

Planning Committee

10 January 2025

Agenda item number 14

Local Plan- Preparing the publication version

Report by Planning Policy Officer

Summary

The report introduces three pieces of evidence for the Local Plan.

Recommendation

To endorse as evidence for the Local Plan for the Broads:

- i. the Fine Particulate Matter (PM2.5) Targets Topic Paper;
 - ii. the Gypsy and Traveller need – rest of the Broads; and
 - iii. the Development Boundaries Topic Paper – update.
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1. Introduction

- 1.1. This report introduces three pieces of evidence for the Local Plan: the PM2.5 Topic Paper; Gypsy and Traveller need check – rest of the Broads and the Development Boundaries Topic Paper – update.

2. PM2.5 Topic Paper

- 2.1. In mid-November 2024, the Government released interim guidance relating to the impact of development and particulate matter 2.5 microns. A Topic Paper (Appendix 1) has been produced as a way of assessing relevant policies in the Local Plan. Some minor amendments are proposed to the Local Plan.

3. Gypsy and Traveller check – rest of the Broads

- 3.1. Members will be aware that a study looking into the need for Gypsy and Travellers' sites in Great Yarmouth was produced and endorsed at the November Planning Committee. This work assessed data received from the other five districts and concludes there is no need for Gypsy and Traveller sites in the rest of the Broads Area (Appendix 2).

4. Development Boundaries Topic Paper update

- 4.1. The Development Boundaries Topic Paper (Appendix 3) has been updated to clarify that we will not be asking a question about having a development boundary in the part of Filby that is in the Broads in the Regulation 19 Local Plan. The boundary itself has been amended to remove an area of gardens as it is considered that the long gardens are characteristic of the area.

Author: Natalie Beal

Date of report: 09 December 2024

Appendix 1 – [Fine Particulate Matter \(PM2.5\) targets topic paper](#)

Appendix 2 – [Broads Authority GTAA Review December 2024](#)

Appendix 3 – [Development Boundaries Topic Paper – update](#)



Fine Particulate Matter (PM2.5) targets and the Local Plan for the Broads

November 2024

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1: Introduction

This Topic Paper addresses the requirement set by Government to demonstrate how Fine Particulate Matter (PM_{2.5}) targets have been considered in planning applications and decisions and Local Plans.

2: What is PM_{2.5}?

The following information is taken from [Particulate matter \(PM₁₀/PM_{2.5}\) - GOV.UK](#).

Particulate matter (PM) is everything in the air that is not a gas. It consists of a huge variety of chemical compounds and materials, some of which can be toxic. Due to the small size of many of the particles that form PM some of these toxins may enter the bloodstream and be transported around the body, lodging in the heart, brain and other organs. Therefore, exposure to PM can result in serious impacts to health, especially in vulnerable groups of people such as the young, elderly, and those with respiratory problems. As a result, particulates are classified according to size. The UK is currently focused on measuring the fractions of PM where particles are less than 10 micrometres in diameter (PM₁₀) and less than 2.5 micrometres in diameter (PM_{2.5}) based on the latest evidence on the effects of PM to health.

Fine PM (PM_{2.5}) and the precursor pollutants (that can form secondary PM) can travel large distances in the atmosphere. A proportion of the concentrations of PM that people in the UK are exposed to come from naturally occurring sources such as pollen and sea spray and some is transported to the UK from other European countries or international shipping. However, around half of UK concentrations of PM comes from anthropogenic sources in the UK such as domestic wood burning and tyre and brake wear from vehicles.

In terms of trends:

- **Urban background PM_{2.5} pollution has generally decreased despite a period of little change between 2015 and 2019**
- **Roadside PM_{2.5} pollution has generally decreased despite a period of little change between 2015 and 2019.**

In terms of the sources of PM_{2.5}, DEFRA ([FAQ 141 - Sources and Effects of PM_{2.5} | LAQM](#)) say the following.

'Human-made sources of PM_{2.5} are greater than natural sources, which make only a small contribution to the total concentration. Within UK towns and cities, emissions of PM_{2.5} from road vehicles are an important source. Consequently, levels of PM_{2.5} (and population exposure) close to roadsides are often much higher than those in background locations. In some places, industrial emissions can also be important, as can the use of non-smokeless fuels for heating and other domestic sources of smoke such as bonfires. Under some meteorological conditions, air polluted with PM_{2.5} from the continent may circulate over the

UK – a condition known as the long range transportation of air pollution. Long range transport, together with pollution from local sources, can result in short term episodes of high pollution which might have an impact on the health on those sensitive to high pollution.

In addition to these direct (i.e. primary) emissions of particles, PM_{2.5} can also be formed from the chemical reactions of gases such as sulphur dioxide (SO₂) and nitrogen oxides (NO_x: nitric oxide, NO plus nitrogen dioxide, NO₂); these are called secondary particles. Measures to reduce the emissions of these precursor gases are therefore often beneficial in reducing overall levels of PM_{2.5}.

Primary emissions of PM, the formation of secondary PM within the UK and long range transport of pollution from outside the UK all contribute to regional PM levels across the UK. Local primary emissions are also important in urban areas’.

3: PM2.5 Targets: Interim Planning Guidance

In November 2024, the Government released [Interim Planning Guidance on the consideration of the Environment Act PM2.5 targets in planning decisions](#). The guidance says ‘Planning Authorities are encouraged to consider the cumulative impact of development both in developing their Local Plan and when making decisions on a case-by-case basis. Whilst contributions from individual developments may be small, cumulatively they can lead to an increase in regional exposure, and so will have public health impacts and affect progress towards the targets’.

The following questions are included in the guidance and are designed to be used as prompts to support the interim process:

1. How has exposure to PM2.5 been considered when selecting the development site?

Applicants are advised to consider the following in their application:

- Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,
- Site proximity to pollution sources and the impact of these on users of the development,
- Exposure and emissions during both construction and in-use.

2. What actions and/or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 and its precursors?

Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:

- Site layout,

- The development's design,
- Technology used in the construction or installed for use in the development,
- Construction and future use of the development.

4: PM2.5 and the Local Plan for the Broads

Taking into account the prompt questions set out in the guidance, which relate to the impact on human health, the following types of policies have been scoped into consideration in this Topic Paper:

- Allocations for residential dwellings
- Allocations for residential moorings
- Site specific policies relating to employment areas
- Some of the development management policies

The following table uses the prompts that are set out in section 3 above and assesses the relevant policies of the Local Plan for the Broads.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
Policy PUBDM3: Pollution and Hazards in development and protecting environmental quality	All development proposals will protect the quality of the environment.	This is not a site-specific policy.							This policy addresses air pollution already so is relevant to the PM2.5 guidance. It could refer to PM2.5 in the supporting text.	Refer to PM2.5 in the supporting text.	
Policy PUBDM20: Energy demand and performance of new buildings (including extensions)	The expected energy use of buildings must be as low as possible.	This is not a site-specific policy.							This policy will generally be positive in aiming to reduce PM2.5 as it seeks low energy use of buildings.	None.	
Policy PUBDM27: Amenity	Protecting the amenity of both the future occupiers of new development and the occupiers of existing developments	This is not a site-specific policy.							The policy already refers to airborne pollutants. Reference to PM2.5 could be made in the	Refer to PM2.5 in the supporting text.	

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
	is vital for the sustainability of communities in the Broads.									supporting text.	
Policy PUBSP8: Accessibility and Transport	Development will be well located and designed to maximise the use of sustainable forms of transport appropriate to its particular location. All new development is required to address the transport implications of that development. Development proposals need to contribute towards an efficient and safe transport network that	This is not a site-specific policy.								The policy is generally positive in relation to aiming to reduce PM2.5 as it seeks the use of sustainable modes of travel.	None.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
	offers a range of transport choices for the movement of people and goods.										
Policy PUBDM29: Transport, highways and access	Requires assessment of development on the highway and seeks sustainable modes of transport.	This is not a site-specific policy.								The policy is generally positive in aiming to reduce PM2.5 as it seeks sustainable modes of transport. Reference to PM2.5 in the supporting text would be useful.	Refer to PM2.5 in the supporting text.
Policy PUBDM31: New employment development	Sets criteria that new employment development needs to meet.	This is not a site-specific policy.								The policy already refers to airborne emissions and locational criteria that seek less	Refer to PM2.5 in the supporting text.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
										motor vehicle usage. Reference to PM2.5 in the supporting text would be useful.	
Policy PUBSP12: Sustainable tourism and Policy PUBDM36: Sustainable tourism and recreation development	Sets criteria that new tourism development needs to meet.			This is not a site-specific policy.						The policy already refers to locational criteria that seek less motor vehicle usage. Reference to PM2.5 in the supporting text would be useful.	Refer to PM2.5 in the supporting text.
Policy PUBDM44: Residential development within defined Development Boundaries	Directs development to areas with access to key services.	Transport, construction.	The development boundaries are in towns.	No known pollution sources in the settlements. The amenity policy (PUBDM27) will guide what is acceptable,	Development boundaries relate mainly to residential houses and moorings, but also employment	Not known. Policies in the Local Plan will influence this.	Not known. Policies in the Local Plan will influence this.	Not known at this stage.	Development boundaries relate mainly to residential houses and moorings, but also employment	Generally, this is positive in relation to aiming to reduce PM2.5 because residential development	None.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
				reflecting the proposal and location of any scheme or proposal.	and tourism uses.				and tourism uses.	is directed to areas with access to key services by a variety of modes of transport.	
Policy PUBPS16: Strategic Design Policy and Policy PUBDM52: Design	Seeks well-designed places. All development will be expected to be of a high design quality.	These are not site-specific policies.								Generally, these policies will be positive in aiming to reduce PM2.5 because they seek permeability for sustainable transport modes and refer to construction waste	None.
Policy PUBDM53: Source of heating	The policy sets out a preferred method of heating hierarchy in respect of	This is not a site-specific policy.								Generally, this policy will be positive in aiming to reduce	Refer to PM2.5 in the supporting text as further

