Noted.	If change approach, consider evidence needed.
20	RSPB	Given the Broads is a favoured location for wintering waterfowl, which move between the continent and then when in the UK between counties and protected sites, wind turbine installation on land would create problems, both on the grounds of potential mortality and impact on landscape character. This also holds true for larger species such as common crane, Eurasian bittern, resident geese and swans, larger birds of prey and large flocks of smaller birds arriving in winter from Europe. Many species could be impacted through striking rotating blades or by having the suitability of favoured foraging, hunting and breeding sites compromised.	Noted.	Ensure consider impact on birds.
21	Bradwell Parish Council	There should be limited expansion of the use of Wind turbines that has limited impact on the environment.	Noted	Consider this comment as produce Preferred Options version of the Local Plan.
21	Broads Society	The Society considers that the current approach of non-allocation should be maintained given the intrinsic value of the Broads specific landscape.	Support for non allocation noted.	Consider this comment as produce Preferred Options version of the Local Plan.
21	Brooms Boats	All technologies must be considered in view of the significant impact facing the Planet.	Support for change to approach for microgeneration wind turbines noted. Note that the Government are indicating changing the approach, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced
21	East Suffolk Council	As set out in our answer to question 20 above, East Suffolk Council would support further assessment of the sensitivity of the Broads Authority area landscape to smaller scale wind turbines. Depending on the outcome of that work, there may be scope to revisit the policy wording to allow for the potential opportunity for small scale turbines, subject to the caveats identified by the 2015 Ministerial Statement which remain relevant.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
21	Mrs S Lowes	Wind energy – Norfolk is flat. Wind turbines on land will detract from the benefit of tourism and locals. Maybe smaller ones there are not on show.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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21	RSPB	As stated in the response for Q20 the Broads is not suited to wind turbines. Other renewables should be prioritised, such as appropriate solar and household heat source. Land to the north of the Broads, which might be considered suitable could prove unsuitable due to the movements of wintering birds between the Broads and north Norfolk coast.	Support for non allocation noted.	Consider this comment as produce Preferred Options version of the Local Plan.
22	Bradwell Parish Council	We should designate Bluebell Woods and fill out the required form.	Following further conversations, this site is not in the Broads Authority Executive Area.	No further action.
22	East Suffolk Council	East Suffolk Council's approach is that Neighbourhood Plans are encouraged to identify Local Green Spaces. We agree that Local Green Spaces in Neighbourhood Plans do not need to be repeated in the Local Plan.	Noted.	No further action.
22	Suffolk County Council	Suffolk County Council would refer to its Guidance on Neighbourhood Planning in Suffolk. This guidance is due to be updated with further advice on the designation of local green space next year (2023). We are aware that in some cases sections of highway verge have been nominated for designation as local green space. In these cases, Suffolk County Council would request that we are notified of the nomination.	No new LGS came forward as a result of this call for sites. We will share the existing ones with you and you can check to see if you have any issues.	Share current LGS with Suffolk CC.
23	Bradwell Parish Council	We should adopt option C.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	Broads Society	The Society favours the 'Geographic risk-based approach' detailed in 'Option b'.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	Brooms Boats	Option B however economic viability regarding business needs is vital and hence requires a collaborative approach.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	East Suffolk Council	East Suffolk Council's view is that the Broads Authority are best placed to determine which of the options best deliver against the statutory purposes of the Broads Authority in protecting the interests of navigation. However, an approach based on the evidence of risk (option b) would seem sensible as this will allow for the policy to focus on those areas where a critical point has been reached.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	Mrs S Lowes	Old quay heading should be removed.	Support for quay heading in the same location rather than in front noted.	Consider this comment as produce Preferred Options version of the Local Plan.
23	RSPB	Prioritisation for replacement of quay head must go to locations where the heading protects bank integrity first and foremost and provision of mooring facilities second. We recommend the construction cost in terms of CO2 becomes part of the validation process, just as for materials and design of residential developments.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
23	Sequence UK LTD/Brundall Riverside Estate Association	2.58We note the issues that have been raised within the consultation document but are concerned that this is a matter that does need to be considered on a site-by-site basis and therefore the options set out within b) or c) are too prescriptive and inflexible, particularly where navigation matters will also be a factor. Therefore we would recommend that no specific policy would be more appropriate, although guidance only could be provided within the Design Guide or an SPD to ensure there is some form of assistance on this issue.	Suggestions noted and will be considered as we work up any policy approach to this issue.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Norfolk Wildlife Trust	Water efficiency in new buildings – due to the existing pressures on water availability in the region, and the benefits for wetland sites of more efficient water use, as a minimum we support the optional higher water efficiency standard of 110 litres/person/day for residential development, but would also support the 80l/person/day standard used in Greater Cambridge if deliverable. We therefore support options c and d.	Support for higher water efficiency standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Anglian Water	3.29.We disagree with option a) as our own analysis has shown that 55 out of the 59 local planning authorities in the Anglian Water region have, or are working towards, the higher optional standard of 110 litres/head/day given that the region is identified as a region under 'serious water stress'. The option to not have a policy standard for water efficiency is not considered to be a reasonable alternative. 3.30.As a minimum we would support option b) the continued approach of the optional standard of 110 l/h/d. In supporting the Greater Cambridge Local Plan, we are working with key stakeholders, to evidence more ambitious water efficiency standards to assist local planning authorities in their local plan preparation. We aim to share this with local planning authorities when we have a fully evidenced and agreed approach, which would assist in progressing option c).	Support for 110l/h/d or more efficient standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Anglian Water	3.31.We are also leading a £6m Ofwat Innovation Project to develop a national framework for integrated water management in all new developments, showing how rainwater harvesting and reuse, SuDS, nature-based solutions, and water efficiency measures can drastically reduce the water and carbon footprint of new housing developments - the Enabling Water Smart Communities project.	Noted. Will liaise with AWS on this initiative to see if any role for the Local Plan for the Broads.	Liaise with AWS.
24	Anglian Water	3.32.We are supportive of initiatives such as water neutral development to ensure that there is no increase in the total water use as a result of new development – meaning the additional water demand on the environment arising from a new development is zero. The experience of local planning authorities in the Sussex North Water Supply Zone (such as Crawley and Horsham) is due to abstraction having a detrimental impact on a number of designated habitats sites in the Arun Valley, as set out in a Position Statement from Natural England. LPAs within Sussex North are unable to determine applications for new development in the supply zone unless applications can demonstrate they are 'water neutral'. Anglian Water has provided advice on water neutrality to both Crawley and Horsham and further information can be found on the Waterwise website. If this option is taken forward, the challenge will be to ensure developments are much more water-efficient (including through rainwater harvesting and greywater reuse) and to identify sufficient local 'offsets' to enable water neutral development to come forward.	Noted. Will liaise with AWS on this - perhaps this is something for the region rather than just the Broads.	Liaise with AWS.
24	Bradwell Parish Council	We should continue with option b and explore ways of reducing this as outlined in option c.	Support for 110l/h/d or more efficient standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Broads Society	The Society would support continuation of the current policy detailed in 'Option b'.	Support for 110l/h/d noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Brooms Boats	Option B however economic viability regarding business needs is vital and hence requires a collaborative approach.	Noted. This standard is for residential. BREEAM standards would relate to businesses.	Consider this comment as produce Preferred Options version of the Local Plan.
24	East Suffolk Council	As already outlined in other answers, East Suffolk Council recently adopted a Sustainable Construction Supplementary Planning Document (April 2022), which is available to view here: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Sustainable-Construction-2022/FINAL-Sustainable-Construction-SPD.pdf This SPD includes specific guidance on water efficiency in new dwellings, including reference to the 110 litre/ person/ day water efficiency standard. The development a new Local Plan provides an opportunity to reconsider standards, and East Suffolk Council would support the Broads Authority investigating the reasonableness of seeking a standard that designs for less water a day than 110 l/h/d.	Support for 110l/h/d or more efficient standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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24	RSPB	As a minimum option c) should be chosen (in Denmark for example households aim for a max use of 80l/h/day). 'Working towards water neutrality' is stronger than the phrase 'investigate the potential to require water neutrality.' There shouldn't be an option of making no reductions/improvements in a part of the country already recognised to be in a state of severe water stress. Indeed, the disconnection between housing targets and the requirement that water companies must provide for a target number of houses needs resolving. If there isn't the possibility of sustainably providing a supply of water and managing household outputs to achieve nutrient neutrality without huge investment the proposal to construct new houses might be considered untenable.	Support for 80 l/h/d or more efficient such as water neutral noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Sequence UK LTD/Brundall Riverside Estate Association	2.60The matter raised at paragraph 21.5 of the consultation document is particularly pertinent here that there is limited large scale development within the Broads and therefore water use and pressures are significantly less than the cited examples in Sussex and particularly Greater Cambridge. Accordingly we would suggest that water usage for new development should not be reduced below the current 110 l/h/d rate, particularly as this would appear to be consistent with the other Norfolk authorities.	Support for 110l/h/d noted. Although, even though the numbers of new dwellings or replacement dwellings are low in the Broads, if designed to less than 110l/h/d, that will still make a difference in water usage and water bills.	Consider this comment as produce Preferred Options version of the Local Plan.
24	South Norfolk Council	As a minimum the authority should continue with the current policy approach of 110 l/h/d, consistent with Agreement 22 of the NSPF. Whilst it is reasonable for the authority to explore lower usage standards, or water neutrality the imposition of any such standard will need to be particularly carefully balanced against viability and deliverability issues.	Agree and noted. Yes, any lower usage would need justifying and viability tested.	If look into a lower standard, need to justify it and check viability impact.
24	Suffolk County Council	Suffolk County Council support higher water efficiency measures in light of the county being in a water stressed area as identified by the Environment Agency in 2021 in its Water Stressed Areas-Final Classification 2021 document..	Support for 110l/h/d or more efficient standard noted.	Consider this comment as produce Preferred Options version of the Local Plan.
24	Broadland Council	As a minimum the authority should continue with the current policy approach of 110 l/h/d, consistent with Agreement 22 of the NSPF. Whilst it is reasonable for the authority to explore lower usage standards, or water neutrality the imposition of any such standard will need to be particularly carefully balanced against viability and deliverability issues.	Agree and noted. Yes, any lower usage would need justifying and viability tested.	If look into a lower standard, need to justify it and check viability impact.
25	Bradwell Parish Council	We should adopt options b and d.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Broads Society	The Society feels that this could adequately be dealt with by 'Option b'. The challenge must now be to help stakeholders and businesses rapidly establish the offering that will engage the audience who will help shape, support and participate within the Broads National Park. This help being agile planning and planning support from joined up Authorities enabling the capture of rapidly changing economic opportunities.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Brooms Boats	Option B with consideration to t he challenge that is to help businesses rapidly establish the offering that will engage the audience who will help shape, support and participate within the Broads National Park. This help being agile planning and planning support from joined up Authorities enabling the capture of rapidly changing economic opportunities. Ref British Marine Futures report and The Glover Landscapes Review 2019	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Designing Out Crime Officer, Norfolk Police	From a policing perspective to ensure any refurbishment or new development is free from crime generators (and fear of crime) which can be achieved by building to Secured by Design standards.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	East Suffolk Council	East Suffolk Council would welcome the inclusion of a specific policy relating to tranquillity as part of the Broads Local Plan. As is rightly set out in the consultation document, much of the Broads area contains high levels of tranquillity and this should be protected. Such a policy could operate as a stand alone policy as per option c), or it could incorporate the dark skies policy. If the two policies are kept separate, it will be important to ensure significant cross referencing between the two in order to reflect the strong relationship between tranquillity and dark skies. If the Broads Authority have robust evidence relating to specific tranquil areas then these could also be included in the policy.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Historic England	We would welcome policy intervention addressing tranquillity in the Local Plan. The setting of heritage assets (designated and non-designated) can make an important contribution to their significance. The setting of a heritage asset is defined as the surroundings in which a heritage asset is experienced, and tranquillity, remoteness and wildness can be important attributes affecting how a heritage asset is experienced. While we don't have a specific preference in terms of the options presented, we would request that the historic environment - specifically it's contribution to the significance of heritage assets - is a factor in determining the appropriate policy response.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Mrs S Lowes	In terms of tranquillity, through traffic speeding causes noise. High windmills in the area will be a blight on the Broads. People come here for peace and quiet and for the dark skies. Light pollution will ruin this. Noise levels of traffic on the A149 s something many tourist boaters have listed as a reason for not staying in PH.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	RSPB	Option e). This also needs to extend to encompass promoting visitor access, however, it is recognised that maintaining and enforcing tranquil zones will be problematic, if the locations chosen have unrestricted/open access.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	South Norfolk Council	It is reasonable to consider tranquillity within the local plan, however the Council is concerned that this could be a highly subjective criteria that, if misused, may restrict even relatively minor or trivial impacts. Therefore, careful consideration needs to be given to ensuring that any policy criteria to ensure that it was proportionate and not unduly restrictive and that it could be objectively and consistently applied so that it is unambiguous and that it is evident how a decision maker should react to a development proposal. This will help provide certainty of outcomes to applicants and ensure the efficient processing of applications by the authority. To this end, identifying areas that can reasonably be considered tranquil and subject to additional restrictions may be a more predictable approach if it can be achieved. This may also allow for more engagement in the identification of such areas and a more accurate assessment of the impact of any associated restrictions. As always, careful consideration would need to be given to the impact of further restrictive designations on enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Advice noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Wroxham Parish Council	WNP support option d.	Support for improving how tranquillity is addressed in the Local Plan noted.	Consider this comment as produce Preferred Options version of the Local Plan.
25	Broadland Council	It is reasonable to consider tranquillity within the local plan, however . Careful consideration would need to be given to ensuring that any policy criteria could be objectively and consistently applied so that it is unambiguous and that it is evident how a decision maker should react to a development proposal. This will help provide certainty of outcomes to applicants and ensure the efficient processing of applications by the authority. To this end, identifying areas that can reasonably be considered tranquil and subject to additional restrictions may be a more predictable approach if it can be achieved. This may also allow for more engagement in the identification of such areas and a more accurate assessment of the impact of any associated restrictions. As always, careful consideration would need to be given to the impact of further restrictive designations on enabling development and change that helps build a strong, responsive and competitive economy and that enables strong, healthy and vibrant communities.	Advice noted.	Consider this comment as produce Preferred Options version of the Local Plan.
26	Bradwell Parish Council	We feel that there needs to be more focus on crops to feed the nation, so we are more independent on the effects of international events. So if this means subsidies then so be it.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.

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26	Broads Society	The Society generally supports the current Policy DM27.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
26	East Suffolk Council	Appropriate diversification of farming is generally supported by East Suffolk Council. Paragraph 84 of the National Planning Policy Framework states that policies should enable, 'the development and diversification of agricultural and other land-based rural businesses'. It is agreed that the approach should ensure land is not fragmented and that any diversification is supportive of the existing farm and does not reduce the farm's overall viability. In accordance with policy DM27 of the Broads Local Plan utilising existing structures where possible is recommended.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
26	RSPB	We don't subscribe to the principle that as a general principle 'farmers may need to make changes less beneficial to the countryside'. Can you expand or give examples of what this might entail, because as presented this statement appears very open-ended and unregulated? We do not contest the principle of farm diversification making farms more viable, but there need to be limits agreed to ensure a sustainable approach is adopted.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
27	Bradwell Parish Council	Bearing in mind my answer above then the purpose should be linked to food production in line with the farms original use.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
27	Broads Society	The Society supports the idea that farms should not be fragmented but also feels that other uses not strictly related to the farm could be acceptable as long as they were closely related, locationally, to the existing built form of the farm.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
27	East Suffolk Council	East Suffolk Council supports ensuring that farms are not fragmented which helps protect the viability of the wider area. This allows a greater degree of control over the land, avoiding new planning units with inappropriate or disruptive uses. The East Suffolk Council - Suffolk Coastal Local Plan (September 2020) takes a similar approach within Policy SCLP4.7 which requires farm diversification to ensure farming remains the predominant use on the site.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
27	East Suffolk Council	The fragmentation of land may have a wider impact on the character of the area (whether positively or negatively). The important landscape character attributes are defined in the Broads Authority Landscape Character Assessment, and it is important to note the strong relationships between the landscape character within East Suffolk as defined in the Waveney District Landscape Character Assessment: https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/Landscape-Character-Assessment.pdf . Any adverse character impacts could have cross-boundary impacts.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
27	RSPB	Agree with the principle of not allowing subdivision and fragmentation and that all land needs to be managed or 'developed.' There are huge benefits to wildlife in providing a network of locations (fields if you like) which provide rough ground for species such as owls. Not every speck of land needs to be worked. Longer term planning and contribution to the greater good of the landscape should be encouraged.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
28	Bradwell Parish Council	You definitely need to ask for supporting information on how the diversification project/proposal will enable the farm to be viable.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
28	Broads Society	The Society considers that the submission of a viability statement is a great way of getting the applicant to focus on whether or not any proposal is really financially viable and beneficial to them in practical terms.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
28	East Suffolk Council	Farm diversification allows for non-agricultural uses ensuring the farms continued viability. This can mean that jobs are retained, and food security is continued. The Broads Authority may wish to note that policy SCLP4.7 of the East Suffolk Council - Suffolk Coastal Local Plan requires similar viability information stating that diversification is supported subject to, 'e) The diversification is supported by detailed information and justification that demonstrates that the proposals will contribute to the viability of the farm as a whole and its continued operation'.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
28	East Suffolk Council	In developing a policy approach for this area, the Broads Authority may wish to consider stating that the level of supporting viability information should be of a scale appropriate to the size of development and set out that details of what viability information is appropriate in either the policy or within an appendix.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
28	RSPB	Yes, to requiring additional information on viability, especially the time frame for the proposed projects. As stated clearly market trends will play a large part in directing choices about direction of farm business but retention of a set approach for a longer period will offer greater value, except when unforeseen circumstances show the proposed direction of travel is no longer viable.	Support for supporting information note.	Consider this comment as produce Preferred Options version of the Local Plan.
29	Bradwell Parish Council	Limit farm diversification so the focus is on availability for food production going forward.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	Broads Society	The Society would agree that conversion is preferable to new build (particularly in relation to holiday accommodation provision). However, there are site specific instances where new build would be acceptable and should not be ruled out. A criteria based policy which could allow new build would be a better way forward than restricting it totally.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	Designing Out Crime Officer, Norfolk Police	Norfolk Constabulary will continue to work with the Planning Officers and applicants for any significant new build to encourage and implement Secured by Design standards.	Seems the suggestion is for agricultural development to address secured by design.	Consider this comment as produce Preferred Options version of the Local Plan.
29	East Suffolk Council	It is often beneficial to seek the retention and conversion of an existing building, as opposed to new development, particularly where it ensures the retention of buildings with positive character impact. As the issues and options document states it also potentially reduces the carbon impact.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	East Suffolk Council	The East Suffolk Council - Waveney Local Plan includes policy WLP8.15 for new self-catering tourist accommodation. The policy states that new permanent self-catered accommodation can be allowed in the countryside where it involves conversion of rural buildings subject to a set of criteria. Were the Broads Authority to take forward a similar approach in the new Local Plan, consideration should be given to how best to ensure tourist accommodation arising from farm diversification can be protected from pressure to become	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	East Suffolk Council	The Broads Authority may also wish to note that the Waveney Local Plan includes other policies governing conversion of existing rural building, namely, policies WLP8.11 (to residential use) and WLP8.14 (to employment use).	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	RSPB	New build if construction is shown to have a low or long-term neutral Carbon footprint, and will sit well within the landscape, should be considered. However, conversion of more permanent new build (bricks and mortar) would suggest the developer hasn't fully thought through construction and should be avoided and discouraged. Conversion of existing buildings if done sympathetically, following guidance and design principles should be encouraged.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
29	Sequence UK LTD/Brundall Riverside Estate Association	2.70We would broadly support a policy that allowed for conversion of farm and indeed other buildings to both holiday let and permanent residential. Current policies within the Broads Local Plan do make it more challenging to secure residential and holiday let conversion with a preference for buildings to be first retained in their current use. This is out of step with other Local Plan policies and indeed paragraph 80, part c of the Framework and therefore we would welcome policies allowing more straightforward residential and holiday let conversion.	Comments noted	Consider this comment as produce Preferred Options version of the Local Plan.
30	Bradwell Parish Council	The continued focus on diversification is not consistent with the country having self sufficiency in food production.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
30	Broads Society	The Society feels that farm diversification should remain a subsidiary element to the overall agricultural function of the business and should not exceed more than 50% of the total business operation.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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30	East Suffolk Council	As noted above, East Suffolk Council's view is that proposals for farm diversification should support the viability of the farm which will remain the main, primary use. A continuous loss of farmland to more diverse uses could, on a planning balance, change the primary use and the planning use class meaning it could fail its original objective.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
30	Luke Paterson	4.there is discussion around the nature and scale of farm diversification, farm diversification is very important with BPS being REMOVED and the energy crisis effecting farm profitability. Old buildings are not always efficient to heat and may not be as suitable as a new build. I have diversified into tourism and see that this is the direction of travel for my business to maintain its sustainability.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
30	Luke Paterson	6.Farmers PD rights should not be curtailed.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
30	RSPB	A complete business plan should define whether a particular diversification proposal is sound financially, will be acceptable in terms of design and will have no adverse impact on surrounding land, water, and other interests. It isn't so much a case of whether a single farm has been diversified enough as much as it is the in-combination impact of several adjacent farms diversifying and changing the landscape character. However, even this approach should be given due consideration if the proposed approach is deemed to be more beneficial given prevailing impacts of climate change. The land management activity known to produce the highest release of CO2 into the atmosphere is arable cropping.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
31	Bradwell Parish Council	Option b.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
31	Broads Society	The Society's preference is for 'Option a' to allow for a less constrained approach to any developing trends in the future. A specific policy might hamper an agricultural business from implementing speedier changes to the operation)	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
31	Designing Out Crime Officer, Norfolk Police	AS Q5 response - Consideration of condition of planning that the development and physical security meet Secured by Design standards.	Seems the suggestion is for agricultural development to address secured by design.	Consider adding the need for agricultural development to address secured by design principles.
31	East Suffolk Council	As the consultation document rightly sets out, agriculture is a key land use in the Broads and is important to the local economy. Within that context, there may be value in the Broads Authority giving further consideration to the feasibility of developing a new development management policy, specifically relating to agricultural buildings (option b).	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
31	Norfolk Wildlife Trust	Agricultural development – whilst we have no comments in principle on this question, we would recommend that any new development or renovation includes integral features of benefit for wildlife such as swift, bat and bee bricks, in order to help turn around the decline in these important species.	Seems the suggestion is for agricultural development to address biodiversity enhancements.	Consider adding the need for agricultural development to address biodiversity enhancements.
31	RSPB	Option b) should be chosen. A specific consideration relates to the creation of winter storage reservoirs to enable irrigation of arable crops and other forms of horticulture. Given the pressure on water resources and the Restoring Sustainable Abstraction decision made by Environment Agency facilitating the creation of new water storage reservoirs to capture winter rain and excess (perhaps reverse pumped storm flows) is paramount. This is especially attractive if farm clusters operate to create a shared structure as a single reservoir, which if sited appropriately is likely to have a lower impact on the landscape than several such structures if located on many individual farms. Obtaining planning permission for such structures is often a long-winded process and given these reservoirs protect both cropping and maintenance of groundwater sources, they should be applauded and supported.	Seems the suggestion is to consider reservoirs.	Consider adding the need for agricultural development to consider reservoirs.
32	Bradwell Parish Council	Maintain 12-month marketing period to allow time for full consideration of proposals.	Support for 12 month marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Broads Society	The Society feels that a period of 12 months can seriously restrict a business from implementing changes that may make a use viable. Given the need to quickly respond to changing economic trends, the Society suggests a period of 6 months would be more appropriate and reasonable.	Support for 6 month marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Brooms Boats	6 months would be more appropriate and reasonable.	Support for 6 month period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	East Suffolk Council	As set out in the consultation document the East Suffolk Council - Waveney Local Plan includes marketing requirements in relation to a number of policies (see appendix 4 of the Local Plan for details). For consistency, East Suffolk Council would strongly support the retention of a 12 month marketing requirement for the Broads Authority Local Plan.	Support for 12 month period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Sequence UK LTD/Brundall Riverside Estate Association	2.76We note that the proposed 12-month marketing period is largely consistent with other local planning authorities within Norfolk but Sequence also has concerns with those approaches. Requiring a marketing period for certain uses seems out-of-step with the Government's approach to change of use. In particular the amalgamation of a range of high street / town centre uses under Class E and the ability to vary the use of properties within those use classes to other uses without the need for any marketing, or indeed often a planning application as this can often be undertaken under permitted development. 2.77The marketing process adds significant time and cost to proposals for change of use and therefore Sequence would suggest this is reduced as far as possible	Support for shorter marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	South Norfolk Council	It is considered that the marketing period for a change of use needs to be relative to the existing use. Ultimately, it will be important to ensure a balanced and fair marketing period is required. This will ensure that viable uses are not lost prematurely without placing unduly restrictive burdens on business owners etc that might restrict their ability to flexibly adapt to changing market circumstances that would be necessary for them to remain financially viable.	Support for a flexible marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Wroxham Parish Council	WNP think the 12-month marketing period is too long. Cite the Windboats site as an example. The large site had been derelict for years and there was clearly no interest in rekindling boat building on this site. This could be in development by now, instead of caught up in the nutrient neutrality issue.	Support for shorter marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
32	Broadland Council	It is considered that the marketing period for a change of use needs to be relative to the existing use. Ultimately, it will be important to ensure a balanced and fair marketing period is required. This will ensure that viable uses are not lost prematurely without placing unduly restrictive burdens on business owners etc that might restrict their ability to flexibly adapt to changing market circumstances that would be necessary for them to remain financially viable.	Support for a flexible marketing period noted.	Take into consideration this representation as consider the marketing period for the Preferred Options Local Plan.
33	Bradwell Parish Council	Where applicable re- allocation of property for different use is a better option than demolition and re-build.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
33	Broads Society	The Society agrees that this approach can be maintained but has one suggestion for other allocations:- Brundall Riverside area.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan. See comments on BRU section.
33	East Suffolk Council	East Suffolk Council would support the retention of this approach.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
33	RSPB	Support retention of this approach to maintain parity across the entirety of development.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.

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33	Sequence UK LTD/Brundall Riverside Estate Association	2.79There is no objection to the broad approach of identifying sites with the potential for change and redevelopment, and there are no particular sites within the Brundall Riverside Estate that we would wish to see allocated for change. However in broader terms, it is difficult to predict what sites may be available for redevelopment and things can change very quickly, certainly over the timescale of a Local Plan as we have seen with COVID-19 and the current inflationary and economic pressures. Accordingly we would suggest that the Broads Authority takes a flexible and positive approach to sites that may become available for redevelopment over the plan period and are not necessarily allocated for change. This relates to the response to question 32 above in terms of a potential reduction in the current 12-month marketing period, and also question 40 below.	Support noted.	Consider this comment as produce Preferred Options version of the Local Plan.
33	South Norfolk Council	It is reasonable for the authority to set out land-use policies setting out alternative uses that would be acceptable on specific sites, including specific requirements for types of development. It will be important to ensure that any specific requirements set out for redevelopment are realistic, can be viably achieved and incentivise the redevelopment of the site for the proposed use.	Agreed and advice noted.	Consider this advice as the approach to such sites is worked up.
33	Broadland Council	It is reasonable for the authority to set out land-use policies setting out alternative uses that would be acceptable on specific sites, including specific requirements for types of development. It will be important to ensure that any specific requirements set out for redevelopment are realistic, can be viably achieved and incentivise the redevelopment of the site for the proposed use.	Agreed and advice noted.	Consider this advice as the approach to such sites is worked up.
34	Anglian Water	3.33.Anglian Water supports a biodiversity net gain requirement, which can, in part, be achieved by requiring Sustainable Drainage Systems (SuDS) built in new developments to deliver water quality and biodiversity benefits as well as reductions in flood risk. We consider the introduction of higher BNG targets is a matter for the Authority in evidencing the policy requirements for new development. 3.34.Anglian Water has a voluntary biodiversity net gain (BNG) business plan commitment to deliver 10% BNG against the measured losses of habitats measured by area on all Anglian Water-owned land. It is also important to recognise that Anglian Water through landholdings and projects, as well as working with other bodies such as Wildlife Trusts can support the development of landscape scale BNG and linked habitats which support climate change adaptation and species resilience. We suggest that delivery of offsite BNG should align with Local Nature Recovery Strategies to deliver improvements at a landscape scale to support nature recovery and resilience.	Noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Bradwell Parish Council	Option b to Introduce a standard of greater than 10% Biodiversity Net Gain seems sensible.	Support for greater than 10% noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Broads Society	The Society considers that the current policy set by the Government should be followed until more stringent standards are put into legislation.	Not supporting greater than 10% noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Brooms Boats	Current policy set by the Government should be followed.	Not supporting greater than 10% noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	East Suffolk Council	The adopted Local Plans for East Suffolk support the implementation of Biodiversity Net Gain whilst not specifying that 10% is required. Suffolk Local Planning Authorities are currently developing an interim position that also supports the 10% requirement, whilst stating that this should be seen as a minimum and that higher values will be supported. If gains of greater than 10% can be robustly justified to be included in policy this would be supported.	Support for greater than 10% noted if justified.	Consider this comment as produce Preferred Options version of the Local Plan.
34	East Suffolk Council	East Suffolk would also support the implementation of ‘Environmental Net Gain’, however this has similar issues as requiring more than 10% Biodiversity Net Gain as it would need to be robustly justified in policy.	Support for Environmental Net Gain noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Norfolk Wildlife Trust	Biodiversity Net Gain – whilst we support the mandatory 10% biodiversity net gain required by the 2021 Environment Act, given the scale of the global biodiversity crisis, and the need to make clear and tangible progress on nature’s recovery, Norfolk Wildlife Trust recommends that wherever possible, a requirement for 20% should be set instead. We therefore support option b, and would also support option c.	Support for greater than 10% noted if justified.	Consider this comment as produce Preferred Options version of the Local Plan.
34	RSPB	Adopting a 20% BNG requirement will provide a more powerful and better targeted impact to restore biodiversity and encourage reconnection of fragmented habitats. The importance of this approach should not be under-estimated in the ability to restore wildlife, mitigate for the impacts of climate change and contribute to the wellbeing of residents and visitors alike. Extending the network of sites well managed for nature will also enhance the attractiveness of the landscape and reinforce the beauty and desirability as a tourist destination and create that ‘breathing space for the cure of souls’ you mention.	Support for greater than 10% noted if justified.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Sequence UK LTD/Brundall Riverside Estate Association	2.82IIIWe would suggest the Broads Authority follows option a, which is the Government’s 10% figure. As set out in previous answers, the majority of development within the Broads Authority area is small scale and therefore 10% on site provision can be challenging. Similarly the purchasing of credits for off-site mitigation as proposed by the Government could be also be challenging for small sites on viability grounds.	Not supporting greater than 10% noted.	Consider this comment as produce Preferred Options version of the Local Plan.
34	South Norfolk Council	The aim of creating biodiversity is in accordance with the NSPF (Agreement 3, 27, 28). As identified, the 10% requirement will also now be covered by other legislation (Environment Act 2021). If there is local evidence to suggest a need to go beyond this requirement either in percentage terms or in terms of an alternative approach then a separate policy may be justified. However, such interventions would need to be carefully balanced against the impact on the viability and deliverability of appropriate development.	Noted and agreed. If a greater % is desired, it will need to be justified and indeed, tested in terms of viability.	No further action other than justifying and assessing impact of a greater % than 10% for BNG.
34	Suffolk County Council	At this time, Suffolk County Council supports setting the biodiversity net gain standard at 10% as required by Government from November 2023. However, we are aware other Suffolk Local Authorities, including West Suffolk in their preferred options local plan, have an aspiration of 20% and Suffolk County Council would support investigation as to whether this would be achievable.	Support for greater than 10% noted if justified.	Consider this comment as produce Preferred Options version of the Local Plan.
34	Suffolk County Council	It is important to note that although we are still awaiting secondary legislation for biodiversity net gain and further guidance for LNRS, it is Suffolk County Council’s understanding that the two will work closely together. Therefore, any policies on biodiversity net gain should also refer to the LNRS.	Noted - will consider links with LNRS.	Consider links with LNRS.
34	Broadland Council	The aim of creating biodiversity is in accordance with the NSPF (Agreement 3, 27, 28). As identified, the 10% requirement will also now be covered by other legislation (Environment Act 2021). If there is local evidence to suggest a need to go beyond this requirement either in percentage terms or in terms of an alternative approach then a separate policy may be justified. However, such interventions would need to be carefully balanced against the impact on the viability and deliverability of appropriate development.	Noted and agreed. If a greater % is desired, it will need to be justified and indeed, tested in terms of viability.	No further action other than justifying and assessing impact of a greater % than 10% for BNG.
35	Bradwell Parish Council	Option c they should consider introducing the M4(3) standard for a percentage of the homes.	Support for a M4(3) standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	Broads Society	The Society feels that Option ‘a’ is appropriate at this time.	Support for waiting for a national standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	East Suffolk Council	East Suffolk Council would support option c) (to consider introducing a M4(3) standard, subject to viability). However, Broads Authority will also want to consider the implications of planned changes to the Building Regulations in this regard and may supersede Local Plan policy requirements.	Support for a M4(3) standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.

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35	RSPB	Option b) seems appropriate.	Support for an amended M4(2) threshold noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	Sequence UK LTD/Brundall Riverside Estate Association	2.84It would seem reasonable to continue with the current Local Plan approach and then amendments can come forward with any updated Government guidance.	Support for waiting for a national standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
35	Suffolk County Council	Suffolk County Council supports the delivery of accessible homes. The Local Plan has identified that the Broads has an age profile of more older people and although only 9.6% report a long-term health problem or disability that limits their day-to-day activities ‘a lot’, an aging population means that the prevalence of health conditions associated with old age, such as dementia and frailty are likely to increase. This has implications for the types of housing which need to be planned for within the Broads. Accessible homes create living environments that are designed with the mobility and wellbeing needs of older residents in mind and can enable residents to live independently in the community and among their social support systems for longer. Suffolk County Council would support an approach to amend the M4(2) threshold so it applies to more schemes in the Broads, subject to viability and would also support consideration of introducing M4(3) standards.	Support for an amended M4(2) threshold noted. Support for a M4(3) standard noted.	Consider these comments as work up Preferred Options, noting that there will be a national standard at some point in the future.
36	Bradwell Parish Council	Design of properties should focus on energy efficiency maximising heat gain and retention. Incorporating high levels of insulation and environmentally friendly materials.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Broads Society	Generally, the Society supports the current Policy DM43.	Support for DM43 noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Brooms Boats	Collaborative design and planning approach between all authorities, including cross border, businesses and residents to achieve environmental (current and future), economic viability, economic growth, well-being and job creation opportunities.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Designing Out Crime Officer, Norfolk Police	Consideration of making SBD condition of planning and to support partnership working for any new developments to ensure that the Broads towns and villages remain safe and do not see an increase of crime and disorder due to poor design.	Suggestions noted.	Ensure design policy adequately addresses crime and safety.
36	East Suffolk Council	What constitutes good design in the Broads Authority area is unlikely to have changed since the Government’s amendments to the National Planning Policy Framework, and the introduction of the National Design Guide and National Model Design Code. East Suffolk Council therefore agree that the Broads Authority Local Plan policy relating to design may not need to change significantly. Comments on the Design Guide for the Broads have been submitted to you separately.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Great Yarmouth Borough Council	The emerging Broads Design Guide is noted, chiefly the chapters concerning the design of potential developments within the ‘Historic Clusters’, ‘Rural Homes’ and ‘Farmstead & Enclosures’ as these will be of particular relevance to those settlements and areas which straddle both the Great Yarmouth and Broads Authority planning boundaries.	Noted.	No further action.
36	Great Yarmouth Borough Council	The Borough Council is also currently preparing its own borough-wide design code which will include (amongst others) a focus on developments within the borough’s rural hinterland. There is potential, therefore, for a degree of overlap between the respective design guides/codes. The Borough Council would welcome further engagement with the Broads Authority during the on-going preparation of its own borough-wide design code to ensure there is an appropriate alignment between the two documents.	Noted and agreed.	Pass on to officer leading on design at the Broads Authority.
36	RSPB	Integration of the principles which stand behind each element of design is complex. As we become more aware of the impacts of climate change and the need to change the way we do things, we need to integrate choice of materials, to be Carbon neutral both in source and construction. Equally being in a drought stressed part of the UK, we ought to consider how for example water storage reservoirs sit within the national character assessment and the landscape. We may need to adjust our thinking and approach to enable creation of such structures to be streamlined so that mitigation for abstraction is viewed as being a positive move, even though some may consider the impact on the landscape to be negative. Trying to balance the needs of different user groups and industries will become ever-more difficult and we need to change perceptions starting now so quality of structures is maintained alongside the need to be progressive and future proofed.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Sequence UK LTD/Brundall Riverside Estate Association	Design policy should not be too prescriptive and repeating previous comments, each site will be considered on its merits. In addition, Broads Planning Officers place a considerable emphasis on good design already in our experience, commensurate with the National Park Status. Therefore we would not consider that any specific policy approach is required, noting the emphasis within Section 12 of the Framework and the associated national design guidance on high quality development and beautiful design. We also note the introduction of the Draft Design Guide and have made further comments with respect to this draft document in Section 3 of this response.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
36	Suffolk County Council	Suffolk County Council would draw attention to the Suffolk Design: Streets Guide which has been recently released and is now being used by County Council Highways and Transport officers to assess the design of streets in new developments across the county.	Suggestions noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Question 37, 38, 39	Great Yarmouth Borough Council	The Borough Council offers no comment in relation to the existing development boundaries as these lie outside of our planning administrative area. The Borough Council has noted the most recent Broads’ Settlement Study (2022) evidence base, including scorings for settlements based upon their access to services and facilities and potential suitability for development boundaries as commented in Table 7 of the current consultation document.	Noted.	No further action.
Question 37, 38, 39	Great Yarmouth Borough Council	The Borough Council is also in the process of preparing an update to its Settlement Study to inform the potential hierarchy of settlements and approach to development limits for its own Local Plan review. The Borough Council would therefore be keen to liaise with the Broads Authority to ensure that approaches taken to identify and justify development boundaries in settlements which straddle the shared planning boundary are complementary to the aims of both emerging development plans.	Noted. We would be happy to be involved.	Contact GYBC re their work.
37	Bradwell Parish Council	No comment	Noted.	No further action.
37	Broads Society	The Society has no objections to the current development boundaries relating to the areas currently identified.	Noted.	No further action.
37	East Suffolk Council	The Waveney Local Plan defines Settlement Boundaries around the built up area of a number of settlements, including for the Waveney Local Plan part of settlements which also straddle the border with the Broads. Land outside of Settlement Boundaries (and allocations) is considered as the countryside where new residential, employment and town centre development will not be permitted except where in accordance with other policies in the Local Plan. The Settlement Boundaries can be viewed in the Waveney Local Plan policies maps here - www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/local-plans/policies-map/ . Below are some settlement-specific comments:	Background information noted.	No further action.

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37	East Suffolk Council	Oulton Broad The only development boundary in the current Broads Local Plan within the East Suffolk part of the Broads is Oulton Broad. It is noticeable that the area in the development boundary is partly located within flood zones 2 and 3. The area contained within the development boundary that is covered by flood zones 2 and 3 could increase in the future due to the impact of climate change. The Settlement Boundary as defined by Waveney Local Plan policy WLP1.2 follows the Broads Authority boundary through Oulton Broad itself. The two only deviate from each other further north near Camps Heath and Oulton in the south approaching Carlton Colville. The Oulton Broad Development Boundary extends southwards from Broadview Road and westwards from Commodore Road towards the water and includes housing that is not included within the Waveney Local Plan Settlement Boundary. It is not considered necessary	Comments noted and will be considered as the development boundaries for the new Local Plan are produced.	Consider this comment as produce Preferred Options version of the Local Plan.
37	East Suffolk Council	Beccles The Settlement Boundary in the Waveney Local Plan closely follows the Broads Authority Boundary along the northern and western edges of the town. The Settlement Boundary runs close to, but does not touch the Broads Authority Boundary in all places. It is noticeable that there are several waterside properties next to the River Waveney which are situated within the Broads Authority area but are clearly part of Beccles. The Council previously highlighted, in relation to the preparation of the current Broads Local Plan, that introducing a Settlement Boundary for Beccles would not be supported due to issues of character and flood risk. These matters are reflected in Table 7 of the Issues and Options consultation documents and should be given careful consideration.	Comments noted and will be considered as the development boundaries for the new Local Plan are produced.	Consider this comment as produce Preferred Options version of the Local Plan.
37	East Suffolk Council	Bungay The Settlement Boundary in the Waveney Local Plan closely follows the Broads Authority Boundary, except around the Olland's Plantation. The Bungay Conservation area also extends eastwards into the Broads Authority area. Parts of the built-up area are within the Broads and therefore not within the Settlement Boundary. However, the Council previously highlighted, in relation to the preparation of the current Broads Local Plan, that introducing a Settlement Boundary for Bungay would not be supported due to issues of character and flood risk. These matters are reflected in Table 7 of the Issues and Options consultation documents and should be given careful consideration.	Comments noted and will be considered as the development boundaries for the new Local Plan are produced.	Consider this comment as produce Preferred Options version of the Local Plan.
37	East Suffolk Council	Somerleyton Somerleyton Settlement Boundary, as designated by policy WLP1.2 (Settlement Boundaries) is drawn very tightly around the existing built up areas of the settlement. Somerleyton Conservation Area borders the Broads Authority area along its western edge and encompasses both Brickfields and Staithe Lane. There do not appear to be reasonable opportunities to introduce a Development Boundary into the Broads part of Somerleyton.	Agreed.	No further action.
37	South Norfolk Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
37	Suffolk County Council	The only settlements within the Broads with potential for development boundaries, of relevance to Suffolk County Council, are Beccles, Oulton Broad, Bungay and Ditchingham Dam. The only one of these settlements that currently has a development boundary is Oulton Broad. Suffolk County Council provided comments on the proposed development boundary in February/March 2022, as set out at Appendix 1 of the Development Boundaries Topic Paper. These comments from the County Council as LLFA and from the SCCAS remain valid and we have no further comments to make on this development boundary.	Noted.	No further action.
37	Wroxham Parish Council	map incorrectly labelled "Hoveton" - map shows Hoveton & Wroxham.	Noted. Will ensure correct title.	Ensure title says 'Hoveton and Wroxham'.
37	Broadland Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
38	Bradwell Parish Council	No comment	Noted.	No further action.
38	Broads Society	The study solely assesses 'walking distance and public transport against bus routes and not train routes. The example of Brundall is such that Authorities have failed to provide adequate provision for public access to Brundall Station and hence the scoring within the Study is inaccurate.	The study includes access to a train station and therefore it is not clear how the scoring is inaccurate.	No further action.
38	Broads Society	Improved links and access for pedestrians and cyclists to Brundall Station is embodied within the vision and policies of the Brundall Neighbourhood Plan 2016-2026 and is impacted further by approved housing developments and the inevitable population increase of Brundall and surrounding areas.	In general, we would support the access to the train station being improved, however it seems the comments implies this is about access from the side of the rail lines that is in Broadland Council's area.	No further action.
38	Brooms Boats	The study solely assesses 'walking distance and public transport against bus routes and not train routes. The example of Brundall is such that Authorities have failed to provide adequate provision for public access to Brundall Station and hence the scoring within the Study is inaccurate.	The study includes access to a train station and therefore it is not clear how the scoring is inaccurate.	No further action.
38	Brooms Boats	Improved links and access for pedestrians and cyclists to Brundall Station is embodied within the vision and policies of the Brundall Neighbourhood Plan 2016-2026 and is impacted further by approved housing developments and the inevitable population increase of Brundall and surrounding areas.	In general, we would support the access to the train station being improved, however it seems the comments implies this is about access from the side of the rail lines that is in Broadland Council's area.	No further action.
38	East Suffolk Council	East Suffolk Council broadly welcomes the Settlement Study, however, there are some additional elements that the Broads Authority may wish to consider for inclusion in the Settlement Study.	Noted.	See actions for each comment.
38	East Suffolk Council	Allotments are a valuable community resource, providing residents with the opportunity to grow their own food. This in turn enables allotment holders to exercise and socialise. Therefore there may be value in including them in appendix D of the Settlement Study. The East Suffolk Council: Suffolk Coastal Local Plan Settlement Hierarchy Topic Paper provides an example of where this has been done, see https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/Final-Settlement-Hierarchy-Topic-Paper.pdf	Noted and will add this as another consideration.	Amend study to assess provision of allotments.
38	East Suffolk Council	Appendix D of the Settlement Study does also not include proximity to major towns as a consideration. The close proximity of a smaller settlement to larger settlement/market town provides access to a wider range of shops, employment opportunities, public services and other facilities and can therefore increase the sustainability of the smaller settlement and increases the feasibility of sustainable modes of transport. Again, the Suffolk Coastal Local Plan Settlement Hierarchy considered this. See https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/First-Draft-Local-Plan/Final-Settlement-Hierarchy-Topic-Paper.pdf	This is considered. The facility or service considered might be in another settlement.	No change to study.
38	East Suffolk Council	In addition to the comments above, please note that appendix D of the Settlement Study still refers to Beccles, Oulton Broad and Bungay as being located in Waveney. This should be updated to refer to East Suffolk.	Noted and will amend.	Amend study to say ESC rather than Waveney.