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	source of heating. Replacement buildings are required to improve their method of heating in line with the hierarchy. New buildings are required to be ready for other heating technologies.									PM2.5 as it refers to heating source and seeks schemes that do not use oil. Reference to PM2.5 in the supporting text would be useful.	justification for this policy.
Policy PUBDM59: Designing places for healthy lives	Development proposals that support healthy choices, healthy behaviours and reduce health inequalities will be supported.	This is not a site-specific policy.								The small sites and large sites checklist already refers to dust associated with construction and active travel modes.	None.
Policy PUBBRU2: Riverside Estate Boatyards, etc., including land	Guides development at the boatyards.	Industrial, construction, transport.	The site is not a new site; it is existing. Not aware of any	No known pollution sources nearby.	Not known at this stage. The Local Plan and other relevant	Not known at this stage. The Local Plan and	Not known at this stage. The Local Plan and other relevant	Not known at this stage. The Local Plan and other relevant	Policy does not propose development, it seeks to guide	Policy does not allocate a specific use for the site,	None.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
adjacent to railway line			vulnerable groups nearby. The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.		guidance will influence any future proposals.	other relevant guidance will influence any future proposals.	guidance will influence any future proposals.	guidance will influence any future proposals.	any development proposals put forward. As such, the construction and future use of any proposals on site are not known. That being said, the site will likely continue as boatyard use.	but guides what is acceptable. Other general development management policies referred to earlier in this table will apply.	
Policy PUBBRU6: Brundall Gardens	Residential mooring allocation.	Transport.	The site is not a new site; it is existing. Not aware of any vulnerable groups nearby. Few nearby residents The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any	No known pollution sources nearby.	Limited, if any, construction as the moorings are in place already. In use would be transport and travel associated with living at the moorings.	Residential moorings would replace existing moorings, no new moorings expected.	Residential moorings would replace existing moorings, no new moorings expected.	Residential moorings would replace existing moorings, no new moorings expected.	Limited construction work expected as existing moorings would be used for residential boats. Travel and transport to and from the site. The site is next to a train station and walking distance to key	Limited construction. Other general development management policies referred to earlier in this table will apply.	None.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
			scheme or proposal.						services within the town.		
Policy PUBCAN1: Cantley Sugar Factory	Guides development at this industrial site.	Industrial, construction transport.	On the edge of Cantley which is a small village. Not aware of any vulnerable groups nearby.	The processes on site and related traffic are likely to mean this site is classed as a source of pollution.	The processes on site and related traffic may class this site as a source of pollution.	This is an existing site and new proposals will fit within the constraints on site.	This is an existing site that is industrial in nature.	The site produces sugar and there are technical processes associated with that.	Policy does not propose development, it seeks to guide any development proposals put forward. The construction and future use of any proposals on site are not known, it is likely that the site will continue as a factory that produces sugar.	This is an existing site that has technical processes associated with sugar production. It does emit pollution and there will be associated guidance and regulations for the technology used on site that sit outside of planning. Other development management policies referred to earlier in this table will apply.	Refer to PM2.5 in the supporting text as further justification for this policy.

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Policy PUBCHE1: Greenway Marine residential moorings	Residential mooring allocation.	Transport.	The site is not a new site, it is existing. Not aware of any vulnerable groups nearby. Few nearby residents. The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.	No known pollution sources nearby.	Limited, if any construction as the moorings are in place already. In use would be transport and travel associated with living at the moorings.	Residential moorings would replace existing moorings. So no new moorings expected.	Residential moorings would replace existing moorings. So no new moorings expected.	Residential moorings would replace existing moorings, so no new moorings expected.	Limited construction work expected as existing moorings would be used for residential boats. Travel and transport to and from the site. The site is next to a train station and walking distance to key services within the town.	Limited construction. Other general development management policies referred to earlier in this table will apply.	None.
Policy PUBGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)	Residential mooring allocation.	Transport.	The site is not a new site, it is existing. Not aware of any vulnerable groups nearby. Few nearby residents. The amenity policy (PUBDM27) will guide what is acceptable, reflecting the	No known pollution sources nearby.	Limited, if any construction as the moorings are in place already. In use so would be transport and travel associated with living at the moorings.	Residential moorings would replace existing moorings. So no new moorings expected.	Residential moorings would replace existing moorings. So no new moorings expected.	Residential moorings would replace existing moorings, so no new moorings expected.	Limited construction work expected as existing moorings would be used for residential boats. Travel and transport to and from the site. The site is next to a train station	Limited construction. Other general development management policies referred to earlier in this table will apply.	None.

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			proposal and location of any scheme or proposal.						and walking distance to key services within the town.		
Policy PUBGTY1: Marina Quays (Port of Yarmouth Marina)	Mixed use allocation.	Transport, construction.	Few nearby residents. Not aware of any vulnerable groups nearby. The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.	No known pollution sources nearby.	Uses could include residential and water related uses. In terms of travel and transport, site is near to a railway station and bus route.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Could include residential and water related uses. In terms of travel and transport, site is near to a railway station and bus route.	Policy does not allocate a specific use for the site, but guides what can happen. Other general development management policies referred to earlier in this table will apply.	None.
Policy PUBHOR6: Horning - Boatyards, etc. at Ferry Road. and Ferry View Road	Guides development at the boatyards.	Industrial, construction transport.	The site is not a new site, it is existing. Not aware of any vulnerable groups nearby. The amenity policy (PUBDM27) will guide what is	No known pollution sources nearby.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Policy does not propose development. Policy seeks to guide any development proposals put forward. The construction and future use of	Policy does not allocate a specific use for the site, but guides what can happen. Other general development	None.