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38	Sequence UK LTD/Brundall Riverside Estate Association	2.90No specific comments on the findings of the Settlement Study, which reflect our views on Brundall as a Key Service Centre with a good range of services and facilities.	Noted.	No further action.
38	South Norfolk Council	The approach appears to be generally consistent with Agreement 3 of the NSPF. In respect of question 38, it is important to recognise how services and facilities are distributed across the broads authority area. Careful consideration needs to be given to ensuring that important services and facilities are maintained, and it may be the case that some of these may not be in the best served villages. In this regard, when determining the location of new development consideration should be given to paragraph 79 of the NPPF which sets out that where there are groups of smaller settlements, development in one village may support services in a nearby village.	Noted.	Consider these sections of the NPPF when producing housing sections of the Preferred Options.
38	Broadland Council	The approach appears to be generally consistent with Agreement 3 of the NSPF. In respect of question 38, it is important to recognise how services and facilities are distributed across the broads authority area. Careful consideration needs to be given to ensuring that important services and facilities are maintained, and it may be the case that some of these may not be in the best served villages. In this regard, when determining the location of new development consideration should be given to paragraph 79 of the NPPF which sets out that where there are groups of smaller settlements, development in one village may support services in a nearby village.	Noted.	Consider these sections of the NPPF when producing housing sections of the Preferred Options.
39	Anglian Water	3.35.The Settlement Study sets a direction for sustainable growth, but this needs to be informed by constraints to delivering the housing needs of The Broads particularly in relation to the availability of suitable and deliverable sites that can access, and be supported by, resilient infrastructure and facilities. This should factor in embedded (capital) carbon. The Development Boundaries Topic Paper is helpful in this regard, but we recognise that this will be consolidated with other evidence as it emerges, to provide a comprehensive evidence base on appropriate and sustainable locations for long term growth through the Sustainability Appraisal. It is noted that many of the locations identified in the Development Boundaries Topic Paper have areas of flood risk, which will have implications for future growth.	Yes, the settlements study and the development boundaries proposed are a starting point, and each application may have other constraints that need addressing if they can. AWS have been asked to comment on the sites put forward as part of the Call for Sites.	Await AWS comments on sites put forward as part of the Call for Sites.
39	Bradwell Parish Council	No Comment	Noted.	No further action.
39	East Suffolk Council	It is important to take account of the settlement boundaries defined by other local authorities. Development boundaries defined by the Broads Authority should therefore be defined having regard to the criteria used by neighbouring local authorities. Settlement boundaries defined by the Waveney Local Plan closely follow the built- up area of a settlement, as well as landscape features such as hedgerows. Therefore, it is important for any development boundaries defined by the Broads Local Plan to take a similar approach, along with considerations of the statutory purposes and special qualities of the Broads. For information, a link to the Waveney Local Plan Settlement Boundaries Topic Paper can be found below. https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/C38-Topic-Paper-Definition-of-Settlement-Boundaries.pdf	This seems to be about the actual form of the development boundary and the idea is logical and we will look into that.	Liaise with districts about how they draw development boundaries to see if the BA ones should be changes to fit with their approach.
39	RSPB	The impact of either maintaining or extending the area of hard standing with obvious rapid run-off doesn't seem to be considered. This will be important given the trend for extreme, heavy rain events and the need for water to flow off by gravity.	The settlements study and the development boundaries proposed are a starting point, and each application may have other constraints that need addressing if they can. Indeed, the Local Plan has a policy relating to flood risk and SuDS.	No further action.
39	Sequence UK LTD/Brundall Riverside Estate Association	2.92We note that the Development Boundary Topic Paper is currently a guide for the Issues and Options consultation and will be developed further in response to the consultation responses. Therefore we trust that our comments below for question 40 with regard to the suitability of the Riverside Estate being included within an extended development boundary for Brundall will be considered within that update. 2.93In response to the topic paper itself, we note the summary in the table in section 3 referencing Brundall Riverside comprising boatyards and residential (holiday let) to the south of the railway. The reference to the estate being 'over the railway from the main settlement' is unhelpful as it would suggest a degree of separation when as set out below, the Riverside Estate abuts the current settlement limit with the crossing on Station Road which does not act as a barrier. There are also ongoing discussions with regard to enhancements to Station Road and those linkages. 2.94We recognise the majority of the Riverside Estate lies within the higher risk flood zones but this should not preclude its inclusion within the development boundary / settlement limit. It is not clear what is meant by 'entire areas subject to policies in the Local Plan already' but again this would be not be a basis for not including the estate within a development boundary.	Noted, but the Brundall Riverside area is over the railway. See also response to question 40.	No further action.
39	South Norfolk Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
39	Broadland Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
40	Bradwell Parish Council	With ongoing rising sea levels building on possible flood plans seems highly questionable.	National policy is clear in relation to building in such areas and the Broads Authority has a history of upholding flood risk policy.	No further action.
40	East Suffolk Council	The Definition of Settlement Boundaries Topic Paper sets out how settlement boundaries are defined in the East Suffolk Council: Waveney Local Plan https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Background-Studies/C38-Topic-Paper-Definition-of-Settlement-Boundaries.pdf Settlement boundaries are drawn close to the built-up area of a settlement and tend to follow features in the landscape such as hedges and trees. Comments on individual settlements have been provided in response to question 37 above.	This seems to be about the actual form of the development boundary and the idea is logical and we will look into that.	Liaise with districts about how they draw development boundaries to see if the BA ones should be changed to fit with their approach.
40	RSPB	None	Noted.	No further action.
40	Sequence UK LTD/Brundall Riverside Estate Association	We would suggest the Brundall Riverside Estate is incorporated within the development boundary for Brundall. The image below shows the current settlement limit for Brundall within the Broadland Site Allocations DPD 2016. (image shows BDC site allocations map). 2.96The above image shows that the settlement limit runs essentially to the railway line to the south of Brundall which marks the boundary between the respective local authority area of Broadland District Council and the Broads Authority. However we are of the view that the extension of the boundary south to incorporate the Brundall Riverside Estate would be a logical extension, as shown on the image below. 2.97The extension of the development boundary to the south would include land that is contiguous with the current boundary and contains a significant concentration of residential properties, holiday accommodation and business uses including boatyards, in a sustainable location with excellent access to Brundall train station. It would therefore seem wholly appropriate for it to be included within an extended settlement boundary for Brundall to reflect that this is a developed area, which will see further (re)development and diversification, and is demonstrably not countryside.	One of the justifications for including a development boundary is potential for development; there seems limited development potential at the Brundall Riverside Estate. The Local Plan already allows for replacement dwellings.	No change to approach for the Brundall Riverside Estate area is terms of development boundary.
41	Bradwell Parish Council	There absolutely needs to be development boundaries.	Support for development boundaries noted.	Consider this advice as the approach to development boundaries is worked up.
41	Broads Society	The Society feels that, given that there are currently only four areas deemed to require a formal development boundary, the removal of those boundaries and a criteria-based approach may be possible. However, this would depend on what the criteria were and whether or not this could realistically be applied across the whole of the Broads area.	Support to investigate criteria based approach noted.	Consider this advice as the approach to development boundaries is worked up.

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41	Brooms Boats	This would depend on the criteria were and if it were possible to realistically apply across the whole of the Broads area using a economic viability, environmental impact and economic growth assessment model.	Noted.	Consider this advice as the approach to development boundaries is worked up.
41	East Suffolk Council	Removing development boundaries in the Broads Authority area will have the effect of treating the whole area of The Broads as being in the open countryside. This will make it easier to resist development and protect the rural character of The Broads area. However, it also means that it will no longer be possible to focus the development that does come forward within existing centres. This could mean the development of isolated dwellings. While there could potentially be fewer developments in the Broad Authority area, those that did come forwards could be more likely to take place in isolated locations, creating a dispersed settlement pattern, which would undermine the delivery of sustainable development.	Thoughts on this matter welcomed and will be considered as we produce the housing section of the Local Plan.	Consider this comment as produce Preferred Options version of the Local Plan.
41	Sequence UK LTD/Brundall Riverside Estate Association	2.99Sequence acknowledge that there are other Local Plans that do not have specific development boundaries drawn on proposals maps and more generally look to guide development to certain locations (for example a consideration of a built-up area or cluster of properties). These can work well as an alternative to development boundaries and the Riverside Estate Brundall should be recognised as a built-up location for the reasons set out in the response to question 40 in particular above. We would, however, reserve the right to comment further on the specific wording of such a policy.	Support to investigate criteria based approach noted.	Consider this advice as the approach to development boundaries is worked up.
41	South Norfolk Council	As previously stated elsewhere in the plan, the definition of development boundaries, supported by appropriate exception policies, is a tried and tested approach and acts as a useful policy tool to help direct development/growth into sustainable locations. However, in most cases, the development boundary will only be the starting point with regard needing to be had to the development plan taken as a whole and to specific exception policies.	Noted. We do currently have exceptions policies that are likely to be checked, updated and rolled forward.	No further action other than checking the exceptions policies and updating them for the Preferred Options consultation.
41	South Norfolk Council	If the authority were to pursue a criteria-based approach careful consideration would need to be given to ensuring that the policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. This will ensure that the plans overall outcomes are still achieved, that there are predictable outcomes for applicants and that the authority can efficiently process applications.	Agreed and advice noted.	Consider this advice as the approach to development boundaries is worked up.
41	Broadland Council	As previously stated elsewhere in the plan, the definition of development boundaries, supported by appropriate exception policies, is a tried and tested approach and acts as a useful policy tool to help direct development/growth into sustainable locations. However, in most cases, the development boundary will only be the starting point with regard needing to be had to the development plan taken as a whole and to specific exception policies.	Noted. We do currently have exceptions policies that are likely to be checked, updated and rolled forward.	No further action other than checking the exceptions policies and updating them for the Preferred Options consultation.
41	Broadland Council	If the authority were to pursue a criteria-based approach careful consideration would need to be given to ensuring that the policy is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. This will ensure that the plans overall outcomes are still achieved, that there are predictable outcomes for applicants and that the authority can efficiently process applications.	Agreed and advice noted.	Consider this advice as the approach to development boundaries is worked up.
42	Bradwell Parish Council	No. of dwellings being developed seems extremely low compared to other areas.	Noted. The Broads is a very constrained area.	No further action.
42	East Suffolk Council	East Suffolk Council has welcomed, under the Duty to Co-operate, the previous discussion with the Broads Authority and their consultants as part of the production of the Local Housing Needs Assessment, and the further opportunity to review a draft of the report. We understand that a final version of the report was to be produced following our previous comments.	This has been produced and is here: https://www.broads-authority.gov.uk/__data/assets/pdf_file/0026/432476/Great-Yarmouth-and-The-Broads-Authority-LHNA_Final-Version-2.pdf	No further action.
42	East Suffolk Council	The current Broads Local Plan identifies a housing need of 57 dwellings over the current plan period (2015-2036) in the Waveney (now East Suffolk) part of the Broads. As set out on page 2 of the Waveney Local Plan the 57 dwellings forms a part of the 'objectively assessed need' for the Waveney area and housing development within the Broads will meet this part of the need. This position is established through a Statement of Common Ground between the former Waveney District Council and the Broads Authority dated January 2018.	Noted.	No further action.
42	East Suffolk Council	The May 2022 Local Housing Needs Assessment identifies a need for 23 dwellings in the East Suffolk part of the Broads over the period 2021 – 2041. Whilst this is lower than the previous need of 57, it is understood that this is partly due to the methodology now considering the Broads as part of the larger East Suffolk area rather than the smaller former Waveney district, as well as the part of the Broads in East Suffolk having a relatively small population compared to other parts of the Broads.	Noted.	No further action.
42	East Suffolk Council	Completions of dwellings in the Broads are generally low, with a net gain of 5 dwellings recorded since the start of the current Local Plan period (1/4/2015). The current Broads Local Plan allocates a site at Pegasus Marine in Oulton Broad (Policy OUL2). This has planning consent for 76 dwellings, granted in 2014, and is coming forward with East Suffolk Council's 2022 Housing Land Supply Statement reporting that the developer has stated that the quay heading work is nearly complete and that the construction of the reed bed is to recommence. It is considered prudent to maintain the site allocation given that the development of the site addresses the housing needs identified for the Broads over the plan period and will also importantly bring about an enhancement to this area through the redevelopment of this previously developed site which is with Oulton Broad Conservation Area. As substantial construction of the uses forming the permission has not begun the continued allocation of this site will guide any future applications should they be submitted.	Noted and we intend to keep the allocation in the Local Plan.	Keep the Pegasus allocation in the Local Plan.
42	East Suffolk Council	East Suffolk Council would support a review and updating of the January 2018 Statement of Common Ground as part of the review of the Broads Local Plan to ensure that the approach of housing completions within the Broads contributing to meeting the objectively assessed need in the Waveney area / East Suffolk remains in place going forward	Noted and we will do this later in the local plan production period.	No further action for now, but SOCGs needed in future.

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42	East Suffolk Council	In relation to the May 2022 Local Housing Needs Assessment we have previously made comments which we would like to be considered if the evidence document is to be revised further: a: Paragraph 2.19 – it would be helpful to explain what the ‘backlog of need’ is. It is understood that this relates to any existing historic need before considering future projections. b: Figure 49 (page 54) - the first row refers to Figure 35 but should be 36? And row 5 refers to Figure 46 which should be 47? c: Paragraph 6.32 (page 74) – clarity could be provided to explain that figure 61 shows households whilst figure 74 shows dwellings, to explain the difference between the figures of 151 (figure 61) and 153 (para 6.32 and figure 74). d: Figure 76 (page 76) – paragraph 6.19 explains that the needs for C2 accommodation are presented in the form of the C3 dwellings that could be released based upon the provision of C2 bed spaces at a ratio of 1.8 to 1 (i.e. equivalent of 1 dwelling for every 1.8 bed spaces). It could be misleading however to set out the need for ‘C2 dwellings’ in the Broads as zero in figure 76. This implies that there is no need for any C2 accommodation however it is understood that the approach is based on the anticipation that any needs for C2 accommodation would be met outside of the Broads Authority area. e: Figure 76 (page 76) – some additional clarification of the figures in figure 76 would be helpful, for example paragraph 6.34 states that there is a need for 78 social rented dwellings in the Broads however figure 76 suggests a need for 78 dwellings for those unable to afford social rent. It is understood that it is the contribution from Housing Benefit that makes these properties achievable and this could be explained.	The response from the consultant who produced the study was passed on to ESC. Here is their response. a: footnote added b: amended c: Figure 61 shows households. Para 6.32 and Figure 74 show dwellings. Footnotes added to both, e.g.: “153 dwellings, which is the result of converting the need for 151 households identified in Figure 61 to the need for dwellings.” d: Again, it’s because of small numbers making the results inaccurate, but also in this case it would be infeasible to provide the C2 dwellings as the costs wouldn’t stack up. Any need for C2 dwellings would have to be outside of the Broads Authority area in the individual council areas, each of which will have an estimated C2 need including those people who live in the intersection of their council area and the Broads. e: Para 6.34 amended to read: Overleaf Figure 76 shows the components of housing need with a breakdown of affordable rented between social rent and Affordable rent in the Broads Authority and shows a need for 78 social rented dwellings (with the households involved requiring some Housing Benefit contribution to pay their rent) and 21 Affordable rented dwellings (with the households involved requiring some Housing Benefit contribution to pay their rent).	No further action.
42	Great Yarmouth Borough Council	The Borough Council is fully supportive of the approach and method undertaken by the Broads Authority in deriving their housing need, which forms part of the wider housing need for the whole borough of Great Yarmouth.	Support noted.	No further action.
42	Great Yarmouth Borough Council	The Borough Council considers that the constraints and special qualities of the Broads mean that it is unlikely to be desirable to provide significant housing within the Broads. Due to these exceptional circumstances, the Borough Council accepts that some, or perhaps all of the need arising from within that part of the Broads within the borough of Great Yarmouth will likely need to be met in those parts of the Borough outside of the Broads. This reflects the commitment of the Borough Council (alongside South Norfolk, Norwich City, Broadland and North Norfolk Councils) in the current Norfolk Strategic Planning Framework to address the housing needs arising from the part of the Broads which overlaps in its administrative area, if the housing need cannot be met within the Broads Local Plan.	Support noted. We have undertaken a call for sites and will assess the suitability of the sites put forward. If needed, we will liaise with out councils in relation to meeting housing need.	Assess call for sites nominations and liaise with constituent districts as required as the Preferred Options is produced.
42	Great Yarmouth Borough Council	Notwithstanding this above, there may be opportunities where housing development in the Broads could strengthen the sustainability of settlements, for example by helping to support the operation of key local facilities. The Borough Council is therefore keen to continue collaborating with the Broads Authority to investigate whether such benefits may be secured in settlements that straddle the shared planning boundary, and will welcome the opportunity to comment upon any such sites put forward for consideration through the Broads’ call for sites consultation.	Support noted. We have undertaken a call for sites and will assess the suitability of the sites put forward. If needed, we will liaise with out councils in relation to meeting housing need.	Assess call for sites nominations and liaise with constituent districts as required as the Preferred Options is produced. Sites shared with our councils for comment.
42	RSPB	It is unclear how this ‘total number’ is derived. This is especially important given the disconnect between houses and services, be it power, water, sewerage. When will we reach the limit where new construction becomes unfeasible given the rising impacts of climate change which are getting more severe?	The study has been completed by experts in their field. As you will see in other responses to this question, it is acknowledged that the Broads Authority may not be able to meet this need and as such will work with our councils if required. We also ask key stakeholders to comment on sites, including AWS who will provide comments on water and sewerage.	No further action.
42	South Norfolk Council	The Council notes the use of Option Research Services (ORS) in producing the housing needs study for the Broads. ORS have also been engaged to prepare a housing needs assessment for the Greater Norwich area and this work is considered to be robust and credible. The Council supports the authority in identifying is objectively assessed need for homes. Through the Greater Norwich Local Plan (GNLP) the Council has planned to fully meets its objectively assessed needs for housing. Agreement 13 of the NSPF states that, amongst others, South Norfolk, Norwich City and Broadland will include appropriate provision within their local plans to address 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. The Council therefore considers that there needs to be an assessment of the extent to which the Broads Local Plan is able to meet the needs within its area, with that need being met within the Broads area wherever possible. It is somewhat unclear from the current consultation what the Broads Authority intends to do in this regard.	The Local Plan Issues and Options consultation clearly refers to and includes a call for sites. We will assess the sites put forward and allocate appropriate sites and then take things from there.	Assess call for sites nominations and liaise with constituent districts as required as the Preferred Options is produced.
42	Broadland Council	The Council notes the use of Option Research Services (ORS) in producing the housing needs study for the Broads. ORS have also been engaged to prepare a housing needs assessment for the Greater Norwich area and this work is considered to be robust and credible. The Council supports the authority in identifying is objectively assessed need for homes. Through the Greater Norwich Local Plan (GNLP) the Council has planned to fully meets its objectively assessed needs for housing. Agreement 13 of the NSPF states that, amongst others, South Norfolk, Norwich City and Broadland will include appropriate provision within their local plans to address 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. The Council therefore considers that there needs to be an assessment of the extent to which the Broads Local Plan is able to meet the needs within its area, with that need being met within the Broads area wherever possible. It is somewhat unclear from the current consultation what the Broads Authority intends to do in this regard.	The Local Plan Issues and Options consultation clearly refers to and includes a call for sites. We will assess the sites put forward and allocate appropriate sites and then take things from there.	Assess call for sites nominations and liaise with constituent districts as required as the Preferred Options is produced.
42	Wroxham Parish Council	WNP section on housing refers.	Noted.	No further action.
43	Bradwell Parish Council	No comment	Noted.	No further action.
43	Broads Society	Firstly the Society considers that there is a clear difference between ‘residential moorings’ and ‘liveaboards’. With regard to Residential Moorings, the Society would support a clear, criteria based policy which allowed for designated residential moorings throughout the Broads area. These designated areas, however, should be providing modern, on-shore facilities for users to promote a more environmentally acceptable approach that leads to a less detrimental impact on the visual quality and amenity of the Broads.	DM37 is in place and will be checked and amended and updated if required as the Preferred Options is produced.	Amend and update DM37 as required.

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43	Brooms Boats	Planning should support a modern approach to both using agile means to help answer the vital questions of environmental impacts and economic viability	Noted.	No further action.
43	East Suffolk Council	The production of updated evidence by the Broads Authority in relation to new residential moorings is supported. In the preparation of the current Broads Local Plan the former Waveney District Council commented that Somerleyton should be considered as a suitable area for a modest number of residential moorings, and the site subsequently allocated under Policy SOM1 is acknowledged as providing a contribution to meeting the identified needs.	Noted.	No further action.
43	East Suffolk Council	Suffolk Coastal District Council and Waveney District Council (now East Suffolk Council), alongside Ipswich Borough Council, Babergh District Council, and Mid Suffolk District Council commissioned RRR Consultancy Ltd to prepare the Gypsy, Traveller, Travelling Showpeople, and Boat Dweller Accommodation Needs Assessments (2017) (available here: https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Gypsy-Traveller-Travelling-Showpeople-Boat-Dwellers-Accommodation-Needs-Assessment-May-2017.pdf). The needs assessment concluded that 28 permanent residential moorings were required over the period 2016-2036, of which 10 arose from need in Babergh, 17 in the former Suffolk Coastal area, and 1 in the former Waveney area. Our monitoring data shows the Local Plan policy relating to houseboats has not been used and no residential moorings/houseboat applications have been received.	Noted. We have policies and guidance relating to residential moorings that seek to enable successful schemes.	No further action.
43	RSPB	If moorings can be constructed and maintained in a sustainable manner, then the approach is acceptable.	Noted.	No further action.
43	South Norfolk Council	The Council welcomes the Authority identifying an objectively assessed need for residential moorings. In respect of the identified allocation, it will be important not only that allocations exist but also that there is proportionate evidence that those moorings are deliverable/developable in accordance with paragraph 68 of the NPPF.	Noted and agreed and that is why the call for sites refers to deliverability and seeks information from site promoters on that very issue.	No further action
43	Woodbastwick Parish Council	Residential moorings: The plan does not make clear what residential moorings would consist of, nor does it explain why there has been little or no progress in developing designated sites.	More detail is in the current Local Plan, much of which will be rolled forward. We allocate the sites and it is down to the site owner to put in an application and develop the site. For this Local Plan, our Call for Sites asks more questions about deliverability.	Ensure Local Plan is clear about residential moorings.
43	Woodbastwick Parish Council	Residential moorings: The people who live on boats should be consulted as a priority and their views should influence future development	Noted. We advertise the consultation far and wide and also consult the Residential Boat Owners Association.	None.
43	Broadland Council	The Council welcomes the Authority identifying an objectively assessed need for residential moorings. In respect of the identified allocation, it will be important not only that allocations exist but also that there is proportionate evidence that those moorings are deliverable/developable in accordance with paragraph 68 of the NPPF.	Noted and agreed and that is why the call for sites refers to deliverability and seeks information from site promoters on that very issue.	No further action
44	Bradwell Parish Council	In the interests of fairness other areas of the Broads should be considered for Traveller and Gypsy pitches, it should not just be limited to the Great Yarmouth Area.	As is clearly set out in the Issues and Options consultation document, we worked with GYBC to understand the need for sites in the Broads part of that Council area. The document goes on to say that we will work with the other five districts to understand need elsewhere in the Broads.	No further action other than working with other districts to understand need.
44	Broads Society	The Society strongly feels that occupants of 'liveaboards' which, by their nature, often tend to be transient users of the waterways, should be regarded in the same way as Gypsies and Travellers. It should be incumbent upon the Authority to regulate their use effectively through planning law and its navigation responsibilities; and, should also, provide similar designated provision to that of residential moorings. We followed this comment up and the Broads Society said: As you are aware, the Authority recognises that there are a number of boat dwellers that do not have permanent moorings and do not wish to moor in the same location on anything but a temporary basis. This was recognised in the 'Broads Authority Boat Dwellers Accommodation Assessment Final Report August 2022'. All the Society is suggesting is that it may be helpful for a small number of temporary moorings to be allocated around the system with basic facilities (pump out, water, electricity) so that this lifestyle choice could be accommodated and more effectively regulated.	Suggestion noted and will be passed on to colleagues for consideration.	Pass comment to colleagues at BA.
44	East Suffolk Council	The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017) covered the former Waveney and Suffolk Coastal districts (as well as Babergh, Mid Suffolk and Ipswich) (www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/First-Draft-Local-Plan/Gypsy-Traveller-Travelling-Showpeople-and-Boat-Dwellers-Accommodation-Needs-Assessment-May-2017.pdf). The assessment has informed the needs and policies for Gypsy and Traveller accommodation set out in both the Waveney and Suffolk Coastal Local Plans. The assessment did not cover the Broads Authority and recognises in paragraph 2.30 that "The Broads Authority, the Greater Norwich local authorities, Great Yarmouth, and North Norfolk are working in partnership and are updating their GTAA. This is being undertaken by RRR Consultancy using a similar method and approach as adopted for this accommodation needs assessment, but also includes the assessment of accommodation needs of residential caravan dwellers."	Noted.	No further action.
44	East Suffolk Council	East Suffolk Council is aware of unauthorised encampments having taken place in Nicholas Everitt Park, Oulton Broad, which is in the Broads part of East Suffolk. An assessment has been undertaken for Great Yarmouth Borough however it is not clear whether the Broads Authority intend to undertake further work to cover the other five district Council areas in the Broads and/or will be looking to engage as part of any future updates undertaken by those authorities. The 2021 Greater Norwich Accommodation Need and Supply Changes since the Accommodation Needs Assessment only appears to provide updates in relation to the Greater Norwich authorities. Whilst the Council has no reason to consider the overall need situation has changed for the Broads since the 2017 Assessment covering the Broads was undertaken, the Council supports the reference in the Issues and Options consultation document to working with the other five district councils, in particular given that unauthorised encampments have taken place.	Noted. We intend to revisit Gypsy and Traveller approach/evidence over the coming months.	Consider this comment as look into gypsy and traveller work.
44	Great Yarmouth Borough Council	In similar to the response to Question 42, the Borough Council is fully supportive of the derived need figure for gypsy and travellers and, in recognition of the special qualities and constraints of the Broads (not least the risk of flooding), accepts the likelihood of having to meet this need within the borough which lies outside of the Broads. The Borough Council is therefore keen to continue collaborating with the Broads Authority in order to help meet this need and will welcome the opportunity to comment upon any such sites put forward for consideration for gypsies and travellers through the Broads' call for sites consultation.	Support noted.	Work with GYBC to address need for Gypsy and Travellers.
44	South Norfolk Council	Agreement 15 of the NSPF sets out that all Norfolk Planning Authorities need to quantify the need for and plan to provide for gypsy and travelling show people. The Council welcomes the Authorities commitment to updating their assessment of the need for Gypsy and Traveller sites through the production of a further addendum to their existing work.	Noted, but this is only in relation to Great Yarmouth as is clearly stated in the Issues and Options document.	Ensure any need in the GNLP area is understood as the Local Plan progresses.

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44	South Norfolk Council	The Council notes that the Authority refers to a 2021 Greater Norwich addendum to their needs assessment. Since the publication of this addendum a further draft update of the Greater Norwich GTAA has been produced. This was published in June 2022. It should be noted that this assessment excluded land within the Broads area, which would need to be considered separately through the Authorities addendum.	The Broads Authority were only aware of the Addendum and not aware of the study dates June 2022. I have found the study and it says it excludes the Broads as we were doing our own update. That is incorrect; we worked with GYBC to work out the Gypsy and Traveller need for the Broads part of GYBC. Indeed, if we had have known about this study, we would have worked with Greater Norwich Authorities to be part of this study.	Ensure any need in the GNLP area is understood as the Local Plan progresses.
44	Broadland Council	Agreement 15 of the NSPF sets out that all Norfolk Planning Authorities need to quantify the need for and plan to provide for gypsy and travelling show people. The Council welcomes the Authorities commitment to updating their assessment of the need for Gypsy and Traveller sites through the production of a further addendum to their existing work.	Noted, but this is only in relation to Great Yarmouth as is clearly stated in the Issues and Options document.	Ensure any need in the GNLP area is understood as the Local Plan progresses.
44	Broadland Council	The Council notes that the Authority refers to a 2021 Greater Norwich addendum to their needs assessment. Since the publication of this addendum a further draft update of the Greater Norwich GTAA has been produced. This was published in June 2022. It should be noted that this assessment excluded land within the Broads area, which would need to be considered separately through the Authorities addendum.	The Broads Authority were only aware of the Addendum and not aware of the study dates June 2022. I have found the study and it says it excludes the Broads as we were doing our own update. That is incorrect; we worked with GYBC to work out the Gypsy and Traveller need for the Broads part of GYBC. Indeed, if we had have known about this study, we would have worked with Greater Norwich Authorities to be part of this study.	Ensure any need in the GNLP area is understood as the Local Plan progresses.
45	Bradwell Parish Council	In the interests of fairness of areas of the Broads should be considered for Residential Caravans.	Noted.	No further action.
45	Broads Society	The Society has no comment to make apart from any form of development should obviously fully comply with other relevant policies in the local plan.	Noted.	No further action.
45	East Suffolk Council	The Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (2017) that assessed needs for both the Waveney Local Plan area and the Suffolk Coastal Local Plan area did not include an assessment of the needs for residential caravans. The Strategic Housing Market Assessment part 2 (2017) (www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Local-Plan-Review/Evidence-base/Ipswich-and-Waveney-Housing-Market-Areas-Strategic-Housing-Market-Assessment-Part-2.pdf) considered the needs for mobile homes / park homes and concluded that the price of these meant they did not provide a cheaper alternative to standard market housing. East Suffolk Council would support liaising with the Broads Authority under the Duty to Co-operate in relation to understanding any needs for residential caravans in the Broads.	Noted.	No further action.
46	Designing Out Crime Officer, Norfolk Police	DM43 Design policy the local plan currently states under subsection 25 Design g) Crime Prevention currently states 'The design and layout of development should be safe and secure, with natural surveillance. Measures to reduce the risk of crime and antisocial behaviour should be considered at an early stage so as not to be at the expense of overall design quality.' Norfolk Constabulary requests that in line with the aforementioned NPPF guidance and Design policies and to support the Broads Authority in its visions and commitments that this is amended to specifically include building to Secured by Design standards / in line with Crime Prevention Through Environmental Design (CTPED) Principles. This amendment will promote a significant step towards protecting the wonder and heritage of the Broads for future generations to use and enjoy safely. This could be further embedded into policy is consideration was given to making Secured by Design Awards a condition of planning for all commercial and residential applications within this area.	Noted.	Consider these amendments as work up the Design policy for the Preferred Options.
46	East Suffolk Council	Comments in relation to existing policies have been picked up in our response to the other questions as appropriate. The Council is aware that the Broads Authority may be considering the applicability of other designations close to the Broads, and therefore offers the comments below:	Noted.	No further action.
46	East Suffolk Council	Oulton Broad District Shopping Centre Oulton Broad District Shopping Centre, as defined by Local Plan policy WLP2.11, extends into the Broads Authority area where it is allocated under the current Broads Local Plan policy OUL3. The Broads Local Plan designation extends the District Shopping Centre westwards along the southern shore of Lake Lothing. It is considered appropriate area for the Broads Local Plan allocation to continue in its current form, unless further work indicates that change is necessary. The policies in each plan that relate to Oulton Broad should be aligned as closely as possible.	Support for current approach noted.	Working with ESC, consider continuing the current policy approach for the District Centre.
46	East Suffolk Council	Common Lane North Employment Area Common Lane North Employment Area is designated in Waveney Local Plan Policy WLP8.12. The northeast section of Common Lane North Employment area is situated close to the Broads Authority area boundary. Both the employment area boundary and settlement boundary are tightly drawn around existing buildings. There would be no justification to extend the Employment area boundary further north into the Broads authority area.	Thanks for considering nearby sites and contemplating the appropriateness for the Broads Authority to continue the policy approach. Reasons for not doing this are agreed.	No further action.
46	East Suffolk Council	Town Centre Boundary Beccles Town Centre Boundary as defined by Waveney Local Plan policy WLP8.18, meets the Broads Authority Boundary in the northwest corner of the town centre (adjacent to Saltgate) and also runs close to the Broads Authority Boundary along its western flank. The Waveney Retail and Leisure Needs Assessment (2016), which provides the evidence base for the current Waveney Local Plan, does not advocate moving the town centre boundary further to the west. Westward expansion of the town centre would mean incorporating parts of the town centre which only have a minimal retail presence. However, there may be scope to include the Waveney House Hotel within the town centre boundary.	Noted. We will liaise with ESC on this matter.	Liaise with ESC on how to address the issue of Waveney House Hotel and Beccles Town Centre.
46	East Suffolk Council	Gasworks Allotments The Gasworks allotments, Beccles, are designated as open space by Local Plan policy WLP8.23. The Gasworks allotments are separated from the Broads Authority area by a small stream, which itself is bounded by vegetation on each side. To the north is an area of vacant open land in the Broads. The vacant open land and allotments are separate and the allotments do not extend into the Broads, and there is therefore no reason to extend this designation into the Broads.	Thanks for considering nearby sites and contemplating the appropriateness for the Broads Authority to continue the policy approach. Reasons for not doing this are agreed.	No further action.
46	East Suffolk Council	Holy Trinity Church Open Space, Bungay Holy Trinity Church in Bungay is designated as open space under Local Plan policy WLP8.23 and is located on the eastern edge of Bungay. It directly borders the Broads Authority area. However, the churchyard is separated from the Broads Authority area by a wall or fence. Land on the other side of the boundary appears to be developed. Therefore, there is unlikely to be any justification in identifying open space into the Broads Local Plan.	Thanks for considering nearby sites and contemplating the appropriateness for the Broads Authority to continue the policy approach. Reasons for not doing this are agreed.	No further action.

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46	East Suffolk Council	Holy Trinity Churchyard, Barsham Holy Trinity Churchyard in Barsham is designated as open space under Local Plan policy WLP8.23 and directly borders the Broads Authority area. However, the churchyard is separated from the Broads Authority area itself by a line of trees and the two do not appear to be connected in any way and so it is not considered advisable to extend the churchyard into The Broads Authority area.	Thanks for considering nearby sites and contemplating the appropriateness for the Broads Authority to continue the policy approach. Reasons for not doing this are agreed.	No further action.
46	Great Yarmouth Borough Council	The Borough Council considers it fundamental that a positive and proactive policy is retained within the Broads Local Plan which helps to enable the delivery of full dualling of the A47 'Acle Straight'. Realising the full dualling of the Acle Straight continues to be a key ambition of the Borough Council, and is critical to the long term health of industries and job growth in the borough, which are of importance to the wider and national economy.	The Acle Sraight policy, like all others, will be taken before members in due course for their consideration.	When take Acle Straight policy to Members, report back this representation.
46	Historic England	Historic England considers the current policies to be robust and that they provide a good strategic policy basis for the conservation and enhancement of the historic environment. In particular Policies SP5, DM11 and DM12 comprehensively address The Broads' varied heritage assets.	Support noted.	No further action.
Agriculture	Mr K Lowes	The area needs farming industry. Farmers need fresh water. Winter rainfall needs to be collected as the climate is changing and we get drier summers.	Noted.	Consider how to include this in the Local Plan.
Archaeology	Suffolk County Council	Suffolk County Council would encourage policies which set out a clear approach to addressing the historic environment and archaeology. Policies should include reference to Suffolk County Council managing the Historic Environment Record for the county. A separate policy addressing undesignated heritage assets and whether they relate to built heritage or archaeological remains would be helpful. Including requirements for archaeological investigations in site specific policies can be helpful in setting expectations for developers and guiding decision makers.	Suggestion noted. We will consider this as we produce the heritage policies for the Preferred Options.	Consider this suggestion for heritage policies.
Archaeology	Suffolk County Council	The Local Plan should also make clear that Suffolk County Council advises early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the NPPF, Suffolk Coastal Core Strategy are met. SCCAS is happy to advise on the level of assessment and appropriate stages to be undertaken. They should be consulted for advice as early as possible in the planning application process.	Suggestion noted. We will consider this as we produce the heritage policies for the Preferred Options.	Consider this suggestion for heritage policies.
Archaeology	Suffolk County Council	Suffolk County Council would also welcome the encouragement of public engagement as part of a development project to improve public understanding of the area's archaeology.	Suggestion noted. We will consider this as we produce the heritage policies for the Preferred Options.	Consider this suggestion for heritage policies.
Archaeology	Suffolk County Council	Use of Historic England's Historic Environment Good Practice Advice in Planning is encouraged throughout the plan making process and it may be beneficial for both Historic England and the County Councils to be involved jointly with the Broads Authority to create joined up holistic policy on the historic environment.	Noted.	We will send heritage policies to SCC, NCC and HE.
BRU policies	Broads Society	This is an area accommodating several important businesses supporting the marine industry, boatyards and tourism. There are a number of ageing and unused buildings which are falling into disrepair and have little or no industrial use. Access is poor hindering local plan objectives of sustainable travel, local economic development, local jobs and community well-being. Businesses and dwellings are threatened by environmental impacts. Valuable prime riverside locations could be enhanced through collaborative planning approaches that enable bio diversity, increased green sustainable tourism, net zero approaches, economic growth for the area and region, local jobs for local people, increased skills and job opportunities. This seems to be an ideal area to be targeted for positive change.	The Brundall Riverside area has its own series of policies.	Consider comment in relation to BRU policies.
BRU policies	Brooms Boats	Brundall Riverside area. An area accommodating several important businesses supporting the marine industry, boatyards and tourism. Ageing and unused buildings are eroding and have no industrial use. Access is poor hindering local plan objectives of sustainable travel, local economic development, local jobs and community well-being. Businesses and dwellings are threatened by environmental impacts. Valuable prime riverside locations could be enhanced through collaborative planning approaches that enable biodiversity, increased green sustainable tourism, net zero approaches, economic growth for the area and region, local jobs for local people, increased skills and job opportunities.	The Brundall Riverside area has its own series of policies.	Consider comment in relation to BRU policies.
BRU policies.	Sequence UK LTD/Brundall Riverside Estate Association	2.80Whilst not proposing any particular sites for allocation, the inclusion of the Brundall Riverside Estate within the development boundary as set out below, would recognise its built-up and previously developed nature and make it more straightforward in planning terms for sites to be redeveloped. In particular, the nature of boatyards is changing, for example Broom Boats is diversifying and policies should be flexible to the changing requirements for such sites.	The Brundall Riverside area has its own series of policies.	Consider comment in relation to BRU policies.
CAN1	British Sugar/Rapleys	British Sugar is fully supportive of the existing allocation for Cantley Sugar Factory (Policy CAN1) which, in principle, supports development within the defined area that secures and enhances the sugar factory's contribution to the economy of the Broads and wider area. We request that the policy allocation is carried forward in the Local Plan Review in order to ensure that there continues to be support for British Sugar's ongoing operation, diversification and associated development needs.	General support of the policy noted.	No change to general policy approach, although see other comments.
CAN1	British Sugar/Rapleys	As we raised in the previous representations to the adopted Broads Plan, there is an intrinsic area of the Cantley Sugar Factory site that is not contained within the Cantley Sugar Factory policy area, as identified on the enclosed Site Location Plan. The area currently excluded from Policy CAN1 is in the ownership of British Sugar and contains the car and truck park/service yard for British Sugar's operations and the entrance to the factory. The area therefore forms a fundamental component of the operation of British Sugar. As such, we request that the policy boundary is amended to include this area.	Noted. We will look into amending the boundary.	Look into amending the boundary of CAN1. Meet operators.
CAN1	British Sugar/Rapleys	As explained above, British Sugar's future development needs include potential on-site renewable energy development to reduce carbon emissions from the operation. British Sugar is considering opportunities for solar and wind energy development in order to ensure that its operations become more efficient and sustainable and contribute towards the net zero carbon target. We consider that the Local Plan should support such development needs in line with the Broads Authority's vision for the net zero carbon reduction targets in the long term.	Support for renewable energy noted. Note that the Government are indicating changing the approach for wind turbines, although final details are to be confirmed and adopted.	Consider this support for microgeneration as the renewable energy policy is checked and produced as well as policy CAN1 is checked and produced (see comments from British Sugar on CAN1), being aware of any Government policy change.

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CAN1	British Sugar/Rapleys	Therefore, we request that Policy CAN1 is updated to support the principle of renewable energy development, including identifying the site as suitable for wind energy development to support the operation of Cantley Sugar Factory, as follows: This site is defined as an employment site for the purposes of Broads Local Plan Policies on general employment (DM26). Development on this site which secures and enhances the sugar works' contribution to the economy of the Broads and wider area will be supported where this also: a) Protects or enhances wildlife and habitats (including the nearby Ramsar site, SPA and SAC); b) Protects or enhances the amenity of nearby residents; c) Avoids severe residual impacts on highway capacity or safety; d) Improves the appearance of the works, particularly in views from the river and other receptors in the locality, through design, materials and landscaping and have regard to the setting of the nearby designated heritage assets; e) Reduces light pollution; f) Uses the disposition, bulk and location of buildings and structures to avoid extending the built up part of the site into the open areas around or more prominent in the skyline; g) Can be demonstrated to be in conformity with national policy on flood risk; and h) Appropriately manages any risk of water pollution. Renewed use of the railway or river for freight associated with the plant would be particularly encouraged, as would measures reducing carbon dioxide emissions, including solar and wind powered energy development. The site is identified as being suitable for wind turbine development in association with the sugar works, subject to satisfying the above criteria. Employment uses other than that associated with the sugar works will be supported only where they do not prejudice the future of that use (and associated waste operations) and also meet the above criteria.	Proposed amendment to enable renewable energy at Cantley Sugar Beet Factory noted. It is not clear if there are particular sites suggested within the boundary of the Factory in mind.	Meet with operator on site to discuss their ideas for renewable energy at the site.
CAN1	British Sugar/Rapleys	In recognition of the Cantley Sugar Factory's national significance and British Sugar's commitment to the factory's ongoing and long-term operation and diversification, we request that the Local Plan Review will carry forward the Cantley Sugar Factory policy allocation with an amended policy boundary and amended wording to support renewable energy development.	Noted. We will consider the changes as we prepare the Local Plan for the Broads Preferred Options version.	Consider changes put forward to CAN1. Potential to meet operator on site to talk through and understand the area.
Climate change	Anglian Water	3.20.Our long-term strategic ambitions are shaped to deliver on our purpose and drive us to achieve more, for everyone, this includes becoming a net zero carbon business by 2030 and reducing the carbon in building and maintaining our assets by 70%. We are therefore, committed to reducing our carbon footprint in both operational and capital carbon 3.21.We support the climate checklist and suggest that surface water flooding and drought could have joined up solutions regarding rainwater harvesting and greywater recycling opportunities to minimise surface water run- off and potable water demand through implementing these climate resilient measures. Plus, more ambitious water efficiency measures in new development helps to reduce future water demand. 3.22.We suggest the spatial strategy should ensure that new development is directed to locations which avoid areas at risk of flooding (from all sources) and sea level rise - taking climate change allowances into account. Further consideration could be given to whether this section also specifically mentions sea level rise implications.	noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Design	Designing Out Crime Officer, Norfolk Police	Secured by Design Secured by Design aims to achieve a good standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable Natural Surveillance and create a sense of ownership and responsibility for every part of the development. These features include secure vehicle parking, adequate lighting of common areas, defensible space and a landscaping and lighting scheme which when combined, enhances Natural Surveillance and safety. Experience shows that incorporating security measures during a new build or refurbishment reduces crime, fear of crime and disorder. The aim of the Police Service is to assist in the Design process to achieve a safe and secure environment for residents and visitors without creating a "fortress environment". All new developments should provide a venue that makes the most from the proven crime reduction methodologies of Secured by Design gained from over thirty years policing experience and supported by independent academic research. There are Residential, Commercial, Hospital and Educational Developments Design Guides available from www.securedbydesign.com which explain all of the crime reduction elements of these schemes. They are separated into sections; Section 1: Deals with the development layout and design and all external features and Section 2: Provides the detailed technical standards for various elements of the buildings. The interactive design guide https://www.securedbydesign.com/guidance/interactive-design-guide is also a very good and self-explanatory tool that can walk you through the various elements of designing out crime in a visual manner.	Noted. Consider this comment as produce the design policy of the Local Plan.	Consider this comments as produce design policy of the Local Plan.
Design	National Grid/Avison Young	Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure. National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets. Therefore, to ensure that future Design Policies remain consistent with national policy we would request the inclusion of a policy strand such as: "x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."	Noted and we will weave this into the Design policy.	Weave this wording into the Design policy.
DM11	Historic England	We support the current policy which seeks to protect, preserve or enhance the significance and setting of the heritage assets and that of the wider historic environment. We welcome the reference within the policy, to non- designated heritage assets, archaeology and undiscovered heritage assets. The supporting text provides good justification for the policy provisions and explains the reasoning clearly which should help direct decision makers and prospective applicants.	Support noted.	No further action
DM12	Historic England	We support the current policy.	Support noted.	No further action
DM30	Lanpro Services	Development proposals constrained by unenforceable restrictions requiring the use of holiday accommodation to be only for short stay occupancy on a rented basis, as currently exists in Broads Policy DM30 only serves to make continued investment in the provision and upgrading of specifically designed tourism accommodation and facilities on the Broads unviable and will result in investment taking place in nearby Local Authority areas where such restrictions do not apply.	Thoughts noted. We will consider this as we review and check DM30.	Consider comments as check DM30.
DM37 - residential moorings	Norwich City Council	With regards to residential moorings, we would like to see the criteria-based policy for residential moorings in Norwich that is contained within the current plan be retained in the new plan.	Noted and we don't anticipate removing that criterion from the current policy.	Maintain the Norwich City locational criterion of DM37.