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			acceptable, reflecting the proposal and location of any scheme or proposal.			any future proposals.			any proposals on site are not known. That being said, the site will likely continue as boatyard use.	management policies referred to earlier in this table will apply.	
Policy PUBHOV3: Brownfield land off Station Road, Hoveton	Mixed use allocation.	Industrial, construction transport.	Within a town. Not aware of any vulnerable groups nearby. The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.	No known pollution sources nearby.	Uses could include residential, holiday and town centre uses given its location. In terms of travel and transport, site is near to a railway station and bus route.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Could include residential, holiday and town centre uses given its location. In terms of travel and transport, site is near to a railway station and bus route.	Policy does not allocate a specific use for the site, but guides what can happen. Other general development management policies referred to earlier in this table will apply.	None.
Policy PUBNOR1: Utilities Site	Mixed use allocation.	Industrial, construction transport.	On the edge of a city. Not aware of any vulnerable groups nearby. The amenity policy	No known pollution sources nearby. Site is near a train depot, but that is not necessarily a	Uses could include residential and employment.	Not known at this stage. The Local Plan and other relevant guidance will	Not known at this stage. The Local Plan and other relevant guidance will	Not known at this stage. The Local Plan and other relevant guidance will influence any	Uses could include residential and employment.	Policy does not allocate a specific use for the site, but guides what can happen.	None.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
			(PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.	pollution source.		influence any future proposals.	influence any future proposals.	future proposals.		Other general development management policies referred to earlier in this table will apply.	
Policy PUBORM1: Ormesby waterworks	Guides development at the waterworks.	Industrial, construction transport.	Few nearby residents. Not aware of any vulnerable groups nearby. The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.	No known pollution sources nearby.	Proposals would be associated with water supply for the local population.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Continued use of waterworks. The details of future projects is not known at this stage. The policy generally guides future development.	Policy does not allocate a specific use for the site, but guides what can happen. Other gnereal development management policies referred to earlier in this table will apply.	None.
Policy PUBOUL2: Oulton Broad - Former	Mixed use allocation.	Transport, construction.	This is within a Town. Not aware of any vulnerable groups nearby.	No known pollution sources nearby.	Uses could include residential and employment.	Not known at this stage. The Local Plan and other	Not known at this stage. The Local Plan and other relevant guidance will	Not known at this stage. The Local Plan and other relevant guidance will	Uses could include residential and employment.	Policy does not allocate a specific use for the site, but guides	None.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
Pegasus/Hamptons Site			Residential uses are next to the site. There are key services within walking distance which could be accessed by means other than motor vehicle.			relevant guidance will influence any future proposals.	influence any future proposals.	influence any future proposals.		what can happen. Other general development management policies referred to earlier in this table will apply.	
Policy PUBSOM1: Somerleyton Marina Residential Moorings	Residential mooring allocation.	Transport.	The site is not a new site; it is an existing site. Not aware of any vulnerable groups nearby. Few nearby residents The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.	No known pollution sources nearby.	Limited, if any construction as the moorings are in place already. In use so would be transport and travel associated with living at the moorings.	Residential moorings would replace existing moorings. So no new moorings expected.	Residential moorings would replace existing moorings. So no new moorings expected.	Residential moorings would replace existing moorings. So no new moorings expected.	Limited construction work expected as existing moorings would be used for residential boats. Travel and transport to and from the site. The sites is next to a train station and walking distanc to key services within the town.	Limited construction. Other general development management policies referred to earlier in this table will apply.	None.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)	Guides development at the boatyard. Residential mooring allocation.	Industrial, construction transport.	The site is not a new site; it is an existing site. Not aware of any vulnerable groups nearby. Few nearby residents. The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.	No known pollution sources nearby.	Limited, if any construction as the moorings are in place already. In use would be transport and travel associated with living at the moorings. In terms of boatyard uses, not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Residential moorings would replace existing moorings. So no new moorings expected. In terms of boatyard uses, not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Residential moorings would replace existing moorings. So no new moorings expected. In terms of boatyard uses, not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Residential moorings would replace existing moorings. So no new moorings expected. In terms of boatyard uses, not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Limited construction work expected as existing moorings would be used for residential boats. Travel and transport to and from the site. The sites is next to a train station and walking distanc to key services within the town. The site will likely continue as boatyard use.	Limited construction. Other general development management policies referred to earlier in this table will apply. In terms of boatyard use, policy does not allocate a specific use for the site, but guides what can happen.	None.
Policy PUBTSA3: Griffin Lane – boatyards and industrial area	Guides development at the boayards.	Industrial, construction transport.	The site is not a new site; it is an existing site. Not aware of any vulnerable groups nearby. The amenity policy	No known pollution sources nearby.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Not known at this stage. The Local Plan and other relevant guidance will influence any future proposals.	Policy does not propose development. Policy seeks to guide any development proposals put forward. As	Policy does not allocate a specific use for the site, but guides what can happen. Other	None.

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
			(PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.			any future proposals.			such, the construction and future use of any proposals on site are not known. The site will likely continue as boatyard use.	general development management policies referred to earlier in this table will apply.	
Policy PUBTHU1: Tourism development at Hedera House, Thurne	Residential and holiday dwellings allocation.	Transport, construction.	Some nearby residents, but Thurne is a small village. Not aware of any vulnerable groups nearby. The amenity policy (PUBDM27) will guide what is acceptable, reflecting the proposal and location of any scheme or proposal.	No known pollution sources nearby.	Residential land use.	The site has planning permission. It will be for promoters to design scheme according to the site and any constraints on site.	The site has planning permission. It will be for promoters to design scheme according to the site and any constraints on site.	The site has planning permission. It will be for promoters to design scheme according to the site and any constraints on site.	Development will be housing with construction and travel and transport associated with housing use.	Other general development management policies referred to earlier in this table will apply.	None.
Policy PUBSSA47: Road schemes on	Seeks to guide roads schemes on the A47.	Industrial, construction transport.	Few residential properties nearby. Users are in motor	No known pollution sources nearby.	In terms of construction, would expect National	Layout to be determined, although there will be	Design to be determined, although there will be national	For National Highways to determine.	For National Highways to determine.	The policy does not propose road schemes, but	Refer to PM2.5 in policy and

Policy	Summary of policy	Potential relevant sources of PM2.5	Site proximity to people and the impact of the development on these	Site proximity to pollution sources and the impact of these on users of the development	Exposure and emissions during both construction and inuse.	Site layout	The development's design	Technology used in the construction or installed for use in the development	Construction and future use of the development.	Conclusion	Proposed changes to the policies
the Acle Straight (A47T)			vehicles. Not aware of any vulnerable groups nearby.		Highways to address PM2.5 emissions. In terms of use, this is a road that exists and passes through the Broads and will have motor vehicles using it.	national guidance for road schemes.	guidance for road schemes.		In terms of use, this is a road that exists and passes through the Broads and will have motor vehicles using it.	seeks to guide any schemes that come forward. There will be guidance and standards for the design of roads, but the policy could refer to PM2.5.	supporting text.

Natalie Beal – MRTPI
Planning Policy Officer
Broads Authority
Yare House
Norwich, NR1 1RY

04/12/2024

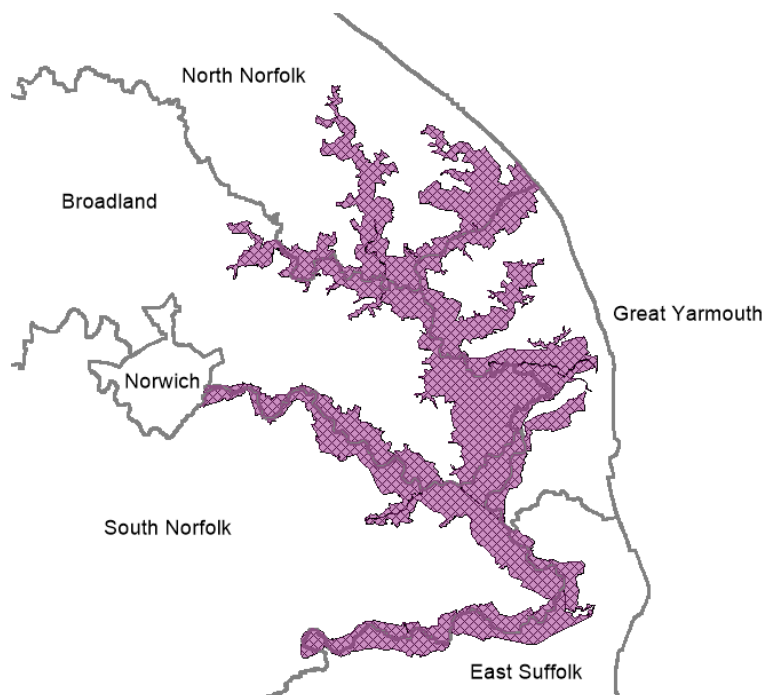
Dear Natalie

Broads Authority GTAA Review December 2024

In response to the request from The Broads Authority for Opinion Research Services (ORS) to review the current situation regarding need for Gypsy and Traveller accommodation I can provide the following summary.

The Broads Authority is made up of parts of the following local authorities as shown in the map below:

- Broadland and South Norfolk.
- East Suffolk.
- Great Yarmouth.
- North Norfolk.
- Norwich.



ORS have completed a comprehensive review of the current provision for Gypsies, Travellers, and Travelling Showpeople for the parts of each of these local authorities that fall within the Broads Authority. This has included a review of existing sites and yards, as well as records of unauthorised encampments since 2017. The outcomes are set out below.

Broadland and South Norfolk

- There are no Gypsy and Traveller sites or Travelling Showpeople yards in the areas that make up The Broads Authority.
- There is one small public transit site with 5 pitches called Costessey Stopping Place.
- There have been two small encampments recorded since 2017 - both in 2021. These were both short-term and transient in nature.
- In conclusion, there is no current or future need for Gypsy and Traveller pitches or Travelling Showpeople plots, and no need for any additional transit provision as there is already a public transit site.

East Suffolk

- There are no Gypsy and Traveller sites or Travelling Showpeople yards in the areas that make up The Broads Authority.
- There is no public transit provision.
- There have been 3 small encampments recorded since 2017 all of which were short-term and transient. One in 2017 (6 caravans for 6 days), one in 2018 (4 caravans for 5 days), and one in 2021 (4 caravans for 4 days).
- In conclusion, there is no current or future need for Gypsy and Traveller pitches or Travelling Showpeople plots, and no need for any transit provision given that the small number of recorded encampments were short-term and transient. Where unauthorised encampments are identified in Suffolk, the relevant Protocol for the Management of Unauthorised Encampments is applied.

Great Yarmouth

- A Gypsy and Traveller Accommodation Assessment (GTAA) was completed by ORS in 2024 that covered Great Yarmouth and the areas of Great Yarmouth that fall within The Boards Authority. The GTAA was published in September 2024.
- The GTAA identified a total of 9 small unauthorised sites within the areas of Great Yarmouth that make up The Broads Authority. These were located at Cobholm Island.
- For the full period covered by the GTAA to 2041/42 the total need identified for households that met the 2023 PPTS planning definition of a Traveller is for 24 pitches, and the 5-year need is for 20 pitches.
- For the full period covered by the GTAA to 2041/42 the total need identified for households that did not meet the 2023 PPTS planning definition of a Traveller is for 2 pitches, both of which are included in the 5-year need.
- There have been a small number of encampments but as there are public transit pitches available there was no recommendation for any additional transit provision.

North Norfolk

- There are no Gypsy and Traveller sites or Travelling Showpeople yards in the areas that make up The Broads Authority.
- There was one short term encampment recorded in 2022 comprising a single caravan.
- There is one public transit site with 9 pitches located at Holt Road, Cromer.
- In conclusion, there is no current or future need for Gypsy and Traveller pitches or Travelling Showpeople plots, and no need for any additional transit provision, given that there is already a public transit site.

Norwich

- There are no Gypsy and Traveller sites or Travelling Showpeople yards in the areas that make up The Broads Authority.
- There are no public transit sites.
- There have been no recorded encampments since 2017.
- In conclusion, there is no current or future need for Gypsy and Traveller pitches or Travelling Showpeople plots, and no need for any additional transit provision, given that there is public transit provision in other local authorities in Norfolk.

PPTS 2023

Changes were made to the planning definition of a Traveller in the PPTS in December 2023. These changes were made in response to the Lisa Smith Court of Appeal Judgement that was handed down in October 2022.

The implications of these changes are that households who have ceased to travel permanently now fall back under the 2023 PPTS planning definition of a Traveller.

My professional views on the implications of the changes that were made to the PPTS in 2023 in relation to GTAA's are as follows:

- As a result of the Lisa Smith Judgement the PPTS was updated in December 2023 to revert back to the 2012 PPTS planning definition of a Traveller (now referred to as the 2023 PPTS) by reintroducing those who have ceased to travel permanently due to education, ill health, or old age into the definition.
- When the 2012 definition was issued the alternative planning definition in the 2004 Housing Act was also in place (now revoked by the Housing and Planning Act in 2016). This included anyone of a nomadic habit of life or those living in a caravan. So if a household did not meet the 2012 PPTS definition it was highly likely that they would meet the 2004 Housing Act definition if they were living in a caravan on a site or yard.
- Now that the Housing Act definition has been revoked, there will still be large numbers of households who will not meet the 2023 PPTS planning definition if they have never travelled or if they have never travelled for work – under case law you can only have ceased to travel

(either temporarily or permanently) if you have previously travelled for work or for seeking work.

- Following the changes to the PPTS in 2023 ORS have completed a review of a large number of recent GTAAs that we have completed. These reviews have concluded that the vast majority of those who will now meet the planning definition (those who have previously travelled for work and have now ceased to travel permanently) are old or sick, have no children now living with them, and unless they are living on a temporary or unauthorised site do not generate much, if any, need.
- The reviews also concluded that whilst on average up to 25% of households may now move under the 2023 definition, they bring little or no need over with them. The majority of need from remaining non-2023 PPTS definition households is from teenagers and through new household formation from families with children who have never travelled or have never travelled for work.
- Therefore, in my professional view the changes to the PPTS in December 2023 will not change things as far as GTAAs are concerned other than an adjustment to potentially increase need slightly (if any is identified) from those who have legitimately ceased to travel permanently; that the target for 5-year supply should also not change very much, if at all; and that Paragraph 63 in the revised NPPF should still be used to address need from those who do not meet the 2023 planning definition alongside wider housing need.
- In conclusion, households who have never travelled, or have never travelled for work do not meet the 2023 PPTS planning definition of a Traveller.

Overall Conclusions on Need and Transit Provision

In conclusion, other than the need identified in the Great Yarmouth GTAA for the unauthorised sites at Cobholm Island, there is no further need identified for Gypsies, Travellers or Travelling Showpeople elsewhere in The Broads Authority, nor any requirements for any additional transit provision.

Regards



Steve Jarman - BSc (Hons) City & Regional Planning, DipTP
Head of Traveller Assessments
Opinion Research Services Ltd.



Development Boundaries Topic Paper

Updated December 2024

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1. Introduction

The purpose of a development boundary is to consolidate development around existing built-up communities where there is a clearly defined settlement where further development, if properly designed and constructed, would not be incongruous or intrusive because of the size of the settlement. Development boundaries have twin objectives of focusing the majority of development towards existing settlements whilst simultaneously protecting the surrounding countryside.

There are currently four areas in the Broads Executive Area that have development boundaries. These are detailed in Policy DM35: Residential development within defined development boundaries in the adopted Local Plan for the Broads (2019) and are shown on the [adopted policies maps](#). The four areas are:

- A. Horning
- B. Wroxham and Hoveton
- C. Oulton Broad
- D. Thorpe St Andrew

This version of the Topic Paper is intended to support the update of the Local Plan. It sets out the proposed development boundaries to be included in the new Local Plan.

This is an update to the August 2023 version, to take on board comments received during the Issues and Options consultation (see [section 4](#) and [Appendix 3](#)) and Preferred Options consultation (see [Appendix 6](#)).

2. The Settlement Study

The Settlement Study¹, completed throughout 2021/22 and updated in 2023, sets out the methodology for assessing if settlements have good access to facilities and services. This study scored settlements according to access to schools and shops for example. The settlements included in Section 3 were assessed as having the best access to services and facilities. Those highlighted in green already have development boundaries as discussed previously. It is important to note that just because a settlement may be sustainable in terms of the facilities and services nearby, it does not automatically follow that it should have a development boundary (or indeed development) as there may be on-site or local issues that would indicate a development boundary is not appropriate. Please note that during the 2023 update, in response to a comment received as part of the Issues and Options consultation, allotments were added as a facility or service. And following the Preferred Options consultation, a section about Filby has been added. See [section 7](#).

3. Settlements in the Broads and the potential for development boundaries

The following table includes a summary of the built-up area in the Broads part of those settlements. Stakeholders' comments were also sought. See [Appendix 1](#). Maps of the built-up areas of these settlements in the Broads, with some other spatial information such as flood risk and neighbouring development boundaries is also included at [Appendix 2](#).

¹ Can be found here: [Local Plan for the Broads \(broads-authority.gov.uk\)](https://broads-authority.gov.uk)

Settlement	District/Borough	Place in District's Settlement Hierarchy.	Commentary of built-up area in the Broads
Norwich City	Norwich	City	The Broads part of Norwich is the river only as it flows through the centre of the City. But to the east, there are some built up areas. Cremorne Lane for example is an area of housing. The Utilities Site is an area of brownfield land that is allocated for mixed use in the current local plan. Close/adjoining the main settlement. Limited impact from flood risk.
Great Yarmouth	Great Yarmouth Borough	Main town	There are some dwellings on Riverwalk, to the south of Bure Park, near to the permission for dwellings and residential moorings. To the north of Gapton Hall Retail Park is some more urban uses, more industrial. Close/adjoining the main settlement. Seems all of the Broads part is at risk of flooding.
Beccles	Waveney	Market Town	To the east of the River Waveney are some dwellings, hotel and the Lido. There is also Hipperson's Boatyard. And Morrison's and fuel station. Close/adjoining the main settlement. Nearer to the road, no risk of flooding, but nearer to the water, flood risk. The incremental impacts of even small-scale developments or activities can ultimately have cumulative adverse effects on the local landscape character
Thorpe St Andrew	Broadland	Fringe Parish	There are areas of housing and pubs. There are development boundaries in place already. Close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary.
Loddon	South Norfolk	Key Service Centre	There are some dwellings along Mill Road and Pyes Mill Road, but these are some distance from the main area of Loddon. There is also the Loddon Boatyard. Other than the boatyard, Mill Road and Pyres Mill Road tends not to be at risk of flooding.