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DM41 -Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Environmental The proposal provides a number of key environmental benefits by: •III Making more efficient use of land thereby reducing the need to use limited land resources for housing. •III Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions. •III Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.	Noted.	See responses to other comments from McCarthy Stone.
DM41 -Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Given all these factors, evidence and the guidance of the PPG, the council should initially ensure that the Housing Needs for older persons' housing is identified in the plan. We then consider that the best approach is for the plan to identify the level of housing needed to meet the requirement of older people in the Broads Authority area and to allocate specific sites to meet the that are in the most sustainable locations close to key services. The plan should also continue to include a standalone policy actively supporting the delivery of specialist older people's housing, however some more flexibility should be applied to this compared to the existing policy.	All Norfolk LPAs worked with Norfolk County Council Independent Living and Supported Living Teams to look into the need for such housing. Whilst the Broads Authority is part of this work, no specific need is identified for the Broads Authority. This is because data is not available for the Broads. The boundary is such, that, for example, not one entire postcode area is within the Broads. The same is similar for other typical areas like Lower Super Output areas. That is why, taking market housing need as an example, the Standard Methodology does not apply to areas like the Broads – indeed, we have to commission bespoke evidence. It is also important to understand our area is part of 6 districts. Our need is part of their need, not additional to their need. The Broads Authority is open to development of the right type, in the right place, of the right design. Indeed, that is what policy DM41 allows. So, it is not clear how a need can be identified for the Broads. Further, we held a call for sites as part of the Issues and Options consultation and no sites have been put forward for elderly or specialist need housing. If MS have sites, please feel free to contact us to discuss them. Also, if MS have any comments on the policy DM41 then please do let us know.	Liaise with Norfolk County Council Officers in the first instance regarding this comment. Ask McCarthy Stone if they wish to put any sites forward and if they wish to propose changes to DM41.
DM41 -Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Developers should not be required to demonstrate need for older persons housing, given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments “help reduce costs to the social care and health systems” (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.	Suggested amendments to the existing policy noted and we will consider these as we draft the Preferred Options version.	Consider this comment as produce Preferred Options version of the Local Plan.
DM41 -Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council: “The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”	Suggested amendments to the existing policy noted and we will consider these as we draft the Preferred Options version.	Consider this comment as produce Preferred Options version of the Local Plan.
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Older peoples' housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.	Background information noted.	See responses to other comments
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Economic A report 'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that: •III 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year. •III Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year. •III On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.' A further report entitled Silver Saviours for the High Street : How new retirement properties create more local economic value and more local jobs than any other type of residential housing (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme built in a sustainable location, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open and high streets vibrant.	Background information noted.	See responses to other comments
DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first- time buyers (Aug 2020)" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.	Background information noted.	See responses to other comments

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DM41 - Benefits of Older Persons' Housing	McCarthy Stone/The Planning Bureau Limited	Social Retirement housing gives rise to many social benefits: •III Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder. •III Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns. •III The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.	Background information noted.	See responses to other comments
DM41 - general	McCarthy Stone/The Planning Bureau Limited	We note that the existing local plan contains policy DM41 Elderly and Specialist Needs Housing that deals specifically with older persons housing and states 'Proposals for the development of or change to elderly or specialist needs housing will be supported if they are located within a development boundary and they have regard to: i) The local need for the accommodation proposed; ii) Whether the proposal would result in an undue concentration of such provision in the area; and iii) Impact upon amenity, landscape character, the historic environment and protected species or habitats.' The existing Local Plan was adopted just before the government updated the PPG with a new section on Housing for Older and Disabled People now recognising the need to provide housing for older people. Page 14 of the Issues and Options document identifies the PPG as relevant. Of relevance paragraph 001 Reference ID: 63- 001-20190626 of the PPG states: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid- 2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking" (emphasis added).	Background information noted.	See responses to other comments
DM41 - general	McCarthy Stone/The Planning Bureau Limited	Paragraph 003 Reference ID: 63-003-20190626 recognises that "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support." Thus, a range of provision needs to be planned for and recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing or adaptable housing is important. Paragraph 006 Reference ID: 63-006-20190626 sets out "plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require."	Background information noted.	See responses to other comments
DM41 - Need for older persons' housing	McCarthy Stone/The Planning Bureau Limited	It is well documented that the UK faces an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to 5 million (ONS mid 2018 population estimates). Between 2014 and 2039, the ONS project that over 70 per cent of projected household growth will be made up of households with someone aged 60 or older. It is generally recognised (for example The Homes for Later Living Report September 2019). That there is a need to deliver 30,000 retirement and extra care houses a year in the UK to keep pace with demand. The Mayhew Review Future-proofing retirement living' recommends 'an accelerated programme of retirement housing construction with up to 50,000 new units a year'. Although there are no apparent specific statistics for older people for the Broads Authority area both the 'Study of Demand for Specialist Retirement housing and Accessible housing for Older People in Norfolk' and the 'Great Yarmouth Borough Council and The Broads Authority Local housing Needs Assessment 2022, version 2' imply that the authority is anticipating an increase in the older persons population. This can be supported by looking at the age profile of Norfolk as a whole that can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 219,260 persons aged 65 and over in 2018, accounting for 24.3% of the total population of the County. This age range is projected to increase by 92,196 individuals, or 42%, to 311,456 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 30.2% of the total population of the County by 2043.	Background information noted.	See responses to other comments
DM41 - Need for older persons' housing	McCarthy Stone/The Planning Bureau Limited	In 2018 there were 60,914 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 48,822 individuals, or 80.2%, to 109,736 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Norfolk's residents, accounting for 6.7% of the total population in 2018 and increasing to 10.7% by 2043. It is therefore clear there will be a significant increase in older people over the Plan Period in Norfolk which will include the Broads Authority area and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan. The Plan should ensure that the policy approach to meet the housing needs of older people is up to date and addresses the need.	Background information noted.	See responses to other comments
DM43	McCarthy Stone/The Planning Bureau Limited	Point h of policy DM43 considers 'Accessibility and adaptability. This states that 'Developments shall be capable of adapting to changing circumstances, in terms of occupiers, use and climate change (including changes in water level). In particular, dwelling houses should be able to adapt to changing family circumstances or ageing of the occupier(s) and commercial premises should be able to respond to changes in industry or the economic base. Applicants are required to consider if it is appropriate for their proposed dwelling/ some of the dwellings to be built so they are accessible and adaptable and meet Building Regulation standard M4(2) and M4(3). If applicants do not consider it appropriate, they need to justify this. For developments of five dwellings or more, 20% will be built to meet Building Regulation Standard M4(2)'.	Noted.	Review standard - could it apply to more dwellings? Also, keep an eye on Building Regulation changes and delete or amend the policy if they come into force during the production of the Local Plan.
DM43	McCarthy Stone/The Planning Bureau Limited	The council should initially recognise that the proposed changes in building regulations will require all homes to be built to part M4(2) of the Building Regulations. This will remove the need to reference this in the local plan and should be removed.	As and when the requirement becomes part of Building Regulations, we can delete (if still producing the Local Plan). Until then we will review the standard and are likely to keep it.	Review standard - could it apply to more dwellings? Also, keep an eye on Building Regulation changes and delete or amend the policy if they come into force during the production of the Local Plan.
DM43	McCarthy Stone/The Planning Bureau Limited	Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that "the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support", the council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.	Noted. Agree that adaptable housing as well as housing for older persons are both appropriate approaches.	Carry forward DM41 and DM43 approach (although noting that accessibility may be addressed through Building Regulations).

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DM43	McCarthy Stone/The Planning Bureau Limited	Adaptable houses do not provide the on-site support, care and companionship of specialist older persons’ housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons’ housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person’s housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons scheme reducing independence contrary to the ethos of older persons and particularly extra care housing and this should be recognised within the plan.	Noted. Agree that adaptable housing as well as housing for older persons are both appropriate approaches.	Carry forward DM41 and DM43 approach (although noting that accessibility may be addressed through Building Regulations).
DM43	McCarthy Stone/The Planning Bureau Limited	Recommendation: Delete DM43 point h from the plan.	Suggestion noted. As and when the requirement becomes part of Building Regulations, we can delete (if still producing the Local Plan). Until then we will review the standard and are likely to keep it.	Review standard - could it apply to more dwellings? Also, keep an eye on Building Regulation changes and delete or amend the policy if they come into force during the production of the Local Plan.
Economy and Tourism	Lanpro Services	The Local Plan Review covers a wide range of topic areas and although at Section 7.6 The economy of the Broads the review acknowledges that tourism is the significant contributor to the economy and employment of the Broads, as it states: “Tourism is the mainstay of the Broads’ economy. In 2019, the Broads and surrounding area (including the area of influence) received around 8.1 million visitors, bringing in an estimated £490 million and directly supporting more than 7,435 FTE jobs.” and at Section 7.9 Navigation: “Navigation is fundamental to the local economy and provides varied health and wellbeing benefits. The Local Plan will need to ensure that navigation is protected and appropriately enhanced” the review does not contain any specific references as to how the Broads Authority aim at encouraging future investment into these important sectors in order to not only maintain but enhance the existing quality and provision in these sectors so they continue to be significant contributors to the economy.	It is intended that our current tourism policies will continue. No comments on those were provided however. It is worth noting that the Authority has a Tourism Strategy and the Broads Plan, which is the Management Plan for the Broads, has been adopted and is in place.	Assess economy and tourism policies and update and amend as required.
Economy and Tourism	Lanpro Services	Whilst, separate sections have been devoted to many other aspect and issues impacting on the Broads, the Tourism and Navigation sectors which are the main drivers of the Broads Economy, have failed to be addressed. This represents a significant and fundamental omission from the Local Plan review. The Broads Authority should be actively engaging with its tourism and navigation sectors to understand their needs and how to improve the quality and range of facilities on offer to ensure that tourism and navigation continue to thrive over the period to be covered by the Local Plan Review.	It is intended that our current tourism policies will continue. No comments on those were provided however. It is worth noting that the Authority has a Tourism Strategy and the Broads Plan, which is the Management Plan for the Broads, has been adopted and is in place. We have consulted far and wide (as evidenced by the number of comments received) and some boat yards have come forward to us wishing to speak about future plans - we have therefore engaged with tourism and navigation sections.	Assess economy and tourism policies and update and amend as required.
Economy and Tourism	Lanpro Services	Local Plan policies formulated as part of the review SHOULD whilst affording protection of the Broads environment, landscape and ecology, also actively encourage business investment in tourism accommodation, boat moorings, marinas and services without the imposition of unnecessary and unenforceable restrictions, to ensure facilities which actively support the diversification and adaptation of the Broads tourism economy are provided for the future. Visitors expect high quality accommodation in which to stay and facilities to moor boats and this can only be achieved through creating the right climate for businesses to invest in these facilities.	It is intended that our current tourism policies will continue. No comments on those were provided however so it is not clear if the comments are saying the existing policies do this or not. It is worth noting that the Authority has a Tourism Strategy and the Broads Plan, which is the Management Plan for the Broads, has been adopted and is in place.	Assess economy and tourism policies and update and amend as required.
Economy and Tourism	Lanpro Services	Tingdene companies are significant providers of a variety of types of high quality holiday accommodation and mooring berths, which directly contribute to the economy and job opportunities of the Broads. They have in recent years been significant investors in the Broads with circa £34 million invested in the upgrading of the Parks and Marinas they have purchased and operate. This high level of investment ensures continued improvement of the facilities and services which directly contribute to the quality of the visitor experience and the overall economy of the Broads. Investment in the Broads economy needs to be actively recognized and encouraged in addition to policies affording protection to the environment, landscape and ecology of the Broads.	Background information noted.	No further action.
Economy and Tourism	Lanpro Services	Tingdene’s business model for the operation of its holiday parks throughout the country, including those in the Broads, is to sell the holiday lodges on their holiday parks on long term leases to individual purchasers who wish to own holiday accommodation, rather than, as is often the case on many holiday sites, offering annual or time limited licences. The leases are registered with HM Land Registry which provides long term certainty for people purchasing holiday accommodation in an area. This model enables many different people who wish to purchase a wide range of types of holiday accommodation, the opportunity to do so on a dedicated holiday park, rather than opting for the purchase of an unrestricted property from within the general housing stock, further depleting the housing stock available for primary residences.	Background information noted.	No further action.
Economy and Tourism	Lanpro Services	The individual owners of the holiday accommodation then frequently rent their properties out to visitors to the Broads. This cyclical investment enables Tingdene to recoup the initial investment it has made in upgrading and improving the often poor quality holiday accommodation and facilities on a site and then to continue to invest in the upgrading of further holiday sites which have often fallen into disrepair, through lack of investment. Owners of the holiday accommodation then not only have accommodation available for their own use but also to achieve a return on their investment in the holiday accommodation by letting it out ensuring that holiday accommodation is available for visiting holiday makers throughout the year. This year round availability of holiday accommodation and facilities then results in wider business opportunities being created in the local area to serve the visitors.	Background information noted.	No further action.
Economy and Tourism	Lanpro Services	Broadlands at Oulton Broad is a prime example of a holiday park and marina within the Broads which Tingdene has invested significantly in over recent years. The increase in tourism accommodation and marina berths has benefitted the Broads economy. The Park is now providing a range of high quality year round holiday accommodation and Marina berths at Oulton Broad, encouraging visitors throughout the year. The lodges and chalets on this Park are not constrained by unenforceable limitations on the periods the accommodation can be occupied or requirement that they should only be used for short stay occupation on a rented basis as required under the current Local Plan policy DM30- Holiday accommodation – new provision and retention. They are simply limited to ‘holiday use only and not for use as a sole or main residences’. This ensures the accommodation is used for holiday purposes only.	Background information noted.	No further action.
Economy and Tourism	Lanpro Services	Tingdene is also making substantial investment in the provision of a range of types of tourism accommodation at a recently acquired site at Caldecott Hall Country Park, Fritton, which whilst just outside the Broads Authority’s Executive Boundary directly serves the Southern Broads Area. The tourism accommodation recently permitted at Caldecott Hall allows for year round use for holiday purposes only and not as a sole or main residence, providing maximum flexibility in its holiday use whilst ensuring it does not become a sole or main residence.	Background information noted.	No further action.

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Economy and Tourism	Lanpro Services	Tingdene as a significant operator and employer within the Broads would urge the Broads Authority to address in the review of its Local Plan how it proposes to attract investment into the main stays of its economy and would welcome the opportunity to discuss its business operations with the Broads Authority.	Will contact the respondent to understand better the nature of the request to meet.	Contact respondent.
Electric charging points	Woodbastwick Parish Council	Most boats on the Broads are powered by diesel or petrol and consequently contribute to global warming and climate change. The plan fails to recognise this, nor does it offer any mitigating action. As a minimum, steps should be taken to develop an infrastructure to encourage hire boats and private boats to use electric power. Charging points on 24-hour moorings would be a good start	The BA have a programme of installing charging points in certain areas. We are looking at the feasibility and practicalities of installing such pillars in more remote areas where power source is an issue. The unintended consequence of the pillars we install is the impact of the light at the top of the pillars and that needs consideration. We are also aware of some private organisations like boatyards and pubs installing the pillars. Further, even if the plan does not have a specific policy or mention of a particular issue, the policies on other relevant issues are of relevance and proposals can still be addressed.	Consider electric charging points as produce the Local Plan.
Flood risk	Mr K Lowes	Believes a barrier has been installed at Ipswich to reduce surge effects – perhaps one at GY would protect tidal rivers.	Noted. We work closely with colleagues producing the Broadland Futures Initiative and these comments seem relevant for that work and so will be passed on.	Pass on comments to BFI.
Flood risk	Mrs S Lowes	Concerned re river flooding locally – dead fish.	Noted. We work closely with colleagues producing the Broadland Futures Initiative and these comments seem relevant for that work and so will be passed on.	Pass on comments to BFI.
Flood risk	Mrs S Lowes	PH is in a flood area and in 2008 we were told it was only protected for 50 years so any new building here should never be allowed despite several requests to place homes near the village hall.	Noted. We work closely with colleagues producing the Broadland Futures Initiative and these comments seem relevant for that work and so will be passed on. There is only a small part of Potter Heigham in the Broads and yes, flood risk in that part is a significant constraint to development in the area.	Pass on comments to BFI.
Flood risk	Mrs S Lowes	Flood wall needs raising along with quay heading raised and repaired to protect residents.	Noted. We work closely with colleagues producing the Broadland Futures Initiative and these comments seem relevant for that work and so will be passed on.	Pass on comments to BFI.
Flood risk	Woodbastwick Parish Council	We would encourage further dredging as it is our Councillors’ experience that this will help to reduce local flooding, particularly in our local parish of Panxworth.	The BA have just finished a dredging project in Malthouse Broad, where we removed about 6000 m3. If the comment about Panxworth is in relation to management of the small stream that comes through Panxworth, then this is either EA or IDB responsibility for drainage management. The Authority is only responsible for dredging in the publicly navigable areas.	No further action.
General comment	Anglian Water	Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, our region has the highest rate of housing in England. The initial 2021 census report identifies that population growth in the region was 8.3% in the past decade against a national average of 6.6%. However, we recognise that The Broads, in focussing on the delivery of development to address local needs, will have a markedly different population change compared to the region as a whole.	Background information noted.	No further action.
General comment	Anglian Water	5.1.Anglian Water utilises six capitals thinking to help us keep our responsibility to customers, communities, and the environment at the front of our minds when making business decisions. Using this approach to assess the priorities and principles of the emerging Local Plan, we find the following	Background information noted.	No further action.
General comment	Anglian Water	The Plan should consider the impact and resilience of new development and its spatial distribution, in terms of capital (embedded) carbon, and climate adaptation for new development and the infrastructure needed to support future growth over the longer-term.	Noted. Will consider this as we produce the Preferred Options.	Consider this comment as produce Preferred Options version of the Local Plan.
General comment	Anglian Water	This reflects organisational culture and ways of working – we consider that this initial stage of the Plan illustrates that the process of plan development and supporting evidence increases skills and knowledge and develops new ways of working.	Noted.	No further action.
General comment	Anglian Water	Further evidence needed to support the preparation of the plan towards preferred options include an updated Water Cycle Study and Strategic Flood Risk Assessment, and consideration of producing a carbon assessment to inform the spatial strategy. We recognise that partnership working is valuable in realising this, and we will provide advice where necessary.	Noted. We will produce a proportionate water cycle study. We will await the BFI modelling before updating a SFRA and will work with other LPAs like we did last time.	Produce a proportionate water cycle study and SFRA once BFI modelling done.
General comment	Anglian Water	3.8.Anglian Water recognises the challenges in operating in a low-lying wetland environment such as The Broads, particularly in maintaining and managing our infrastructure networks to support local communities. We would support an approach that minimises the need for carbon intensive infrastructure, in terms of capital (embedded) carbon and operational carbon, which would steer development to locations where there is existing infrastructure with the capacity to accommodate future development.	Background information noted.	No further action.
General comment	Anglian Water	3.9.Anglian Water is supportive of Local Nature Recovery Strategies, as the platform to provide a holistic approach to addressing environmental concerns including climate change, nature recovery, and opportunities for informed locations for offsite biodiversity net gain, to achieve meaningful landscape scale environmental benefits. Anglian Water is proactively working to embed nature-based solutions to provide a range of benefits including improved water quality, minimising surface water flood risk and biodiversity net gain.	Background information noted.	No further action.
General comment	Anglian Water	3.10.We also understand how important natural capital, like water, soil and biodiversity provide benefits to society. Our Natural Capital Asset Check report explores how these dependencies impact our environment, helping us to make better decisions and help to protect natural capital around our region.	Background information noted.	No further action.
General comment	Anglian Water	3.11.There are a range of stakeholders with an influence on water quality and we believe that working in collaboration and using new markets for the trading of ecosystem services it can help deliver positive environmental outcomes.	Background information noted.	No further action.

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General comment	Anglian Water	3.12.Anglian Water recognises that a collaborative, partnership approach to addressing issues, particularly within environmentally vulnerable and sensitive areas, can provide multiple benefits, including: shared stakeholder ownership of the issues and solutions, more potential sources of funding that can make schemes more affordable for individual partners, increased pace of delivery, and a true focus on a clear outcome, not individual outputs. Examples of where we are part of a multi-sector approach in our region include: •IIIWendling Beck Exemplar Project: a pioneering habitat creation, nature restoration and regenerative farming project, spanning almost 2,000 acres of land in North Dereham, Norfolk. It is a collaboration between private landowners, local authorities, environmental NGOs, and Anglian Water. It aims to transform land use for environmental benefit, whilst also building community and environmental resilience. The priorities began as carbon, flood risk reduction, and biodiversity net gain, and we have included nutrient neutrality to that list. •IIIThe Norfolk Water Strategy Programme: a partnership to prepare a sustainable Norfolk Water Strategy in recognition of the growing pressures on water resources in a changing climate. The objectives of the programme are to secure good quality, long-term water resources for all water users, while protecting the environment and showcasing the county as an international exemplar for collaborative water management. This will test and implement a number of nature-based solutions to manage water.	Background information noted.	No further action.
General comment	Anglian Water	3.13.In relation to the nutrient neutrality issue affecting The Broads SAC and River Wensum SAC, Anglian Water has been working proactively with the Norfolk local planning authorities to identify and take forward mitigation measures, including those that are focussed on nature-based solutions. In addition, an amendment to The Levelling Up and Regeneration Bill proposes a new duty to be placed on Water Companies to upgrade all WRCs situated in nutrient sensitive areas to the ‘highest technically achievable limits’, with the deadline for this to be achieved by 2030.	Background information noted.	No further action.
General comment	British Sugar/Rapleys	The Cantley Sugar Factory was the first sugar beet processing factory in the UK and has been in operation since its opening in 1920. The Cantley Sugar Factory is of national importance, producing home-grown sugar and other related produces. This, in turn, helps underpin food security in the UK, in line with the Government’s recently published food strategy (June 2022). The factory is an important part of the local – and regional – economy. As well as directly employing 90 permanent staff and a further 25 seasonal employees during the Campaign period, the factory supports a further 80 off-site/indirect jobs within the catchment area and 350 local farmers (with sugar beet grown by local growers) and several haulage companies. The factory supports local schools and colleges through offering work experience and apprenticeship schemes every year. In addition to the production of sugar, the sustainable production of the site ensures that the output of each process becomes the input of the next, turning raw materials into products thus avoiding unnecessary waste. The result is the production of much more than sugar, with its co-products including: •IIIA nimal feed from residual sugar beet fibre which is supplied to the livestock industry; •IIITopsoil from soil recovered from sugar beet which is used primarily by the landscaping industry; •IIILimeX, a liming material supplied to agriculture; •IIIO n-site power generation (Combined Heat and Power) and the export of electricity into the electrical grid, and •IIIA ggregates from stones recovered from sugar beet which is used by civil engineering, road building and construction industries.	Background information noted.	No further action
General comment	British Sugar/Rapleys	British Sugar is fully committed to the ongoing and long-term operations at its factory in Cantley. For example, the business is currently investing in a new waste water treatment plant (£10m investment). British Sugar is continuously reviewing opportunities to diversify while at the same time reducing greenhouse gas emissions from the sugar beet processing operation through on-site renewable energy development. British Sugar’s operations at Cantley are diverse and they will continue to invest in further opportunities for diversification, efficient operations and carbon emission reductions, which will strengthen its role in the agri-food sector in the region and the sustainable, low carbon future.	Background information noted.	No further action
General comment	Catfield Parish Council	The Local Plan for the Broads is an excellent document in terms of recognising the unique ecological value of the Broads and the challenges facing their preservation for future generations. It also highlights the problems arising from the split responsibility between Local Planning Authorities (LPA’s) and the need to work closely with neighbouring LPA’s.	Support noted.	No further action.
General comment	Catfield Parish Council	Catfield Parish Council welcomes the consultation and the opportunity to express its views. Put succinctly it considers that more emphasis should be given to the monitoring and implementation of existing policies for the preservation of the Broads rather than the development of new strategies and public relations initiatives.	Noted and we are doing that. We also need to review the local plan to bring it up to date and try to tackle challenges now and in the future.	No further action.
General comment	Catfield Parish Council	The practical implementation of existing policies to meet the known challenges is seen to be the main priority.	Noted and we are doing that. We also need to review the local plan to bring it up to date and try to tackle challenges now and in the future.	No further action.
General comment	Designing Out Crime Officer, Norfolk Police	Norfolk Constabulary are committed to ongoing partnership working with the Broads Authority and look forward to further consultation regarding the suggestions made with regards to designing out crime being feature within the future planning and protection of the Broads.	Noted.	No further action.
General comment	Great Yarmouth Borough Council	In general, the Borough Council welcomes the Issues and Options consultation and its focus on the key issues for consideration at this early stage in the review of the Broads Local Plan. The comments below have been necessarily focussed on the main strategic cross-boundary planning issues between the Borough Council and the Broads Authority.	Support noted.	No further action
General comment	Historic England	Please note that absence of a comment on a policy, allocation or documents in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.	Noted.	No further action
General comment	Lanpro Services	Please see below comments made on behalf of Tingdene Holiday Parks Ltd and Tingdene Marinas Ltd operators of Broadlands Park and Marina at Oulton Broad, Waveney River Centre at Burgh St Peter, Brundall Bay Marina within the Broads Authorities Executive area and Caldecott Hall Country Park at Fritton whilst within Great Yarmouth Borough Council borders onto the Broads Authority’s area	Background information noted.	No further action.
General comment	Loddon Parish Council	Loddon Parish Council discussed the Local Plan Issues and Options and the Draft Design Guide at it’s meeting on 12 October 2022 and resolved that they broadly support the plans but reserve the right to challenge it when the Council receives the final details.	Noted.	No further action.
General comment	Luke Paterson	2.Making space for water and allowing passage of fish by re flooding Dilham broad	Idea noted and will be passed onto colleagues for consideration .	Pass on to colleagues at the BA for consideration
General comment	Marine Management Organisation	Please be aware that any works within the Marine area require a licence from the Marine Management Organisation. It is down to the applicant themselves to take the necessary steps to ascertain whether their works will fall below the Mean High Water Springs mark.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.

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General comment	Marine Management Organisation	Works activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Applicants should be directed to the MMO's online portal to register for an application for marine licence. https://www.gov.uk/guidance/make-a-marine-licence-application	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	The MMO is also the authority responsible for processing and determining Harbour Orders in England, together with granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	The MMO is a signatory to the coastal concordat and operates in accordance with its principles. Should the activities subject to planning permission meet the above criteria then the applicant should be directed to the follow pages: check if you need a marine licence and asked to quote the following information on any resultant marine licence application: •The local planning authority name, •The planning officer name and contact details, •The planning application reference.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	In cases where a project requires both a marine licence and terrestrial planning permission, both the MWR and The Town and Country Planning (Environmental Impact Assessment) Regulations http://www.legislation.gov.uk/uksi/2017/571/contents/made may be applicable.	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Marine Management Organisation	Under the Marine and Coastal Access Act 2009 ch.4, 58, public authorities must make decisions in accordance with marine policy documents and if it takes a decision that is against these policies it must state its reasons. MMO as such are responsible for implementing the relevant Marine Plans for their area, through existing regulatory and decision-making processes. Marine plans will inform and guide decision makers on development in marine and coastal areas. Proposals should conform with all relevant policies, taking account of economic, environmental and social considerations. Marine plans are a statutory consideration for public authorities with decision making functions. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. A map showing how England's waters have been split into 6 marine plan areas is available on our website. For further information on how to apply the marine plans please visit our Explore Marine Plans service. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. If you wish to contact your local marine planning officer you can find their details on our gov.uk page	Noted. We will refer to this as required in the next version of the Local plan.	Check how we address this in the Local Plan to see if it needs improving.
General comment	Mr K Lowes	The area needs a logical plan for development – not only housing, but agriculture and water.	Noted. The plan covers agricultural development and water related planning issues. The Broads Plan is also relevant.	No further action.
General comment	Mrs S Lowes	We need no development in PH.	Noted. There is a specific policy for the Potter Heigham Bridge area that guides what can happen in the area.	No further action.
General comment	Mrs S Lowes	We love where we live, but seems it's being destroyed.	Noted. There is a specific policy for the Potter Heigham Bridge area that guides what can happen in the area. We hope this would result in appropriate development that would not ruin the area.	No further action.
General comment	National Grid/Avison Young	National Grid assets within the Plan area Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the Plan area. Details of National Grid assets are provided below. Gas Transmission Asset Description Gas Transmission Pipeline, route: BACTON TO YELVERTON A plan showing details and locations of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to National Grid assets.	General route of pipeline noted and thanks. Information sent to GIS officer to check our records.	Send rough route of pipe to GIS Officer.
General comment	Sequence UK LTD/Brundall Riverside Estate Association	1.2The Brundall Riverside Estate Association is an elected committee to oversee the general interests of its members, comprising of companies and individuals who own land/property within the Riverside Estate area. Primarily boatyards, marinas and other businesses and a number of private residential and holiday homes.	Background information noted.	No further action.

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General comment	Somerleyton Marina/Evolution Planning	<p>1.1 These representations on behalf of the Somerleyton Estate discuss the opportunity for the new Local Plan to support the improvement of the marina and boatyard in Somerleyton village. The Estate's long-term aim is to secure the viable future of the boatyard and marina, to support a range of different types of moorings in the marina and to bring the boatyard with its buildings up to date. The facilities are old and there is the potential for the facility to better support the local tourism industry. With a larger marina the boatyard, which is an important local business, can flourish supporting local businesses and crafts connected with the water.</p> <p>1.2 We would welcome the chance to discuss if this is something that the Local Plan could support in all or in part. We would like to understand how the Local Plan could support the proposals for example using a site allocation or by using non site-specific development management policies. It is likely that any applications or developments would be done over a period of time as funds allow so supportive Local Plan policies would be welcome.</p> <p>1.3 The background is that the marina came up for sale in 2012 and was bought by the Estate. The Estate has had a longstanding policy of supporting traditional local businesses in the area. The marina has long been an active part of Somerleyton village, providing a boatyard, serving local boats and moorings. For 10 years, the Estate has run a successful boatyard and around 120 moorings at the marina. The Estate has been paying off the borrowings needed to purchase the marina and is now able to invest in, and improve the marina, as long as the investment produces a sensible return.</p> <p>1.4 Improvements to the marina would support the boatyard. The boatyard is housed in a building which is nearing the end of its useful life. In order to replace the building with a similar sized structure, the marina and boatyard need to be able to fund the new building which will be a significant cost. Keeping the boatyard going will maintain an important local business. It is the aspiration of Hugh Somerleyton to expand the range of traditional local boat businesses and crafts carried out at the site. For example, early discussions have been held with a company working with local reed.</p>	Background information noted. Aspirations for the boatyard noted.	Will meet operator on site.
General comment	Somerleyton Marina/Evolution Planning	<p>1.5 The marina basin could be expanded into an area of adjacent reed bed to the south. Work is underway to carefully study the ecology of the reed bed and understand how to create new reed bed nearby if required, or to enhance other reed beds on the Estate. The Estate has some 32 hectares of reed bed already providing a good opportunity for mitigation.</p> <p>1.6 Elsewhere, the Somerleyton Estate is rewilding hundreds of hectares of farmland as part of a project started by Hugh Somerleyton and he is committed to ensuring there is no loss of biodiversity as a result of this project. Mill House Ecology are advising the Estate.</p> <p>1.7 The following sections set out more detail on the proposal. We would welcome the chance to discuss this in more detail with the Broads Authority.</p>	Background information noted. Aspirations for the boatyard noted.	Will meet operator on site.
General comment	Somerleyton Marina/Evolution Planning	<p>2.1 The Somerleyton marina and boatyard are located between Somerleyton village and the River Waveney. The Lowestoft railway line runs to the south and west. The site is accessed via a roadway that leads from the village at the junction of Slugs Lane and The Street.</p> <p>2.2 The vehicular access leads down a slope to the edge of the marina and boatyard and enters the marina at a car parking area. To the south east of the car park are welfare facilities for the owners of the boats. To the south of the marina is a building of around 775 square metres, and a smaller building of around 90 square metres which are the base for the boatyard. Around these buildings are outside storage areas for boats.</p> <p>2.3 A channel containing moorings and a slipway runs from the buildings in a westerly direction to where it opens out to the north. At this point there is a basin that can accommodate around 105 boats to the north of the channel. Further west from this channel, is the entrance to the River Waveney. A vehicular access runs alongside the southern part of the channel, and along the northern part of the channel, before running around the north of the mooring basin.</p>	Context of the Marina noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	<p>2.4 To the west of the marina is the River Waveney. The river is around 40 metres wide at the entrance to the marina. To the north along the river there are moorings alongside the river. To the south, the river goes under the swing bridge for the Lowestoft Railway Line.</p> <p>2.5 To the north and east of the marina is the village of Somerleyton with homes and the Dukes Head Pub. To the south, is a single house and woodland and to the west is woodland and farmland.</p> <p>2.6 To the south of the existing marina basin, is an area of reed bed which extends to the railway line.</p> <p>2.7 The only planning application at the marina in the last 5 years was for 5 floating pontoon moorings, and has the reference BA/2018/0220/FUL.</p>	Context of the Marina noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	<p>Background to the Marina, Boatyard and the Somerleyton Estate</p> <p>2.8 There are a diverse range of activities on the Somerleyton Estate. The marina and boatyard were bought by the Estate in 2012 after it was put up for sale by its previous owners who were the holiday company TUI. The Estate bought the business because it wanted to ensure that it remained viable, and remained an important amenity for the local area. The Estate has a long history of investing in local businesses including the Dukes Head Pub in Somerleyton. The Pub has been run by the Estate to ensure that it continued as a village amenity. The Estate owns and runs the Fritton Lake Resort and Fritton Arms Pub which are a high-quality holiday resort. The Estate has a large farming business, and a portfolio of properties that are let to local people. The Grade II* Somerleyton Hall and Gardens are owned and maintained by the Estate and are open to visitors.</p> <p>2.9 The Estate has embarked on a significant rewilding project. Rewilding is a process which encourages landowners and occupiers to make changes to how they use the environment for the benefit of nature and ecosystems. It is an initiative which can be engaged in at a range of scales (from domestic gardens to large estates of land), but the aim is to use land in less intensive ways, so that nature can colonise and coexist with other uses, to enable the flourishing of wild nature on its own terms.</p>	Context of the Marina noted.	No further action.

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General comment	Somerleyton Marina/Evolution Planning	<p>2.10 Examples of rewilding include:</p> <ul style="list-style-type: none"> •IIIProtecting, expanding and connecting ancient woodlands to enable a diverse range of wildlife to establish and disperse, and increasing carbon storage; •IIIReducing high populations of grazing animals to help trees and other vegetation grow; •IIIRemoving fishing pressure and creating proper marine protection to stop dredging and bottom trawling so that sea life can recover and flourish; •IIIRestoring wetlands and introducing beavers to boost biodiversity, store carbon and help flood prevention; •IIIBringing back missing species to plug crucial gaps in the ecosystem, and re-forge key relationships between species (for example, between predators and prey and scavengers); •IIIRemoving dams so that fish can move freely, and the forces of erosions and deposition are allowed to re-establish themselves; •IIIReconnecting rivers with floodplains, restoring their natural course to slow the flow, easing flooding and creating habitats for fish and other aquatic and wetland wildlife; •IIIConnecting up habitats and providing wildlife bridges so wildlife can move and disperse naturally, helping them adapt to climate change and build resilience.; •IIISetting aside large areas for nature so that nature can truly flourish on its own terms, maximising biodiversity, carbon storage and essential eco benefits; and •IIICreating a wildlife-friendly garden and helping wildlife move through it to help nature on a smaller scale. 	Context of the Marina noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	<p>2.11 On the Somerleyton Estate, Hugh Somerleyton has been pioneering in raising awareness of this project and has been aiming to recover nature by rewilding the lowland habitats of Norfolk and Suffolk. The project includes 400 hectares of land and began in 2016. As such, it is a large-scale project, which aims to facilitate the rewilding of lowland, mixed woodland, lakes and ponds, grassland and meadow and heathlands and shrub habitats. Key species introduced have included Exmoor Ponies, Welsh Black Cattle, Large Black Pigs, Mouflon and Water Buffalo. A key part of the rewilding project is enabling extensive grazing for these animals and natural regeneration. As such, the Estate has taken the decision to move away from intensive sheep grazing and traditional management to a rewilding approach, enabling extensive low-density cattle grazing instead. A reduction in sheep grazing was essential to allow natural processes more of a free reign on the site. More diverse, functional grazing animals were introduced to the project area to create species diversity and wood pasture habitats. In addition, some manual removal of non-native invasive species and fences was required.</p> <p>2.12 This project is part of the wider Wild East project, aimed to promote nature recovery across the region and return 20% of land to nature.</p>	Context of the Marina noted.	No further action.
General comment	Somerleyton Marina/Evolution Planning	<p>2.13 The various businesses on the Estate have been built up or created in order to provide an income that maintains Somerleyton Hall, to provide local employment and to keep local skills alive such as those needed in livestock farming and boat building. The businesses are run with a strong environmental focus.</p> <p>2.14 The ambition for the marina and boatyard is to support local boat building and local crafts and businesses. A larger marina would support the boatyard.</p> <p>2.15 The aim of the Estate is to improve the marina and boatyard so that it can:</p> <ul style="list-style-type: none"> •IIIDeliver a wider range of moorings supporting the local tourism industry; •IIISecure the long-term future of the boatyard and marina; •IIISecure local jobs in traditional marine industries; •IIIBe a catalyst for local businesses and crafts connected with the water; and •IIIEnable the replacement of the existing boatyard building on a like for like basis. 	Aspirations for the Marina noted.	No further action.
General comment	Water Management Alliance	I can confirm that we have no comments at this time.	Noted.	No further action.
General comment	Broads Society	Environmental impacts threaten the survival of businesses, including boatyards, dwellings and access by the public for recreational and well being activities. A high-level plan is required that supports the mitigation of the environmental effects with a collaborative effort between Authorities, Town and Parish Councils, Businesses and residents.	Noted. The Broads Plan is the key document for the Broads. There are also other plans and strategies that relate to the Broads Plan like the Local Plan and Sustainable Tourism Strategy for example.	No further action.
General comment	Brooms Boats	Environmental impacts threaten the survival of businesses, including boatyards, dwellings and access by the public for recreational and well being activities. A high-level plan is required that supports the mitigation of the environmental effects with a collaborative effort between Authorities, Town Councils, Businesses and residents.	Noted. The Broads Plan is the key document for the Broads. There are also other plans and strategies that relate to the Broads Plan like the Local Plan and Sustainable Tourism Strategy for example.	No further action.
Heritage	Luke Paterson	1. Restoring heritage – Dilham water mill as education centre/hostel.	Officers will contact the respondent to go and visit him.	Contact and meet respondent.
HRA	Historic England	Support.	Comment noted and will be passed on to HRA consultants.	Pass on to HRA consultants.
HRA	Norfolk Wildlife Trust	With regard to the potential impacts of air pollution on designated sites, and the criteria for screening them in to further HRA work in the next draft of the HRA, we recommend that in addition to Natural England’s AADT threshold criteria (quoted for example in HRA section 5.3.13) regarding levels of traffic, that further consideration is given to the potential for lower levels of traffic to result in a Likely Significant Effect (LSE) requiring progression to the Appropriate Assessment (AA) stage. We have recently been consulted on several cases elsewhere in the county where Natural England’s AADT threshold wouldn’t be met, but the data from APIS shows that the existing baseline emissions of nitrogen are either close to or already exceeding critical loads/levels. In such cases, the sensitivity of those designated sites are clearly far more susceptible to adverse effects from much smaller increases in emissions. Whilst we haven’t had the opportunity to review the APIS data for any of the sites in the HRA prior to submitting our comments, we would recommend as a precaution, that any sites close to or already exceeding their critical loads/levels are automatically screened in for AA regardless of the vehicle number threshold.	Comment noted and will be passed on to HRA consultants.	Pass on to HRA consultants.
LOD1	Ray Hollocks	There is no logic in transferring 10 of the existing moorings to residential as the boatyard has always had residential moorings without any restrictions.	Permission is required for residential moorings. If you wish for residential moorings at your site, you need to apply for planning permission.	No further action.
LOD1	Ray Hollocks	The SSSI site is a distance up the river and any impact from the boatyard is unlikely to have any impact so a habitats regulations assessment should not be required.	It would be for a suitably qualified HRA consultant to undertake the assessment and come to that conclusion or not. Please note that since the original policy was put in place, if the site were to be allocated, a tariff of around £180 would need to be paid per boat due to recreational impacts on protected sites. So the HRA issue is still relevant.	Continue with reference to need for HRA if site continues to be allocated.