Settlement	District/Borough	Place in District's Settlement Hierarchy.	Commentary of built-up area in the Broads
Oulton Broad	Waveney	Main Town	There are areas of housing and pubs and shops. There are development boundaries in place already. The scheme at the former Pegasus boatyard site has permission. Close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary.
Hoveton	North Norfolk	Small Growth Town	There are areas of housing, shops, boatyards and pubs. There are development boundaries in place already. There is also an allocation on Station Road in the current Local Plan. Close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary.
Brundall	Broadland	Key Service Centre	Boatyards and residential to the south of the railway. Entire areas subject to policies in the Local Plan already. Over the railway from the main settlement. Most of the riverside area is at risk of flooding.
Bungay	Waveney	Service Centre	Built up areas to the south of the River Waveney, especially along Bridge Street. Close/adjoining the main settlement. Development likely to have adverse effects on landscape character.
Wroxham	Broadland	Key Service Centre	There are areas of housing, shops, boatyards and pubs. There are development boundaries in place already. Close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary.
Trowse with Newton	South Norfolk	Fringe Parish	Ski centre, campsite and a few dwellings along Whitlingham Lane somewhat separated from the main settlement. Flood risk to the west of the Lane. No obvious extensions to the neighbouring LPA's settlement boundary.

Settlement	District/Borough	Place in District's Settlement Hierarchy.	Commentary of built-up area in the Broads
Coltishall	Broadland	Village cluster	Dwellings and pubs along Anchor Street and Wroxham Road somewhat separated from the main settlement. Tends to be limited flood risk away from the river. Quite sensitive having a conservation area etc.
Reedham	Broadland	Village cluster	Dwellings, pubs and retail along the Riverside. Close/adjoining the main settlement. Some flood risk mainly up to the road itself. Visual impacts of built development could detract from the perceived naturalness and tranquillity of the area
Ditchingham Dam	Waveney	Open Countryside	North of the River Waveney, with some dwellings and business park. Over the river from the main settlement of Bungay. Most the area at risk of flood zone 2.
Ditchingham	South Norfolk	Village cluster	Ditchingham Maltings development, with some other dwellings near the Yarmouth Road/Ditchingham Dam roundabout. Also, sports facilities. Over the A143 from the main settlement. Limited flood risk issue – flood zone 2 if there is a risk.
Chedgrave	South Norfolk	Key Service Centre	Dwellings and boatyards to the north of the River Chet, and off Wherry Close. Close/adjoining the main settlement. Flood risk an issue for most of the built-up area.
Horning	North Norfolk	Small growth village	There are areas of housing, shops, boatyards and pubs. There are development boundaries in place already close/adjoining the main settlement. Some of the area at risk of flooding. No obvious changes to the existing development boundary. Capacity issues at Horning Water Recycling Centre a constraint.

Settlement	District/Borough	Place in District's Settlement Hierarchy.	Commentary of built-up area in the Broads
Stalham Staithe	North Norfolk	Small Growth Town	There are areas of housing, shops, boatyards and pubs. Over the A149 from the main settlement. Some flood risk nearer the boatyard/river. Proximity of A149, settlement and large boatyards make this area less sensitive. Policy STA1 includes some landscape requirements which would help safeguard landscape character.
Ludham	North Norfolk	Large Growth Villages	Some boatyards and dwellings around Womack Water. Away from the main settlement. Most of the built-up areas are at risk of flooding. Womack water has special qualities which would be vulnerable to further development
Cantley	Broadland	Village cluster	Some dwellings along Station Road which are close/adjoining the main settlement as well as the Sugar Beat Factory. Parts of Station Road and parts of the Factory not at risk of flooding.
Filby	Great Yarmouth	Secondary Village	Dwellings and pubs to the west of Thrigby Road. Generally, the settlement is linear in nature. Generally, nearer the road, no flood risk, but nearer the Broad, tends to be at risk of flooding.

4. Comments received as part of Issues and Options consultation

During the Issues and Options consultation², we asked the following questions:

Question 37: Do you have any comments on the development boundaries as they are currently drawn?

Question 38: Do you have any comments on the Settlement Study?

Question 39: Do you have any comments on the Development Boundary Topic Paper?

Question 40: Do you have any suggestions for other development boundaries in the Broads? Please explain your suggestion.

The responses are included at Appendix 3.

There was also another question which is discussed in the next section: Question 41: What are your thoughts about not having development boundaries?

² [The Local Plan for the Broads: Review - Issues and Options Consultation \(broads-authority.gov.uk\)](https://broads-authority.gov.uk), section 29.

5. The option of not having development boundaries.

As part of the Issues and Options consultation, we asked for opinions on not having development boundaries and instead, relying on criteria-based policy approach. The responses are as follows:

Question	Respondent	Comment	BA response	Action for Local Plan
Question 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.
Question 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.
Question 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 an economic viability, environmental impact and economic growth assessment model.	Noted.	Consider this advice as the approach to development boundaries is worked up.

Question	Respondent	Comment	BA response	Action for Local Plan
Question 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.
Question 41	Sequence UK LTD/Brundall Riverside Estate Association	2.99 Sequence 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.

Question	Respondent	Comment	BA response	Action for Local Plan
Question 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.
Question 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.
Question 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.

Question	Respondent	Comment	BA response	Action for Local Plan
Question 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.

Taking all the responses into account, there seems to be two reasonable options to consider when producing the development boundary policy:

- a) Criteria based development boundary policy – would not use a spatial approach but use a criteria-based approach.
- b) Spatial approach – using boundaries on a map.

These have been assessed through the Sustainability Appraisal. The full assessment is set out in Appendix 4, but a summary is included below.

A: Criteria-based development boundary policy: 0 positives. 0 negatives. 8 ?

B: Plan based development boundary policy 7 positives. 0 negatives. 1 ?

On one hand, removing development boundaries in the Broads Authority Executive Area could be treating the whole area of The Broads as being in the open countryside which could help protect the character of The Broads area. On the other hand, it will not be possible to influence the location of development to built up/urban areas that have key services which could result in isolated dwellings. Indeed, development boundaries is a tried and tested policy approach. The Local Plan will also enable any development that is needed to come forward in more remote areas to do so, for example through rural enterprise dwellings and replacement dwellings. Development boundaries will also provide certainty to all involved as to where development is suitable in theory.

The New Local Plan will therefore include development boundaries.

6. Horning Water Recycling Centre – capacity issues

The capacity issues at Horning Water Recycling Centre have been known for some time now. More detail can be found in the [Joint Position Statement \(August 2023\)](#), but to summarise the issue:

- Concerns regarding development in the catchment of the WRC relates to the potential impact of rising nutrient loads on the river and sensitive downstream receptors and excess flows caused from water ingress into the system.
- Water ingress is from surface water, river over topping and the resultant groundwater infiltration which is compounded through defects in the public and private network.
- Development that would add foul water flows or increase surface water runoff are not permitted in the Horning area.

Anglian Water Services have undertaken studies, assessments and some work in the area over recent years to try to address the issue of water ingress into the system, but issues still remain.

It is currently not clear how the situation will ultimately be resolved to enable the WRC to accommodate more foul water or surface water and therefore enable development in the Horning area.

As a result, the development boundary for Horning will not be included in the emerging Local Plan.

If the situation changes over the rest of the Local Plan production period, this approach could be changed. Indeed, if the situation changes, subsequent Local Plans may reintroduce a development boundary for Horning.

7. A development boundary for Filby?

During the consultation on the Preferred Options version of the Local Plan (see [Section 7](#)), Great Yarmouth Borough Council recommended that the part of Filby that is within the Broads should have a development boundary to complement the development boundary of the part of Filby that is within their planning area. On checking the assessment of Filby in the Settlement Study, Filby rates favourably in terms of services and facilities in the settlement and so some options for a development boundary in the Broads part of Filby were produced. This was sent to Filby Parish Council for comment, as well as internally to heritage, landscape and ecology Officers at the Broads Authority for comment. There was general support, with some suggestions for amendments.

We are therefore proposing to include a Development Boundary for Filby in the Local Plan for the Broads.

It should be noted that the form of the proposed development boundary for the Filby part of the Broads reflects the settlement fringe landscape type that is identified in the area. Settlement fringe is a landscape type found repeatedly throughout the Broads, where

settlement and semi natural/natural environment converge. The Broads' Landscape Character Assessment identifies areas that are classed as Settlement Fringe. Invariably around any settlement there are pressures for use other than for traditional agriculture. Many of these pressures are generated as a direct result of recreational and leisure activities. Developments can be varied and include garden extensions with their associated fencing and features, allotments, poultry keeping, horse keeping, sports pitches, pond construction (fishing and wildfowling), storage of scrap items and so on. Policy PUBDM26: Protection and enhancement of settlement fringe landscape character seeks to protect this landscape type.