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LOD1	Ray Hollocks	There is no restriction on boat lengths at the moment and the one third policy for using the navigable river will apply. The Vessel Dimension act 1995 restricts the beam to 3.8 meters on the Chet so this is relevant.	Under the Vessel Dimension Bylaws, 1995 vessels navigation on the Chet are restricted to 3.8m beam and 14m length (unless exempt, see byelaws for full details). Vessels larger than these dimensions may navigate on the Chet providing written permission is sought from the Authority up to 7 days in advance and on no more than 4 occasions in one year. With regards to mooring in the navigation area, the Navigation Byelaws, 1995 (part 5) sets out the full requirements. There is no reference to 'a third' in the Byelaws. Vessels mooring abreast must not extend into the channel more than 10m or a quarter of the channel, whichever is the less. Vessels must not be moored in a way which impedes the clear and free passage of any other vessel or otherwise obstruct the navigation of a waterway or channel. The byelaws do not apply outside of the Navigation area, for example in a marina.	No further action.
LOD1	Ray Hollocks	Despite much effort it has not been possible to engage Highways or Anglia Water so this should be excluded as a condition but recognize they will have an opportunity to respond upon an application.	As part of any pre-application enquiry (which is for free), we can provide contact details if you wish. AWS and Norfolk Highways are key stakeholders and their involvement in the application process is essential. If this site is to continue to be allocated, the requirement will remain. We recognise that some organisations may charge for application advice, but the policy requirements are still valid and the policy raises important considerations that need addressing.	None
LOD1	Ray Hollocks	The quay headings have been upgraded.	Noted. If the site is put forward through the call for sites, a site visit will be undertaken and it may be that such a requirement could be removed from the policy.	Check quality of quay heading if continue to allocate the site.
LOD1	Ray Hollocks	The BA does not have any authority or examples to insist on a management plan and cannot make this a condition.	There is a guide that has been adopted by the Broads Authority which will be of assistance. We consider a management plan important and so this requirement is likely to be continued. Indeed, other applicants for residential moorings have provided a management plan.	Continue with requirement for management plan.
LOD1	Ray Hollocks	Page 229 of the plan 2015 to 2036 advises that the Environment Agency would have the flood zone evaluated for the flood defence work by Summer 2021. Has this been done as part of the site that would be ideal for residential moorings is flood zone 3.	The new modelling has been delayed and could be ready in 2024 or 2025. That being said, residential moorings are in the body of water by their very nature and are deemed generally acceptable, but you will see at the end of the supporting text of the residential moorings policy, DM37, we talk about requirements for residential moorings in terms of flood risk.	Include findings of the flood risk work in later iterations of the Local Plan.
LOD1	Ray Hollocks	The Marina has just been served with enforcement notice on 2 static caravans and the justification for these are as follows together with a response. <i><note that the some other text in the representation responded to parts of the enforcement notice and these are not included as they are not relevant to the thrust of the representation which is about LOD1>.</i>	Noted. This enforcement notice is with regards to two static caravans that do not have permission. This allocation (LOD1), if continued, is for residential moorings that, even though allocated, need planning permission.	None
LOD1	Ray Hollocks	Can you please clarify why any application will not receive the same objections from the planning department as the likelihood of any residential boats are likely to not comply with these policies.	LOD1 and the residential moorings policy DM37 set out what is required for a residential moorings scheme to be permitted. If a residential mooring scheme comes in and meets those criteria, it is likely it will be permitted.	None
LOD1	Ray Hollocks	This email is sent on behalf of the property owner and the tenants <<names removed>> may have a different approach and may wish to comply with the restrictions under policy LOD1. We will have no objections if they do proceed. They wish to keep the option for 10 residential moorings and we will decide upon receiving your response.	Noted.	No further action
Minerals and Waste	Norfolk County Council	Norfolk County Council in its capacity as the Mineral Planning Authority considers that in terms of mineral planning the Issues and Options document correctly address these issues in the context of the Broads Authority Executive Area.	Support noted.	No further action
Minerals and Waste	Norfolk County Council	The Mineral Planning Authority currently has the Publication version of the Norfolk Minerals and Waste Local Plan review undergoing the Pre-submission representations period, which is available at: Norfolk County Council - Minerals and Waste Local Plan: Pre-Submission Publication (oc2.uk). Following the conclusion of this it is intended to submit the Minerals and Waste Local Plan to the Secretary of State, for the Examination in Public to take place in 2023.	Noted.	No further action
Minerals and Waste	Norfolk County Council	Norfolk County Council in its capacity as the Mineral Planning Authority welcomes the inclusion of the references to mineral planning within the Issues and Options document. In particular the reference that Norfolk County Council is the county planning authority for the Norfolk part of the Broads and that the Council's responsibilities include minerals and waste planning, is welcomed.	Support noted.	No further action
Moorings	Luke Paterson	3.The provision of extra moorings in Dilham, the Staite is quite busy and its hard to turn around when busy I would like to help address this.	Suggestion has been passed on to Waterways and Access Officer who will look into it as he works on the Integrated Access Strategy in 2023.	Pass on to Waterways and Access Officer.
Navigation	Mr K Lowes	To promote the Broads and income from tourism, more moorings need to be provided and perhaps an inquiry into the size of boats which dominate the existing ones which in effect has created a wild mooring habitat which is good to the hospitality sector as people eat and drink supplies from supermarket.	Comment noted and will be passed on to officers who work with moorings and boats.	Pass on to colleagues at the BA for consideration
Nutrient Neutrality	Luke Paterson	5.I would like to put land forward for phosphate mitigation and Biodiversity net gain (BNG).	Offer noted. Natural England have indicated a call for sites as part of their mitigation scheme in the New Year. We will keep an eye out for that and will aim to tell the respondent about it. We have got in touch with the lead on mitigation work for the Norfolk mitigation scheme about this offer and have put them in touch with the respondent.	Tell respondent when Natural England call for Sites starts. Liaise with lead for the Norfolk mitigation scheme.
Planning obligations	Norfolk County Council	Norfolk County Council's Planning Obligation Standards should be referred to in the emerging local plan.	Noted. We will cross refer to Norfolk and Suffolk Planning Obligation Standards.	Cross refer to NCC and SCC Planning Obligation Standards.

Part of document (numbers denote the question number)	Organisation	Comment	Response	Action for next version of the Local plan
Renewable energy - solar	Mrs S Lowes	Solar panels on roofs (not fields) but not in areas of natural beauty, where possible.	Noted. We will consider this comment as we work up the renewable energy policy for the Preferred Options version.	Consider position on solar.
Renewable energy - solar	Norfolk Wildlife Trust	whilst we are supportive of increased use of renewable energy given the benefits to climate change mitigation that it brings, we are also aware of the sensitive designated sites that cover much of the plan area and the need to ensure that any renewable energy allocations do not result in adverse impacts on protected habitats and species.	Comment noted.	Consider this comment as produce Preferred Options version of the Local Plan.
Residential dwellings	Ray Hollocks	We applied last time for the Berney and Beauchamp to be included for development. Can you clarify if you are just looking for sites for residential moorings or does it include land based occupation. In every discussion we have with planning they refuse any opportunity for residential on the following. 1. Flood zone 3. As mentioned in the other email both sites have had major flood defence work which has not been evaluated by EA. Will this stop any consideration of these sites. 2. All policies require development in sites that are within existing communities. Beauchamp is considered rural by planning but is in fact on a bus route and access to all amenities. The Berney is a specialised site attractive to a certain type of the community. Will these facts stop consideration at stage 1. 3. There is a policy being implemented in the Norwich Greater plan to allow 3 residential units in every village in Norfolk in order to assist rural regeneration. Beauchamp and Berney are both villages without the likelihood of other developments so would the BA apply this policy. Any development at the Beauchamp and Berney are supported by all the objectives of the 1988 Broads Act and the majority of the policies under the planning Policy 2015 to 2036. If you can give us answers that any application for inclusion in suitable sites will be considered despite the Planning Departments use of irrespective policies to deny a fair application.	If you wish to put these sites in for consideration then that is up to you. Their location has not changed, so they may not be supported. In terms of flood risk, the approach taken in planning is to consider the flood risk without flood defences. In terms of access to facilities, the call for sites asks questions about this, so if you wish to put the sites in for consideration, you can put your thoughts in to answer that question. And in terms of what GNLP does, they are a different local planning authority and may have the need and justification to take certain approaches although the two sites in question are not located in villages. We are not aware of the 3 dwelling approach by the GNLP - we are aware of the South Norfolk Council Village Clusters Local Plan.	No further action.
Residential Moorings	Ray Hollocks	Is it still the case that the BA have to have the 63 residential moorings to exclude it from any Government imposed housing demands.	We need to address the need for residential moorings. As per the Issues and Options document, the need is not for 63, it is for 48 residential moorings. Our Call for Sites was also for residential moorings.	No further action.
SA	East Suffolk Council	Overall, East Suffolk Council welcomes the Sustainability Appraisal and considers it to provide clear and comprehensive consideration of the key Sustainability issues affecting the Broads Authority area.	Support noted.	No further action.
SA	East Suffolk Council	The baseline chapter acts as a comprehensive overview of the existing environmental, economic and social characteristics of the area. We welcome acknowledgement of the emerging Census data and commitment to reflecting the latest data releases in future SA work. As per our comments on the SA Scoping report, there may be value in clarifying that where 2011 census data has been used this refers to 'Waveney' which no longer exists as a local authority. While overall the baseline is considered comprehensive, the Broads Authority may want to consider expanding the data in relation to health. Currently the health topic is only covered with self-reported health status which means this does not provide a sufficient evidence base for identifying key health challenges.	Comments and suggestions noted. We will consider these as we produce the Preferred Options SA.	Consider this comment as produce Preferred Options version of the Local Plan.
SA	East Suffolk Council	We have reviewed the Literature Review and consider that there may be value in reviewing the following additional documents in future iterations of the SA: •III East Suffolk Sustainable Construction SPD; •III East Suffolk Cycling and Walking Strategy; •III Building for a Healthy Life (https://www.designforhomes.org/project/building-for-life/) •III Suffolk Design: Streets Guide (https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/)	We will review these documents as we produce the Preferred Options SA.	Review these documents.
SA	East Suffolk Council	East Suffolk Council consider that the Sustainability Objectives reflect the identified characteristics, baseline data, and SWOT analysis set out in the Issues and Options document. We welcome the amendments made in response to our comments on the Scoping Report. Within the specific wording of the objectives, we have the following suggestions: •II ENV3- consider adding specific reference to habitat restoration and creation •II ENV11- consider adding specific reference Dark Skies as part of the objective, although we note and welcome that it forms part of the decision making criteria against a number of the objectives •II SOC1- as per comment above, this objective could benefit from more baseline data in relation to health	Comments and suggestions noted. We will consider these as we produce the Preferred Options SA.	Consider this comment as produce Preferred Options version of the Local Plan.
SA	East Suffolk Council	Subject to the comments above, East Suffolk Council consider that the Sustainability Framework in Appendix 4 represents an appropriate mechanism for assessing the Plan against the identified SA objectives. Against the specific wording of the criteria, we have the following suggestions/ comments: •II ENV5 o consider adding criteria/ question relating to solar shade/solar gain and mitigating/adapting to overheating o consider adding adaptable and flexible design of buildings o Consider adding support for nature based solutions over hardscape (SuDS, attenuation, screening, etc.), where relevant •II ENV10 o ENV10 is worded slightly differently in the appendix to the main body (p. 6) o Consider adding criteria in relation to the efficient use of land in sustainable locations for higher density development o Consider adding criteria in relation housing design that promotes good space standards	Comments and suggestions noted. We will consider these as we produce the Preferred Options SA.	Consider this comment as produce Preferred Options version of the Local Plan.
SA	Historic England	Support.	Support noted.	No further action

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Saline incursion	Mr K Lowes	Rivers are being affected by saline incursions. We are losing fish and the tourist fisherman that support the local economy i.e. hotels. Pubs, restaurants, holiday lets. It needs sorting.	We are aware of the saline incursion as a result of salt surges and low river flows. In a way this has always happened in the Broads, however with climate change these effects are expected to worsen. Apart for the general actions to combat climate change, the Broadland Futures Initiative are now working to agree a framework for future flood risk management that better copes with our changing climate and rising sea level. The focus will be on what happens from the mid-2020s onwards, and we need to start planning now to secure support and make well-informed decisions. We are working with farmers and land managers to talk about land subsidence and the impact of excessive land drainage on the whole ecosystem of the Broads. We have in the past few weeks hosted two presentations and discussions at our partnership meetings the Broads Angling Services Group. We provide support to salinity monitoring network in the Broads by purchase of new monitoring equipment. The Broads Authority is also working with the Environment Agency to look at a salinity model to understand how different water and land management options may affect the salt levels in the Broads rivers system. The Broads Authority rangers support the Environment Agency with fish rescues as required.	No further action for Local Plan.
Site	Brooms Boats	Wish for site to be updated and improved. CALL FOR SITE FORM NOT FILLED OUT	Respondent's wishes for the sites noted. We will arrange to meet the site promoter and talk through their plans.	Meet site promoter
Site	Brundall Gardens	Wish for site to be updated and improved. CALL FOR SITE FORM FILLED OUT	Respondent's wishes for the sites noted. We will look into the proposals and arrange to meet the site promoter and talk through their plans.	Meet site promoter
Site	Principal Planning/Crown Point Estate	This submission promotes a location on Whitlingham Lane as a site that would benefit from an allocation under the Sites Allocated for Change approach for Class E. CALL FOR SITE FORM NOT FILLED OUT	Respondent's wishes for the sites noted. We will look into the proposals and arrange to meet the site promoter and talk through their plans.	Meet site promoter
Site	Somerleyton Marina/Evolution Planning	3.1A possible improvement to is to create a new marina basin to the south of the existing basin. The access point would be through the existing marina bank southwards into an area of reed bed to the south of the existing basin. An access into the new basin from the existing marina avoids the need to have a new access directly into the River Waveney, and disruption to boat traffic. 3.2Subject to the findings of an ecological appraisal which is underway the loss of reed bed could be compensated for with the creation of new reed bed or by the improvement of existing reed beds on the Estate. The Estate has 32 hectares of reed bed and has already been involved in the creation of reed bed elsewhere on its land. The new reed bed, and other biodiversity measures, could be designed to ensure that there is no loss of biodiversity. 3.3The existing boatyard building is nearing the end of its useful life and will require investment in order to sustain the yard for the long term. A new building would be sustained by a greater range of boats. The Estate would like to see the building supporting small local businesses connected with the water and local crafts. The key to achieving this is a thriving marina. The existing boatyard building would be replaced on a like for like basis and would be provided with better facilities. This way there would be no visual impact from the replacement. 3.4The expansion of the marina will help develop a more diverse range of moorings including short term moorings to meet the local demand identified in the Broads Local Plan. The Estate would like to develop the 10 residential moorings allocated in the current Local Plan in the next few years in order to generate income to support the improvement of the marina and boatyard. CALL FOR SITE FORM FILLED OUT FOR RESIDENTIAL MOORINGS. CALL FOR SITES FORM FOR THE REST OF THE SITE NOT FILLED OUT.	Respondent's wishes for the sites noted. We will look into the proposals and arrange to meet the site promoter and talk through their plans.	Meet site promoter
Site	Walsingham Planning/Greene King Brewing	We write with reference to their landholding on Station Road, Hoveton and to confirm Green King's support for identification of the site as a redevelopment plot/ site allocated for change within the emerging plan. CALL FOR SITE FORM FILLED OUT	Respondent's wishes for the sites noted. We will look into the proposals and arrange to meet the site promoter and talk through their plans.	Meet site promoter
SP5	Historic England	We support the current strategic level policy which seeks to protect and enhance the historic environment. We welcome the reference within the policy itself to setting, archaeology, waterlogged heritage, and heritage at risk. We are also welcome the term historic environment being used. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage, and both designated and non-designated heritage assets.	Noted	No further action.
Table 7, page 77	Wroxham Parish Council	Wroxham doesn't have any shops or pubs in the BA boundary. There is only a florist and a garage in Wroxham (BDC) and no pubs.	Noted, but there are shops over the river in Hoveton. This is about access to shops and facilities regardless of what town or village they are in.	No further action.
Transport	Mrs S Lowes	Due to increase in traffic on rural roads, many deer have been run over due to their habitat being lost.	Comments noted. Will be passed on to Norfolk County Council contact as they are the Highways Authority.	Pass on to Norfolk County Council
Transport	Mrs S Lowes	In PH, we have tourists who will not remain in Herbert Woods yard because of the traffic noise!	Comments noted. Will be passed on to Norfolk County Council contact as they are the Highways Authority.	Pass on to Norfolk County Council
Transport	Mrs S Lowes	PH was a quiet village but traffic has dramatically increased and speeding is a problem with through traffic. Traffic calming is a necessity.	Comments noted. Will be passed on to Norfolk County Council contact as they are the Highways Authority.	Pass on to Norfolk County Council
Transport	Norfolk County Council	The County Council will need to be consulted on the sites submitted through the call for sites process in due course.	Noted and yes, we will consult you.	Consult Norfolk and Suffolk Highways on sites.
Transport	Norfolk County Council	The Local Plan transport policy should reference the County Council's Local Transport Plan 4.	Noted and we will do.	Refer to Norfolk and Suffolk Local Transport Plans.

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Water	Mrs S Lowes	Less homes – less water use!	Noted. Although we do need to provide homes for the communities. We currently require homes to be designed to 110l/h/d water use and are looking at a lower level than this.	No further action other than look into the potential for water use of less than 110l/h/d.
Your part	Mr K Lowes	In terms of ‘your part of the Broads’, I expect to see a gradual increase in house building. I expect villages to fill in the spaces between then and I expect the Broadlands villages will lose their appeal to tourists. I expect the whole of Norfolk to develop and eventually eat itself to its detriment. The more concrete you put down, the less the water has anywhere to go. See the marsh behind Herbert Woods.	Noted. The Local Plan will address surface water. Our Enforcement Officer was made aware of the marsh behind Herbert Woods. Generally, local plan policies seek to maintain the gaps between settlements. There is a need for housing, so yes, there will be more housing over the coming years and beyond.	No further action.

Planning Committee

03 March 2023

Agenda item number 11

Local Plan- Preferred Options- bitesize pieces

Report by Planning Policy Officer

Summary

This report introduces some new or amended policies that are proposed to form part of the Preferred Options version of the Local Plan. The policies are relating to Ditchingham Dam, Recreational Parking Facilities, Ormesby St Michael, Fleggburgh, Thurne, Horning, St Olaves, and Hoveton.

Recommendation

Members' comments on the policies are requested.

1. Introduction

- 1.1. Members have seen bite size pieces of the Issues and Options version of the Local Plan. The production stages of the Issues and Options are now complete and work has begun on the Preferred Options version, which will contain proposed policies. This will also be presented in bite size pieces.
- 1.2. This report introduces some amended or new policies for Members to consider for inclusion in the Preferred Options version of the Local Plan.
- 1.3. It is important to note that until such time as the Local Plan is adopted, our current policies are still in place and will be used to guide and determine planning applications.
- 1.4. Members' comments are requested on the policies and amendments. The policies considered in this report at this Planning Committee are relating to Ditchingham Dam, Recreational Parking Facilities, Ormesby St Michael, Fleggburgh, Thurne, Horning, St Olaves, and Hoveton.

Author: Natalie Beal

Date of report: 22 March 2023

Appendix 1 – Draft Ditchingham Dam policies

Appendix 2 – Draft Recreation Facilities Parking Areas policy (DM24)

Appendix 3 – Draft Ormesby St Michael policy

Appendix 4 – Draft Fleggburgh policy

Appendix 5 – Draft Thurne policy

Appendix 6 – Draft Horning Car Parking policy

Appendix 7 – Draft Horning Open Space policy

Appendix 8 – Draft St Olaves policy

Appendix 9 – Draft Hoveton Station Road Car Park policy



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
March 2023**

Sites Specifics – Ditchingham Dam

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy PODIT1: Maltings Meadow Sports Ground, Ditchingham

Policy Map x - https://www.broads-authority.gov.uk/_data/assets/pdf_file/0032/259259/7.-DITCHINGHAM-DAM.pdf

1. The continued use of the area for sports facilities will be supported.
2. Any proposal to improve existing and provide new facilities will be supported if:
 - a) It retains the general character of openness of the area;
 - b) It avoids unacceptable impacts on neighbouring occupiers;
 - c) Particular care is taken to consider the landscape impacts of fencing, lighting columns and other structures;
 - d) It is of a high standard of design, materials and landscaping;
 - e) Steps are taken to reduce existing light pollution ~~where possible~~;
 - f) New lighting installations are fully justified and designed so they do not contribute to light pollution;
 - ~~g) New lighting installations do not contribute to light pollution;~~
 - h) It manages flood risk on the site and does not increase flood risk elsewhere;
 - i) Appropriate steps are taken to promote walking and cycling to the sites (see later about travel plan); and
 - ~~j) Any demand for additional car parking is addressed.~~ Any proposals for additional car parking are thoroughly justified. These will be considered in light of how the proposed scheme meets criterion i on walking and cycling.

- 21 3. Any development permitted here would be subject to a condition requiring the production and
22 implementation of a robust travel plan for the entire site.
- 23 4. Any 'assembly and leisure' uses which are otherwise acceptable under this policy will be
24 restricted to those parts of the site demonstrated to have a lower than 1-in-20-year return
25 flood risk.
- 26 5. The site lies on a safeguarded mineral resource (sand and gravel) and any development
27 proposals will need to address this (see Norfolk County Council's Core Strategy Policy CS16 -
28 Safeguarding mineral and waste sites and mineral resources).

29 Constraints and features

- 30 • Risk of flooding (almost wholly zone 3 by EA mapping; zones 1, 2, 3a & modelled 3b by SFRA
31 2017 mapping).
- 32 • Minerals (sand and gravel) safeguarding area.
- 33 • Contains cropmarks of enclosures and a field system. Prehistoric, Roman, medieval and post
34 objects have been recovered from or immediately adjacent to the site. A Roman settlement is
35 known to have existed less than 500m away to the southwest.

36 Reasoned Justification

37 The site provides valuable sports and recreation facilities for a wider area. The policy is intended to
38 support the continuation of this, while ensuring the interests of the landscape, neighbour amenity,
39 and flood risk are appropriately addressed.

40 This policy is intended to provide clarity and consistency in the approach to future development of
41 the area, and in particular to stress the importance of the landscape sensitivity of this area of
42 floodplain and grazing marshes, and potential impacts on neighbours' amenity.

43 The Authority is aware of the management committee's aspirations to improve the layout of the
44 venue and provide further sport and recreation facilities, both indoors and outdoors. This policy
45 generally supports appropriate improvements to the facility that would benefit the health and
46 wellbeing of the community, as well as appropriate amendments to enable greater and improved
47 social use of the site.

48 On the issue of transport and access to the venue, the requirement of the policy for a robust,
49 deliverable travel plan will assist the venue to accommodate demand for parking, especially at peak
50 times. [Further, the policy requires improvements for walking and cycling.](#) The aim is to seek modal
51 shift away from single occupancy car use, reducing the demand for car parking spaces. The travel
52 plan needs to address the use of the entire site.

53 The Bungay and Ditchingham area is one of the darkest areas of the Broads. As part of any
54 proposals, there may be opportunities to address current external lighting. New lighting proposals
55 ~~should~~ [will need to](#) be line with Policy **PODMXX** on light pollution.

56 Restrictions on the location of any 'assembly and leisure' uses are made on the advice of the
57 Environment Agency and in furtherance of national policy on flood risk. This recognises that these
58 uses are not appropriate in those parts of the site at a higher degree of risk where outdoor sports
59 and recreation, and essential facilities such as changing rooms, may be located.

60 **Reasonable alternative options**

- 61 a) The original policy, with no amendments.
- 62 b) An alternative option could be to have no specific policy relating to Maltings Meadow Sports
- 63 Ground; any application would be considered using existing policies. To not have a policy is
- 64 considered a reasonable alternative option in this instance as the various criteria listed are
- 65 addressed in other policies.

66 **Sustainability appraisal summary**

67 The three options (of the original policy, no policy and amended policy) have been assessed in the

68 SA. The following is a summary.

A: Keep original policy	9 positives. 0 negatives. 0 ? Overall, positive.
B: No policy	0 positives. 0 negatives. 9 ?
C: Preferred Option - amend policy.	9 positives. 0 negatives. 0 ? Overall, positive.

69 **How has the existing policy been used since adoption in May 2019?**

70 According to recent Annual Monitoring Reports, the policy has not been.

71 **Why have the alternative options been discounted?**

72 Maltings Meadow Sports Ground; is important to the health and wellbeing of the local community,

73 but is also in an area with some constraints to consider. The amendments to the original policy

74 fundamentally reinforce the location of this popular attraction – being in an edge of settlement

75 area, drawing in people who tend to use their cars. The preferred policy is favoured as it

76 emphasises the importance of dark skies and walking and cycling. Not to have a policy was

77 discounted because this is a unique and successful facility in the Broads, so by setting out the key

78 considerations, the policy supports appropriate change at the site.

79 **UN Sustainable Development Goals check**

80 This policy meets these [UN SD Goals](#):

3 GOOD HEALTH
AND WELL-BEING



Policy PODIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck

Policy map 7

1. The areas defined on the policies maps (including Alma Beck) shall be protected as open space and habitat area.
2. The area allocated as open space will be kept open because of its contribution to amenity, townscape and recreation, as well as providing an important pedestrian link from Ditchingham Dam through the site to the crossing of the A143 into Ditchingham.
3. The habitat area will be conserved and enhanced for its contribution to the landscape, its wildlife and its openness.

Constraints and features

- New development nearby (Ditchingham Maltings).
- Path runs through open space.
- Alma Beck is an IDB drain.
- Habitat area and open space on site.
- Beck and surrounding area classed as mostly 2 and some 3a and modelled 3b flood zones – SFRA 2017.

Reasoned justification

The habitat and open space areas were provided as part of the Ditchingham Maltings major development, completed in 2016. Both areas contribute to the character of the area, with the open space providing informal recreation space for residents and visitors. The open space is also an important pedestrian link through the site, linking Ditchingham Dam to Ditchingham and its services and facilities.

The habitat area benefits wildlife on the site by retaining, enhancing and creating habitats and maintaining favourable conservation status of bat species. Much of this habitat area falls outside of the Broads Authority Executive Area, and South Norfolk District Council has been contacted about allocating the remaining habitat areas in their future Local Plan.

Alma Beck forms part of the open space and habitat area allocation because of its contribution to the amenity, recreation and biodiversity value of the area. It is an Internal Drainage Board drain, maintained for its drainage function and enhanced for its importance to wildlife.

Reasonable alternative options

No alternatives considered as this site is an important part of the Ditchingham Maltings development with site specific considerations.

Sustainability appraisal summary

The policy has been assessed in the SA. The following is a summary.

A: Keep original policy	6 positives. 0 negatives. 0 ? Overall, positive.
-------------------------	---

How has the existing policy been used since adoption in May 2019?

116 According to recent Annual Monitoring Reports, the policy has not been used.

117 **Why have the alternative options been discounted?**

118 No alternatives considered as this site is an important part of the Ditchingham Maltings
119 development with site specific considerations.

120 **UN Sustainable Development Goals check**

121 This policy meets these [UN SD Goals](#):



122 **Reasonable alternative options**

The policy is not proposed to be amended. Given the importance of the area, to not have a policy is not seen as a reasonable alternative.

No reasonable alternative options.

123 **Sustainability appraisal summary**

124 The policy has been assessed in the SA. The following is a summary.

A: Original policy	6 positives. 0 negatives. 0 ? Overall, positive.
--------------------	---

125 **How has the existing policy been used since adoption in May 2019?**

126 According to recent Annual Monitoring Reports, the policy has not been used.

Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

Policy DIT1: Maltings Meadow Sports Ground, Ditchingham

		A: No specific policy.	B: Keep original policy	C: Preferred Option - amend policy to improve reference to light pollution and walking and cycling
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. With the sports centre being asset to the community in the Broads it seems prudent to have a policy.	+ Walking and cycling and car parking are addressed in the policy.	+ Walking and cycling and car parking are addressed in the policy. This wording is stronger than the original policy.
ENV2				
ENV3	?		+ Policy requires protection of designated nature site.	+ Policy requires protection of designated nature site.
ENV4	?		+ Policy refers to landscape.	+ Policy refers to landscape.
ENV5				
ENV6	?		+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV7				
ENV8				
ENV9				
ENV10	?		+ Policy requires good design.	+ Policy requires good design.
ENV11	?		+ Policy refers to light pollution.	+ Policy refers to light pollution. This wording is stronger than the original policy.
ENV12				
SOC1	?		+ The sports centre helps with active lifestyles.	+ The sports centre helps with active lifestyles.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6	?		+ Access by walking and cycling is referred to in the policy.	+ Access by walking and cycling is referred to in the policy.
SOC7	?		+ The venue has facilities that can be used by various groups in the community.	+ The venue has facilities that can be used by various groups in the community.
ECO1				
ECO2				
ECO3				

Policy PODIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck

There are no reasonable alternatives identified at this stage.

A: Keep original policy		
ENV1	+	There is a path through the site.
ENV2	+	Alma Beck is a waterbody and generally the policy seeks protection of this area.
ENV3	+	By protecting and enhancing the area, biodiversity will benefit.
ENV4	+	The area adds to the character of the site.
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10		
ENV11		
ENV12		
SOC1	+	The space could bring benefits to physical and mental wellbeing.
SOC2		
SOC3		
SOC4		
SOC5		
SOC6	+	The route acts as a link through the site.
SOC7		
ECO1		
ECO2		
ECO3		



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Policy PODM24: Recreation facilities parking areas

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy PODM24: Recreation facilities parking areas

Proposals for recreational facilities are required to consider how users will access these facilities, with access by public transport, walking and cycling being preferred where practicable.

If these recreation facilities are to be accessed by vehicles or bicycles, consideration needs to be given to where these vehicles, trailers and bicycles can be safely parked.

Limited provision for parking of cars (including trailers) and bicycles to enable use of the facility will be supported, if proposals adequately address the following:

- i) Recreation facility is readily accessible from the parking area;
- ii) The parking area is of an appropriate and commensurate size for the facility it serves;
- iii) High quality design of surface, landscaping and boundary treatments including to address management of water (run off and avoiding pollution);
- iv) Safe access and visibility into and out of the parking area can be achieved;
- v) Impact on designated habitats and priority species;
- vi) Impact on the local landscape
- vii) Provide biodiversity enhancements if appropriate to do so;
- viii) The provision of litter bins; and

ix) Protect dark skies.

The Authority would expect an appropriate provision of disabled parking spaces.

Reasoned Justification

In line with sustainable tourism policies, facilities should be located where they can be accessed by walking, cycling or public transport.

To improve facilities providing tourism and access benefits, in some cases provision of parking facilities is essential and in others desirable. For example, canoes and boats tend to be transported to slipways by a motor vehicle, so the canoeist/boater needs somewhere to leave their vehicle and trailer. Equally, the provision of a new facility like a footpath (such as the Wherryman's Way) may result in increased car use by people wanting to get to the path, as bus services may not drop off near to the access point.

Proposals are required to consider how users will access the facility and consequently where modes of transport will be parked. When deciding on the location of a recreation facility, its accessibility by public transport, cycling and walking is a key consideration. If a car needs to be used, opportunities for using existing parking in the vicinity of the facility, with the agreement of the landowner, should be explored.

Parking areas will need to be designed in a way that is acceptable in the Broads. Of relevance are the policies on landscaping and design (Policy DMxx), the policy on biodiversity enhancements (DMXX) and the policy on light pollution (policy DMxx) as the areas to which this policy may apply could generally be in more rural areas. They also do not need to be immediately by the particular attraction - a short walk from the car park to the access point is acceptable. Parking areas will need to meet the safety requirements of the Local Highways Authority. Further, to reduce impact on the area, litter bins should be provided and subsequently arrangements made for emptying.

It is not intended that parking standards relating to development such as employment or residential land uses are addressed through this policy approach - this section relates more to the location and design of car parking related to slipways and footpaths for example. The parking design standards of Suffolk and Norfolk County Councils and any district standards remain in place.

The Authority expects proposals to include an appropriate number of disabled parking spaces. The policy does not set a standard or threshold for this requirement; it will be for the applicant to consider and justify their approach. The design of the disabled spaces will need to follow best practice.

Reasonable alternative options

- a) The original policy, with no amendments.
- b) No policy

Sustainability appraisal summary

56 The three options (of the amended policy, no policy and the original policy) have been
57 assessed in the SA. The following is a summary.

A: Keep original policy	4 positives. 0 negatives. 0 ? Overall, positive.
B: Preferred Option - amend policy.	5 positives. 0 negatives. 0 ? Overall, positive.
C: No policy	0 positives. 0 negatives. 5 ? Overall, positive.

58 **How has the existing policy been used since adoption in May 2019?**

59 According to recent Annual Monitoring Reports, the policy has been used and schemes have
60 been in conformity with the policy.

61 **Why have the alternative options been discounted?**

62 The amendments to the original policy clarify include biodiversity enhancements which is
63 favoured.

64 **UN Sustainable Development Goals check**

65 This policy meets these [UN SD Goals](#):

66 None identified.

Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

	A: Keep original policy		B: Preferred Option - amend policy		C: No policy
ENV1	+	The policy refers to parking for various modes of transport.	+	The policy refers to parking for various modes of transport.	?
ENV2					
ENV3			+	The policy refers to biodiversity enhancements.	?
ENV4	+	The policy refers to landscaping.	+	The policy refers to landscaping.	?
ENV5					
ENV6					
ENV7					
ENV8					
ENV9					
ENV10					
ENV11	+	The policy refers to dark skies.	+	The policy refers to dark skies.	?
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					
ECO2					
ECO3	+	The policy relates to attractions in the area such as footpaths and slipways.	+	The policy relates to attractions in the area such as footpaths and slipways.	?

Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.



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Sites Specifics - ORMESBY ST. MICHAEL

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy POORM1: Ormesby waterworks

Policy Map x - https://www.broads-authority.gov.uk/_data/assets/pdf_file/0029/259265/13.-ORMESBY-ST-MICHAEL.pdf

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

Constraints and features

- Site adjacent to and slightly overlapping with, SAC and SSSI.
- Flood risk - zones 1, 2 & 3 by EA mapping and similar for SFRA 2017 mapping, although indicative 3b
- [Dark sky zone 2](#)

21 **Reasoned Justification**

22 Ormesby Waterworks, run by Essex & Suffolk Water, provides the public water supply for a large
23 area around Great Yarmouth. The company is also involved in improvements to water quality in
24 the Trinity Broads as part of the Trinity Broads Partnership.

25 The policy is intended to encourage the continuing maintenance and upgrading of the works, while
26 making sure the sensitivities of the area are fully addressed in any development.

27 Proposals will need to meet the requirements of policy **DM22** as the Trinity Broads generally has
28 very good dark skies.

29 **Reasonable alternative options**

30 a) The original policy, with no amendments.

31 Given the importance of waterworks, not to have a policy is seen as an unreasonable alternative.

32 **Sustainability appraisal summary**

33 The two options (of the amended policy and the original policy) have been assessed in the SA. The
34 following is a summary.

A: Keep original policy	6 positives. 0 negatives. 0 ? Overall, positive.
B: Preferred Option - amend policy.	6 positives. 0 negatives. 0 ? Overall, positive.

35 **How has the existing policy been used since adoption in May 2019?**

36 According to recent Annual Monitoring Reports, the policy has not been used.

37 **Why have the alternative options been discounted?**

38 The amendments to the original policy emphasise the importance of addressing light pollution – it
39 strengthens the policy in this regard. Given the rural nature of the area, the impact of light pollution
40 can be significant.

41 **UN Sustainable Development Goals check**

42 This policy meets these [UN SD Goals](#):



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

	A: Keep original policy		B: Preferred Option - amend policy	
ENV1				
ENV2	+	Fundamentally, the policy relates to the waterworks.	+	Fundamentally, the policy relates to the waterworks.
ENV3	+	The policy refers specifically to protected sites.	+	The policy refers specifically to protected sites.
ENV4	+	The policy refers specifically to visual impact.	+	The policy refers specifically to visual impact.
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10	+	The policy refers specifically to visual impact.	+	The policy refers specifically to visual impact.
ENV11	+	The policy refers specifically to light pollution	+	Policy includes a stronger criterion on light pollution.
ENV12				
SOC1				
SOC2				
SOC3				
SOC4	+	Water availability is important to consider in terms of meeting housing needs.	+	Water availability is important to consider in terms of meeting housing needs.
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				



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Sites Specifics – Fleggburgh

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy POFLE1: Broadland Sports Club

Policy map x https://www.broads-authority.gov.uk/_data/assets/pdf_file/0024/259260/8.-FLEGGBURGH.pdf

1. The continued use of the area for sports facilities will be supported.
2. Any proposal to improve and provide new facilities will be supported if:
 - i) It is of high standards of design, materials and landscaping;
 - ii) Steps are taken to reduce existing light pollution ~~where possible~~;
 - iii) New lighting installations are fully justified and designed so they do not contribute to light pollution;
 - iv) It manages flood risk on the site and does not increase flood risk elsewhere;
 - v) It avoids adversely impacting designated nature sites;
 - vi) Access to the site by walking and cycling is improved and promoted; and
 - ~~vii) Any demand for additional car parking is addressed.~~ Any proposals for additional car parking are thoroughly justified. These will be considered in light of how the proposed scheme meets criterion vi on walking and cycling.
3. Any development permitted here would be subject to a condition requiring the production and implementation of a robust travel plan for the entire site.

Constraints and features

- Part in flood zone 2 and 3 (EA mapping), 2 and indicative 3b (SFRA 2017)

- Adjacent to the Trinity Broads SSSI and the Broads SAC
- Contains cropmarks of a ditch and bank.

Reasoned Justification

The Authority supports the continued use of the Sports Club to reflect the benefits it provides to health and wellbeing of the community. The Authority is aware of Club's aspirations to improve the venue and raise the standard of its facilities to be a regionally important area for racquet sports, and to improve the swimming pool provision and storage to expand the exercise offer.

The venue is subject to some constraints such as flood risk and proximity to a Site of Special Scientific Interest. Broadland Sports Club is also fairly remote from significant areas of population and attracts people from as far away as Winterton on Sea. These will be important considerations for future proposals.

On the issue of transport and access to the venue, the requirement of the policy for a robust, deliverable travel plan will assist the venue in accommodating demand for parking, especially at peak times. Further, the policy requires improvements for walking and cycling. The aim is to shift away from single occupancy car use, reducing the demand for car parking spaces. Such a travel plan needs to address the usage of the entire site.

The Trinity Broads area is one of the darkest areas of the Broads. As part of any proposals there may be opportunities to address current external lighting. New lighting proposals ~~should~~ will need to be line with Policy **PODMXX** on light pollution.

It is important to be aware that the **Fleggburgh Neighbourhood Plan** was 'made' in July 2022 and is part of the Development Plan and the policies it contains may be of relevance to proposals for the Broadland Sports Club.

Reasonable alternative options

- The original policy, with no amendments.
- An alternative option could be to have no specific policy relating to Broadland Sports Club; any application would be considered using existing policies. To not have a policy is considered a reasonable alternative option in this instance as the various criteria listed are addressed in other policies.

Sustainability appraisal summary

The three options (of the amended policy, the original policy and no policy) have been assessed in the SA. The following is a summary.

A: No policy	0 positives. 0 negatives. 9 ? Overall, positive.
B: Keep original policy	9 positives. 0 negatives. 0 ? Overall, positive.
C: Preferred Option - amend policy.	9 positives. 0 negatives. 0 ? Overall, positive.

How has the existing policy been used since adoption in May 2019?

53 According to recent Annual Monitoring Reports, the policy has been used and applications have
54 been determined in accordance with the policy.

55 **Why has the alternative option been discounted?**

56 Broadland Sports Club is important to the health and wellbeing of the local community, but is also
57 in an area with some constraints to consider. The amendments to the original policy fundamentally
58 reinforce the location of this popular attraction – being in an edge of settlement area, drawing in
59 people who tend to use their cars. The preferred policy is favoured as it emphasises the importance
60 of dark skies and walking and cycling. Not to have a policy was discounted because this is a unique
61 and successful facility in the Broads, so by setting out the key considerations, the policy supports
62 appropriate change at the site

Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

Assessment of policy

		A: No specific policy.	B: Keep original policy	C: Preferred Option - amend policy to improve reference to light pollution and walking and cycling
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. With the sports centre being asset to the community in the Broads it seems prudent to have a policy.	+ Walking and cycling and car parking are addressed in the policy.	+ Walking and cycling and car parking are addressed in the policy. This wording is stronger than the original policy.
ENV2				
ENV3	?		+ Policy requires protection of designated nature site.	+ Policy requires protection of designated nature site.
ENV4	?		+ Policy refers to landscape.	+ Policy refers to landscape.
ENV5				
ENV6	?		+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV7				
ENV8				
ENV9				
ENV10	?		+ Policy requires good design.	+ Policy requires good design.
ENV11	?		+ Policy refers to light pollution.	+ Policy refers to light pollution. This wording is stronger than the original policy.
ENV12				
SOC1	?		+ The sports centre helps with active lifestyles.	+ The sports centre helps with active lifestyles.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6	?		+ Access by walking and cycling is referred to in the policy.	+ Access by walking and cycling is referred to in the policy.
SOC7	?		+ The venue has facilities that can be used by various groups in the community.	+ The venue has facilities that can be used by various groups in the community.
ECO1				
ECO2				
ECO3				



Local Plan for the Broads - Review
Preferred Options bitesize pieces
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THURNE

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy POTHU1: Tourism development at Hedera House, Thurne

Policy Map https://www.broads-authority.gov.uk/_data/assets/pdf_file/0027/259272/20.-THURNE.pdf

1. Land at Hedera House is allocated for tourism uses, with a proportionate amount of general market housing as enabling development. Development proposals on this site shall provide the following:
 - ~~i) The majority of the site to be retained in holiday accommodation available as short stay lets;~~
 - ii) The proportion of the site to be developed for general market housing shall be only that required to deliver satisfactory redevelopment, renovation or upgrading of the existing holiday accommodation. This shall be demonstrated to the satisfaction of the Broads Authority, in a viability assessment of the proposed development which shall be prepared by an independent chartered surveyor;
 - iii) A layout, form and design which strengthens the rural character of the village and its location in a National Park equivalent area, and which reinforce local distinctiveness and landscape character and take into consideration the setting and significance of nearby listed buildings and is in conformity with the Design Guide (or successor document);
 - iv) Retention of mature hedgerows and provision of suitable boundary landscaping and areas of open space to retain a spacious and 'green' approach within the site appropriate for a rural village;
 - v) Demonstration 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;
- vi) Evidence, including a site flood risk assessment, to confirm that any development will be consistent with national and local policy in terms of both on-site and off-site flood risk;
 - vii) Protection of the amenity of nearby residents;
 - viii) Adequate vehicular access compatible with the above criteria;
 - ix) The scheme addresses light pollution (in line with policy xx);
 - x) The scheme provides biodiversity net gain (in line with policy xx) and mitigates recreation impacts (through the GI RAMS tariff or equivalent mitigation); and
 - xi) Proposals must ensure no adverse effects on the conservation objectives and qualifying features of the nearby SSSI.
2. The inclusion of ancillary facilities (for example, the retention of the swimming pool and/or games room) for the benefit of visitors or residents would be welcomed, subject to it not compromising the provision of a suitable scheme.
3. Project Level Habitats Regulation Assessments will be needed to assess implications on sensitive European Sites. Measures to mitigate for the effects of new growth may be required, ~~such as the provision of good quality on-site green infrastructure to mitigate for recreational disturbance.~~

Constraints and features

- EA mapping Flood Risk Zone 2 and 3. SFRA 2017 mapping shows part is 2 and indicative 3b.
- Riverside pub nearby.
- SAC, SPA, Ramsar site to the north of the Staithe. Shallam Dyke Marshes SSSI is a component SSSI of Broadland SPA and Ramsar site and The Broads SAC.
- A low-density site with boundary hedges, specimen trees and high levels of planting.
- Ludham-Walton Hall Water Recycling Centre capacity issues.
- Nearby Grade II* Listed Windpumps: Thurne Dyke Windpump and St Benet's Level Windpump.
- Potential for previously unrecorded heritage assets. Within area of medieval and post medieval village (as shown by Faden's 1797 map). Cropmarks of enclosures, trackways and field boundaries to the north. Close to eastern end of medieval/post medieval staithe. Medieval church about 160m to the southeast.
- Within a GI RAMS charging area
- Area has good to very good dark skies

Reasoned justification

The site received outline planning permission in 2017 and then reserved matters in 2020, but at the time of writing has not been completed. The site has planning permission 16 dwellings; 6 market dwellings and 10 holiday homes.

Thurne is an attractive settlement in the Broads, centrally located and easy to access from the water, and as such is very popular with visitors. Tourism is an important part of the local economy and existing visitor facilities should be protected and enhanced.

Within the centre of the village, there ~~is~~ was a holiday complex (Hedera House), comprising 11 detached bungalows and a 7-bedroomed house, ~~which are all used for holiday hire, plus a heated~~

63 ~~swimming pool and games room for the use of guests.~~ The properties ~~are~~ were run down and ~~do~~
64 did not meet modern standards for holiday accommodation, and the holiday use of the site was
65 increasingly unviable. As such, a policy to enable appropriate redevelopment of the site was
66 introduced in the 2014 Sites Specifics Local Plan and then included in the 2019 Local Plan for the
67 Broads. The site has planning permission 16 dwellings; 6 market dwellings and 10 holiday homes.
68 The buildings have been cleared away. ~~As Hedera House is a tourist accommodation offer in an~~
69 ~~attractive location, but is rundown and offering 'old-fashioned' tourist accommodation (and~~
70 ~~running at a loss to the owners),~~

71 This policy seeks the retention of holiday accommodation on the site, while taking a pragmatic
72 approach that allows a proportionate element of enabling development. Any application should be
73 accompanied by a report, undertaken by an independent Chartered Surveyor, which demonstrates
74 the viability of the scheme. The Authority will need to verify the content of such a report and may
75 need to employ external expertise to do so. The applicant will need to meet the cost of this.

76 Of particular importance to Hedera House are the potential for flood risk and the quality in the
77 design and landscaping of any scheme to reflect Thurne's attractiveness. These factors will be taken
78 into consideration during the viability assessment of the tourist accommodation redevelopment
79 proposals. Proposers are encouraged to engage early with the Broads Authority about the mix of
80 uses, site layout and design. A site-specific flood risk assessment will be required to accompany
81 proposals.

82 Further, to reflect the site's location at the edge of the settlement, proposals will need to meet the
83 requirements of policy DM22 as the Thurne area generally has good to very good dark skies.

84 The policy highlights the need for the scheme to ensure Biodiversity Net Gain in line with policy xxx.
85 The scheme will also need to mitigate recreation impacts and this is most easily done through
86 paying the GI RAMS tariff.

87 The design of the development shall meet the requirements of the Design Guide and design policy
88 xx.

89 In terms of Nutrient Neutrality, the Broads Authority consider that the sites itself is outside of the
90 Broads SAC catchment and this scheme's foul water would drain to a Water Recycling Centre that is
91 not within the Broads SAC catchment and so does not need to mitigate for Phosphate or Nitrates.

92 There may be a requirement for an evidence based, project level HRA to assess the impact of this
93 development on European Protected species and habitats. ~~Mitigation could be required such as~~
94 ~~adequate daily recreation and dog walking facilities to meet needs.~~

95 ~~At the time of writing the Local Plan, this allocation had received planning permission for 16~~
96 ~~dwellings; 6 market dwellings and 10 holiday homes.~~ It is anticipated that the dwellings could be
97 delivered around 2023/2024.

98 **Reasonable alternative options**

- 99 a) An alternative option would be to keep the original policy (other than amending text relating to
100 numbers as well as adding reference to BNG, GI RAMS and NN) and not mention light pollution
101 or the design guide within the policy itself.

102 Another option would be to not have a policy and not allocate the site, but this site has planning
103 permission and so that is not deemed a reasonable alternative.

104 **Sustainability appraisal summary**

105 The following is a summary of the assessment of the policy.

A: Keep original policy (other than amending text to refer to BNG, GI RAMS and NN).	6 positives. 1 negatives. 0 ? Despite the negatives, there are benefits to allocating the site, as set out in the supporting text.
B: Preferred Option - amend policy to improve reference to light pollution (and add reference to BNG, GI RAMS and NN).	7 positives. 1 negatives. 0 ? Despite the negatives, there are benefits to allocating the site, as set out in the supporting text.

106 **How has the existing policy been used since adoption in May 2019?**

107 According to recent Annual Monitoring Reports, the policy has been used and the scheme was in
108 conformity.

109 **Why has the alternative option been discounted?**

110 The stronger wording relating to light pollution is favoured when compared to the original to
111 ensure the dark skies of the Broads are protected in this edge of settlement location. The other
112 changes relating to numbers, BNG, GI RAMS and NN are factual.

113 **UN Sustainable Development Goals check**

114 This policy meets these [UN SD Goals](#):

115 None identified

116 **Sustainability Appraisal**

117 SA objectives:

- 118 • ENV1: To reduce the adverse effects of traffic (on roads and water).
- 119 • ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to
- 120 use water efficiently.
- 121 • ENV3: To protect and enhance biodiversity and geodiversity.
- 122 • ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and
- 123 towns/villages.
- 124 • ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- 125 • ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and
- 126 coastal change.
- 127 • ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- 128 • ENV8: To minimise the production and impacts of waste through reducing what is wasted, and
- 129 re-using and recycling what is left.
- 130 • ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and
- 131 their settings
- 132 • ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable
- 133 and reflects local distinctiveness.
- 134 • ENV11: To improve air quality and minimise noise, vibration and light pollution.
- 135 • ENV12: To increase the proportion of energy generated through renewable/low carbon
- 136 processes without unacceptable adverse impacts to/on the Broads landscape
- 137 • SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- 138 • SOC2: To reduce poverty, inequality and social exclusion.
- 139 • SOC3: To improve education and skills including those related to local traditional industries.
- 140 • SOC4: To enable suitable stock of housing meeting local needs including affordability.
- 141 • SOC5: To maximise opportunities for new/ additional employment
- 142 • SOC6: To improve the quality, range and accessibility of community services and facilities and to
- 143 ensure new development is sustainability located with good access by means other than a
- 144 private car to a range of community services and facilities.
- 145 • SOC7: To build community identity, improve social welfare and reduce crime and anti-social
- 146 activity.
- 147 • ECO1: To support a flourishing and sustainable economy and improve economic performance in
- 148 rural areas.
- 149 • ECO2: To ensure the economy actively contributes to social and environmental well-being.
- 150 • ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy,
- 151 society and the environment.

Assessment of policy

		A: Keep original policy (other than updating the text relating to BNG, NN and GI RAMS).		B: Amend policy to improve reference to light pollution (and adding/updating text relating to BNG, NN and GI RAMS).
ENV1				
ENV2				
ENV3	+	Scheme would need to provide Biodiversity Net Gain – so positive. Note that GI RAMS and potentially Nutrient Neutrality mitigation would be required, but that would be neutral impact.	+	Scheme would need to provide Biodiversity Net Gain – so positive. Note that GI RAMS and potentially Nutrient Neutrality mitigation would be required, but that would be neutral impact.
ENV4	+	Seeks to retain hedgerows and mature trees. Policy refers to character of the village.	+	Seeks to retain hedgerows and mature trees. Policy refers to character of the village.
ENV5				
ENV6				
ENV7	+	Land is brownfield land	+	Land is brownfield land
ENV8				
ENV9				
ENV10	+	Importance of design emphasised.	+	Importance of design emphasised.
ENV11			+	Makes specific reference to light pollution
ENV12				
SOC1	+	Seeks the protection of the amenity of neighbours.	+	Seeks the protection of the amenity of neighbours.
SOC2				
SOC3				
SOC4	+	Would contribute to housing need in the Borough.	+	Would contribute to housing need in the Borough.
SOC5				
SOC6	-	Few facilities provided in the village.	-	Few facilities provided in the village.
SOC7				
ECO1	+	More dwellings could result in support of the local businesses.	+	More dwellings could result in support of the local businesses.
ECO2				
ECO3				



**Local Plan for the Broads - Review
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March 2023**

POHOR1: Horning Car Parking

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy POHOR1: Horning Car Parking

Policy Map https://www.broads-authority.gov.uk/data/assets/pdf_file/0026/259262/10.-HORNING.pdf

1. The continued use of this land for car parking for visitors will be supported. Improved cycle parking provision in a more prominent and useful location will also be supported.
2. Environmental improvements and landscaping will be encouraged to improve the site's contribution to the character or appearance of the Conservation Area and to visual amenity, and to address surface water runoff.
3. Any proposals for lighting will be determined and considered In line with policy DMxx on light pollution and dark skies.
4. The Authority would expect an appropriate provision of disabled parking spaces.

Constraints and features

- Within Horning Conservation Area.
- Not far (across river) from SSSI.
- Flood risk zones 1, 2 & 3 by EA mapping and small part 2 and 3a by SFRA 2017.

- 18 • Knackers Wood Water Recycling Centre
- 19 • Surface water concerns (linked to Knackers Wood Water Recycling Centre).
- 20 • [Dark skies zone 2.](#)

21 Reasoned Justification

22 Horning is a popular location for its views, boating and boat trips, shops, pubs and more.
 23 Most visitors and residents arrive by car, and the car parks in the village are important to its
 24 economy and to the value of the area for enjoyment of the Broads. The existing pay and
 25 display car/coach park intrudes somewhat into the village scene close to the riverside, but it
 26 would be difficult to find a satisfactory alternative of similar capacity, given the layout and
 27 sensitivity of the locality.

28 There is a second important parking area near the staithe. This is also protected in this car
 29 parking policy.

30 Proposals will need to meet the requirements of policy DM22 as the Horning area generally
 31 has good dark skies.

32 [The Authority expects proposals to include an appropriate number of disable parking](#)
 33 [spaces. The policy does not set a standard or threshold for this requirement; it will be for](#)
 34 [the applicant to consider and justify their approach. The design of the disabled spaces will](#)
 35 [need to follow best practice.](#)

36 Reasonable alternative options

37 a) The original policy, with no amendments.

38 Given the importance of the car park to the area, not to have a policy is seen as an
 39 unreasonable alternative.

40 Sustainability appraisal summary

41 The two options (of the amended policy and the original policy) have been assessed in the
 42 SA. The following is a summary.

A: Keep original policy	9 positives. 0 negatives. 0 ? Overall, positive.
B: Preferred Option - amend policy.	10 positives. 0 negatives. 0 ? Overall, positive.

43 How has the existing policy been used since adoption in May 2019?

44 According to recent Annual Monitoring Reports, the policy has not been used since adoption
 45 of the Local Plan.

46 Why have the alternative options been discounted?

47 The amendments to the original policy seek to protect the dark skies of the area and so is
 48 favoured.

49 UN Sustainable Development Goals check

50 This policy meets these [UN SD Goals](#):

3 GOOD HEALTH
AND WELL-BEING



6 CLEAN WATER
AND SANITATION



13 CLIMATE
ACTION



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

91 Assessment of policy

	A: Keep original policy		B: Preferred Option - amend policy	
ENV1	+	Policy related to travel and transport and includes cycle parking.	+	Policy related to travel and transport and includes cycle parking.
ENV2	+	Policy seeks to address surface water runoff.	+	Policy seeks to address surface water runoff.
ENV3				
ENV4	+	Policy seeks to reduce visual impact of the car park.	+	Policy seeks to reduce visual impact of the car park.
ENV5				
ENV6	+	Policy seeks to address surface water runoff.	+	Policy seeks to address surface water runoff.
ENV7				
ENV8				
ENV9	+	Policy seeks to improve the site's contribution to the Conservation Area.	+	Policy seeks to improve the site's contribution to the Conservation Area.
ENV10	+	Policy seeks to reduce visual impact of the car park.	+	Policy seeks to reduce visual impact of the car park.
ENV11			+	Policy seeks to protect the dark skies of the area.
ENV12				
SOC1	+	Policy seeks to provide cycle parking.	+	Policy seeks to provide cycle parking.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6	+	Policy seeks to provide cycle parking.	+	Policy seeks to provide cycle parking.
SOC7				
ECO1				
ECO2				
ECO3	+	Policy seeks to protect the car park and provide cycle parking to enable visitors to the village.	+	Policy seeks to protect the car park and provide cycle parking to enable visitors to the village.



**Local Plan for the Broads - Review
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March 2023**

HOR2: Horning Open Space (public and private)

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy POHOR2: Horning Open Space (public and private)

Policy Map x - https://www.broads-authority.gov.uk/_data/assets/pdf_file/0026/259262/10.-HORNING.pdf

1. ~~This~~ The two areas of public open space ~~is~~ (adjacent to the public car park on Lower Street and the area opposite the entrance to Mill Loke) are conserved for ~~its~~ their contribution to the character and landscape of Horning, and for the amenity of residents and visitors.
2. The area marked on the policies map outside the Swan Inn will be retained as private open space for its contributions to the character and appearance of the village.

Constraints and features

- Within Horning Conservation Area.
- Just across river from SSSI.
- Flood risk zones 1, 2 & 3 by EA mapping, most 2 and 3a with some modelled 3b by SFRA 2017 mapping.
- Dark skies zone 2.

Reasoned Justification

This policy covers three areas of open space, as shown on the policies map. These are:

- adjacent to the public car park on Lower Street
- opposite the entrance to Mill Loke
- between the Swan Inn and River Bure

In terms of the open spaces adjacent to the public car park on Lower Street and the area opposite the entrance to Mill Loke, these are ~~This is a~~ well-used and appreciated open spaces, contributing to the amenity of residents and visitors, to the setting of nearby historic buildings, and to the wider landscape of the area. Although many other spaces around Horning contribute in various ways to the appearance and amenities of the area, ~~this is~~ these are perhaps the most characteristic and important to its sense of place and role as a focus for visitors.

At the time of writing, the area marked as 'private open space' is a pub garden. As such, this is not public open space as access onto this private land is only for paying customers of the pub. This landscaped open space adds to the character and attractiveness of the staithe, and will be retained in this generally open and attractive state for the benefit of pub users, as well as for its quaint appearance from land and water.

Identifying ~~this~~ these areas as open spaces is intended to complement the development boundary shown for other parts of Horning, and to clarify that the various types of development, which the Local Plan would normally permit adjacent to or outside a development boundary, would not be acceptable in the defined areas of the open space.

Reasonable alternative options

a) No policy

The amendments to the original policy are simply to provide clarity to where the areas referred to in the policy are. As such, the original policy with no amendments is not considered an alternative.

Sustainability appraisal summary

The two options (of the amended policy and no policy) have been assessed in the SA. The following is a summary.

A: No policy	0 positives. 0 negatives. 3 ? Overall, positive.
B: Preferred Option - amend policy.	3 positives. 0 negatives. 0 ? Overall, positive.

How has the existing policy been used since adoption in May 2019?

According to recent Annual Monitoring Reports, the policy has not been used since 2019.

Why have the alternative options been discounted?

These open spaces are important to the character of the area. The amendments to the original policy simply clarify that there are three areas of open space and where each is located.

52 **UN Sustainable Development Goals check**

53 This policy meets these [UN SD Goals](#):

3 GOOD HEALTH
AND WELL-BEING



11 SUSTAINABLE CITIES
AND COMMUNITIES



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
- ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings
- ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.
- ENV11: To improve air quality and minimise noise, vibration and light pollution.
- ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape
- SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

94 Assessment of policy

		A: No policy	B: Preferred Option - amend policy
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	
ENV2			
ENV3			
ENV4			+ The open spaces add to the character of the area.
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			+ The open spaces add to the character of the area.
ENV10			
ENV11			
ENV12			
SOC1			+ The open spaces benefit mental and physical health and wellbeing.
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
March 2023**

Site Specifics - ST. OLAVES

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy POSOL1: Riverside area moorings

Policy Map: [https://www.broads-](https://www.broads-authority.gov.uk/data/assets/pdf_file/0033/259269/17.-ST-OLAVES.pdf)

[authority.gov.uk/data/assets/pdf file/0033/259269/17.-ST-OLAVES.pdf](https://www.broads-authority.gov.uk/data/assets/pdf_file/0033/259269/17.-ST-OLAVES.pdf)

1. The defined area will be kept generally open, and uses limited to the mooring of boats and uses incidental to that activity.
2. Particular care will be taken to ensure that any development is sensitively designed, landscaped, and, where appropriate, screened from river views.
3. Provision of appropriately designed unobtrusive facilities (such as access tracks, parking areas, moorings, steps, ramps and small-scale storage lockers) for use incidental to the enjoyment of the moorings, will be permitted.
4. The permanent or seasonal occupation of the land, vehicles, boats, etc., or the stationing of caravans, will not be permitted.

Constraints and features

- Article 4 Direction (1990) – removes wall/gate/enclosure PD Rights.

- Area at high risk of flooding (zones 2 & 3 by EA mapping; zones 2 and indicative 3b by SFRA 2017 mapping).
- Area is adjacent / in close proximity to a number of designated heritage assets including listed buildings and the Halvergate Marshes Conservation Area.
- Dark skies zone 2.

Reasoned Justification

Management of a potential proliferation of development in this area has been an issue going back some years. The policy continues the approach of the 1997 Local Plan. Applicants are directed to the Authority's adopted Mooring Design Guidance¹.

Reasonable alternative options

Considering the history of potential proliferation of development in this area, the alternative option of no policy is not considered reasonable. The amendment is extremely minor and it is considered to not be an alternative option.

No reasonable alternative options.

Sustainability appraisal summary

The policy has been assessed in the Sustainability Appraisal and summarised below:

A: Preferred Option	4 positives. 0 negatives. 0 ? Overall, positive.
---------------------	---

How has the existing policy been used since adoption in May 2019?

According to recent Annual Monitoring Reports, the policy has not been used.

Why have the alternative options been discounted?

No alternative options considered.

UN Sustainable Development Goals check

This policy meets these [UN SD Goals](#):

11 SUSTAINABLE CITIES
AND COMMUNITIES



¹ Mooring Design Guide: www.broads-authority.gov.uk/_data/assets/pdf_file/0005/703940/Mooring-design-guide.pdf

38 **Sustainability Appraisal**

39 SA objectives:

- 40 • ENV1: To reduce the adverse effects of traffic (on roads and water).
- 41 • ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to
- 42 use water efficiently.
- 43 • ENV3: To protect and enhance biodiversity and geodiversity.
- 44 • ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and
- 45 towns/villages.
- 46 • ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- 47 • ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and
- 48 coastal change.
- 49 • ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- 50 • ENV8: To minimise the production and impacts of waste through reducing what is wasted, and
- 51 re-using and recycling what is left.
- 52 • ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and
- 53 their settings
- 54 • ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable
- 55 and reflects local distinctiveness.
- 56 • ENV11: To improve air quality and minimise noise, vibration and light pollution.
- 57 • ENV12: To increase the proportion of energy generated through renewable/low carbon
- 58 processes without unacceptable adverse impacts to/on the Broads landscape
- 59 • SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.
- 60 • SOC2: To reduce poverty, inequality and social exclusion.
- 61 • SOC3: To improve education and skills including those related to local traditional industries.
- 62 • SOC4: To enable suitable stock of housing meeting local needs including affordability.
- 63 • SOC5: To maximise opportunities for new/ additional employment
- 64 • SOC6: To improve the quality, range and accessibility of community services and facilities and to
- 65 ensure new development is sustainability located with good access by means other than a
- 66 private car to a range of community services and facilities.
- 67 • SOC7: To build community identity, improve social welfare and reduce crime and anti-social
- 68 activity.
- 69 • ECO1: To support a flourishing and sustainable economy and improve economic performance in
- 70 rural areas.
- 71 • ECO2: To ensure the economy actively contributes to social and environmental well-being.
- 72 • ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy,
- 73 society and the environment.

74 Assessment of policy

75 There are no reasonable alternatives identified at this stage.

A: Preferred Option		
ENV1	+	Policy requires access tracks to be well design, unobtrusive.
ENV2		
ENV3		
ENV4	+	The general thrust of the policy is to seek landscape character protection.
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10	+	The policy requires any small-scale development to be appropriately designed and unobtrusive.
ENV11		
ENV12		
SOC1		
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		
SOC7		
ECO1	+	The policy provisions in general assist in recreation use of the area and the Broad.



**Local Plan for the Broads - Review
Preferred Options bitesize pieces
March 2023**

POHOV2: Station Road car park

This is a proposed draft section/policy for the Preferred Options Local Plan. Member's comments and thoughts are requested. This policy is already in the local plan, but some amendments are proposed.

Amendments to improve the policy are shown as follows: ~~text to be removed~~ and added text.

There is an assessment against the UN Sustainable Development Goals at the end of the policy.

The proposed Sustainability Appraisal of the policy is included at the end of the document. This would not be included in the Preferred Options Local Plan itself; this table would be part of the Preferred Options Sustainability Appraisal, but is included here to show how the policy and options are rated.

The currently adopted policy remains in place – these are proposed amendments and this section will form part of the Preferred Options version of the Local Plan.

Policy POHOV2: Station Road car park

Policy Map https://www.broads-authority.gov.uk/_data/assets/pdf_file/0027/259263/11.-HOVETON-and-WROXHAM.pdf

1. This area will be retained in use for car parking.
2. Environmental improvements, biodiversity enhancements and landscaping will be ~~encouraged~~ be required to improve its contribution to the character and appearance of the area.
3. Schemes will need to include appropriately located and well-designed cycle parking and electric vehicle charging points.
4. Lighting will need to meet the requirements of policy DMxx.
5. Schemes will also need to address surface water (see policy DMxx).
6. The Authority would expect an appropriate provision of disabled parking spaces.

Constraints and features

- Flood risk zones 1, 2 & 3 by EA mapping and some zone 2 by SFRA 2017 mapping.

Reasoned Justification

The availability of sufficient parking is a major factor in the continued success of businesses in the area and to the vitality of Wroxham and Hoveton. Given the nature of the hinterland, car use is the primary means of access to facilities for most people, and the present level of parking is important to maintain that access. The concentration of car parking here and elsewhere in the village also helps to reduce the clutter of cars in the wider townscape. That being said, the policy also seeks well designed cycle parking. In terms of light pollution and dark skies, design of any lighting will need to be well designed in order to meet the requirements of policy DMxx.

The policy also seeks appropriate biodiversity enhancements, given the car parks' location next to Hoveton Riverside Park; the Biodiversity Enhancements Guide will be of relevance. Schemes are also required to include Electric Vehicle charging points as well as address surface water run off as per policy DMxx.

The Authority expects proposals to include an appropriate number of disabled parking spaces. The policy does not set a standard or threshold for this requirement; it will be for the applicant to consider and justify their approach. The design of the disabled spaces will need to follow best practice.

Reasonable alternative options

- a) The original policy, with no amendments.
- b) No policy – it could be that other policies in the Local Plan are adequate.

Sustainability appraisal summary

The three options (of the amended policy, no policy and the original policy) have been assessed in the SA. The following is a summary.

A: Keep original policy	4 positives. 0 negatives. 0 ? Overall, positive.
B: Preferred Option - amend policy.	8 positives. 0 negatives. 0 ? Overall, positive.
C: No policy	0 positives. 0 negatives. 8 ? Overall, positive.

How has the existing policy been used since adoption in May 2019?

According to recent Annual Monitoring Reports, the policy has been not been used.

Why have the alternative options been discounted?

The amendments to the original policy fundamentally reinforce the importance of the need for cycle parking, biodiversity enhancements and lighting impact to be addressed in line with other policies of the Local Plan and therefore are favoured.

UN Sustainable Development Goals check

47 This policy meets these [UN SD Goals](#):

11 SUSTAINABLE CITIES
AND COMMUNITIES



Sustainability Appraisal

SA objectives:

- ENV1: To reduce the adverse effects of traffic (on roads and water).
- ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.
- ENV3: To protect and enhance biodiversity and geodiversity.
- ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.
- ENV5: To adapt, become resilient and mitigate against the impacts of climate change
- ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.
- ENV7: To manage resources sustainably through the effective use of land, energy and materials.
- ENV8: To minimise the production and impacts of waste through reducing what is wasted, and re-using and recycling what is left.
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- SOC2: To reduce poverty, inequality and social exclusion.
- SOC3: To improve education and skills including those related to local traditional industries.
- SOC4: To enable suitable stock of housing meeting local needs including affordability.
- SOC5: To maximise opportunities for new/ additional employment
- SOC6: To improve the quality, range and accessibility of community services and facilities and to ensure new development is sustainability located with good access by means other than a private car to a range of community services and facilities.
- SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.
- ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.
- ECO2: To ensure the economy actively contributes to social and environmental well-being.
- ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.

88 Assessment of policy

	A: Keep original policy		B: Preferred Option - amend policy		C: No policy
ENV1	+	By trying to keep the car parking in one area, there could be benefits to traffic and travel in the area.	+	By trying to keep the car parking in one area, there could be benefits to traffic and travel in the area.	?
ENV2					
ENV3			+	The policy seeks biodiversity enhancements.	?
ENV4	+	The policy seeks landscaping.	+	The policy seeks landscaping.	?
ENV5			+	Policy refers to the need for EV charging points.	?
ENV6			+	Policy refers to addressing surface water.	?
ENV7					
ENV8					
ENV9					
ENV10					
ENV11			+	The policy addresses light pollution.	?
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1	+	By providing cycle and car parking facilities in the area, local businesses could benefit.	+	By providing cycle and car parking facilities in the area, local businesses could benefit.	?
ECO2					
ECO3	+	By providing cycle and car parking facilities in the area, local businesses could benefit.	+	By providing cycle and car parking facilities in the area, local businesses could benefit.	?

Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.

Planning Committee

31 March 2023

Agenda item number 12

Adopting the Revised Planning in Health Protocol – Norfolk and Waveney area

Report by Planning Policy Officer

Summary

The built and natural environment is a key determinant of health and wellbeing, and shapes health inequalities. A Planning in Health Protocol was adopted in 2019. This has now been updated to take account of new structures and policy within both health and spatial planning.

Recommendation

- i. Note the new approach to embedding health and wellbeing in spatial planning.
 - ii. Adopt the revised Planning in Health Protocol.
-

1. Introduction

- 1.1. The built and natural environment is a key determinant of health and wellbeing, and shapes health inequalities. There is a body of research showing that the environment people live in is inextricably linked to health across the life course. For example, the design of neighbourhoods can influence physical activity levels, travel patterns, social connectivity, mental and physical health and wellbeing outcomes.
- 1.2. Public Health would like to better engage with spatial planning bodies in Norfolk and the Waveney part of East Suffolk to ensure that local plans have the necessary hooks and levers to ensure health and wellbeing are key considerations in proposed future development, and to develop tools and resources to make it easier for spatial planners to embed health and wellbeing in their work.
- 1.3. The process governing how health organisations are consulted about planning applications is set out in the original [Planning in Health Protocol \(March 2019\) \(pdf | north-norfolk.gov.uk\)](#). It sets out how relevant NHS organisations, public health and local planning authorities jointly consult to ensure that health considerations are adequately accounted for in plan making, planning applications and their subsequent development.
- 1.4. The protocol has been revised to take account of new structures and policy within both health and spatial planning.

2. Main content

- 2.1. The protocol governs how relevant NHS organisations, public health and local planning authorities will jointly consult to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments. In this context health considerations includes planning for health service provision – such as the provision of enough doctor’s surgeries to meet population needs – and promoting health and wellbeing in the design and provision of developments, such as provision of walking and cycling infrastructure, access to green spaces or maintenance of good air quality.
- 2.2. The protocol sets out the size and scale of development when it will apply and provides information about the types of activities that can be undertaken, such as health impact assessment, to promote healthy planning and development and includes a health planning checklist.

3. Changes in this revision

- 3.1. The changes made in the revised protocol are to:
 - a) Ensure greater consideration of health promotion through the planning process
 - b) Update the protocol to reflect new NHS structures and changes in national planning policy
 - c) Make the protocol more accessible, as well as clarifying partner roles and responsibilities
- 3.2. The protocol is a multiagency-owned document between planning authorities and health organisation and was developed by the Norfolk Strategic Planning Group in 2022. It has been endorsed by Norfolk’s Health and Wellbeing Board District Council sub-committee and by Norfolk’s Members’ Planning Forum.

Author: Natalie Beal

Date of report: 08 March 2023

Appendix 1 – Planning in Health Protocol (Revised May 2022)

PLANNING IN HEALTH

An engagement protocol between local planning authorities, the Norfolk and Waveney Integrated Care Board, Health Partners and Public Health Norfolk and Public Health Suffolk

Revised May 2022

FOREWORD

This revision is based upon the previously published version from August 2019 and has come about in recognition of a need for greater collaboration between local planning authorities, health service organisations, and public health departments in local government to plan for future growth and to promote health. It reflects changes in national planning policy and the need for health service organisations to deliver on the commitments within the NHS Long Term Plan which sets out how money will be spent on the NHS between 2019 and 2029.

This revision recognises the emergence of the [Norfolk and Waveney Integrated Care System \(ICS\)](#), an umbrella body bringing together the organisations planning, buying, and providing publicly funded healthcare to the population of the area. On 1st April 2020 the five Clinical Commissioning Groups (CCGs) were merged into the Norfolk and Waveney CCG. Subsequently On 1st July 2022, the N&WCCG was superseded by the Norfolk and Waveney ICS which includes an Integrated Care Partnership (ICP), and an Integrated Care Board (ICB) called NHS Norfolk and Waveney ICB.

This revision recognises the latest publication of the revised [National Planning Policy Framework](#), which sets out government's planning policies for England and how these are expected to be applied.

This revision streamlines the processes and simplifies and shortens the protocol to make it easier to use and embed into the work of all partner agencies. Updated population healthcare needs assessments as well as population and demographic change estimates will be published separately to increase the longevity of this document and facilitate timely updates. These will support plans to deliver new healthcare infrastructure formulated by NHS colleagues.

Following the Covid-19 pandemic and the long-term aspirations of the NHS to increase service delivery, planning in the health sector will need to be reviewed, which will lead to changes over the coming years. Notwithstanding this, the Protocol remains an important tool to ensure appropriate and continued engagement between the Norfolk and East Suffolk Local Planning Authorities and the health service communities.

ACKNOWLEDGEMENTS

This protocol was jointly prepared by staff at Norwich City Council, Broadland Council, and Norfolk County Council. It also built heavily upon other work across the country including The London Healthy Urban Development Unit (HUDU) which gave permission for use of their 'Planning Contribution Model'.

Amendments in 2022 have been made in collaboration with Public Health at Norfolk County Council, County and District Council planners, the Norfolk & Waveney ICS, and N&W CCG.

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1. HOW TO USE THIS PROTOCOL

1.1. WHAT IS THE PURPOSE OF THIS PROTOCOL?

The Planning in Health Protocol (hereafter the Protocol) presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Council Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly consult to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments. In this context, the term “health considerations” includes planning for health service provision (e.g. the provision of enough doctors’ surgeries to meet population needs) as well as ensuring that health promotion is considered in the design and provision of developments (e.g. the provision of walking and cycling infrastructure, or maintenance of good air quality).

Updates to this version of the Protocol are the addition of a new Section 1 (How to use this protocol) as well as revisions to the text describing changes to the health and social care system within which the Protocol operates.

1.2. WHO SHOULD USE THIS PROTOCOL?

The Protocol should be used by the Norfolk and East Suffolk Local Planning Authorities (LPAs), the Norfolk and Waveney Integrated Care System (ICS) Estates Group, in charge of the buildings and other infrastructure used to deliver healthcare, (who will liaise with relevant health and social care partners), and the Norfolk and Suffolk County Councils’ Public Health teams. Parts of the Protocol, the ‘Health Planning Checklist’ at the end of the document, can also support the LPAs in any discussions they have with developers. **It is the responsibility of the planning officer in the LPA overseeing a development to invoke the protocol.**

1.3. IN WHAT CIRCUMSTANCES SHOULD THE PROTOCOL BE USE?

The Protocol should be used when consultation is required on the potential health considerations associated with a development. This will be for:

- A housing development of 50 dwellings or more
- A development of less than 50 dwellings but which is still deemed to potentially impact on health services significantly
- A development that includes care homes, housing for the elderly, or student accommodation
- A development that involves the significant loss of public open space
- Any other type of development that could have significant health implications

Defining what is deemed to have impact on health services or significant health implications is challenging. It could, for example, be related to likely impacts on vulnerable populations, or to do with uses for employment sites. In cases where the planning officers are unsure the protocol should be used.

Other developments, such as those related to transport, minerals, or waste, are not considered in this protocol as these are covered under existing structures, processes, and legislation.

1.4. AT WHAT POINT IN THE PLANNING PROCESS SHOULD THE PROTOCOL BE USED?

The Protocol should be used at all points in the planning process from pre-planning discussions (when the need for elements such as a [Health Impact Assessment](#), a methodology used to judge the potential health effects of a policy, programme or project on a population, can be considered), the outline process (when the initial likely health considerations associated with any development can be scoped in or out and design implications can be flexibly considered) to the full planning application (when health considerations can be assessed in detail and any final modifications recommended).

1.5. WHAT ARE THE ACTIONS THAT THE PROTOCOL DESCRIBES?

At the *pre-planning application stage*, the ICS Estates Group and Public Health partners will be provided with information on the likely application and given the opportunity to comment. As part of their feedback, they will provide a view within 21 days (subject to negotiated extension time), on the key areas of focus of any Health Impact Assessment that is required.

At the *outline planning application stage*, the ICS Estates Group and Public Health partners will provide general comment within 21 days (subject to negotiated extension time) on health considerations in outline proposals that meet the inclusion criteria to be covered by this Protocol.

At the *full planning application stage*, the ICS Estates Group and Public Health partners will provide comments if appropriate on full planning applications that meet the inclusion criteria to be covered by this Protocol. These comments will be provided within 21 days of the receipt of the request for comment, (subject to a negotiated extension time). Responses will be reported in the planning officer's report.

1.6. WHAT OTHER ACTIVITIES SHOULD TAKE PLACE?

In addition to the Protocol being initiated as required, the LPAs, ICS Estates Group and Public Health teams should be in regular contact. This will include:

- The sharing of the Annual Monitoring Report (AMR) produced by each LPA at the end of the calendar year with the parties engaged in the Protocol.
- An annual meeting between all parties covered by the Protocol to consider the data within the AMRs, assess how well the Protocol is working, and discuss any other strategic and upcoming issues.
- Attendance at other meetings on an ad-hoc as-needed basis. This might include an LPA Local Plan Meeting where a development with significant health considerations is being considered.

1.7. WHAT TOOLS AND INFORMATION ARE AVAILABLE TO SUPPORT THIS PROTOCOL?

This document contains a checklist tool as well as a detailed background information on the planning process and how the Protocol integrates with it.

- The “Healthy Planning Checklist” tool is provided in Appendix 1. It provides a practical tool to assist developers and their agents when preparing development proposals as well as LPAs in policy making and in the application process. It also provides a framework for public health teams when considering health and wellbeing impacts of development plans and planning applications.
- The “Detailed background Information” section of this document (Section 2 and beyond) provides a detailed description of the current planning and health systems and structures (as of July 2022) as well as providing more information on the operation of the Protocol and how it integrates with those systems and structures. Further, it details the relevant partners to this Protocol by name. It is recommended that those not familiar with the Protocol or local planning for health process read this section before engaging.

1.8. WHO ARE THE CONTACTS?

The local planning officer invoking and overseeing the implementation of the Protocol for a given development should use the following contact email addresses. Please make it clear that any contact is associated with the implementation of the Protocol.

NHS ICS Estates: nwccg.icsestates@nhs.net

NCC Public Health: phplanning@norfolk.gov.uk

SCC Public Health: phplanning@suffolk.gov.uk

2. DETAILED BACKGROUND

The importance of planning decisions on the health and wellbeing of the population has been recognised since the 19th century when reforms brought about by town planners and public health practitioners resulted in improved health and life expectancy. Many of the major disease and health issues affecting the population in Britain today are impacted by the environment in which people live, work and play ([Marmot, 2010](#)). Spatial planning can have a major positive impact on improving the environment in which people live or, if the health impacts of developments are not adequately considered, it can adversely impact people’s physical and mental health ([Ross and Chang, 2012](#)).

The [National Planning Policy Framework](#) (NPPF) requires local planning authorities to ensure that health and wellbeing and the health infrastructure are considered in Local and Neighbourhood Plans and in planning decision making. The revised NPPF 2021 reiterates the presumption in favour of sustainable development and now specifically includes economic, social, and environmental objectives. Government [guidance on promoting healthy and safe communities](#) also states that “the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities”

2.1. AIM OF THE PROTOCOL

To present a protocol containing a documented process outlining the input and linking of relevant NHS organisations and Public Health agencies with local planning authorities for planning for housing growth and the health infrastructure required to serve that growth. This attempts to both better understand and consider health service needs arising from development; and also make explicit the impact that the planning process, from plan making to determining applications, can have on:

- Health,
- Well-being and
- Long term health service demand.

The protocol will enable surgeries and other health service providers to plan for expanding communities in areas where new housing is to be built.

2.2. OBJECTIVES

Objectives for the protocol are:

- To establish a working relationship and set a protocol for engagement between Norfolk and East Suffolk¹ Local Planning Authorities (LPAs), and relevant health and social care partners within the ICS, Norfolk County Council (NCC) and Suffolk County Council (SCC) Public Health.
- To outline a standardised process for obtaining robust and consistent health and social care and public health information to inform plan making and planning decisions.
- To support appropriate health infrastructure, with technical input from appropriate public health, health, and social care information teams.
- To ensure that the principles of prevention, health and wellbeing are adequately considered in plan making and when evaluating and determining planning applications.
- To establish a collective response to planning consultations from relevant health and social care partners and commissioning organisations through the appropriate mechanism.
- To agree a defined threshold indicator for Planners to contact health and Public Health teams for input into planning applications and spatial plans.

¹ East Suffolk is covered by two Integrated Care Systems (ICS), the Norfolk and Waveney ICS and the Suffolk and North East Essex ICS. This protocol only applies to the part of East Suffolk within the area of the Norfolk and Waveney ICS (which is essentially the former Waveney District Council area)

2.3. ORGANISATIONS INVOLVED

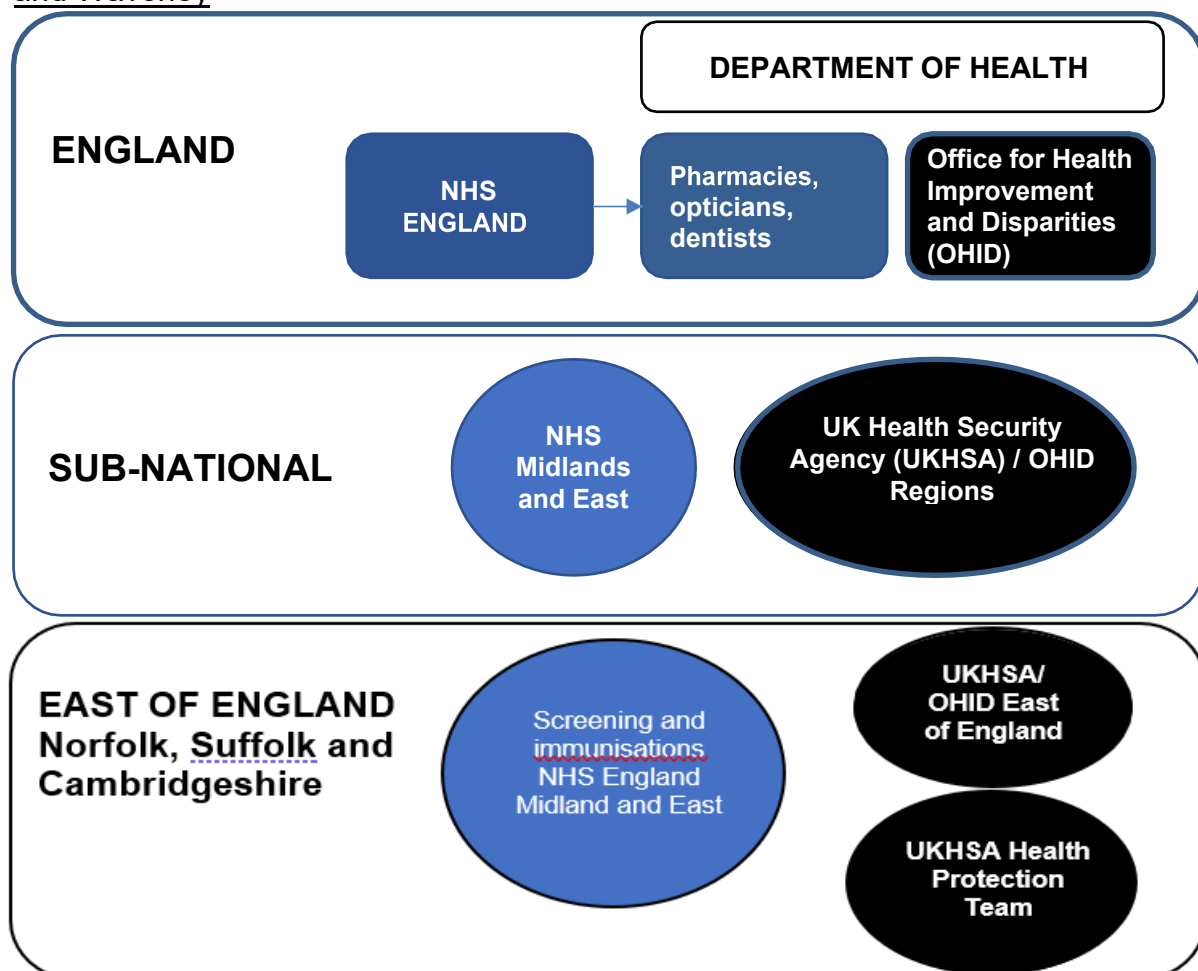
PUBLIC HEALTH FUNCTIONS IN ENGLAND

Following the Health and Social Care Act 2012, the NHS no longer has a public health function. Most of the public health workforce was transferred to Public Health England (PHE) at a national, regional, or sub-regional (in PHE Centre's) level and to local authorities at a local level, with a complementary set of roles and responsibilities. These have been further restructured in 2021 - [Public health system reforms: location of Public Health England functions from 1 October - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/public-health-system-reforms-location-of-public-health-england-functions-from-1-october) when PHE role and responsibility's were divided between the UK Health Security Agency and the Office for Health Improvement and Disparities.

The role of the newly formed ([UKHSA](#)) is to offer leadership and scientific and technical advice at all organisational levels. This involves working with local authorities and the NHS to reduce rates of infection and provide evidence to establish effective strategies and inform commissioning.

The reform of the PHE also established ([OHID](#)). As a focus on, for example, smoking cessation and obesity, it also has an aim to “act on the wider factors that contribute to people's health, such as work, housing and education”. Like UKHSA this will have a regional as well as national perspective. Figure 1 shows a schematic of how the organisations are represented at national, regional, and local level

Figure 1: NHS and Public Health Structures from the National to Local level in Norfolk and Waveney



NHS England

Commissions a wide range of specialist NHS services, including prison health services, medical services for the armed forces, and primary care medical and dental services. This means that GP practice contracts are between NHS England and the local GP provider. There are two main types of funding associated with ownership of general practice premises:

The practice is a tenant with a landlord (leased)

The practice owns the premises (owner/ occupier)

NHS England also authorises the integrated Care System (ICS) and Integrated Care Boards (ICB) which operate at the local level.

NHS Property Services

Following the Health and Social Care Act 2012, NHS Property Services was established as a private limited company owned by the Secretary of State for Health. NHS Property Services manages NHS property estates across England, with responsibility for 4,000 buildings, worth over £3 billion. The buildings are used to provide patient care such as GP surgeries and community hospitals. Norfolk is covered by NHS Property Services Midlands and East regional team.

NORFOLK AND WAVENEY INTEGRATED CARE SYSTEM (ICS)

The [Health and Care Act 2022](#) put ICSs on a statutory footing from July 2022, comprising of an Integrated Care Partnership and an Integrated Care Board. Figure 2 Illustrates how the various elements including, health care providers, NHS Trusts and Councils are brought together in Norfolk under the Norfolk and Waveney ICS

Figure 2: Infographic of Norfolk and Waveney Integrated Care System (ICS)



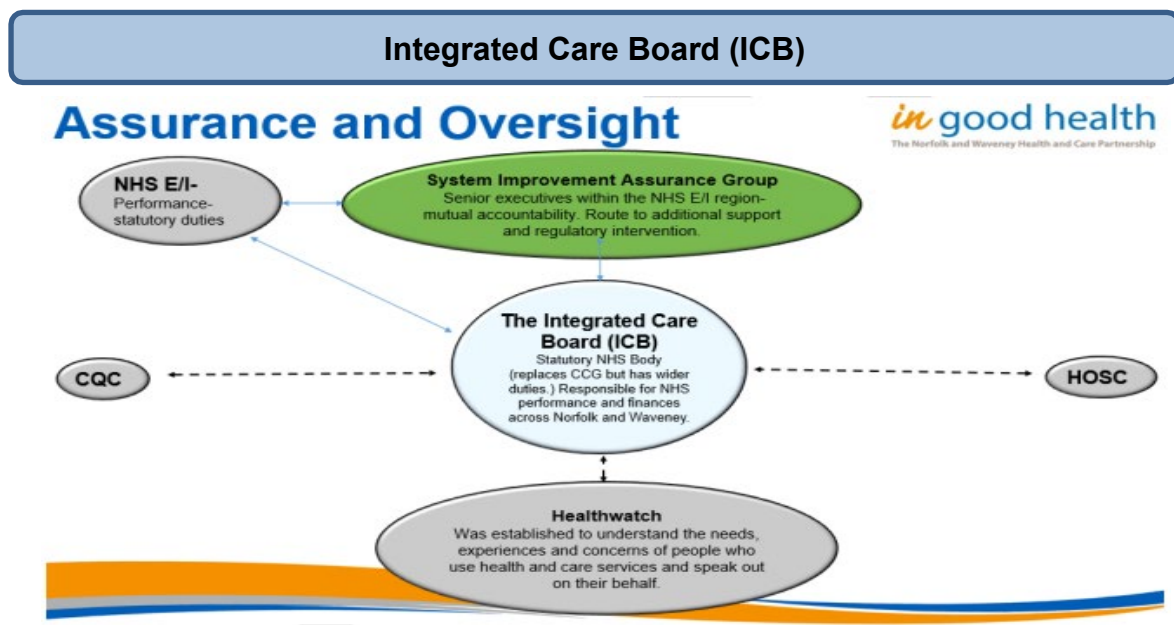
The Integrated Care Partnership (ICP)

Is an alliance of NHS providers that work together to deliver care by agreeing to collaborate rather than to compete. They include hospitals, community services, mental health services and GPs. The ICP will be responsible for bringing together a wider set of organisations, including County, Borough, City and District Councils, Norfolk Constabulary, and the Voluntary Sector, to agree an integrated care strategy for improving the health care, social care, and public health of the local population.