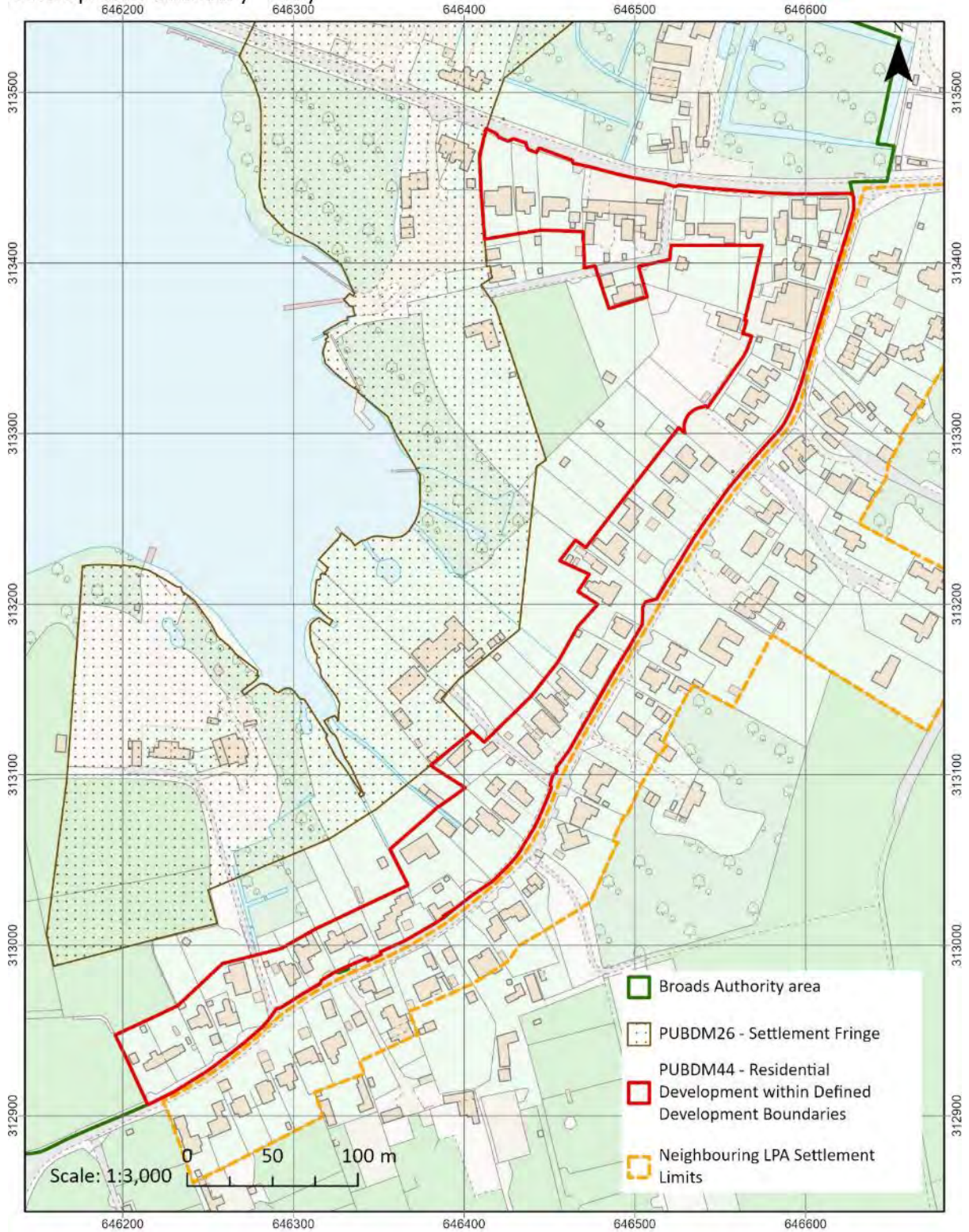
Constraints and features of Filby:

- Some protected trees in the area.
- EA flood zone 2 and 3 and SFRA indicative flood zone 3 covers some properties and gardens.
- Close to SAC and SSSI.
- Part of Filby in SSSI impact zone.
- Settlement fringe landscape type nearby.

Development Boundary for Filby – general information:

The western side of Thrigby Road is within the designated Broads area. Elsewhere, Great Yarmouth Borough Council is the local planning authority. The part of Filby in the Broads is urban in nature along the road frontage, but backs onto Filby Broad. Filby itself has some facilities and services including, a primary school, everyday shop and post office. Although there is a range of buildings and uses within the identified boundary, in practice it is not anticipated that there will be a great deal of development in the foreseeable future. The development boundary provides additional scope for some redevelopment if opportunities arise, subject to flood risk - the relevant Local Plan and National Planning Policy Framework Policies will apply, and a site flood risk assessment may be required to establish the degree of risk.

Development boundary - Filby



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8. Development boundaries in the new Local Plan

There are currently four areas in the Broads Executive Area that have Development Boundaries, and these are:

- A. Horning
- B. Wroxham and Hoveton
- C. Oulton Broad
- D. Thorpe St Andrew

It has been suggested, through the Issues and Options Consultation responses, that a development boundary be drawn at **Brundall Riverside**. In liaison with Norfolk County Council as the Highways Authority, it is recommended to not have a development boundary here for the following reasons:

- The access to the area is constrained by the level crossing. There is no footway for the entire length from the level crossing north along Station Road and due to land ownership and levels of the land, it seems difficult to provide one.
- There does not seem to be any land that could be used to develop more dwellings in the area. Proposals that affect the boatyards in the area would be judged against economy policies in the Local Plan.
- If property owners wish to replace their dwellings, there are policies in the Local Plan related to this.

The previous section discussed the Water Recycling Centre issues at **Horning**.

Finally, no amendments to the current areas included in the development boundaries are proposed.

There will therefore be 4 development boundaries in the Local Plan: **Filby, Hoveton and Wroxham, Oulton Broad and Thorpe St Andrew**. They will be drawn the same as the 2019 Local Plan, although the Filby Boundary is new and shown in section 7 of this report.

The proposed policy is included at [Appendix 5](#).

Appendix 1: Short technical consultation

In February/March 2022, some stakeholders were sent the table as set out in Section 3 for comments. These stakeholders were Anglia Water Services, Environment Agency, Norfolk and Suffolk Councils. Comments were also received from Broads Authority Officers.

The following comments were received and have been weaved into an amended Section 3.

Suffolk County Council

- **Archaeology:** We would not have any objection to the proposed development boundary, although potential developments may require archaeological investigation - most likely as mitigation secured through conditions on any consent although depending on the scale, nature and location of the development, historic features may be affected by individual development proposals, and SCCAS would be happy to advise on the scope of desk-based assessment in the first instance. The area of the development boundary at Oulton Broad includes sites and features of WW2 and post-medieval date in particular (see [Map - Suffolk Heritage Explorer](#)). The Broad itself is probably the remnant of a medieval turbary. There may also be peat deposits surviving and for this geoarchaeological work may be appropriate – peat deposits have the potential for waterlogged remains and environmental remains that allow reconstruction of changing environments over the long term. There may be cases where the Marine Management Organisation has jurisdictional boundary in some areas of the broads, who are advised by Historic England.
- **Flood and water:** content with the current commentary on flooding and have no substantive comments to make.