NHS Norfolk and Waveney Integrated Care Board (ICB)

Is the statutory legal entity which has replaced the CCG. The ICB is a statutory NHS organisation responsible for developing a plan for meeting the health needs of the population, managing the NHS budget, and arranging for the provision of health services in the ICS area. It will bring the local NHS together to improve population health and care. Figure 3 illustrates the role of an Integrated Care Board.

Figure 3: role and responsibility of the Integrated Care Board



Place Boards and Primary Care Networks

In Norfolk and Waveney, five Place Boards will bring together colleagues from health and social care to integrate services with a focus on effective operational delivery and improving people's care. GP services are brought together in Primary Care Networks. The distribution on Place Boards and Primary Care Networks is shown in Figure 4.

Figure 4: The 17 Primary Care Networks (PCNs), and 5 Places Boards



Local Authority Public Health, County Councils

In Norfolk and Suffolk, the Director of Public Health (DPH) and public health workforce is part of Norfolk and Suffolk County Councils respectively. The DPH is responsible for commissioning some mandatory and discretionary health services, for example sexual health, smoking cessation, drug and alcohol treatment, NHS Health Checks, and health improvement services.

Local Planning Authorities

Norfolk and Waveney is covered by a number of district, borough and city councils with local planning roles and responsibilities:

- Breckland District Council
- Broadland District Council
- Great Yarmouth Borough Council
- King's Lynn and West Norfolk Borough Council
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- East Suffolk Council (covers the Waveney area of the Norfolk and Waveney ICS)

The Broads Authority, which is a statutory body established in 1989 with a duty to manage the Norfolk and Suffolk Broads, is also classified as a local planning authority. It is the sole planning authority in relation to land within the broads.

Norfolk County Council and Suffolk County Council (for the East Suffolk area) are responsible for determining planning applications related to mineral extraction, waste management facilities and developments by the County Councils, although planning applications associated with these matters fall outside the scope of this Protocol.

Health and Wellbeing Boards

[Health and Wellbeing Boards](#) are statutory bodies introduced in England under the Health and Social Care Act 2012 whose role is to promote integrated working among local providers of healthcare and social care. They bring together local authorities, the NHS, communities, and wider partners to share system leadership across the health and social care system. They have a duty to encourage integrated working between commissioners of services, and between the functions of local government (including planning). Each Health and Wellbeing Board is responsible for producing a Health and Well-being Strategy which is underpinned by a [Joint Strategic Needs Assessment](#), a document that provides local policy-makers and commissioners with a profile of the health and wellbeing needs of the local population. This will be a key strategy for a local planning authority to take into account to improve health and well-being.

OTHER HEALTH AND SOCIAL CARE PARTNERS:

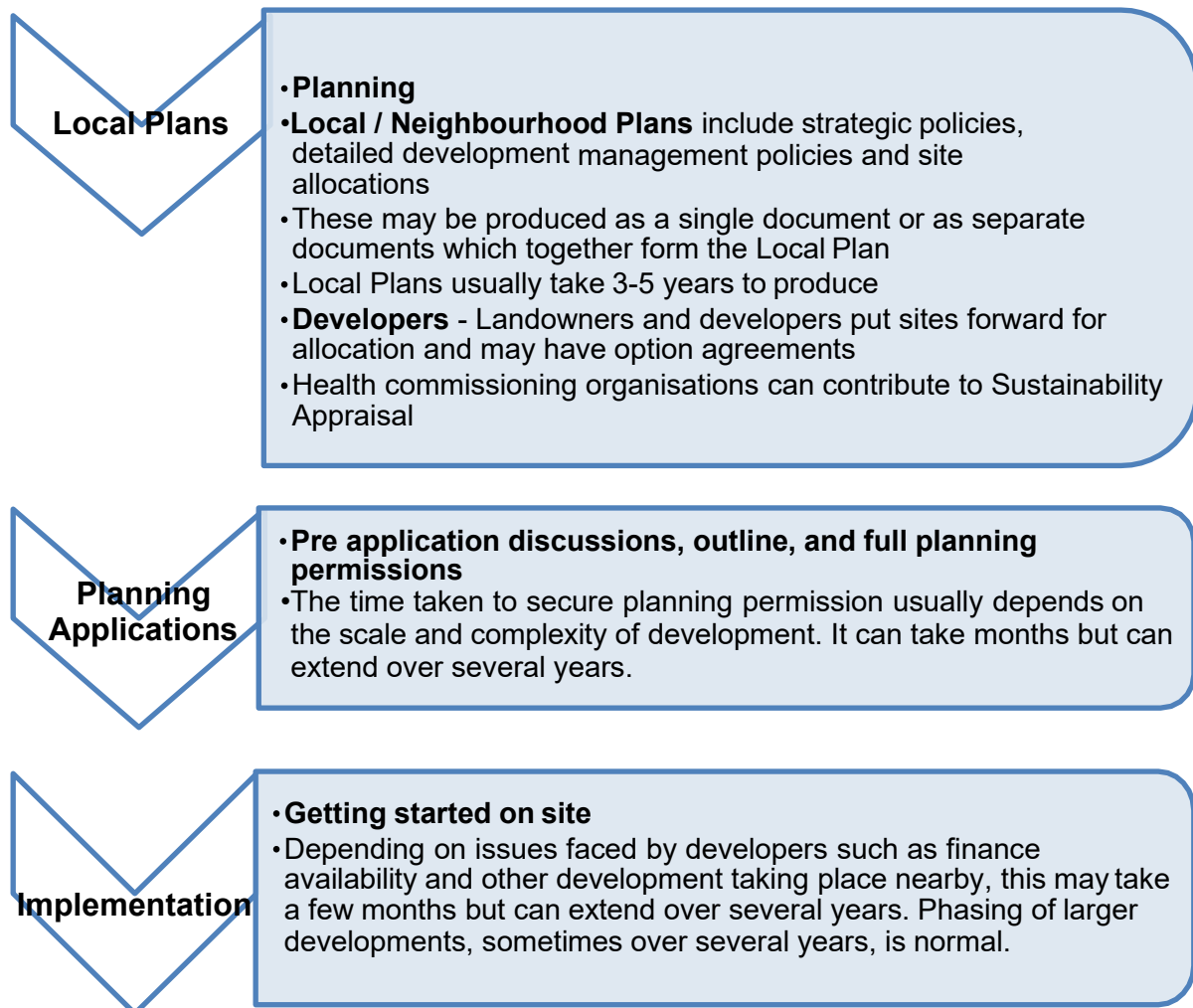
These include, but are not limited to:

- Acute Hospitals; Mental Health; Community Health; Social care; 111 and out of hours care; The Ambulance Trust and patient transport.

3. THE PLANNING PROCESS – KEY STAGES

There are three key stages in the town planning process (illustrated in figure 5 below): plan making, planning applications and implementation.

Figure 5: The key planning stages for building development



3.1. PLAN MAKING

The planning process is plan-led and local planning authorities produce Local Plans to set the planning strategy for their area, to be achieved through strategic policies and through site allocations and detailed development management policies. These may be supported by detailed non-strategic Neighbourhood Plans, with the latter combining with the Local Plan to form the development plan for the local authority area.

These policies are used to assess planning applications. Local Plans include housing targets. The allocation of sites establishes the principle that specific types and scales of development are appropriate in specific locations. This includes allocating sites for housing and mixed-use development to meet housing targets. It also provides healthcare planners and commissioners with the potential to take a long-term strategic approach to allocating sites to meet health infrastructure needs.

Local Plans may be produced as a single document or as a suite of documents. In general, a Local Plan will take three to five years to produce. Local Plans, and Neighbourhood Plans (usually prepared by Parish and/or Town Councils), must take account of guidance in the [National Planning Policy Framework](#) (NPPF). The NPPF sets out the wide-ranging ways in which planning should promote healthy and safe communities (Chapter 8) and requires Local Plans to have strategic policies which aim to achieve healthy, inclusive, and safe places (para.92)

Local Plans are subject to Sustainability Appraisal (SA) to assess the likely economic, social, and environmental effects of policies. Specific questions are generally included about the built and natural environment encouraging healthy lifestyles and providing necessary health service infrastructure. This is an opportunity to ensure LPAs are considering the relative merits of different sites and policies properly against public health related issues. The considerations that go into the Sustainability Appraisal are essential to what follows in the Local Plan and so early engagement in the Sustainability Appraisal process by Public Health and wider health commissioners can make the biggest difference to the resultant local plan.

Increasingly, assessment of the viability of development is important and local planning authorities must ensure that costs resulting from policy requirements would not make development unviable. Therefore, all local plans should contain policies to ensure health issues are considered in new development. Many more recent local plans set a requirement for health impact assessments (HIA) to be undertaken by developers of larger scale housing developments, defined according to [current guidance on HIA use](#) in the planning process. In addition, local planning authorities have a 'duty to cooperate' on plan making. This requires them to work with prescribed bodies including ICSs and NHS England, as well as other local authorities, to cooperate on strategic cross boundary matters such as health infrastructure.

3.2. PLANNING APPLICATIONS

Except for limited types of permitted development such as the conversion of offices to housing, planning permission is required for housing development. An application will generally be granted permission if it is in accordance with the local plan, unless there are material considerations that indicate otherwise. The revised 2021 NPPF also enables housing to be developed if there is no demonstrable supply of a five-year land supply for housing or previous three years delivery was 75% or less of the housing requirements of an area. Since there is a substantial cost to making a planning application, most promoters usually only apply if they are reasonably confident of getting consent. If an application is refused there is an appeals process via the Secretary of State, which can be costly for the promoter or developer.

- Pre application discussions: Early consultation and liaison on development proposals, although not always a formal requirement, is beneficial in enabling policy requirements to be clearly set out and in resolving potential problems or conflicts before a formal application is submitted. Following any discussions, developers submit either outline or full planning applications.

- Outline applications: An application for outline planning permission allows a decision to be made on the general principles of how a site can be developed. Outline planning permission is granted subject to conditions requiring the subsequent approval of one or more detailed 'reserved matters'. On large sites, it is common to secure an outline permission for the whole site and then to apply for full permissions for specific phases of development over time.
- Full applications: An application for full planning permission results in a decision on the detail of how a site or part of a site can be developed. The planning officer dealing with an application will often negotiate and suggest ways to improve the scheme; but the main part of the job is to make a recommendation to approve or refuse planning consent. An officer may have delegated responsibility to issue consent, but on large schemes that decision is usually taken by a council's Planning Committee. If planning permission is granted (which usually lasts for 3 years), subject to compliance with planning conditions, development can take place.

3.3. IMPLEMENTATION

The final stage is implementation of a planning permission. The timing of the implementation of schemes granted planning permission, and in some cases whether they are implemented at all, cannot be guaranteed. From the developer's perspective the planning system is only an element of the construction process. Issues may arise that delay implementation. These can be varied, and often relate to market conditions, site costs, access to finance and the availability of construction staff or materials.

4. PROCESS FOR HEALTH COMMISSIONERS ENGAGEMENT IN PLANNING

The process for health commissioners' engagement with the planning process is set out in detail below and is also summarized in Figure 6 at the end of this section.

4.1. PLAN MAKING

The extensive consultation that takes place on plan making provides the most significant opportunity for health partners including the ICS to use their expertise to ensure that Local and Neighbourhood Plans reflect national and local health priorities adequately.

During the preparation of their Local Plans the respective LPAs will need to consult all statutory and other agreed health² and social care consultees and at "Regulation 18 and 19" statutory consultation stages. Each of the groups of organisations will be responsible for responding on their own behalf in a manner which meets the deadlines for the planning process.

² There will be a single point of contact for NHS / health engagement via the ICS Estates' Group –see below

To meet NPPF requirements, it is important for relevant health planning and commissioning bodies to ensure that strategic Local Plan policies reflect their own strategic priorities and the available evidence base.

Evidence on likely long term overall growth needs and the consequent strategic health needs will be key. Public Health and local planning authorities in Norfolk and East Suffolk have made available provisional figures, based on demographic modelling, for likely annual and long-term population growth in each area. This evidence assists both Local Plan making authorities and the relevant healthcare commissioning body and ICS to assess future health facilities and workforce needs and to plan accordingly.

This evidence is intentionally “high level” to assist strategic planning. It is provided at the place level and is not intended to be site specific as it is the role of the relevant healthcare commissioning body and ICS to determine how best to address the health care needs resulting directly from specific new developments. However, updated data will in the future be publicly available online which will, along with an improved understanding of the implementation of new housing schemes, provide a valuable evidence base to assist healthcare planners and commissioners in planning for health needs in the medium and long term.

In addition to this, health partners will use comprehensive health planning tools which provide detailed information on health estate, travel times to services, clinical indicators such as prevalence, GP workforce data, and mapping future housing trajectories. It may also be possible for health care planners and commissioners to propose specific sites to be allocated for health infrastructure development to meet medium to long term needs.

4.2. PLANNING APPLICATIONS

While Norfolk County Council and Suffolk County Council Public Health are informed of planning applications for larger housing developments (typically 10 or more dwellings or of an area of 1 hectare or greater) as county councils are statutory consultees, other health planning and commissioning bodies are not listed nationally as statutory consultees on such applications. One of the aims of this document therefore is to raise awareness of the importance of local planning authorities in Norfolk and East Suffolk gaining input on housing developments not only from Public Health, but also from relevant health service planning and commissioning bodies. The ICS estate groups role as coordinator between local planning authorities, health partners and the ICS will assist both in ensuring that development is planned to enable healthy lifestyles and allow service delivery to be planned effectively. Guidance is offered [nationally](#) on some considerations on who to engage.

The ICS Estates' Group³ will be able to offer a “one stop” approach for planners to engage with the wider health system and garner views on, for example, primary and acute provision, patient needs and direct consultation requests to the ICS. This will not of course preclude individual GP surgeries or other health partners responding on an individual basis.

³ This group has oversight of NHS buildings and other estate and will be able to access tools to map and plan for future growth with a specific health perspective. From 2018 it has agreement to act as a conduit for cross-county NHS service engagement

It is particularly important that Public Health and relevant healthcare planning and commissioning bodies, via the mechanism detailed in this protocol, are consulted on proposals for development aimed at groups in society with distinct health needs such as the elderly and students. The respective LPAs should therefore consult Public Health and health partners on planning applications submitted for housing developments of 50 dwellings or more and for all planning applications including care homes, housing for the elderly, student accommodation and any proposals which would lead to significant loss of public open space. This should include any relevant pre-application discussions.

For developments below 50 dwellings which may have an impact upon health services then the ICS Estates' Group should also be contacted for an initial view. Discussions and comments provided on all planning applications will make use of the criteria set out in the Health and Wellbeing Checklist (Appendix 1). Planning officers should make developers aware of this checklist and the benefits of taking account of it in working up housing proposals.

PRE-APPLICATION DISCUSSIONS

Since pre-application discussions are held for most of the larger scale proposals, Public Health and the ICS Estates' Group will be engaged with and comments sought on pre-application proposals in Norfolk for all housing developments of 50 dwellings or more⁴, for those including care homes, housing for the elderly, student accommodation and for proposals which would lead to significant loss of public open space. Public Health and health partners may adjust this threshold of 50 dwellings in the future in consultation with the local authority planners. However, during this review (2022) it was still felt to be a suitable threshold.

Active consideration of other developments related to, for example transport and minerals and waste, were considered to be included within the scope of the protocol. However, it was felt that there are existing structures, processes and legislation which cover these types of development.

Some LPAs within Norfolk and East Suffolk are introducing requirements for HIAs to be produced for larger developments and all partners are encouraged to consider broader use of HIAs or similar tools to understand broader health, wellbeing and prevention opportunities afforded by development and to minimise unforeseen circumstances. To this end colleagues have been approached by the Town and Country Planning Association (TCPA) with an offer to provide support to work with all signatories to the protocol about how it may best be supported to work across Norfolk and East Suffolk.

Pending revised tools and guidance the current Appendix 1 is to be retained to help support existing plan making and development requirements to build wider determinants of health into the planning process.

Engagement in pre-application discussions will, in many cases, be the most important stage of involvement in the planning application process as it enables Health and Social care partners and Public Health to influence the design principles of development at its earliest stage.

⁴ See the comment above about developments below 50 dwellings which may require an initial view from the ICS Estates' Group

OUTLINE PLANNING APPLICATIONS

Consultations on outline applications provide an excellent opportunity for health partners and Public Health to comment on emerging development proposals, influencing the eventual development form and identifying whether additional health facilities may be required to serve the community. Adding to the information gained through the Local Plan site allocation process, outline applications enable health and Public Health to gain further knowledge of the scale and likely timescale for delivery of housing. They also provide an additional opportunity for NHS consultees and public health to influence the form of a development before detailed proposals are submitted. Only a proportion of major housing applications, usually the larger scale and more complex proposals, will include an outline phase.

FULL PLANNING APPLICATIONS

Consultation on a full planning application is the final opportunity for health partners and Public Health to influence development proposals. As this is late in the planning process, there will be limited scope for change, highlighting the importance of consultation on outline planning applications. The relevant health authorities, and Public Health will, if deemed appropriate, provide a written response to a consultation from a planning officer within 21 days of the consultation subject to negotiated extension time. This period includes an opportunity for communication between health and social care partners, Public Health, United Kingdom Health Security Agency, NHS England Area Team and NHS Estates if required, and the ICS, on the initial results of modelled output. The criteria set out in the Health and Wellbeing checklist (see Appendix 1) will be used as the basis of detailed comments.

The written response from health and Public Health will be reported in the planning officer's report. Where health partners and Public Health have provided a written response to a planning application case officer, they should receive in writing notification of the planning decision including any relevant conditions attached to the planning decision. It is expected that the relevant local authority will maintain communications between the planning officer, Public Health and the respective ICS or any other relevant health service commissioning body, as its 'duty to cooperate' as created in the Localism Act 2011 and subsequent amendment(s).

4.3. IMPLEMENTATION

Where developer funding is considered appropriate towards health provision associated with new residential development and is in line with the [Community Infrastructure Regulations \(2010 as amended\)](#), this will normally be secured either through Planning Obligations; and/or Community Infrastructure Levy funds. Local Authorities will need to record any such funding arrangements in their annual Infrastructure Funding Statements (IFS).

Since the timing of the implementation of schemes granted planning permission cannot be guaranteed, it is very important that both Public Health and health commissioners have access to the best available information on delivery that the LPA can provide. In most cases, the main source of information will be the Annual Monitoring Report (AMR) produced by each local planning authority, usually at the end of the calendar year. The appropriate mechanism should be in place for each AMR to be shared by the LPA with the ICS. It is suggested that there be an annual meeting between partners to this protocol to consider the data within the AMR and review how well the protocol is working.

There are several existing meetings at different geographical levels which include planners, NHS colleagues and Public Health. The protocol will not prescribe the form and function of these but recommends a range of engagement processes to meet a wide range of information and consultation needs.

4.4. CONTACT DETAILS FOR PROTOCOL USE

NHS ICS Estates: nwccg.icsestates@nhs.net

Norfolk County Council Public Health: phplanning@norfolk.gov.uk

Suffolk County Council Public Health: phplanning@suffolk.gov.uk

Figure 6: Summary Table – The Involvement of Health and Norfolk Public Health in the Planning Process

1. Plan making	
<p>Extensive consultation over a significant period provides the opportunity for Health and Social Care partners and Public Health to ensure that Local Plans reflect national and local health strategies and priorities and address infrastructure needs;</p> <p>Health partners and Public Health to take account of Local Development Schemes and ensure evidence is available for consideration by plan makers.</p>	
2. Planning applications	
<p>Health and Social care partners and Public Health to be consulted on all planning applications for housing developments of 50 dwellings or more, and for care homes, housing for the elderly, student accommodation and loss of open space.</p> <p>LPAs will also consult on those sites less than 50 dwellings where there is likely to be cumulative impact (exceeding 50 dwellings) when considered with other contiguous application/s or applications close by.</p> <p>Health partners and Public Health comments to focus on ensuring development will enable healthy lifestyles and allow service delivery to be planned effectively.</p>	
Pre-application discussions	Health partners and Public Health will attend meetings as appropriate and provide comments on all pre-application proposals consulted on, when resources allow.
	Where HIAs are required discussions should include its scope and nature.
Outline planning applications	Health partners and Public Health will provide comments on all pre- application proposals they are consulted on; usually only large complex proposals are included in outline phase.
	Enables health partners and Public Health to enhance their intelligence on the scale and time frame for housing developments and to influence the form of development.
Full planning applications	Final opportunity for health partners and Public Health to influence development proposals.
	Through the appropriate mechanism, health partners and Public Health will provide a written response within 21 days of receipt of the request, in consultation with relevant commissioning health bodies, subject to negotiated extension time. Response will be reported in the planning officer's report.
3. Implementation	
<p>Health partners and Public Health provided with best available information on implementation from the LPAs through their published AMRs and attendance at bi- annual Local Plan meetings with the respective LPAs.</p>	
4. Accountability	
<p>Public Health will report to the Health and Wellbeing Board annually, on a 'need to know basis'.</p>	

5. CONCLUSIONS

It is widely acknowledged that the environment in which we are born, grow, live, work and play (Marmot, 2010) is a major determinant of our health and wellbeing. Housing quality, air pollution, road infrastructure, access to green space and walk- ability of our neighbourhoods, along with many other social and environmental factors, contribute directly to our health and wellbeing and can impact on our ability to live healthy lifestyles. The ability to access appropriate health services when we need them is also a key requirement for our health and wellbeing.

This is recognised by the National Planning Policy Framework which sets out wide ranging ways in which local planning authorities together with their public health and health service colleagues can contribute to maintaining the health promoting environment.

This paper outlines a documented process that will help to ensure that local planning authorities can work effectively with their Public Health and health service colleagues to ensure the recommendations within the National Planning Policy Framework are carried forward and that the principles of promoting health and wellbeing through the local planning system are implemented across Norfolk.

The collaboration between the Norfolk and Waveney ICS, Public Health, and local planning authorities in following this documented process provides an opportunity to share expertise between the sectors and to support the healthy growth across the communities of Norfolk and East Suffolk. Through the use of the health care requirements modelling tool it will also assist in the long-term strategic planning of health service infrastructure.



Appendix 1 A Healthy planning checklist for Norfolk and East Suffolk

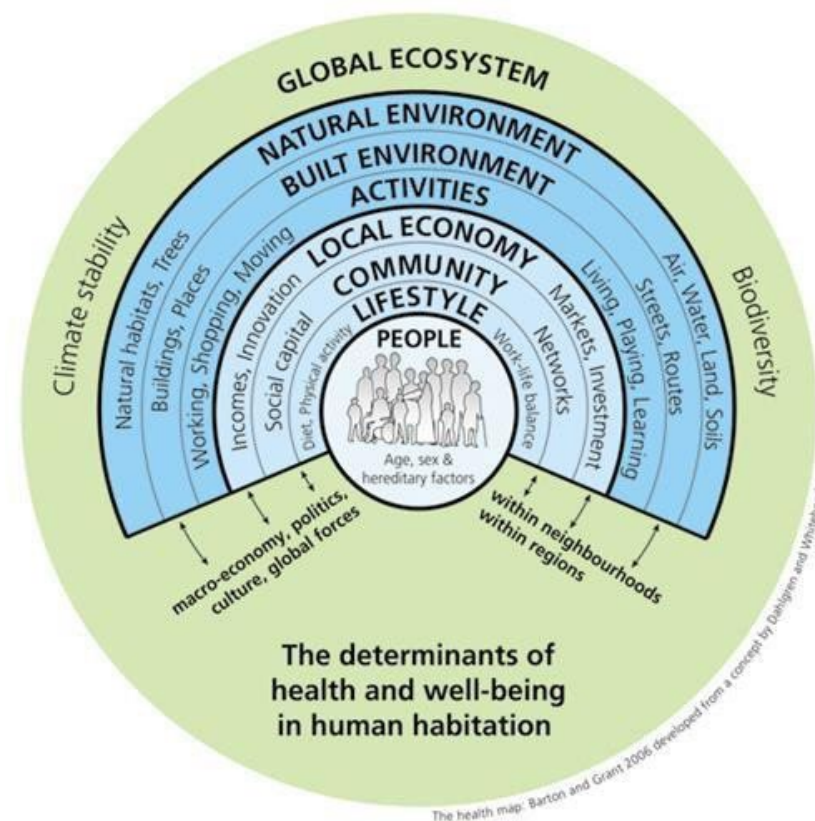


The links between planning and health are long established. The Health Map⁵ shows how lifestyle factors are nested within the wider social, economic, and environmental determinants of health which are, in turn influenced by the built and natural environments in which we live. We know that developments that are carefully planned for and managed may contribute positively to the health and well-being of a community. National Planning Policy Guidance requires local planning authorities to ensure that health and well-being, and health infrastructure are considered in local, and neighbourhood plans and in planning decision making.

The Healthy Planning Checklist for Norfolk has been developed to facilitate joint working to improve health. It is based upon the London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Toolkit⁶ and the Royal Town Planning Institute (RTPI) Principles for Healthy Communities⁷. The Checklist is intended to provide a practical tool to assist developers and their agents when preparing development proposals and local planning authorities in policy making and in the application process. It also provides a framework for Norfolk County Council Public Health when considering health and wellbeing impacts of development plans and planning applications.

The checklist is structured around six healthy planning themes:

- Partnership and inclusion
- Healthy environment
- Vibrant neighbourhoods
- Active lifestyles
- Healthy housing and
- Economic activity



⁵ Barton H and Grant M (2006) **A health map for the local human habitat** The Journal of the Royal Society for the Promotion of Health November 2006 126: 252-253,

⁶ London Healthy Urban Development Unit (2013) Rapid Health Impact Assessment Tool www.healthyurbandevelopment.nhs.uk

⁷ RTPI Principles for Healthy Communities in RTPI (2009) Good practice note 5: Delivering healthy communities.

USING THE CHECKLIST.

The checklist is designed to highlight issues and facilitate discussion and can be used flexibly, reflecting the size and significance of the development. It is best used prospectively, before a plan or proposal is submitted, but can also be used concurrently and retrospectively. Used prospectively it can help assess plans and proposals and inform the design and layout of a development and influence those factors that can impact on the health and wellbeing of residents and the wider communities of Norfolk.

Consideration should be given to each of the six healthy planning themes. It is acknowledged that there will be crossover with other assessments, including environmental impact and transport assessment, and an integrated approach is encouraged.

HEALTHY PLANNING CHECKLIST				
	Criteria to consider	Comments and recommendations	Policy requirements, standards, and evidence	Why is it important?
THEME 1	PARTNERSHIP AND INCLUSION			
Engagement	<p>Health and planning are integrated at an early stage of plan making and proposal preparation.</p> <p>Communities, including vulnerable and hard to reach groups have been engaged in the development of plans and policies.</p>		<p>Planning Policy Guidance, who are the main health organisations a local authority should contact and why?</p> <p>National Planning Policy Framework Chapter 8. National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>Healthy and safe communities - GOV.UK (www.gov.uk)</p> <p>National Design Guide – Chapter U3 (social inclusivity)</p>	<p>Community engagement before and during construction can help alleviate fears and concerns.</p> <p>Creating a sense of community is important to individual's health and wellbeing and can reduce feelings of isolation and fear of crime.</p> <p>Planning can support communities and improve quality of life for individuals by creating environments with opportunities for social networks and friendships to develop.</p>
Integration	The design creates environments where people can meet and interact and connects the proposal with neighbouring communities.			

THEME 2		HEALTHY ENVIRONMENT		
Construction	The plan or proposal minimises construction impacts such as dust, noise, vibration, and odours.		<p>National Planning Policy Framework Chapter 15 and e.g. paragraph 174(e)</p> <p>National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>National Design Guide – Chapters R1, R2, R3 (Resources)</p>	Construction activity can cause disturbance and stress which can have an adverse effect on physical and mental health. Mechanisms should be put in place to control hours of construction, vehicle movements and pollution.
Air quality	The plan or proposal minimises air pollution.			The long-term impact of poor air quality has been linked to life-shortening lung and heart conditions, cancer, and diabetes.
Noise	The plan or proposal minimises the impact of noise caused by traffic and commercial uses through attenuation, insulation, site layout and landscaping.			Reducing noise pollution helps improve the quality of urban life.
Sustainable energy and materials	The plan or proposal maximises opportunities for renewable energy sources and promotes the use of sustainable materials.			Access to nature and biodiversity can have a positive impact on mental health and wellbeing.
Biodiversity	The plan or proposal contributes to nature conservation and biodiversity.			New development can improve existing, or create new, habitats or use design solutions (green roofs, living walls) to enhance biodiversity.

Local food growing	The plan or proposal provides opportunities for food growing, for example by providing allotments, private and community gardens.			Providing space for local food growing helps promote more active lifestyles, better diets, and social benefits.
Flood risk	The plan or proposal reduces surface water flood risk through sustainable urban drainage techniques, including storing rainwater, use of permeable surfaces and green roofs.			Flooding can result in risks to physical and mental health. The stress of being flooded and cleaning up can have a significant impact on mental health and wellbeing.
Overheating	The design of buildings and spaces avoids internal and external overheating, through use of passive cooling techniques and urban greening.			<p>Climate change with higher average summer temperatures is likely to intensify the urban heat island effect and result in discomfort and excess summer deaths amongst vulnerable people.</p> <p>Urban greening - tree planting, green roofs and walls and soft landscaping can help prevent summer overheating.</p>

THEME 3		VIBRANT NEIGHBOURHOODS		
Social infrastructure	The plan or proposal contributes new social infrastructure provision that is accessible, affordable, and timely.		<p>Planning Policy Guidance. How should health and well-being and health infrastructure be considered in planning decision making?</p> <p>National Planning Policy Framework paragraph 20,92c, 93 National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>Healthy and safe communities - GOV.UK (www.gov.uk)</p>	<p>Future social infrastructure requirements are set out in the local authority infrastructure plans and developments may be expected to contribute towards additional services and facilities.</p>
	The plan or proposal promotes access to a range of community facilities and public services (such as health, education, and cultural infrastructure) that are well designed and easily accessible.		<p>Healthy and safe communities - GOV.UK (www.gov.uk)</p>	<p>Good access to local services is a key element of a lifetime neighbourhood and additional services will be required to support new development.</p>
Access to fresh food	The plan or proposal provides opportunities for local food shops and avoids an over concentration or clustering of hot food takeaways.		<p>Planning Policy Guidance, what is a healthy community? How can planning create a healthier food environment?</p> <p>Healthy and safe communities - GOV.UK (www.gov.uk)</p> <p>National Design Guide Chapter U1 (mix of uses)</p>	<p>A proliferation of hot food takeaways and other outlets selling fast food can harm the vitality and viability of local centre's and undermine good dietary behaviour</p>

THEME 4	ACTIVE LIFESTYLES			
Access	<p>The plan or proposal protects and enhances existing and/or provides suitable new accessible green and open space, play and sports spaces, woodlands, and allotments (or provides alternative facilities in the vicinity). It sets out how these new spaces will be managed and maintained for the lifetime of the development.</p>		<p>National Planning Policy Framework Chapter 8 Promoting healthy and safe communities National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>National Planning Policy Framework Chapter 9 Promoting sustainable transport National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>Safe, sustainable development aims and guidance notes for local Highway Authority requirements in Development Management, Norfolk County Council. Highway Guidance for Development</p>	<p>Access to open space and community facilities has a positive impact on health and wellbeing. Living close to areas of green space, parks, woodland, and other open space can improve physical and mental health regardless of social background.</p>

<p>Travel and transport</p>	<p>The plan or proposal has a travel plan that includes adequate and appropriate cycle parking and storage and traffic management and calming measures.</p> <p>The layout is highly permeable and includes safe, well-lit, and networked pedestrian and cycle routes and crossings.</p> <p>The plan or proposal minimises travel to ensure people can access facilities they need by walking cycling and public transport.</p> <p>The plan or proposal keeps commercial vehicles away from areas where their presence would result in danger or unacceptable disruption to the highway or cause irreparable damage.</p>		<p>National Design Guide Chapters M1, M2 & M3 (movement)</p>	<p>A travel plan can promote sustainable transport and address the environmental and health impacts of a development.</p> <p>Cycle parking and storage in residential dwellings can encourage cycle participation. Traffic management and calming measures and safe crossings can reduce road accidents involving cyclists and pedestrians and increase active travel.</p> <p>Developments should prioritise the access needs of cyclists and pedestrians.</p> <p>Developments should be accessible by public transport.</p>
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THEME 5	HEALTHY HOUSING			
Accessibl ehousing	<p>The plan or proposal meets all the requirements contained in National Housing standards for daylighting, sound insulation, and private space.</p> <p>The plan or proposal provides accessible homes for older or disabled people.</p>		<p>National Planning Policy Framework Chapter 12 Achieving well-designed places National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>National Design Guide Chapters H1, H2, H3, L2, & U2</p>	<p>Good daylighting can improve the quality of life and reduce the need for energy to light the home.</p> <p>Improved sound insulation can reduce noise disturbance and complaints from neighbours. The provision of an inclusive outdoor space which is at least partially private can improve the quality of life.</p> <p>Accessible and easily adaptable homes can meet the changing needs of current and future occupants.</p>
Healthy living	<p>The plan or proposal provides dwellings with adequate internal space, including sufficient storage space and separate kitchen and living spaces.</p> <p>Practical use for garden space is provided and where garden space is impractical effectively managed communal garden space will be provided.</p> <p>The plan or proposal encourages the use of stairs by ensuring that they are well located, attractive and welcoming.</p>			<p>Sufficient space is needed to allow for the preparation and consumption of food away from the living room to avoid the 'TV dinner' effect.</p> <p>Rather than having lifts at the front and staircases at the back of buildings hidden from view, it is preferable to have them located at the front to encourage people including those that can use them.</p>

Housing mix and affordability	Neighbourhoods are designed with a mix of housing types and tenures and provide accommodation, which is adaptable to cater for changing needs, including the ageing population.			The provision of affordable housing can create mixed and socially inclusive communities. The provision of affordable family sized homes can have a positive impact on the physical and mental health of those living in overcrowded, unsuitable, or temporary accommodation.
	Affordable housing is integrated in the whole site and will avoid segregation.			Both affordable and private housing should be designed to a high standard ('tenure blind').

THEME 6	ECONOMIC ACTIVITY			
Local employment and healthy workspaces	<p>A range of employment opportunities are available within the neighbourhood or is accessible by sustainable travel means.</p> <p>The plan or proposal includes commercial uses and provides opportunities for local employment and training, including temporary construction and permanent 'end-use' jobs.</p>		<p>National Planning Policy Framework Chapter 6 Building a strong, competitive economy</p> <p>National Planning Policy Framework - GOV.UK (www.gov.uk)</p>	<p>Unemployment generally leads to poverty, illness, and a reduction in personal and social esteem. Employment can aid recovery from physical and mental illnesses.</p> <p>Creating healthier workplaces can reduce ill health and employee sickness absence.</p>

Planning Committee

31 March 2023

Agenda item number 13

Halvergate and Tunstall Conservation Area

Appraisal- consultation

Report by Historic Environment Manager

Summary

The Authority has a statutory duty to review and appraise its Conservation Areas. The purpose of this report is to inform members of the re-appraisal process for Halvergate and Tunstall Conservation Area and to seek approval to proceed with the public consultation on the draft document and associated proposals contained within it, including additions to the Broads Authority Local List.

Recommendation

To approve the commencement of the public consultation process for Halvergate and Tunstall Conservation Area Appraisal.

1. Introduction

- 1.1. The Authority has a duty to identify and maintain up-to-date appraisals of Conservation Areas and to publish proposals for their management. Members have previously agreed to the Authority carrying out the phased re-appraisal of our Conservation Areas.
- 1.2. The Halvergate and Tunstall Conservation Area lies within Broadland District Council's and the Broads Authority Executive area. The whole of Tunstall is within the BA area and there is a physical and visual connection between this Conservation Area and the immediately adjoining Halvergate Marshes Conservation Area, which is wholly within the Broads Authority Executive area. It has therefore been agreed that the Broads Authority should carry out the re-appraisal, with input from colleagues at Broadland District Council.
- 1.3. The Conservation Area at Halvergate and Tunstall was first designated in 2007, which is when it was last appraised.
- 1.4. As part of the re-appraisal process, officers have considered whether boundary changes are required and have concluded that no boundary changes are necessary in this instance.

- 1.5. It is proposed to add a number of buildings in Tunstall to the Broads Authority's Local List. A series of management and enhancement proposals will also be detailed in the document.
- 1.6. The draft proposals for the Halvergate and Tunstall Conservation Area Appraisal were presented to HARG at its meeting on 10 March 2023. They were happy for consultation to proceed.
- 1.7. The draft Halvergate and Tunstall Conservation Area Appraisal is attached at Appendix 1.

2. The Proposed Consultation Process

- 2.1. It is a requirement to carry out public consultation as part of the appraisal process. In preparing the draft appraisal document, we have already consulted Halvergate and Tunstall Parish Council and went on a walk around the villages with them. We have also consulted Broadland District Council and their comments have been taken into account.
- 2.2. We intend to provide all households within the villages with a leaflet about the consultation. It will provide links to the draft appraisal that can be viewed online and details of how to request a hard copy. It will also provide contact details for officers, so that we can answer any queries and so that comments can be submitted to us. We will also hold a drop-in event at Halvergate Village Hall on Saturday 13th May. Other bodies such as the Highway Authority, Historic England, local Members and the County Historic Environment team will also be consulted.
- 2.3. We intend to commence consultation on 14 April running until 9 June 2023.

3. Proposed Contents of the Appraisal

- 3.1. The Conservation Area Appraisal follows the standard format for such documents. This has changed since the publication of the last document and now follows the suggested structure set out by Historic England in their guidance, 'Conservation Area Appraisal, Designation and Management' (February 2019). It contains assessments of the historic and architectural interest of the villages, and spatial analysis of what makes its special, as well as management and enhancement proposals. The purpose is to ensure that the special characteristics of the settlement are set out and can be preserved and enhanced when changes are proposed.
- 3.2. We are proposing that a number of buildings in Tunstall, that are identified as contributing positively to the character of the Conservation Area, are added to the Authority's Local List. These were identified in the 2007 appraisal but had not previously been formally adopted as Locally Listed buildings. Please note, Broadland District Council do not have a formal Local List so similar buildings in their area will be recognised as 'Locally Identified Heritage Assets'.

4. Conclusion

- 4.1. The Authority has a statutory duty to review Conservation Area Appraisals and publish up-to-date appraisals and management proposals.
- 4.2. The consultation of residents, business owners and others with an interest in the area is an important part of the process and will help to inform the final appraisal document.
- 4.3. The draft Halvergate and Tunstall Conservation Area Appraisal has been completed and it is recommended that approval is given for us to proceed with consultation on the basis described above.

Author: Kate Knights

Date of report: 14 March 2023

[Broads Plan](#) strategic objectives: D3

Appendix 1 – Draft Halvergate and Tunstall Conservation Area Appraisal (March 2023)

Halvergate and Tunstall Conservation Area Character Appraisal

Summary of special interest

Halvergate and Tunstall are adjoining villages situated on the western edge of the Halvergate Marshes, south of the A47 at the 'Acle Straight'.

Key characteristics

- Pockets of development interspersed with fields and green spaces
- Significant mature trees
- Small scale historic buildings using vernacular materials
- A number of large historic houses with large grounds
- The location of the settlement on raised ground above the marshes
- Marshland views to the east

Introduction

What are Conservation Areas?

A conservation area is defined as an 'area of special architectural or historic interest the character of which is it desirable to preserve or enhance' (Section 69 (1), Planning (Listed Buildings & Conservation Areas) Act 1990). As described by Historic England (2020):

'Historic places convey a sense of uniqueness and awe and are strong emotional pillars for common values, connecting communities across England. Cultural heritage as a physical resource can play a critical role for community cohesion, collective action and in shaping human health and societal wellbeing. Heritage can also improve personal wellbeing, by helping us understand our past, our individual and communal identity and help us connect with the places where we live'. There are therefore clear community benefits for the protection and preservation of high-quality historic environments such as conservation areas.

Designation of a conservation area recognises the unique quality of a place. It is the contribution of individual buildings and monuments as well as other features including (but not limited to) topography, materials, spatial relationships, thoroughfares, street furniture, open spaces and landscape. Many elements contribute to the character and appearance of an area, resulting in a distinctive local identity.

They may include:

- the architectural quality of the buildings themselves
- the materials of which they are made
- their relationship with one another and their setting
- the character of the spaces between buildings, including walls, hedges and trees and ground surface materials

- views both within the area and from outside.

The extent to which a building or group of buildings and structures positively shape the character of a conservation area comes from their street-facing elevations, the integrity of their historic fabric, overall scale and massing, detailing and materials. Rear and side elevations can also be important, particularly in the Broads where building elevations often face and address the river or Broads, side views from alleys and yards or views down onto buildings in valleys or low-lying topographies. If the special qualities of a conservation area are retained and inappropriate alterations prevented, the benefits will be enjoyed by owners, occupiers and visitors to the place, including the ability to experience interesting and important heritage structures and places. It is therefore in the public interest to manage the area's character and appearance for cultural appreciation.

It should also be acknowledged that change is inevitable, and often beneficial, and the purpose of a Conservation Area status is not to prevent development but is a means of managing change in a way that conserves and enhances the character and appearance of historic areas.

Legislative and policy background

The concept of conservation areas was first introduced in the Civic Amenities Act 1967, in which local planning authorities were encouraged to determine which parts of their area could be defined as "Areas of Special Architectural or Historic Interest, the character or appearance of which it is desirable to preserve or enhance". The 1967 Act was important because for the first time recognition was given to the architectural and historic interest, not only of individual buildings but also to groups of buildings: the relationship of one building to another and the quality and the character of the spaces between them.

The duty of local planning authorities to designate conservation areas was embodied in the Town and Country Planning Act 1971, Section 277. Since then further legislation has sought to strengthen and protect these areas by reinforcing already established measures of planning control, which is now consolidated in the Planning (Listed Buildings and Conservation Areas) Act 1990.

The National Planning Policy Framework (2021) sets out the overarching requirement for local planning authorities to identify and protect areas of special interest. Although primarily in Broadland District Council's area, on its east side Halvergate Conservation Area includes three small parcels of land in the Broads Authority Executive area. The Conservation Area at Tunstall lies entirely within the Broads Authority area. Both villages sit outside the settlement limit and so new development is

likely to be limited. However, the Broads Local Plan (2019) sets out the Authority's policies for guiding development within the Broads Executive Area, whilst the Development Management DPD (2015) sets out the council's policy for guiding development within Broadland District Council's area (see more information at Appendix 3 planning policy and guidance).

Aims and objectives of the appraisal

Halvergate and Tunstall have a particular character worthy of conservation. The Conservation Area at Halvergate and Tunstall was originally designated in 2007 when the current Conservation Area appraisal was produced. This re-appraisal (2023) aims to bring the document in line with current Historic England guidance, examine the historic settlement and special character of Halvergate and Tunstall, review the boundaries of the Conservation Area and suggest areas where enhancements could be made. It also identifies buildings that contribute to the character of the Conservation Area. Where they sit within the Broads Authority area it is hoped that they will be Locally Listed and within Broadland District Council's area they will be considered locally identified heritage assets.

The intention is that the appraisal provides a sound basis for development management to ensure that proposals for change enhance and protect the Conservation Area as well as stimulating local interest and awareness of both problems and opportunities. It should be of use to everyone involved in changes to the built environment in the villages and help to inform home owners, architects and developers when putting together proposals for change and planning departments and Planning Inspectors when making decisions on those applications.

What does designation mean for me?

To protect and enhance the Conservation Area, any changes that take place should positively conserve the character and special interest that make it significant. Statutory control measures are intended to prevent development that may have a negative or cumulative effect on this significance.

The additional controls in Conservation Areas include:

- the Extent of Permitted Development Rights - Permitted Development Rights (i.e. changes that are allowed without requiring planning permission from the local authority) may be restricted. For example: replacement windows, alterations to cladding, the installation of satellite dishes, removing chimneys, adding conservatories or other extensions, laying paving or building walls.

- Changing the use of a building (e.g. from residential to commercial) will require planning permission.
- Demolition - Demolition or substantial demolition of a building within a Conservation Area will usually require planning permission from the local authority.
- Trees - If you are thinking of cutting down a tree or doing any pruning work to a tree within a Conservation Area you must notify the local authority 6 weeks in advance. This is to give the local authority time to assess the contribution that the tree makes to the character of the Conservation Area and decide whether to make a Tree Preservation Order.

It should be noted that the types of alterations/development that need permission can be altered by the local authority by the making of Article 4 Directions. It is therefore advisable to check with the local planning authority before preparing to start any work within a Conservation Area.

Grants- Grant assistance may be available for listed buildings at risk, and in special circumstances for buildings or structures which are not listed but are considered to be of architectural and historic interest and at risk (only for sites outside the Broads Executive Area). Contact the Historic Environment team at Broadland District Council for more information.

General character, location and uses

Halvergate

Though not more than sixteen miles from Norwich and eight miles from Great Yarmouth, Halvergate feels relatively isolated. It is situated on the western edge of the, now drained, Great Estuary which lies between the rivers Yare to the south and Bure to the north and stretches eastwards to Breydon Water and Great Yarmouth. There are no further villages or roads to the east until one reaches Burgh Castle and Great Yarmouth, while to the south, beyond Reedham, travel is restricted by the river Yare with only the chain ferry providing a crossing. Until the building of the Acle Straight and the Branch Road across the wide marshes, the only land link would have been westwards to Norwich via by-ways and small villages, and eastwards along the Stone Road and the Fleet Dyke to Great Yarmouth.

As one approaches the village across the marshes from the former Stracey Arms: the village is set on rising ground against a backdrop of trees, in marked contrast to the flat foreground. The south-western approach on the other hand, whether from Freethorpe or Moulton St Mary, is over gently undulating countryside. But here there is a gentle descent towards the junction by the Village Hall

before the ground rises again past the church towards the centre of the settlement. Thus from both sides, Halvergate has the clear, distinct image of a village “set on a hill”. From Tunstall to the north and Wickhampton to the south the approaches to the village roughly follow a level contour along the edge of the marsh to the east.

The Halvergate and Tunstall Conservation Area sits immediately adjacent to the Halvergate Marshes Conservation Area. Tunstall

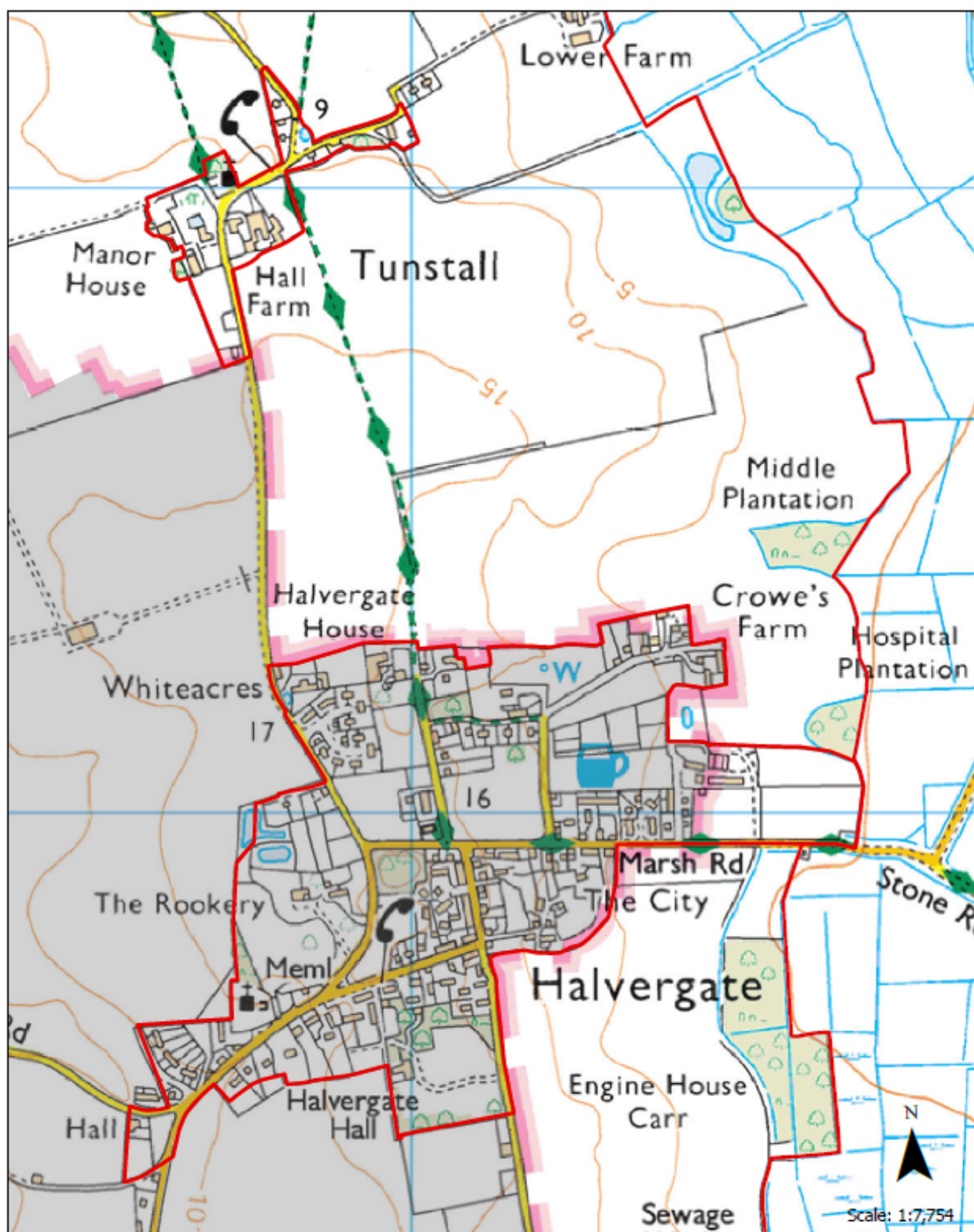
The only road access to Tunstall is by way of Halvergate, less than a mile to the south. East of Tunstall’s church, the road dips slightly before rising again and turning north towards Staithe Farm and ending at Tunstall Dyke. Main rail and road cross the dyke, but these seem as if they are intrusions from another world. The only true link here is with the river Bure which, before the coming of modern road transport, was the main outlet for the produce of Tunstall and quite possibly Halvergate. Unfortunately, today the dyke is largely overgrown and what would have been the Staithe is silted up.

Both settlements sit on the Weaver’s Way long-distance footpath. They are generally attractive and well-maintained. The special character of both settlements derives principally from the way in which groups of buildings are set in the landscape and are separated from each other by open spaces and trees. Modern residential development in Halvergate has led to the erosion of some of these separating spaces: further development could put the special character of the village at risk. The boundaries of the Conservation Area are intended to include groups of buildings of interest and the open spaces and trees which form their setting and keep them distinct from each other. The current boundary is considered satisfactory and we do not propose changing the boundaries as part of this re-appraisal process.

Halvergate & Tunstall conservation area (Broadland)

Last appraised: 2020

Conservation area
 Outside broads area



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Historic interest

There is a long history of settlement in the area, with finds from the Neolithic period (3000 to 1700 BC) having been made in the parish of Halvergate. There is also physical evidence of Bronze Age ring ditches, whilst the Norfolk National Mapping Programme of 2006-2007 discovered extensive cropmarks indicating coaxial field systems of later Iron Age/Roman date across the Halvergate area. By 1086, the Domesday survey identified the village as *Halfriate* and recorded it as having 69 households. This puts it in the largest 20% of settlements recorded in the book so it was a substantial settlement by that date. By 1182 a document refers to *Halvergata*. Its meaning is uncertain: the first part of the name probably means “half”, the second part possibly “gate”, interpreted as meaning an island separating the river into two channels, though it has also been suggested that the name may come from the Old English for ‘Land for which half a heriot (a feudal service or payment) is due’.

Tunstall is a hamlet situated to the north of Halvergate. The name derives from an Old English word for the site of a farm or for a farmstead. The proximity of the villages means that their histories are much inter-twined and in 1935 the civil parish of Tunstall was added to that of Halvergate.

Halvergate stands on relatively high land at 22m above sea level, on the western edge of the flat drained Halvergate Marshes. They stretch to Great Yarmouth and sit at sea level. This significant and distinctive area is a conservation area in its own right, the Halvergate Marshes Conservation Area. Although Halvergate now sits three miles south of the river Bure and four miles from the Yare, in its earliest days it was a sea port and in the thirteenth century it was granted a market charter. The only remnant of this part of the village’s history is the Church of St Peter and St Paul. The nave and chancel of the building date from the early 14th century, although it is likely to have been built on the site of an earlier church mentioned in the Domesday Book. The church is primarily constructed from local flint, but other building materials including stones such as Leziate Quartzite, would have come from further afield and are evidence of distant trading links.

As in Halvergate, there was a community evident in Tunstall by the time of the Domesday book, which records a church there. The remnants of St Peter and St Paul Church that we see today are likely to date from the 14th and 15th centuries. The significant size of the church in such a small community gives some indication of the village’s status at that time. However, by the mid-17th century, services had stopped and by 1704 the nave roof had collapsed. A Faculty was granted

enabling the ruination of the nave and tower and the repair and extension of the chancel. This is commemorated in the inscribed stone in the bricked-up west gable end of the chancel.

After the Black Death in 1348 there was decline in agricultural production in the Halvergate and Tunstall area and as Norwich and Great Yarmouth grew, Halvergate began to decline in significance. There are no remaining buildings from this period (except the churches).

There is evidence of land management of the marshland since the medieval period and by the 17th century the system of drainage and water management included the use of drainage mills. This resulted in a vast area of rich grazing land (first for sheep and later cattle), with cattle brought from as far away as Ireland. This has provided the basis for both Tunstall and Halvergate's prosperity over the centuries. The prevalence of *marshmen and cowkeepers* among the occupations listed in the local directories during the nineteenth and early twentieth centuries is evidence of this, along with the high number of farms in the area.

Today, some of the oldest buildings in both villages are testament to this agricultural heritage. Hall Farm Barn is a large thatched barn (now sympathetically converted to residential use) which dates from the 17th and 18th centuries. It is located to the south of the junction of The Street and Sandhole Lane, just to the east of the church. Along with its 18th century neighbours, Horseshoe Barn and Harrier Barn, they form a cluster of large barns that must indicate the scale of agricultural activity in what was likely to have been the early centre of the village, in close proximity to the church. Also south of The Street and to the east of the barns is Dawdy's Farmhouse, the origins of which are also 17th and 18th century; the barns and farm buildings associated with Dawdy's Farm have since been lost. The unlisted Waycott Forge sits on The Street and is also likely to date from a similar period, as is The Thatched Cottage which is close by at the junction of The Street, Wickhampton Road and Baker's Road.

As well as this cluster of 17th and 18th century development in what could be considered the centre of the village, other 18th century buildings are evidence of the scattered form of development which is so characteristic of Halvergate. William Faden's map published in 1797 clearly shows a large area of common land to the south and east of the church with most of the village's development scattered around its edge. Building often occurred around common-land and the scattered form of development is also clearly visible on the 1840s tithe maps. It is therefore likely that the relatively dispersed nature of development in Halvergate that we still see today (albeit with 20th century infill

housing) was shaped by this common land. As well as being used by residents for firewood, timber supplies and foraging, it is possible that it was also used to graze cattle in the winter when they would have been moved to slightly higher ground from the low-lying marshes.

Amongst the buildings indicated on Faden's map, the following may well have been present: Halvergate House's barn at the northern end of Squires Road, which pre-dates the 19th century house with which it is now associated, and the early 18th century Red Lion Public House at the eastern end of Marsh Road which is now the only remaining pub of the four or five historically in the village. In Tunstall, the Manor House to the west of Tunstall Street in the centre of the village also dates from the 18th century. As would be expected, these buildings all demonstrate the use of local materials such as red brick, lime render, clay pantiles and water reed thatch.

Tunstall also benefitted from access to a staithe which connected via Tunstall Dyke to the River Bure. Access is via Staithe Road and only a small section of the southern end of this is within the Conservation Area, but occupations such as a coal dealer and wherryman which were likely dependent on this access to the river, are evident in the 1864 Trade Directory of Tunstall. Unfortunately, the channel is no longer navigable, although it was in relatively recent years. The dyke is clearly visible as is the basin that formed the village staithe.

Much of the current road layout in the villages is also likely to pre-date the 18th century, with The Street, Sandhole Road and what may be Marsh Road in Halvergate evident on Faden's map of 1797. The deep and now wooded pit at the corner of Sandhole Road and Marsh Road, as well as the street name itself and other areas of excavations, for example to the north of the east-west section of Squire's Road, suggest that quarrying was also carried out locally. This was perhaps related to brick making for the higher number of buildings erected during the 19th century.

Communications to and from the village improved greatly throughout the 19th century. At the beginning of the 19th century, there was no proper road from Halvergate to Great Yarmouth.. In June 1795, William Marshall wrote of his journey between Halvergate and Great Yarmouth, 'for nearly the first mile, we rode to our horses' knees in water'.

In 1831, the opening of the Acle New Road, between Acle and Great Yarmouth, and the Branch Road connecting the Acle New Road to Halvergate had a great impact on the villages' access to the wider world. Indeed, the Norwich Chronicle of the 23rd of April 1831 states, *'a great advantage of the project is, that by means of the branches, a large tract of the country will be laid open to Yarmouth,*

which has hitherto been nearly excluded or a great part of the year, on account of the distance of roads by a circuitous route'. The road must have provided much greater opportunities for the residents of Halvergate and Tunstall. Likewise, in 1844 the opening of the first railway in Norfolk between Norwich and Great Yarmouth, via Brundall, Cantley and Reedham (just three and a half miles away from Halvergate) must also have radically changed the way the villages related to the outside world.

Perhaps as a result, by the mid-19th century the village is described as *"a parish and well-built village, 7 miles west of Yarmouth, of 495 souls and 2675 acres, 2/3 of which are marshes"* (White's Directory, 1845). A number of wealthy landowners were responsible for building some significant houses in Halvergate and Tunstall during this period. They continue to contribute greatly to the character of the Conservation Area, often sitting on large and mature plots. For example: Hall Farm House, Tunstall Street (now known as Tunstall Hall) which has a date stone 'ERB 1815' referring to the landowner Edward Rising Boulton; Halvergate Hall, Wickhampton Road which was built in the second half of the 19th century for the local farming family, the Gilletts; the Rookery on Sandhole Road c. 1840, built by Robert Howard, a local landowner and Halvergate House, Squire Road which was also built c.1840, probably by William Gillett; as well as the Old Vicarage built opposite the church on The Street in the 1850s. There were also a number of much smaller scale cottages erected in the early 19th century, presumably to house agricultural workers. In particular, 'The City' at the eastern end of Halvergate is evident on the 1840s Tithe Map, as are cottages on Squire's Road and, in Tunstall, cottages were built on Marsh Road.

Other 19th century buildings in the village are evidence of the development of Halvergate during this period. The erection of the grand Primitive Methodist Chapel in 1878 confirmed that the "Establishment" no longer held total sway, while the fine new National School (now School Lodge) on Marsh Lane was to widen the horizons of the younger generation. By 1854 a Post Office had opened in an early 19th century building situated on The Street, the shopfront for the Post Office is still *in situ* today, accessed via the alleyway alongside the building, which also contains outbuildings associated with the old Post Office. All of these buildings are now converted for residential use.

The location of Tunstall and Halvergate meant that during the Second World War they held a strategic position as part of the second line of defence in the event of the enemy breaching the east coast defences. The pillbox and Home Guard Post on Marsh Road and the loopholes in the historic barn at Whiteacres on Tunstall Street are reminders of this legacy, as is the grade II listed War

Memorial for Halvergate and Tunstall, situated at the junction of The Street and Sandhole Road. This brown granite column dates from 1920 and stands in a gated enclosure.

With the advent of radio between the Wars and of television after the Second World War, and with increasing car ownership, the village became less the sole focus of people's lives. While the church, village hall and Red Lion PH survive, the school, chapel and the post office have closed. The rapid mechanisation of agriculture and the reduction in the local work force has led to farm buildings and former workers' cottages being sold for residential conversions, while many new houses have been built for an increasingly mobile population.

Architectural Interest and Built Form

The villages of Halvergate and Tunstall contain a number of buildings of architectural interest, primarily ranging from the 17th to 19th centuries. These demonstrate the changes in society affecting the villages at that time, for example the influence of agriculture on the built form and later the provision of services to the wider community with the erection of the buildings like the school. They are also significant in demonstrating the predominance of vernacular materials.

The two earliest and most significant buildings in the Conservation Area are the medieval churches: St Peter and St Paul's Church in Halvergate and Tunstall church to the north which holds the same dedication. Dating from at least the 14th century, Halvergate church sits on high ground at the west of the village. As one enters the village from the west along Moulton Road, the tower, which dates from c.1450, acts as a local landmark. The church was restored by Brown and Lowe in 1857 and the new porch was built in 1867 by James Benest. In 1873 a new roof was added by R.M. Phipson. The building contains a number of significant architectural features such as flint flushwork, a 14th century doorway with ogee, wave moulded arch, crockets and crocketed pinnacles and finials as well as a rare banner staff locker recess in the south nave wall.

The church of St Peter and St Paul in Tunstall is now largely ruinous, but this does not diminish its interest. It is likely that the church dates from at least the 13th century and the stone voussiors of a 13th century arcade are still visible, as is a 13th century double piscina; both of these are within the south wall. It is also notable for the extensive use of brick and the layout of the numerous putlog holes, which is considered of archaeological interest. By the late 17th century, no services were held at the church and the nave roof had collapsed. The 1704 Faculty is commemorated in the stone plaque on the west wall of the bricked up and repaired chancel, which states, 'This rebuilt by Mrs

Elizabeth Jenkenson, the relict of Miles Jenkenson, Tunstal Esq. and Ms Anne Kelkall, daughter of Miles and Elizabeth. 1705'. The church was declared closed in 1980 although it still acts as a place of solitude for visitors and a point of interest on the Weaver's Way walk. Both churches are predominantly flint with stone dressings and some use of red brick. Halvergate church has a slate roof which is likely to date from the 19th century.

In 1878, non-conformism arrived in Halvergate with the erection of the Primitive Methodist Chapel on Squires Road. Built in a simple neo-classical style, typical of mid 19th century Methodist chapels, the building was erected from gault bricks, with a slate roof, neither of which were local materials and would probably have been brought to the area by the new railway.

Other 19th century institutions included the National School on Marsh Lane, built in 1854 alongside a teacher's residence. The building was extended in 1894 to accommodate 130 children. A fire in 1929 meant that it had to be partially rebuilt. It is a single storey, but tall building with large timber windows and hipped slate roofs and is clearly built in a style associated with 19th century school architecture.

There are a number of significant barns within the Conservation Area. Hall Farm Barn, Harrier Barn and Horsehoe Barn (all grade II listed), to the south of The Street, date from the 17th to 18th centuries and are large red brick structures with parapetted gables and thatched roofs. Their residential conversion has been carried out sensitively and they continue to form an important group of buildings in the centre of the village. In Tunstall, the large barn associated with the 18th century Manor House (grade II listed) is also of significance and is likely to be of a similar date and is evident on the 1840s tithe map. Stables in a lean-to run along its east elevation and the building remains in agricultural/storage use. Built of red brick the building has some good detailing, such as the dentil cornice at eaves level, and the remnants of tumbling in on the brickwork on its north gable suggest that this may once have had parapetted gables containing a thatched roof, although today its roof is clad in corrugated sheets.

The Manor House, Tunstall is dated 1783 and is a two storey, three bay red brick farmhouse, positioned at right angles to Tunstall Street. It has an off-centre 6 panel entrance door with attractive timber doorcase with moulded architrave with key block and a pediment supported on consoles. Again, the building has parapetted brick gables with central chimney stacks.

Its close neighbour, Hall Farmhouse (now known as Tunstall Hall and also grade II listed) is positioned on the opposite side of the road and also sits at right angles to the road and is south facing. It dates from 1815 but was re-fronted later in the 19th century. It is an attractive two storey red brick building with a symmetrical facade, a central 6-panel doorcase with a stained glass fanlight, panelled reveals and reeded columns. The front façade has large sash windows. The building has a T-shaped plan with an interesting rear range. To the south-east of the building is a single storey barn, with the gable that faces the hall having a decorative finial and date stone: ERB 18?? (likely to be Edward Rising Boulton the former owner of Tunstall Hall Farm). Despite its poor condition this barn building is considered to contribute to the character of the Conservation Area and has some group value with the main house.

Back in Halvergate, Dawdy's Farmhouse (grade II listed) is set back from The Street and positioned parallel to it. Internally it is clear that the building dates from the 17th century although externally it appears to be 18th century with a two-storey later extension to the west and single storey extension to the east. The main part of the building is red brick (now colour-washed) with a thatched roof, with parapetted gables and an off-centre axial stack and off-centre doorcase.

Other substantial houses in the village include The Rookery and its outbuildings - in particular its now converted stable block. The Rookery is grade II listed and confusingly is labelled Halvergate Hall on the 1840's tithe map, prior to the building now known as Halvergate Hall being erected. The mid-19th century Halvergate Hall and Halvergate House are also substantial and both grade II listed. The tall red brick boundary walls to Halvergate House are also listed and contribute greatly to the character of the Conservation Area around Squires Road.

The Old Post Office on The Street (grade II listed), is a well-proportioned early 19th century building, its front garden surrounded by a waist-height red brick wall with centrally-positioned wrought iron gate. It is of two storeys, three bays, with a central door and large sash windows, built of red brick with a slate roof. The side elevation of the house contains a simple mid-19th century shopfront which would have served as the Post Office and so is of some historic, as well as architectural, interest.

As well as these relatively grand properties, the Conservation Area contains good examples of 'worker's' housing. Stone Cottage (grade II listed) is a good example of a one and a half storey cottage, built with flint construction and red brick dressing and a thatched roof. It has a central stack, two dormers and parapetted gables. It is attractively positioned in the heart of Halvergate

next to the village pond, with the pond and the cottage complementing each other to create a picturesque scene. It is hoped that the building will soon be repaired after recent fire damage.

Another important part of the Conservation Area is 'The City'. This area is located to the east of The Street and south of Marsh Road. Its narrow road winds down the hill and contains small fields and paddocks dotted between haphazardly arranged cottages, most of which are likely to date from the 19th century and are of red brick (although many are now painted in various shades) with red pantile roofs and chimney stacks. Although the houses are two storeys in height they are small in scale and arranged at angles to one another.

There are other pockets of 19th century workers' housing, for example the red brick, two-storey semi-detached houses on Bakers Road and the terraced housing on Chapel Road and the prominent terrace of three houses set back from the southern side of The Street (Hall Cottages). This larger scale red brick terrace has some decorative elements such as gault brick decoration around the windows and doors forming a chequerboard effect with the red brick to the decorative heads of the casement windows. It also has large chimney stacks designed to make an impression.

Both Tunstall and Halvergate contain other buildings of note, but much of the 20th century development is more suburban in style and provides the village with less of a sense of place. Today the village contains a variety of buildings with one aspect of its character being the juxtaposition between these buildings of different periods.

Spatial analysis, landscape features and important views.

Halvergate

Ten character areas [MAPS AND PHOTOS TO BE PROVIDED] have been identified:

(1) The Street (west)

This cluster is centred on the War Memorial at the junction with Sandhole Road. It includes:

- The outstanding group of former barns of Hall Farm which have been successfully converted to a residential use, (converting barns to houses will inevitably affect their character, but it may nevertheless be the only way to conserve them),
- An attractive group of houses and cottages, including the Thatched House and Beechwood House, Stone Cottage, the Church and adjoining cottages.

- The outbuilding to Pond House, is important in the way it extends out to the street and separates the open spaces on either side.

Important landscape features include:

- The curve and gentle fall of the Street,
- the pond,
- the small green in front of the Church,
- the trees round the Church and behind the Pond and Stone Cottage,
- the green round the War Memorial and the Village Sign,
- the trees bordering the field east of the War Memorial ,
- the trees in the former entrance to the Hall and
- the trees and grounds of Beechwood.

Important walls include:

- the churchyard wall,
- the wall north of Blacksmith's Cottage and linking to Swallow Barn,
- the wall round the former entrance to Halvergate Hall and continuing to an outbuilding along Hall Farm Close.

Good views include:

- looking north-east from the War Memorial through the trees in to the field and the attractive former "sandhole" beyond,
- looking south-west from the War Memorial towards the Thatched House and surrounding buildings,
- looking west down The Street with the Church on the right,
- looking east up The Street past Church Lodge and the Church (just visible above the trees) with the trees of Beechwood on the right,
- looking north-east towards Stone Cottage and the pond with the trees behind.

(2) The Street (east)

This cluster includes Dawdy's Farmhouse, (now without its barn and associated farm buildings to the east), Waycott Forge, two terraces of cottages, the Old Post Office and its outbuildings and the Thatched Cottage (in Wickhampton Road). The outbuilding to the Old Post Office is important in the way it extends out to The Street and provides, with Waycott Forge opposite, a visual "pinch point", separating the traditional part of The Street from the modern "suburban" development beyond.

Important landscape features include:

- the chestnut trees in and around the field east of the War Memorial,
- the trees in the grounds of the Hall and
- the garden in front of Dawdy's Farmhouse.

Important walls include:

- the garden walls to the Old Post Office.

Good views include:

- looking east along The Street towards Waycott Forge and the outbuilding to the Old Post Office opposite and the Thatched Cottage beyond
- looking south-west towards the former barns of Hall Farm, with trees on the right.

(3) The City

This is a scattered group of small-scale cottages in a cul-de-sac sloping down towards the marshes to the east. At one time it was quite separate from the main village centred on The Street. Then a series of widely spaced pairs of semi-detached houses were built in the late nineteenth century along Bakers Road. Finally, the late 20th to early 21st century development on both sides of Bakers Road, essentially "suburban" in form, has joined these two parts of the village together. However, the lie of the land and the informal layout of its buildings, gardens and paddocks allows the City to retain much of its essential character.

Important landscape features include:

- the many small open spaces between and behind the houses and
- the slope down from the junction with Bakers Road coupled with the hedges on either side of the road which clearly separate the City from the main village

Good views include:

- looking downhill past Doubleridge and The Cottage towards the marshes beyond and
- looking north past Red House and Sunny South between further cottages either side to others beyond.

(4) Part of Marsh Road, centred on the Red Lion public house

This group includes the Red Lion itself set back behind a forecourt, together with Sunnyside next door, Storrs (a substantial house nearly opposite), and cottages in Frog's Alley. It also includes, albeit set apart from the others, the Methodist Chapel in Chapel Road. Recent "suburban" development alongside this traditional group has changed its setting.

Good views include:

- looking from Marsh Road towards the Red Lion public house with the forecourt in front,
- looking up Chapel Road with the Methodist Chapel on the right,
- from just past the Chapel looking across the fields towards the marshes beyond,
- looking eastwards from the junction of Marsh Road and Squires Road down the hill to the marshes in the distance.

(5) Crowe's Farm

Open fields on both sides of Chapel Road separate Crowe's farmhouse and its outbuildings from the village proper. A few houses have recently been built on the north side of the road, joining an earlier pair of semi-detached houses. But this part of the village remains essentially open countryside, important to the setting of both village and farm. This would be seriously compromised by further development. Crowe's Farm is an important element in the view of the village from Branch Road.

(6) Track between Chapel Road and Squire's Road

This cluster comprises a number of cottages on or adjacent to this unmetalled track, together with pairs of semi-detached inter-war houses and the White House on Squire's Road. An open field still separates the group from the rest of the village, although new houses on the opposite side of Squire's Road all but link it to the converted former school and the modern development along the south side of Marsh Road. Again, further development of these fields would very considerably alter the character of the village.

Important landscape features include:

- trees along the north side of the track, which link up with trees along Squire's Road,
- the dell on the north side of the track, probably a former sand working.

Good views include:

- looking west from the junction with Chapel Road with cottages on the right,
- looking north through the trees into the dell.

(7) Halvergate House

The importance of this group of buildings is recognised by the Listing of the house itself, its garden walls and its barn (now converted). The group also includes two cottages on the opposite side of Squire's Road.

Important landscape features include:

- the open fields to the south on both sides of Squire's Road and (b) the trees along Squires Road.
- The tall red brick walls to Halvergate House

Good views include:

- A good view looking north along Squires Road with, on the left, trees and then the garden wall of Halvergate House.

(8) Whiteacres Farm

This group includes the farmhouse itself and its outbuildings. The low thatched barn hard against Tunstall Street, with the farmhouse and outbuildings beyond give a firm traditional edge to the settlement at its northern approach.

Important landscape features include:

- There are important walls running east and south from the thatched barn.

(9) The Rookery

Though largely hidden by trees this listed house and its stable block are of special interest in themselves.

Important landscape features include:

- parkland to the south of the house and the trees within and around it
- trees along the west side of Sandhole Road and behind Stone Cottage are of importance to the village as a whole: any development here would be detrimental to the character of the centre of the village and of its approaches.

Good views include:

- looking south-east from the junction of Marsh Road and Sandhole Road through the trees into the dell opposite the Rookery,
- looking south from Sandhole Road through the trees towards the former barns of Hall Farm.

(10) Halvergate Hall

Though from many angles hidden from view, this listed house and its outbuildings are important in their own right.

Important landscape features include:

- the parkland associated with the house and the trees within and around it. These are important both as a setting to the house and as a backdrop and boundary to the south of the village.

Good views include:

- looking from Wickhampton Road across the park to the Hall.

Views from outside Halvergate into the village are also important in getting a sense of its historic importance on approach.

Good views of the village from outside include:

- from Branch Road looking west across the marshes, with Crowe's Farm in the middle distance and the roofs of the village beyond against a backdrop of trees,
- looking west up Marsh Road with the World War II pill box in the foreground,
- looking north-east from Mill Road, with the Church among the trees to the left and Halvergate Hall to the right,
- looking south-east from Moulton Road towards the terraced house on Church Avenue, with the Church tower visible behind the trees beyond,
- looking south from Tunstall Street with the barn of Whiteacres in the foreground and the farmhouse behind and the former barn of Halvergate House to the left.

Likewise, there are important general views out of the village to surrounding settlements such as the view from Chapel Road, Marsh Road and Wickhampton Road across to the farms and mills on the marshes to the east.

There are several hedgerows (hedges and trees) which make an important contribution to the character of the village, although they are not directly associated with any of the clusters of buildings identified.

Important hedgerows include:

- along the north side of Marsh Road between Chapel Road and Squires Road,
- along both side of Marsh Road between Squires Road and Tunstall Street,
- along the east side of Tunstall Street from Marsh Road to Oaklands Close.

The presence of mature trees through the Conservation Area make a significant contribution to the character of the area. However it is important to ensure that trees are maintained and periodic tree planting (to replace good specimens once they die or become dangerous) takes place.

Tunstall

Tunstall is a small hamlet. The principal cluster of buildings in the Conservation Area includes three listed buildings in close proximity to one another: the Church, Tunstall Hall and the Manor House. It also includes the barns and other buildings of the two farms, notably the fine Manor barn. There are important trees and hedgerows associated directly with all three buildings. The green triangle at the road junction in front of the Church marks the centre of the settlement. The Church itself, which is partially ruined, is an important and attractive focus to the Conservation Area. The approach from Halvergate is characterised by hedgerows on either side of the road. The field and its trees south of the Manor House are an essential part of the setting of the barn.

The landscape east of the Church, where the road dips down to the pond, is attractive in itself and it is also an essential part of the setting of the Church. The buildings in this part of the Conservation Area are widely separated: they include two cottages opposite the pond and a terrace of cottages at the junction of Marsh Road and Low Farm Road. Two pairs of semi-detached houses on Staithe Road dating from the 1930s are included in the Conservation Area because of their relationship to the pond and they are good examples of Local Authority housing from this period. There are important groups of trees east of Hall Farm, round the pond and on the south side of Marsh Road. There is a traditional K6 red telephone box which punctuates the scene on the south side of the road east of Hall Farm. This no longer accommodates a phone but has a small library and information on the area.

Good views include:

- on the approach from Halvergate with the ruined church tower among the trees,
- looking west from the pond towards the Church,
- looking north over the marshes from the junction with Low Farm Road,
- looking east from the Manor Farm's farm track to the Church.

Management and Enhancement

The character of a village can over time be eroded by an accumulation of minor changes. They include:

- The demolition of traditional buildings.
- The felling of important trees in association with new developments.
- Fencing with concrete posts and close-lap boarding in prominent positions (for example as boundary treatment to front gardens), where traditional brick walls or hedges would be more appropriate
- Poorly designed iron railings and gates. Good wrought iron work is now expensive and hard to come by: simple designs based on tradition tend to look best.
- Inappropriate replacement windows (e.g. top-hung windows masquerading as sliding sash window; fixed and opening sections arranged asymmetrically in casement windows; too narrow cills; windows set too far forward in their openings; PVC windows with wide frames replacing traditional wood windows with refined mouldings). Please see **Appendix 4** for more detail.
- Use of "traditional" building styles unrelated to the district (e.g. "half-timbering" for example) on new buildings.
- The erection of new buildings which do not reflect the scale of surrounding buildings
- Use of standard or pastiche design in modern development which do not relate well to the historic character of the village.
- Substandard modern outbuildings in prominent locations
- The use of substandard or inappropriate materials in replacement of traditional and honest materials. Please see **Appendix 4** for more detail.
- The loss of thatch.

Other smaller repairs to historic buildings that can have a detrimental impact include:

- Alterations to roofing materials
- Inappropriate repointing techniques and materials

- Painting, rendering or cladding brickwork
- Removal of decorative architectural features such as stone or window surrounds
- Installing modern plastic rainwater gutters and downpipes in replacement of metal

Sites in Halvergate which would benefit from appropriate, heritage-led, repair, maintenance and management and/or use include:

- The Red Lion Public House, Marsh Road
- The Stone Cottage, The Street

It is considered that the green spaces in between the built form should be retained and enhanced where appropriate and trees and hedgerows should be protected and enhanced. It is considered that some site would benefit from enhanced landscaping.

Specific sites where enhanced landscaping might be appropriate include:

- More to be made of focal points, such as the pond area, perhaps with village notice board and seating
- Forecourt to the Red Lion Public House, Marsh Road
- Removal of the metal bar in front of the bench near the church
- The churchyard - where there is a conflict between the attractive mature trees and the south churchyard wall, which is in poor repair.

It is considered important to ensure boundary treatments are appropriate as substandard boundary treatment can block views and change the character of the area.

Specific walls and railings in need of repair include:

- Railings to field east of War Memorial
- Wall in front of Churchyard

New Development

New development within the Conservation Area can be an opportunity for enhancement if located correctly and constructed in a sympathetic design and materials. Any proposal within the Conservation Area should be of a high-quality design that enhances and preserves the character of the local area. Materials play an important role in the success of development and often simple, honest and traditional materials, reflecting the surrounding palette, are usually most appropriate.

The use of appropriate hard landscaping such as pavers, boundary treatments, green spaces and soft landscaping associated with new development should also be considered at an early stage. The Broads Authority and Broadland District Council offer pre-application advice and can offer guidance on acceptability of proposals prior to the submission of a formal application.

Public consultation

This document (the re-appraisal) will be subject to public consultation during spring 2023. It should be read in conjunction with the adopted Policy and Guidance (see Appendix 3). No additions or removals are proposed to the Conservation Area boundary. Five buildings are proposed to be included on the Broads Local List including:

- Barn at Manor House
- Outbuildings at Manor House
- Barn at Tunstall Hall
- Old style telephone box
- Pond Cottages

We would like your thoughts on the Conservation Area Appraisal document and the proposals within it, so we can take on board your comments prior to it going out to wider consultation. Please let us have your comments and views on points to be considered by Friday the 9th of June 2023.

**Contact us: Broads Authority, Yare House, 62-64 Thorpe Road, Norwich NR1 1RY
broads-authority.gov.uk | 01603 610734 | planning@broads-authority.gov.uk**

We will also be holding a public drop-in event at Halvergate Village Hall (Moulton Road, Halvergate, Norwich NR13 3PH) on Saturday the 13th of May between 10am and 12.30pm. Please come and see us.

References

English Heritage and CABE: Building in Context: New development in historic areas
East Anglia, A Geographia Guide
Halvergate and Tunstall Remembered – Sheila Hutchinson
Havergate Marshes Conservation Area Appraisal
Historic England (2020) – Heritage and Society
Historic England (2019) Advice Note 1 Conservation area appraisal, designation and management
Historic Environment Record, Norfolk Landscape Archaeology
Norfolk Heritage Explorer
The Buildings of England, Norfolk 1: Norwich and North-East, Nicholas Pevsner and Bill Wilson
The Halvergate Fleet: Past and Present – Sheila Hutchinson
The Norfolk Broads, A landscape history – Tom Williamson
The Norfolk and Suffolk Broad, Robert Malster

Appendix 1: Listed buildings within the conservation area

The following building is included in the list of Buildings of Special Architectural or Historic Interest compiled by the Secretary of State:

Halvergate

I Church of St Peter and St Paul, The Street

I Former tower finial 22cm SW of SW nave buttress of Church

II War Memorial

II Red Lion Public House, Marsh Road

II The Rookery, Sandhole Road

II Halvergate House and E and W Garden Walls, Squires Road

II Barn 50m N of Halvergate House, Squires Road [converted to residential use since Listing]

II Stone Cottage, The Street

II The Old Post Office, The Street

II Hall Farm Barn, 59 m S of War Memorial, The Street

[converted to residential use since Listing: now "Swallow Barn" and "Owl Barn"]

II Barn at Manor Farm, 61 m SE of War Memorial, The Street

[converted to residential use since Listing: now "Harrier Barn"]

II Barn at Manor Farm, 30 m SE of War Memorial, The Street

[converted to residential use since Listing: now "Horseshoe Barn" and "Chestnut Meadow Barn"]

II Halvergate Hall, The Street [entrance now from Wickhampton Road]

II Dawdys Farmhouse, The Street

Tunstall

II* Remains of Church of St Peter and St Paul, Tunstall Street

II Hall Farm House, Tunstall Street [formerly Listed as The Hall and Barn]

II Manor House, Tunstall Street

Appendix 2: List of buildings considered to positively contribute to the character of the Conservation Area

Whilst the following buildings, boundary walls and railings within the present Conservation Area and the proposed extensions to it do not merit full statutory protection, they are considered to be of local architectural or historic interest, and every effort should be made to maintain their contribution to the character of the Conservation Area.

Halvergate

The Street, north side

Crown House

Church Cottage

Church Lodge

Walls surrounding front garden to Old Post Office (also curtilage listed)

The Street, south side

Beechwood House

Outbuilding to Beechwood House

Pond House

Outbuilding to Pond House

The Thatched House

Blacksmiths Cottage

Honeysuckle Cottage

Cottage south of Honeysuckle Cottage

Rose Cottage

Wall north and east of Blacksmiths Cottage

Outbuilding on east side of Hall Farm Close

Wall surrounding former entrance to Halvergate Hall

Old style telephone box

Waycott Forge

Victoria Cottages

Sandhole Road

Stables to The Rookery (converted to residential use)

Tunstall Street

Whiteacres

Outbuildings to Whiteacres

Barn north west of Whiteacres

Squires Road

Outbuildings west of Halvergate House

Rose Cottage

Cottages east of Rose Cottage

The White House

Chapel Road

Far End Cottage and adjoining cottages

Wyands Corner (on track leading off Chapel Road)

Cottage attached to west of Wyands Corner (on track as above)

Brick Cottage (on track as above)

Pair of cottages east of Stonechat Cottage (for tumbled gable)

Crowes Farm

Outbuildings to Crowes Farm

Primitive Methodist Chapel (now converted to residential use)

Marsh Road, north side

School Lodge Guest House (former school)

Sunnyside

World War II pill box

World War II Home Guard observation post

Marsh Road, south side

Storrs

Cottage, outbuildings and wall west of The Laurels

The Old Cottage, Frog's Alley

Cartref, Frog's Alley

Wickhampton Road

The Thatched Cottage

The City, north side

Sunny South

Mallet House

The City, south side

Doubleridge

The Cottage

Ambleside

Tunstall

Barn at Manor House

Outbuildings at Manor House

Barn at Tunstall Hall

Old style telephone box

Pond Cottage

Appendix 3: Planning documents, policies and associated guidance

Please note: Local planning policies, supporting documents and guidance are updated periodically, whilst this policy and document list was relevant at the time of the writing of the report please check with the relevant Authority for update.

Broads Authority

Local Plan for the Broads (Adopted 2019):

Policy SP5: Historic Environment

Policy DM11: Heritage Assets

Policy DM12: Re-use of Historic Buildings

Policy DM43: Design

Policy DM48: Conversion of Buildings

Broads Authority Supporting Documents:

The Landscape Character Assessment (Updated 2016)

The Landscape Sensitivity Study for renewables and infrastructure (adopted 2012)

Strategic Flood Risk Assessments

Broads Authority Flood Risk SPD

Biodiversity Enhancements Guide

Landscape Strategy Guide

Sustainability Guide

Planning Agents information booklet

Keeping the Broads Special

Broadland District Council

Joint Core Strategy for Broadland, Norwich and South Norfolk (Adopted January 2014):

Policy 1: Addressing climate change and protecting environmental assets

Development Management DPD (Adopted 2015):

Policy GC4: Design

Policy EN2: Landscape

Broadland District Council Supporting Documents:

Landscape Character Assessment

Design Guide (1997)

Place Shaping (a guide to undertaking development in Broadland)

Appendix 4: Detailed guidance on materials and windows

Materials

The particular character of both Halvergate and Tunstall owes a great deal to the use of a limited “palette” of building materials. Some of these are indigenous to the district (e.g. red bricks, red pantiles, flint and thatch), some have traditionally been “imported” from other parts of Norfolk (e.g. gault bricks), still others have been “imported” from further afield (e.g. stone and - since the nineteenth century - slate). The “imported” materials are mostly confined to the more prestigious buildings (e.g. stone for the Churches, gault brick and slate for the larger Georgian houses – Halvergate Hall, Halvergate House, The Rookery). But as time went on expensive materials became commoner (e.g. slate on the Old Post Office). On the other hand, some previously cheap materials have now become very expensive. Thatch is a particular case in point because it has to be renewed from time to time - though usually only in part, provided it has been regularly maintained. In some cases, thatch has been able to be renewed despite serious decay (e.g. the converted barns of Hall Farm and the barn at Whiteacres), in other cases it has been replaced by corrugated sheeting (e.g. on farm buildings) or tiles (this is likely to have been the case with many of the older cottages). Given the rarity of thatched buildings today and the special contribution that they make to the Conservation Area, the retention or re-introduction of thatch would today be encouraged.

Ground surfacing materials are an important, but often forgotten, element in a village. In Halvergate and Tunstall public roads and footpaths are in general finished with tarmacadam (or asphalt), though there remain a number of rough non-surfaced tracks and paths. (e.g. by both churches). The further loss of surviving non-surfaced area would be regrettable and where it is necessary any replacement

surface would need to be carefully considered. Some modern residential closes (e.g. Dawdy's Court) have roadways paved with concrete blocks in imitation of granite setts, which are reasonably convincing. Many newer houses have drives paved with imitation bricks, also made of concrete, or loose granite chippings - both suburban in character.

Window Replacements

Window replacements are often the most serious threat to the appearance of Conservation Areas and may even affect the value of properties. If timber windows are in good condition, thermal efficiency can be improved by installing double glazed units in existing frames or secondary glazing.

The replacement of timber windows with PVCu can result in several problems:

- The material cannot reproduce profiles and detailing of traditional joinery
- The variety can destroy the visual harmony of the streetscene, particularly if windows do not replicate the traditional opening arrangement (e.g. top-hung opening 'sash' windows)
- The material is not as easy and economic to repair as timber
 - Historic timber was often slow-grown and is therefore of better quality than more modern timber and is therefore worth retaining where possible.
- It is not a sustainable material (like timber) and its manufacture has a larger carbon footprint. Neither does it have the biodegradable qualities of timber when redundant, creating an environmental landfill hazard.

NB: All complete window replacements are now required to achieve minimum insulation values – please consult Building Control. However, in the interests of conservation, local authorities are empowered to relax the requirements under Building Control Regulations when considering proposals for the restoration or conversion of historic buildings.