Landscape Architect

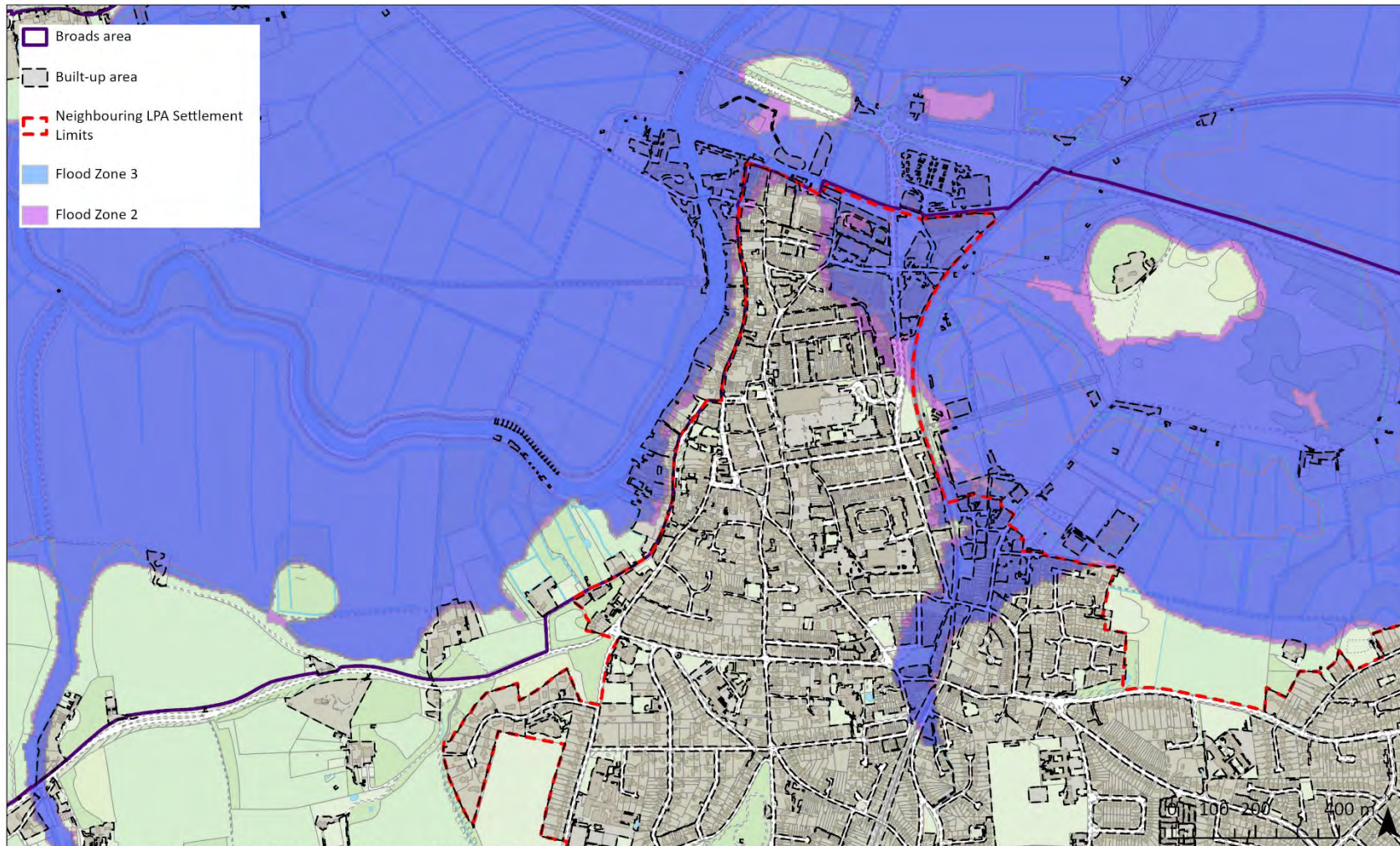
- **Beccles** – Open areas around Beccles are subjected to pressures from different settlement fringe type development which potentially can erode the traditional pastoral landscape of the marshland. The incremental impacts of even small-scale developments or activities can ultimately have cumulative adverse effects on the local landscape character. Development boundary likely to be inappropriate.
- **Brundall** – Development boundary is likely to be inappropriate.
- **Bungay/Ditchingham Dam** - Development likely to have adverse effects on landscape character. Visual impacts of built development and infrastructure around of Bungay allied to the leisure/holiday developments within the area tend to detract from the perceived naturalness of the area. As for Beccles, open areas around Bungay/Ditchingham are subjected to pressures from different settlement fringe type development, the incremental impacts of which can ultimately have cumulative adverse effects on the local landscape character. Development boundary is likely to be inappropriate.
- **Chedgrave and Loddon** – Given the SNDC allocation of 200 dwellings which will cause pressures on the adjacent Broads, there doesn't seem to be justification for introducing a development boundary.

- **Coltishall** - Quite sensitive having a conservation area etc. The settlement is well vegetated and a neat and simple contrast to the apparently unmanaged surrounding valley. It is a main land-based access point to the river valley and is a principal base for recreational boating activity. As such development boundary is likely to be inappropriate.
- **Horning** - Further built development would be likely to exacerbate existing problems such as drainage, Crabbett's Marsh, suburbanisation, and cause erosion of the area's landscape and nature conservation value.
- **Ludham - Womack** water has special qualities which would be vulnerable to further development. Development boundary is likely to be inappropriate.
- **Neatishead** - Development boundary is likely to be inappropriate.
- **Norwich** – I assume policy NOR1 will be updated to reflect the East Norwich Masterplan [[East Norwich Masterplan | Norwich City Council](#)] and forthcoming SPD.
- **Oulton Broad** – No specific comments. Aware of the Pegasus development.
- **Potter Heigham Bridge** – The only suitable development on this particular site would need to be 'Water Compatible' such as boat yards etc. Development boundary is likely to be inappropriate.
- **Reedham** – Visual impacts of built development could detract from the perceived naturalness and tranquillity of the area. Development boundary is likely to be inappropriate.
- **Stalham Staithe** – agree that there may be potential for development, including residential moorings. Proximity of A149, settlement and large boatyards make this area less sensitive. Policy STA1 includes some landscape requirements which would help safeguard landscape character.
- **Thorpe St Andrew** – Development is unlikely to help reduce urbanising effects in this area and create a more effective transition from the urban environment to the open countryside.
- **Wroxham and Hoveton** – Existing development boundary probably fine – extending it would not seem appropriate given density of current development/activity and lack of open space.
- **The Broads' Landscape Character Assessment** identifies areas that are classed as Settlement Fringe. Many of the locations above are identified as such. See also map Appendix A in Settlement Fringe Topic Paper: [Settlement-Fringe-Topic-Paper-Jan-2017.pdf \(broads-authority.gov.uk\)](#)
- **Policy DM20: *Protection and enhancement of settlement fringe landscape character*** is useful in considering development in such areas. Clearly, we just need to be mindful that creating new development boundaries and extending existing ones should avoid potential friction between this policy and new development boundaries.

Appendix 2: Maps of settlements in the Broads with good access to services and facilities

Beccles

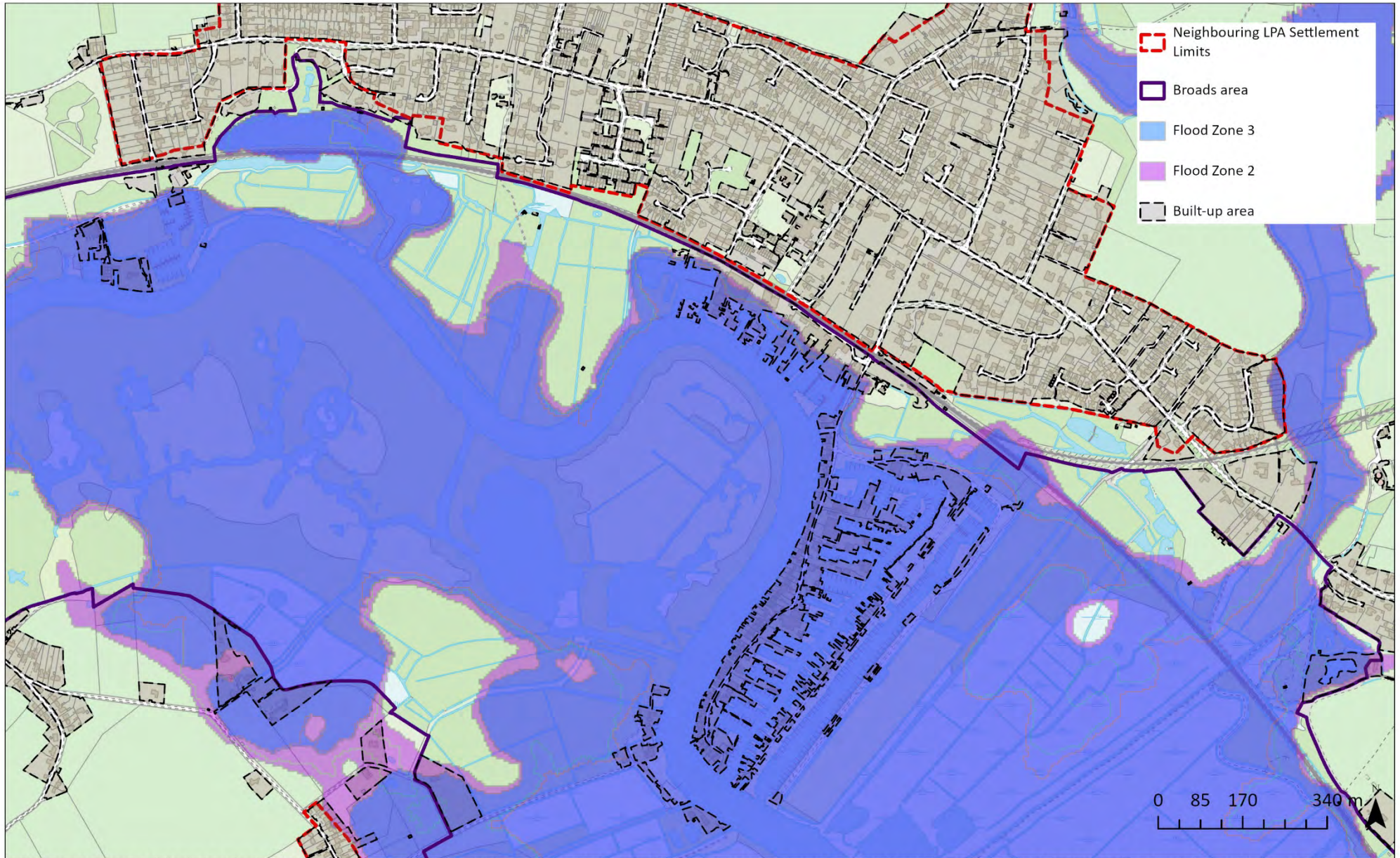
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Brundall