Appendix 5: Contact details and further information

Broads Authority

Address: The Broads Authority, Yare House, 62 – 64 Thorpe Road, Norwich NR1 1RY

Telephone: 01603 610734

Website: www.broads-authority.gov.uk

Broadland District Council

Address: Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich, NR7 0DU

Telephone: 01603 431133

Website: www.broadland.gov.uk

Norfolk Historic Environment Service

Address: Norfolk County Council, County Hall, Martineau Lane, Norwich, NR1 2DH

Tel: 0344 800 8020

Website: [Archaeology and historic environment - Norfolk County Council](#)

Planning Committee

31 March 2023

Agenda item number 14

Department of Levelling Up, Housing and Communities - Increasing planning fees and performance - technical consultation

Report by Head of Planning

Summary

Department of Levelling Up, Housing and Communities (DLUHC) is consulting on proposals to increase planning fees by 25 – 35% to support Local Planning Authorities and increase capacity and capability. This report sets out the proposals and proposed response.

Recommendation

To endorse the proposed response.

1. Introduction

- 1.1. On 28 February 2023 the Department for Levelling Up, Housing and Communities (DLUHC) published a [technical consultation document \(www.gov.uk\)](https://www.gov.uk) setting out measures to improve the performance of Local Planning Authorities (LPAs). This is in response to concerns that inconsistent performance by LPAs will impact on the delivery of the levelling up agenda. Inadequacy in performance is attributed to insufficient resources and capability.
- 1.2. The objectives are to increase resources to LPAs to improve determination efficiency, thereby making the process quicker, and improve consistency and quality by introducing more streamlined and digitised process, which, again, will speed up the process. It is recognised that the issues are not solely about money, so the proposals seek to increase the number of planners (and associated professions). It is also proposed to reframe the performance assessment criteria to give a clearer indication of where there are problems.
- 1.3. Three mechanisms are proposed to address the issues identified: financial support, additional resources and increased measurement and monitoring of performance.
- 1.4. The consultation paper explains the proposed change and then asks a series of questions on each. The information and a brief commentary are set out below and the proposed answers are in Appendix 1.

2. Financial support

Fee increases (questions 1 – 4, 6 & 7)

- 2.1. DLUHC recognise that the income received by LPAs through planning application fees does not cover the cost of the development management service, whilst other elements of a planning service (e.g., plan making and enforcement) receive no direct income from users. The deficit is estimated at around 33%. Planning application fees were last increased in January 2018 and, before that, in November 2012.
- 2.2. It is proposed to increase the fee by 35% for major applications and by 25% for all other applications, with a future annual increase which would be index linked to inflation. The justification for this is to ensure that planning application service is funded principally by the beneficiaries of the planning gain (ie the increased land value). It is also noted that the costs associated with applying for planning permissions typically represent only a small proportion of overall development costs.
- 2.3. In terms of comments, overall the proposals are welcomed. Application fees have fallen in real terms over many years, meaning that nationally the planning process has increasingly been subsidised by the funding provided by Central Government to a Council or LPA rather than being largely self-funding. In addition, the planning function has had to compete with other services for funding, which has had an impact on resources.
- 2.4. The increase proposed is significant, particularly for major development (at 35%), but would help to restore the link between demand for the service/workload and capacity in an LPA. This would support the principle that the beneficiary of a service should bear a greater proportion of the cost of its costs.
- 2.5. It is proposed to ringfence the additional monies to ensure it is retained in planning and this is important if the increase is to be effective.

Discretionary and bespoke planning services_(question 5)

- 2.6. The consultation raises the question of how LPAs charge for additional or 'fast track' services to improve the speed of decision making and asks for comments on this.
- 2.7. The Broads Authority has not offered a 'fast track' service, but is aware this has been used elsewhere in the county, and by a number of the NPAs, for larger schemes. It would be considered if an appropriate scheme arose and a developer requested it, but to date there has been no need so no comments can be made on the experience of this. As a principle, however, whilst the rationale for additional services on a 'paid for' basis is understood, there is concern that this risks the creation of a two tier system and it is considered that there should be an effective and efficiently functioning planning system in place for all users before resources are diverted to additional services unless it can be demonstrated that this would improve overall effectiveness.

Retrospective and 'free go' applications (questions 8 & 9)

- 2.8. Retrospective applications are where a planning application is made to regularise a development after it has taken place. The usual application fee is paid for this. Retrospective applications often arise out of an enforcement investigation, where the LPA is often advised by a third party that development is underway. The failure to apply for planning permission may have been a mistake or may have been deliberate.
- 2.9. The consultation proposes that the fee for a retrospective application should be double the normal fee, in recognition of the additional initial investigation work. An exception would be made for householder development, where only the standard fee would be paid (as currently) as there may have been a genuine mistake.
- 2.10. In terms of comments, the double fee for retrospective applications is welcome as these do often incur additional costs. The rationale for the householder exemption is understood, however there is extensive information about planning available on-line now, including on the Government's own GOV.UK site where there is an interactive house tool so users can identify their own proposals. In addition, all LPAs will be able to advise whether planning permission is required, although some will charge for this. Given that Government and LPAs have put considerable resources into making this information available, the justification given in the consultation for exempting householder development is not considered to be strong. The risk of a double fee is likely to provide an effective impetus for getting correct advice.
- 2.11. Currently where an application is withdrawn, a resubmission of a substantially similar scheme may be submitted within 12 months without paying a further fee. The consultation paper advises that this process may be being used to 'sound out' an LPA on a scheme, without incurring the cost of pre-application advice and experiences of this and suggestions to address it are sought.
- 2.12. This situation is not uncommon on larger schemes, or where a developer wants to get the formal comments of a statutory consultees or to understand local opinion. The Broads Authority experiences it to some degree. A fee for the resubmission would not be unreasonable, as the LPA does incur processing costs and if this were to be reduced to 50% this would contribute to the resource burden.
- Prior Approval by Crown development on closed defence sites (question 10)
- 2.13. The Broads Authority has no experience of this specialist area and does not propose to make any comments.

3. LPA capacity and capability

Increasing resources (questions 11 – 13)

- 3.1. DLUHC recognises in the consultation document that increasing fees alone will not achieve the Government's objectives, and identifies difficulties in recruiting staff, particularly to senior posts and in specialist roles, as being a significant constraint. There are various ways in which LPAs can seek to deal with this issue in the short term, but a cross sector working group has been established by DLUHC to look at ways of

building capacity and capability in the future. The consultation asks for LPAs to provide details of their experience of the above and suggestions.

- 3.2. With its extensive protected areas and little major development, the Broads Authority as an LPA has different pressures to other LPAs. Much of the work involves specialist knowledge, for example of flood risk or making landscape assessments, and much of this is specific to the Broads. Consequently, the approach has always been to develop our own staff, providing training on their specific role and putting them through a formal planning qualification where possible. This has served us well. This approach should be encouraged and wider opportunities given.

4. LPA Performance

Tightening the Planning Guarantee (question 14)

- 4.1. Currently, where a planning decision has not been made within 26 weeks and no extension of time has been agreed an applicant can request a refund of their application fee. It is proposed to reduce this to 16 weeks for all non-major and EIA applications.
- 4.2. In commenting on this, the rationale for the proposal is clear but if poor performance is a result of insufficient resources and capacity, the application of a penalty will not improve the situation. Targeted support and focus on stalled applications is a better approach to clear backlogs, after which the use of such a measure to identify any slowdown in performance may be useful.

Extension of Time Agreements and Planning Performance Agreements (questions 15 & 16)

- 4.3. Where an application has not been determined within the statutory period, an LPA can request a formal Extension of Time (EOT) from the applicant and this in effect extends the measured determination period. It is useful in circumstances where, for example, the negotiations are on-going, consultations responses are awaited or a reconsultation is required. A Planning Performance Agreement (PPA) is similar, but for a PPA the LPA and developer formally agree a timetable for the determination process. The consultation document set out concerns that EOTs and PPAs can be used to conceal poor performance and DLUHC therefore propose that speed of determination be assessed primarily on the statutory timescale. It also proposes to monitor different types of application separately.
- 4.4. In terms of comment, it is the case that EOTs (and PPAs) are a useful short term mechanism to allow negotiations (or other processes) to continue without an LPA being penalised. They should not be used for long periods, or to hold an application in abeyance – in such cases an application should be withdrawn and resubmitted when the issues are resolved. Rather than discount them altogether, a more nuanced approach could be devised using a fixed maximum period.

- 4.5. Determination times are currently assessed separately for different application types and this is satisfactory.

Broadening the Planning Performance Framework (questions 17 & 18)

- 4.6. Members will be aware that the speed of determination of planning applications is monitored, as the Planning Committee receives the quarterly report to DLUHC setting out the speed of determination statistics. DLUHC also separately monitor the appeal success rate as a measure of quality of decision. It is proposed that these measures be extended to include the number of EOTs, the backlog in validation, the speed of three identified processes around planning enforcement, the percentage of delegated decisions and Committee decisions and, finally, the percentage of committee decisions to refuse against officer recommendations that are subsequently allowed at appeal.
- 4.7. The Broads Authority currently reports appeal decisions, EOTs and the percentage of delegated/committee decisions to Planning Committee. Enforcement statistics are reported quarterly to Management Team, following a 2020 audit recommendation.
- 4.8. The additional measurements would give a clearer picture of how an LPA is performing, however the ease of providing the information would depend on how it is recorded and on having the ICT capability to extract it. Significant support could be required to achieve this and that may distract from other service improvements.

Measuring customer experience

- 4.9. Finally, the consultation paper proposes the use of a qualitative measure to measure customer satisfaction and seeks views on this.
- 4.10. Members will be aware that the Broads Authority as LPA does an annual customer satisfaction survey, sending out a questionnaire to everyone who has received a planning decision in January – March, with the results reported to Planning Committee usually in May. This is a useful exercise and the feedback received is always helpful.

5. Conclusion and recommendation

- 5.1. The purpose of the measures outlined above is to increase support to LPAs to facilitate service improvements, particularly around speed of decision making on planning applications. The additional funding would be welcomed, however there are significant problems in many LPAs due, amongst other things, to an historic shortage of suitably experienced and qualified staff and increasing workload pressures and these issues will not be resolved by simply providing more money.
- 5.2. The consultation paper does recognise these established difficulties, which is acknowledged, and there is strong emphasis on the need to increase the number of people going into the profession. This is welcomed.
- 5.3. The third element covers proposals for the measuring and monitoring of planning performance. None of the proposed metrics are in principle unreasonable, but

targeted and funded support will be needed to improve services where there is long established underperformance and the metrics could be useful in monitoring change.

- 5.4. It is recommended that that responses set out in Appendix 1 are submitted as the formal response of the Broads Authority.

Author: Cally Smith

Date of report: 21 March 2023

Appendix 1 – Technical consultation: Stronger performance of local planning authorities supported through an increase in planning fees: Responses of the Broads Authority

Appendix 1 – Technical consultation: Stronger performance of local planning authorities supported through an increase in planning fees: Responses of the Broads Authority

Question 1. Do you agree that fees for planning applications should be increased by 35% for major applications?

YES/no/don't know. Please give your reasons.

Application fees have fallen in real terms over many years and whilst the increase proposed is significant, it would help to restore the link between demand for the service/workload and capacity in an LPA. Ringfencing the additional monies is essential.

Question 2. Do you agree that the fee for householder planning applications should be increased by 25%?

YES/No/don't know. Please give your reasons.

The planning fee represents a minor proportion of the cost of development. The beneficiary of the development should bear a greater proportion of the cost of the service.

Question 3. Do you agree that fees for all other planning applications should be increased by 25%? If not, please include in the comments box the particular application types where you believe the proposed increase is too high or too low. Your comments should be accompanied with evidence/costs if possible.

YES/no/don't know. Please give your reasons.

Question 4. Are there any other application types or planning services which are not currently charged for but should require a fee or for which the current fee level or structure is inadequate?

Yes_- please explain / NO.

Question 5. Please can you provide examples of bespoke or 'fast track' services which have worked well or you think could be introduced for an additional fee? Are there any schemes that have been particularly effective?

No comments.

Question 6. Do you agree with the proposal for all planning fees to be adjusted annually in line with inflation?

YES/no/don't know. Please give your reasons.

This will assist retention and stability in the planning profession.

Question 7. Do you consider that the additional income arising from the proposed fee increase should be ringfenced for spending within the local authority planning department?

YES/no/don't know. Please give your reasons.

This is essential if the increases proposed are to be effective.

Question 8. Do you agree that the fee for retrospective applications should be doubled, i.e. increased by 100%, for all applications except for householder applications?

Yes/NO/don't know. Please give your reasons.

Strong support for the double fee proposal, but do not agree with the householder exemption as there is extensive information available on-line that a householder can view, or they can contact their LPA for advice.

Question 9. Do you consider that the ability for a 'free-go' for repeat applications should be either:

- (a) removed
- (b) REDUCED FOR RE-APPLICATIONS WITHIN 12 MONTHS
- (c) retained
- (d) none of the above
- (e) don't know

Please give your reasons.

Support for a fee for resubmission, but suggest reduced to 50% to reflect previous negotiations time.

Question 10. Do you agree that a fee of £96 (or £120 if the proposed fee increase comes forward) should be charged for any prior approval application for development by the Crown on a closed defence site?

Yes/no/DON'T KNOW

Question 11. What do you consider to be the greatest skills and expertise gaps within local planning authorities?

There is a shortage of suitably experienced staff in most areas of planning. Enforcement has always been difficult to recruit to.

Question 12. In addition to increasing planning fees, in what other ways could the Government support greater capacity and capability within local planning departments and pathways into the profession?

Providing training at different levels, with clearly defined career stages and pathways. Broaden membership of RTPI to include more of the technical and administrative functions which are essential to an effective process. LPAs should promote the importance of professional membership and support staff in this to develop commitment and ambition.

Please provide examples of existing good practice or initiatives if possible.

The Broads Authority has maintained a trainee DM planner post since 2007 and has put six people through training to RTP1-eligible qualifications. We currently have a planning trainee on the new Apprenticeship scheme.

A commitment to training staff is essential and any incentives to LPAs and the private sector to do this should be considered. The Newcastle University year-out scheme is a good one, but shorter blocks or task-specific would be easier to incorporate into a work programme. The ability to share trainee posts with other LPAs would be useful.

Question 13. How do you suggest we encourage people from under-represented groups, including women and ethnic minority groups, to become planning professionals?

Is there a route in through Youth and Community services to engage with young people earlier?

Question 14. Do you agree that the Planning Guarantee should better mirror the statutory determination period for a planning application and be set at 16 weeks for non-major applications and retained at 26 weeks for major applications?

Yes/NO/don't know. Please give your reasons.

This may be useful to monitor performance when the statutory targets are regularly met, but as a penalty for poor performing LPAs it would be counter-productive and targeted support is a better approach.

Question 15. Do you agree that the performance of local planning authorities for speed of decision-making should be assessed on the percentage of applications that are determined within the statutory determination period i.e. excluding extension of times and Planning Performance Agreements?

Yes/NO/don't know. Please give your reasons.

EOTs can be really useful for all parties. Rather than discount them altogether, a more nuanced approach could be devised using a fixed maximum period.

Question 16. Do you agree that performance should be assessed separately for

- (a) Major applications - YES / no / don't know
- (b) Non-Major applications (excluding householder applications) - YES / no / don't know
- (c) Householder applications - YES / no / don't know
- (d) Discharge of conditions - YES / no / don't know
- (e) County matters applications - YES / no / don't know.

Question 17. Do you consider that any of the proposed quantitative metrics should not be included?

Yes/NO/don't know. Please give your reasons and, if appropriate, state the metric letter(s) and number(s) that you believe should not be included.

Question 18. Are there any quantitative metrics that have not been included that should be?

Yes / NO / don't know. Please indicate what additional quantitative metrics you consider should be included.

Question 19. Do you support the introduction of a qualitative metric that measures customer experience?

YES/no/don't know. Please give your reasons.

Question 20. What do you consider would be the best metric(s) for measuring customer experience?

The Broads Authority does an annual survey asking standard questions about satisfaction with a range of elements of the process from pre-application engagement to contactability. We find the results really valuable in looking at the service.

Question 21. Are there any other ways in which the performance of local planning authorities or level of community engagement could be improved?

There are always ways to improve this, but the constraint is usually resources.

Better guidance with the introduction of new schemes such as BNG and Nutrient Neutrality would reduce the amount of time spent looking at how to implement such schemes.

Planning Committee

31 March 2023

Agenda item number 15

Department of Levelling Up, Houses and Communities- Permitted development rights-consultation

Report by Head of Planning

Summary

The Department of Levelling Up, Housing and Communities (DLUHC) is consulting on proposed changes to permitted development rights to support recreational camping, renewable energy and film-making.

The report summarises the proposed changes and includes proposed responses to the questions asked in the consultation.

Recommendation

Members endorse the consultation response.

1. Introduction

- 1.1. On 28 February 2023 the Department for Levelling Up, Housing and Communities (DLUHC) published a [consultation document \(www.gov.uk\)](https://www.gov.uk) on proposed changes to some Permitted Development Rights (PD Rights). Permitted Development Rights cover development that can be done without needing to apply for planning permission.
- 1.2. The deadline for comments is 25 April 2023.

2. Proposals

- 2.1. This consultation contains proposed changes to the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended. The proposed changes are set out below.

Temporary recreational campsites

- 2.2. A new permitted development right to support temporary recreational campsites. This would allow:
 - Temporary use of land for camping;

- For up to 30 tents and related moveable structures;
 - Not for caravans, motorhomes and campervans; and
 - For 60 days per year.
- 2.3. The new permitted development right would require the on-site provision of temporary facilities for showers, toilets and waste storage and collection. The developer would also be required to notify the Local Planning Authority (LPA) of their intention to operate a camp site and to provide them with a site plan showing the location and details of the shower, toilet and waste disposal facilities, and details of the dates on which the site will be used for the placing of tents.
- 2.4. The new right would not apply to land within the curtilage of a listed building, sites of special scientific interest, scheduled monuments, safety hazard areas or military explosives storage area.
- 2.5. Where the site is in Flood Risk Zone 2 or 3 the permitted development right would not apply and the developer would need to apply for prior approval. Prior approval is a process whereby a developer has to seek approval from the LPA that specified elements of the development are acceptable before work can proceed. If the LPA is not satisfied it can refuse to issue prior approval and require a planning application.

Solar

- 2.6. This proposes changes to the existing permitted development rights for solar equipment and a new permitted development right for solar canopies. The details are as below.
- 2.7. For solar on domestic buildings, the proposals retain the existing limitation that solar can be installed on pitched domestic rooftops or walls where it does not protrude more than 0.2 metres beyond the plane of the wall or the roof slope. Currently a solar installation cannot be taller than the highest part of the roof (excluding any chimney), but this would be changed to allow solar to be installed on a flat roof subject to it being no higher than 0.6 metres above the highest part of the roof (excluding any chimney).
- 2.8. For solar on non-domestic buildings, currently in protected areas such as the Broads and Conservation Areas solar equipment which generates electricity up to 1MW cannot be installed on a roof slope which fronts a highway. Where the electricity generated is up to 50kW the solar equipment cannot be installed on a wall which fronts a highway. It is proposed to remove these limitations.
- 2.9. For stand-alone domestic solar, currently there are no permitted development rights in Conservation Areas for the apparatus to be installed closer to the highway than a dwellinghouse or block of flat – i.e. in front of the property. It is proposed to remove this limitation to give more flexibility on location.
- 2.10. For stand-alone non-domestic solar, currently in protected areas such as the Broads and Conservation Areas the apparatus cannot be installed so that it is closer to the

highway than the building. It is proposed to remove this limitation to give more flexibility on location.

- 2.11. A new permitted development right would be created for solar canopies. This would allow apparatus of up to 4 metres in height in ground-level off-street car parks in non-domestic settings. It would not be permitted within 10 metres of a dwellinghouse or the curtilage of a listed building or on a site designated as a scheduled monument. In the Broads and other protected areas such as Conservation Areas it would require prior approval.

Development by local authorities

- 2.12. Local Authorities have permitted development rights to carry out a wide range of works. It is proposed to amend this so that the rights could be exercised by other bodies undertaking the work on behalf of the local authority.

Temporary use of buildings or land for film-making purposes.

- 2.13. A permitted development right was introduced in 2015 allowing the temporary use of buildings or land for film-making purposes and the provision of temporary structures relating to that use. The proposed changes are:

- Maximum period – increased from 9 months to 12 months in any 27 month period;
- Maximum land area – increased from 1.5 hectares to 3 hectares
- Maximum height of any temporary structure, works, plant or machinery – from 15m to 20 m with a 5 metre height limit to any part of the structure, works, plant or machinery that would be within 10 metres of the curtilage of the land.

3. Proposed response

- 3.1 The impact for the protected landscape of the Broads of the proposed changes has been considered and there has been consultation with colleagues in the National Parks. The issues are not the same, or of equal concern, for all the protected landscapes, so this assessment applies to the Broads area. A summary of the proposed response is set out below and the full questions and response attached in Appendix 1.

Temporary recreational campsites

- 3.2 It is considered that this new permitted development right to support temporary recreational campsites should not apply in the Broads. This is partly due to the issue of nutrient neutrality, which has not yet been resolved locally and prevents planning permission being granted for any new campsites. It would be irrational to allow development for which planning permission cannot currently be granted to be instead undertaken under permitted development rights with no control whatsoever over impacts. Furthermore, campsites can have significant and adverse impacts on landscape, local amenity and wildlife interests.

Solar

- 3.3 The Broads Authority is in principle in support of increased use of renewable, including solar, but this must be balanced against the protection of the landscape, heritage and the built environment. The installation of apparatus on roof slopes and walls facing the public highway, or between a dwelling and the public highway, as set out in paragraphs 2.6 – 2.8 above, in the Broads and Conservation Area, has the potential to have a significant and adverse impact on the qualities for which the Broads was designated.
- 3.4 The proposal to extend the rights for solar on flat roofs (see 2.4 above) similarly cannot be supported due to the potential to impact on roofscapes, which can be an important part of the built fabric of an area
- 3.4 It is considered that the current exclusions to permitted development rights should be retained. It should be noted that the need to submit a planning application does not stop permission being granted where appropriate, but it allows negotiation to take place to ensure an acceptable solution and means it is a more democratic process.
- 3.5 The proposed prior approval process for solar canopies (paragraph 2.9 above) is acceptable.

Development by local authorities

- 3.6 The amendment to allow third parties to undertake development on behalf of local authorities under the latter's permitted development rights is supported, as it would increase flexibility around undertaking works.

Temporary use of buildings or land for film-making purposes

- 3.7 Changes to the existing permitted development right allowing for the temporary use of buildings or land for film-making purposes.
- 3.1. This is not an issue which has arisen in the Broads Authority area, although the allowances in the existing permitted development rights already appear generous. No comment will be made.

4. Conclusion and recommendation

- 4.1. The Government propose changes to existing permitted development rights.
- 4.2. These have been outlined and a brief commentary made. It is recommended that the responses outlined at Appendix 1 are submitted as the response of the Broads Authority.

Author: Cally Smith

Date of report: 22 March 2023

Appendix 1 – Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation: Responses of the Broads Authority

Appendix 1 - Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation: Responses of the Broads Authority

Q1. Do you agree that a new permitted development right should be introduced that will allow the temporary use of land for recreational campsites and associated facilities?

No.

This is due to the issue of nutrient neutrality, which has not yet been resolved locally and prevents planning permission being granted for any new campsites. It would be irrational to allow development for which planning permission cannot currently be granted to be instead undertaken under permitted development rights with no control whatsoever over impacts. An assessment under the Habitats Regulations would be a requirement, even if such a site were allowed under permitted development rights.

Furthermore, campsites can have significant and adverse impacts on landscape, local amenity and wildlife interests. Areas of the Broads are identified as having good Dark Skies, which are protected under planning policy.

Q2. Do you agree that the permitted development right should only apply to the placing of tents?

The Broads Authority does not support the principle of the proposed new right.

Q3. Do you agree that the permitted development right should allow up to a maximum of 30 tents to be erected on the land?

The Broads Authority does not support the principle of the proposed new right.

Q4. Do you agree that the permitted development right should be limited to up to 60 days per calendar year?

The Broads Authority does not support the principle of the proposed new right.

Q5. Do you agree that the permitted development right should require the provision of temporary on-site facilities to provide waste disposal, showers and toilets?

The Broads Authority does not support the principle of the proposed new right.

Q6. Do you agree that the permitted development right should not apply on land which is in or forms part of sites of special scientific interest, Scheduled Monuments, safety hazard areas, military explosives storage areas and land within the curtilage of a listed building?

The Broads Authority does not support the principle of the proposed new right.

Q7. Are there any other planning matters that should be considered?

The Broads Authority does not support the principle of the proposed new right.

Q8. Do you agree that the permitted development right should require annual prior notification to the local authority of the matters set out above?

The Broads Authority does not support the principle of the proposed new right.

Q9. Do you think that, in areas of flood risk, the right should allow for prior approval with regard to flooding on the site?

The Broads Authority does not support the principle of the proposed new right.

It is noted that campsites are listed as more vulnerable uses in appendix 3 of the NPPF and are not an appropriate land use in flood risk zones 2 and 3.

Q10. Do you think that any of the proposed changes in relation to a new permitted development right for temporary recreational campsites could impact on: a) businesses b) local planning authorities c) communities?

The proposed new permitted development right could have an impact on all of the interests listed.

In terms of businesses, there is not a level playing field between sites operating with planning permission and in accordance with other regulations (including appropriate access, drainage, habitat protection etc) and pop-up sites with no requirement to address any of these matters. In the Broads, a pop-up site could be established on non-designated land which is nonetheless of significant conservation interest and the LPA would have no control over it.

In terms of LPAs, the requirement for notification is acknowledged, but the LPA may need to monitor the site to ensure compliance so there are resource implications.

For communities, the impact of development on amenity is a key consideration when determining planning applications, but there is no opportunity to consider this where development is permitted development. The occupation and use of 30 tents would have a significant impact in a rural areas.

Q11. Do you think that proposed changes in relation to a new permitted development right for temporary recreational campsites could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

The Broads Authority does not support the principle of the proposed new right.

Q12. Should the permitted development right for solar on domestic rooftops be amended so that they can be installed on flat roofs where the highest part of the equipment would be no higher than 0.6 metres above the highest part of the roof (excluding any chimney)?

No. In many instances, the roofline of flat-roofed domestic buildings is an integral part of the building design and the addition of PV panels and their supporting structures would be detrimental to the appearance of these buildings and the wider area, with a change to the roofline and addition of visual clutter at high level. The Broads Authority would suggest that the permitted development right is retained as existing regarding the installation of PV panels

on domestic flat roofs. This is because the requirement for planning permission does not preclude the granting of that permission in instances where they could be positioned in such a way that they would be acceptable (behind a parapet; set back so as not to be as obtrusive etc) but the planning application process allows a degree of negotiation and control by the LPA and input from the local community.

Q13. Are there any circumstances where it would not be appropriate to permit solar on flat roofs of domestic premises?

Yes - this is the case in many instances. However, Conservation Areas would be particularly sensitive to such change and it could be that the permitted development right is removed in Conservation Areas only.

Q14. Do you agree that solar on a wall which fronts a highway should be permitted in conservation areas?

No. There are very few instances where wall-mounted solar panels on a domestic dwelling would preserve or enhance the character or appearance of a Conservation Area, as the legislation requires and retro-fitted PV panels to a wall of a building should always be controlled. It is much more likely to be considered acceptable when designed as part of a new build and can be properly integrated into the design and considered through the planning process.

Q15. Do you have any views on the other existing limitations which apply to this permitted development right which could be amended to further support the deployment of solar on domestic rooftops?

No.

Q16. Do you agree that the existing limitation which prevents stand-alone solar being installed so that it is closer to the highway than the dwelling house in conservation areas, should be removed?

No. This is because the requirement for planning permission does not preclude the granting of permission for stand-alone solar panels closer to the highway than the dwelling house in a Conservation Area in instances where they could be positioned in such a way that they would preserve and enhance the character or appearance of the Conservation Area. The planning application process allows a degree of negotiation and control by the LPA and input from the local community.

Q17. Do you have any views on how the other existing limitations which apply to this permitted development right could be amended to further support the deployment of stand-alone domestic solar?

No.

Q18. Do you agree that the current threshold permitting the generation of up to 1MW of electricity on non-domestic buildings should be removed?

Yes, as long as the system of prior approval is still in place.

Q19. Is the current prior approval for solar equipment on non-domestic rooftops (where equipment is over 50kW but no more than 1MW) effective?

Yes. It gives LPA the opportunity to require an application for planning permission where the proposal does not meet the criteria.

Q20. Are there any circumstances where it would not be appropriate to allow for the installation of non-domestic rooftop solar where there is no limit on the capacity of electricity generated?

Yes. There are likely to be instances on article 2(3) land; on buildings which are prominently positioned or of some local significance; or where installations have not been well-designed and panels are arranged in a haphazard manner with little consideration for wider public amenity.

Q21. Do you agree that the existing limitations relating to the installation of solar on non-domestic buildings in article 2(3) land - which includes conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites – should be removed?

No. This is because the requirement for planning permission does not preclude the granting of permission for the installation of solar panels in these areas where appropriate. However, it ensures that LPAs and communities have some input. It also ensures that we 'build beautiful' in line with the government's objective.

Q22. Do you have any views on how the other existing limitations which apply to the permitted development right could be amended to further support the deployment of solar on non-domestic rooftops?

No.

Q23. Do you agree that the existing limitation which prevents stand-alone solar being installed so that it is closer to the highway than the building in article 2(3) land - which includes conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites – should be removed?

No. This is because the requirement for planning permission does not preclude the granting of permission for stand-alone solar panels closer to the highway than the building in article 2(3) land in instances where they could be positioned in such a way that they would not be harmful to the character or appearance of the area. The planning application process allows a degree of negotiation and control by the LPA and input from the local community.

Q24. Do you have any views on how the other existing limitations which apply to this permitted development right could be amended to further support the deployment of stand-alone non-domestic solar?

No.

Q25. Do you agree that permitted development rights should enable the installation of solar canopies in ground-level off-street car parks in non-domestic settings?

Agree, as long as the permitted development rights would not apply in article 2(3) land or in the curtilage of listed buildings or scheduled monuments. They would also provide shade from the sun as well as rain in a changing climate.

Q26. Do you agree that a permitted development right for solar canopies should not apply on land which is within 10 metres of the curtilage of a dwelling house?

Yes. These can be rather large and obtrusive structures and so planning permission should be required within 10 m of a curtilage of a dwelling house in order to protect residential amenity. In such locations an assessment needs to be made.

Q27. Do you agree that a permitted development right for solar canopies should not apply on land which is in or forms part of a site designated as a scheduled monument or which is within the curtilage of a listed building?

Yes. This complies with the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF relating to the contribution of setting to the significance of designated heritage assets. In such locations an assessment needs to be made.

Q28. Do you agree that the permitted development right would not apply to article 2(3) land - which includes conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites?

Yes agree – there may be instances where such canopies are acceptable, but this is best done through the normal planning application route.

Q29. Do you agree that solar canopies should be permitted up to 4 metres in height?

No. This appears excessively tall and will mean that they are very large structures . Is this so that lorries and vans can use them? A maximum height of 2.5m should be sufficient.

Q30. Do you think that the right should allow for prior approval with regard to design, siting, external appearance and impact of glare?

Agree as these are important amenity considerations.

Q31. Are there any other limitations that should apply to a permitted development right for solar canopies to limit potential impacts?

No.

Q32. Do you think that any of the proposed changes in relation to the permitted development rights for solar could impact on: a) businesses b) local planning authorities c) communities?

Yes to all of the above. Clearly there could be environmental and economic benefits in the installation of solar panels for all three of those groups but equally there could be harm to the

amenity of areas and the character and appearance of designated sites and land, which would be of detriment to all three groups.

The retention of existing permitted development rights allows these issues to be assessed by the local planning authority and allows them to consider whether the public benefits provided by the environmental gains will outweigh any harm. Clearer government guidance on this and / or policies to encourage solar, for example in the NPPF, should be considered, to ensure there is consistency in this assessment process and to ensure that cases can be judged on a case by case basis with a bias for solar.

Q33. Do you think that proposed changes in relation to the permitted development rights for solar could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation).

No comment

Q34. Do you agree that the permitted development right allowing for development by local authorities should be amended so that the development permitted can also be undertaken by a body acting on behalf of the local authority?

Yes, this is a positive amendment.

Q35. Do you think that any of the proposed changes in relation to the permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Yes, but it is considered that they are likely to be positive.

Q36. Do you think that proposed changes in relation to the permitted development right could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation)?

No comment

Q37. Do you agree that the maximum period of time land or a building can be used for the purpose of commercial film making should be increased to 12 months in any 27 month period?

No comment

Q38. Do you agree that the maximum area of land or land on which the building is situated being used for the purposes of film making should be increased to 3 hectares?

No comment

Q39. Do you agree that the maximum height of any temporary structure, works, plant or machinery allowed for under the right should be increased to 20 metres?

No comment

Q40. Do you think that any of the proposed changes in relation to the permitted development right could impact on: a) businesses b) local planning authorities c) communities?

No comment

Q41. Do you think that proposed changes in relation to the permitted development right could give rise to any impacts on people who share a protected characteristic? (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation)?

No comment

Planning Committee

31 March 2023

Agenda item number 16

Appeals to the Secretary of State update

Report by Senior Planning Officer

Summary

This report sets out the position regarding appeals against the Authority.

Recommendation

To note the report.

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
APP/E9505/W/22/3291736 BA/2021/0244/FUL	Messrs T.A. Graham	Appeal received by the BA on 31 January 2022 Appeal start date 22 June 2022	The Shrublands, Grays Road, Burgh St Peter	Appeal against refusal of planning permission: Proposed retention of timber tepee structure and use as glamping accommodation as farm diversification scheme.	Delegated Decision 31 August 2021 LPA statement submitted 27 July 2022

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
APP/E9505/W/22/3291822 BA/2021/0253/COND	Mr P Young	Appeal received by the BA on 1 February 2022 Appeal start date 1 July 2022	Marshmans Cottage, Main Road A1064, Billockby Fleggburgh	Appeal against refusal of planning permission: Revised width of building and change use of loft space, variation of conditions 2 and 7 of permission BA/2020/0083/HOUSEH	Delegated Decision 7 December 2021 LPA statement submitted 5 August 2022
APP/E9505/W/22/3292450 BA/2021/0239/FUL	Mr Gavin Church	Appeal received by the BA on 9 February 2022 Appeal start date 30 June 2022	Priory Cottage St. Marys Road, Aldeby	Appeal against the refusal of planning permission: Use of land for siting 4 No. Bell Tents and 4 No. wash sheds with compostable toilets (retrospective)	Delegated Decision 24 August 2021 LPA statement submitted 2 August 2022
APP/E9505/W/22/3294205 BA/2021/0211/FUL	Mr Alan Gepp	Appeal received by the BA on 8 March 2022 Appeal start date 1 July 2022	Broadgate, Horsefen Road, Ludham	Appeal against the refusal of planning permission: Change of use to dwelling and retail bakery (sui generis mixed use) including the erection of a single storey extension.	Committee Decision 8 February 2022 LPA statement submitted 5 August 2022

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
APP/E9505/W/22/3295628 BA/2022/0022/FUL	Mr Matthew Hales	Appeal received by the BA 28 March 2022 Appeal start date 22 July 2022	Clean & Coat Ltd, 54B Yarmouth Road Thorpe St Andrew	Appeal against Condition 4, imposed on planning permission BA/2022/0022/FUL	Delegated decision 25 March 2022 LPA statement submitted 25 August 2022
APP/E9505/C/22/3301919 BA/2022/0023/UNAUP2	Mr R Hollocks	Appeal received by the BA on 27 June 2022 Appeal start date 14 July 2022	Beauchamp Arms, Ferry Road Carleton St Peter	Appeal against Enforcement Notice - lighting and kerbing	Committee Decision 27 May 2022 LPA statement submitted 25 August 2022
BA/2022/0021/UNAUP2 APP/E9505/C/22/3301976	Mr R Hollocks	Appeal received by the BA on 27 June 2022 Appeal start date 14 July 2022	Beauchamp Arms, Ferry Road Carleton St Peter	Appeal against Enforcement Notice - workshop	Committee Decision 27 May 2022 LPA statement submitted 25 August 2022

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2021/0490/FUL APP/E9505/W/22/3303030	Mr N Mackmin	Appeal received by the BA on 13 July 2022 Appeal start date 2 December 2022	The Old Bridge Hotel Site, The Causeway, Repps with Bastwick	Appeal against refusal of planning permission: 8 one-bedroom & 4 two-bedroom flats for holiday use with restaurant & covered car-park at ground level.	Committee Decision 7 March 2022 LPA statement submitted 6 January 2023
BA/2021/0193/HOUSEH APP/E9505/D/22/3307318	Dr Peter Jackson	Appeal received by the BA on 22 September 2022 Awaiting start date	4 Bureside Estate, Crabbetts Marsh, NR12 8JP	Appeal against refusal of planning permission: Erection of fence	Delegated Decision 29 July 2022
BA/2021/0295/FUL APP/E9505/W/22/3308360	Trilogy Ltd	Appeal received by the BA on 5 October 2022 Appeal start date 13 February 2023	Morrisons Foodstore, Beccles, NR34 9EJ	Appeal against refusal of planning permission: Coffee Shop with Drive Thru Facility	Delegated Decision 8 April 2022 LPA statement to be submitted by 20 March 2023

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2022/0112/HOUSEH APP/E9505/D/22/3309270	Alan and Joyce Hobbs	Appeal received by the BA on 18 October 2022 Awaiting start date	Bridge Farm, Main Road, Acle Bridge, NR13 3AT	Appeal against refusal of planning permission: Erection of a dormer window and external balcony to domestic outbuilding including external staircase (Retrospective).	Delegated Decision 26 July 2022
BA/2017/0006/UNAUP1 APP/E9505/C/22/3310960	Mr W Hollocks, Mr R Hollocks & Mr Mark Willingham	Appeal received by the BA on 11 November 2022 Start date 16 November 2022	Loddon Marina, 12 Bridge Street Loddon	Appeal against enforcement notice-occupation of caravans	Committee decision 14 October 2022 LPA statement submitted 21 December 2022
BA/2022/0309/COND APP/E9505/D/22/3311834	Mr B Parks	Appeal received by the BA on 23 November 2022 Awaiting start date	Shoals Cottage, The Shoal, Irstead	Appeal refusal of planning permission to change approved roof materials.	Delegated decision 15 November 2022

Application reference number	Applicant	Start date of appeal	Location	Nature of appeal/ description of development	Decision and dates
BA/2022/0144/FUL APP/E9505/W/22/3313528	Mr B Wright	Appeal received by the BA on 20 December 2022 Awaiting start date	East End Barn, Annexe, East End Barn, Aldeby	Appeal against refusal of planning permission to change the use of a residential annex to holiday let.	Delegated decision 5 July 2022
BA/2023/0001/ENF APP/E9505/C/23/3316184	Mr R Hollocks & Mr J Render	Appeal received by the BA on 6 February 2023 Awaiting start date	Beauchamp Arms, Ferry Road, Carleton St Peter	Appeal against enforcement notice-occupation of caravans	Committee decision 9 December 2022

Author: Cheryl Peel

Date of report: 14 March 2023

Background papers: BA appeal and application files

Planning Committee

31 March 2023

Agenda item number 17

Decisions made by officers under delegated powers

Report by Senior Planning Officer

Summary

This report sets out the delegated decisions made by officers on planning applications from 20 February 2023 to 17 March 2023 and Tree Preservation Orders confirmed within this period.

Recommendation

To note the report.

Parish	Application	Site	Applicant	Proposal	Decision
Bungay Town Council	BA/2022/0340/FUL	Land To The East Of Falcon Lane Ditchingham Norfolk	Mr Nathan Holmes	Erection of workshop/storage building & associated works.	Refuse
Coltishall Parish Council	BA/2023/0025/APPCON	Boatyard Maltings 30 Anchor Street Coltishall Norwich NR12 7AQ	Penny Keeley	Details of: Condition3: Materials of permission BA/2020/0217/HOUSEH.	Approve

Parish	Application	Site	Applicant	Proposal	Decision
Ditchingham Parish Council	BA/2023/0009/APPCON	58 Waterside Drive Ditchingham Norfolk NR35 2SH	Bromley-Sutton	Application for written confirmation that property has been built in accordance with conditions 13, 14, 17, 21 and 24	Approve
Halvergate Parish Council	BA/2023/0011/LBC	Stracey Arms Drainage Mill Acle New Road Halvergate Norwich Norfolk NR13 3QE	Mrs Amanda Rix	Replacement centre pivot windows, install timber picket gate at entrance and wall-mounted grab rail at top set of stairs.	Approve Subject to Conditions
Ludham Parish Council	BA/2023/0042/NONMAT	Limes Farm Cottage Clint Street Ludham Norfolk NR29 5PA	Mr & Mrs David & Lynne Sheppard	Amendments to garage door size and door and window positions, non-material amendment to permission BA/2022/0412/HOUSEH	Approve
Oulton Broad Parish Council	BA/2022/0484/FUL	Jetties Adjacent Tubbys Moorings Marsh Road Lowestoft Suffolk	East Suffolk Council	Replacement quay, floating pontoon, fencing and gate	Approve Subject to Conditions
Oulton Broad Parish Council	BA/2022/0422/FUL	Plots 13 And 14 Boathouse Lane Lowestoft Suffolk NR32 3PP	Mr David And Norma O'Dwyer	Erection of an 8'x8' shed	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Oulton Broad Parish Council	BA/2023/0038/HOUSEH	The Cottage Borrow Road Lowestoft Suffolk NR32 3PW	Mr & Mrs Elliston	Proposed demolition of shed and construction of garage	Approve Subject to Conditions
Repps With Bastwick Parish Council	BA/2023/0041/FUL	Land At Former Bridge Hotel The Causeway Repps With Bastwick Norfolk	Dr Keith Bacon	Extend 3-year temporary permission to use derelict land for car parking for occupants of bungalows along River Thurne.	Approve Subject to Conditions
Salhouse Parish Council	BA/2023/0028/COND	Car Park Lower Street Salhouse Norwich Norfolk NR13 6RX	Messrs Henry and Thomas Cator	Amended timings for landscaping works, variation of condition 5 of permission BA/2021/0414/FUL	Approve Subject to Conditions
Stalham Town Council	BA/2023/0030/HOUSEH	De Ja Vu 22 Burtons Mill The Staithe Stalham Norfolk NR12 9FE	Mr David Bane	Replacement of wooden shed with a brick shed (retrospective)	Approve Subject to Conditions
Stalham Town Council	BA/2023/0004/HOUSEH	Staithe Barn 21 Burtons Mill The Staithe Stalham Norfolk NR12 9FE	Mr Byron Welch	Replacement fence	Approve Subject to Conditions

Parish	Application	Site	Applicant	Proposal	Decision
Stalham Town Council	BA/2023/0049/FUL	Wayford Park River Holidays Wayford Road Wayford Bridge Norfolk NR12 9LL	Mr Adrian Cook	Replacement reception & dinghy store	Approve Subject to Conditions
Stalham Town Council	BA/2023/0029/HOUSEH	Chapel Field, Riverview Chapel Field Road Stalham Norfolk NR12 9EN	Mr Robert Jennings	Extension to original garage	Approve Subject to Conditions
Stokesby With Herringby Parish Council	BA/2023/0008/HOUSEH	The Hermitage Mill Road Stokesby With Herringby Norfolk NR29 3EY	Mr Richard Wells	To construct double timber framed 5m x 5m car port with tiled roof joined to existing garage. To construct a lych style front gate, timber framed with plain tiled roof. To construct a pitched roof over existing flat roof on house, incorporating an oak framed porch, with tiles to match existing.	Approve Subject to Conditions
Thurne Parish Council	BA/2023/0037/HOUSEH	East Cottage Church Road Thurne Norfolk NR29 3AP	Mr Christopher Bondi	Single storey 3x3m extension	Approve Subject to Conditions

Tree Preservation Orders confirmed by officers under delegated powers

Parish	Address	Reference number	Description
Horning	Ropes Hill, Ropes Hill, Horning, NR12 8PA	BA/2022/0004/TPO	Tree 1 - Lime
Thorpe St Andrew	River Green, Yarmouth Road, Thorpe St Andrew, Norwich	BA/2022/0005/TPO	Tree 1 – Horse Chestnut

Author: Cheryl Peel

Date of report: 21 March 2023