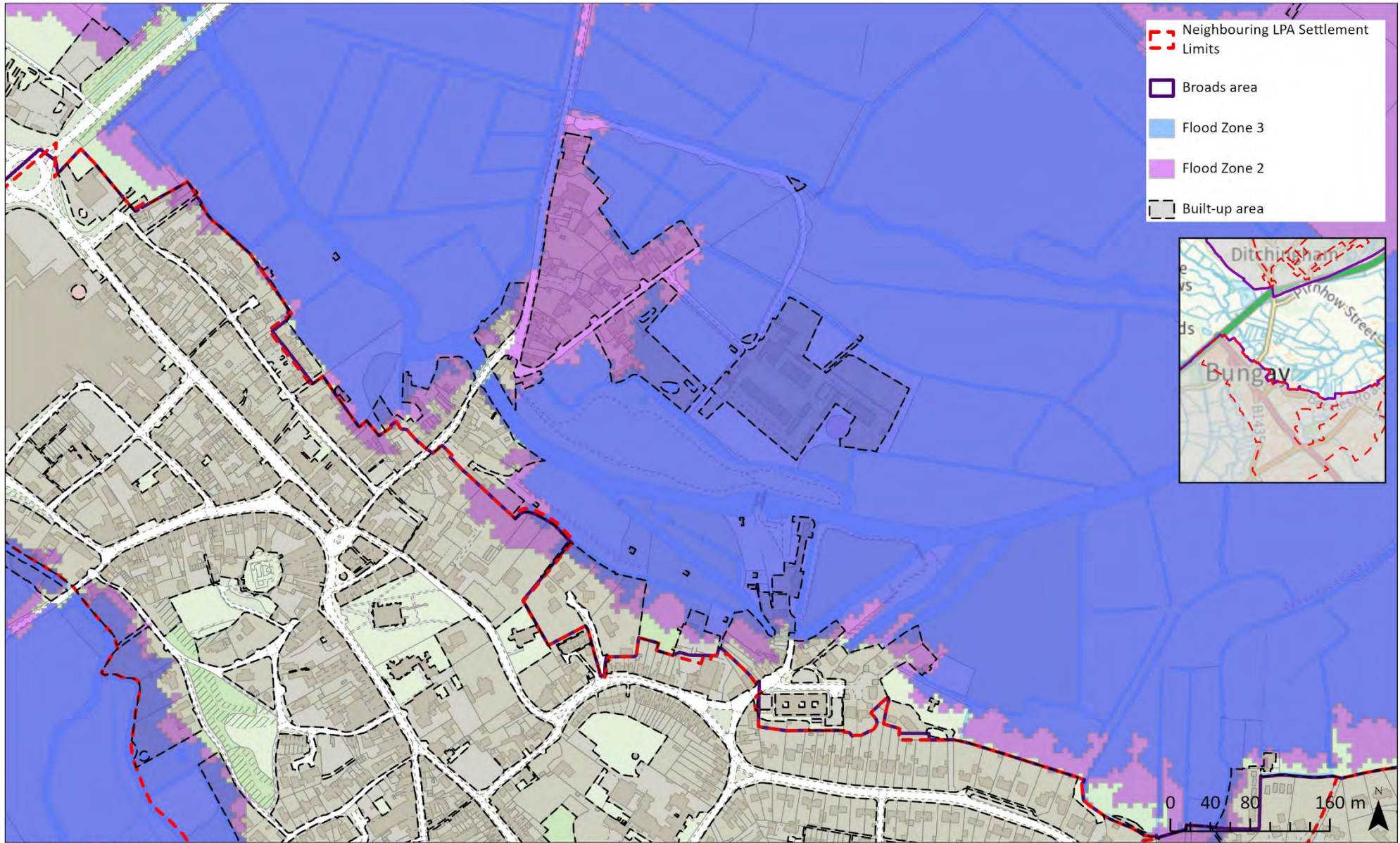
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Bungay

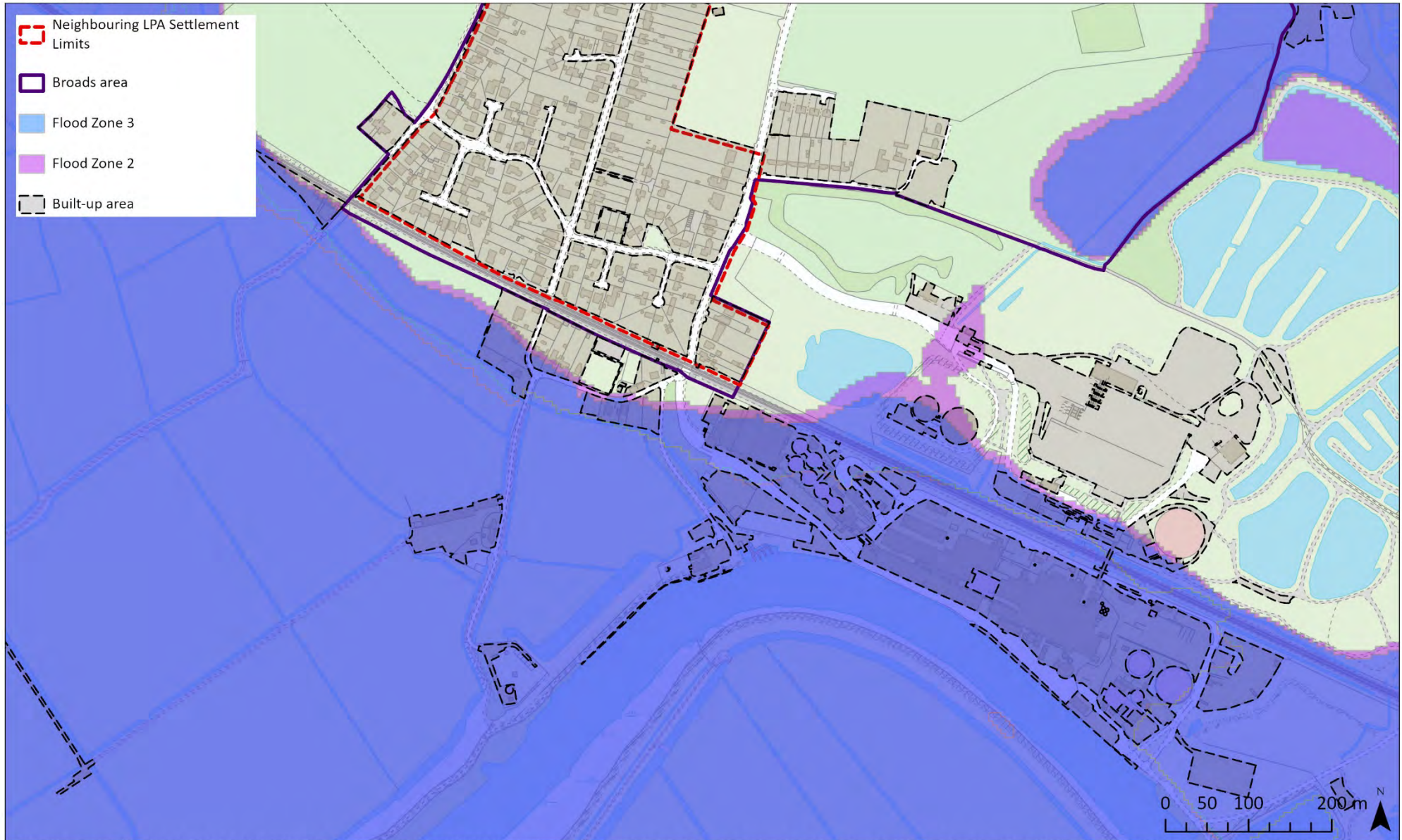
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Cantley

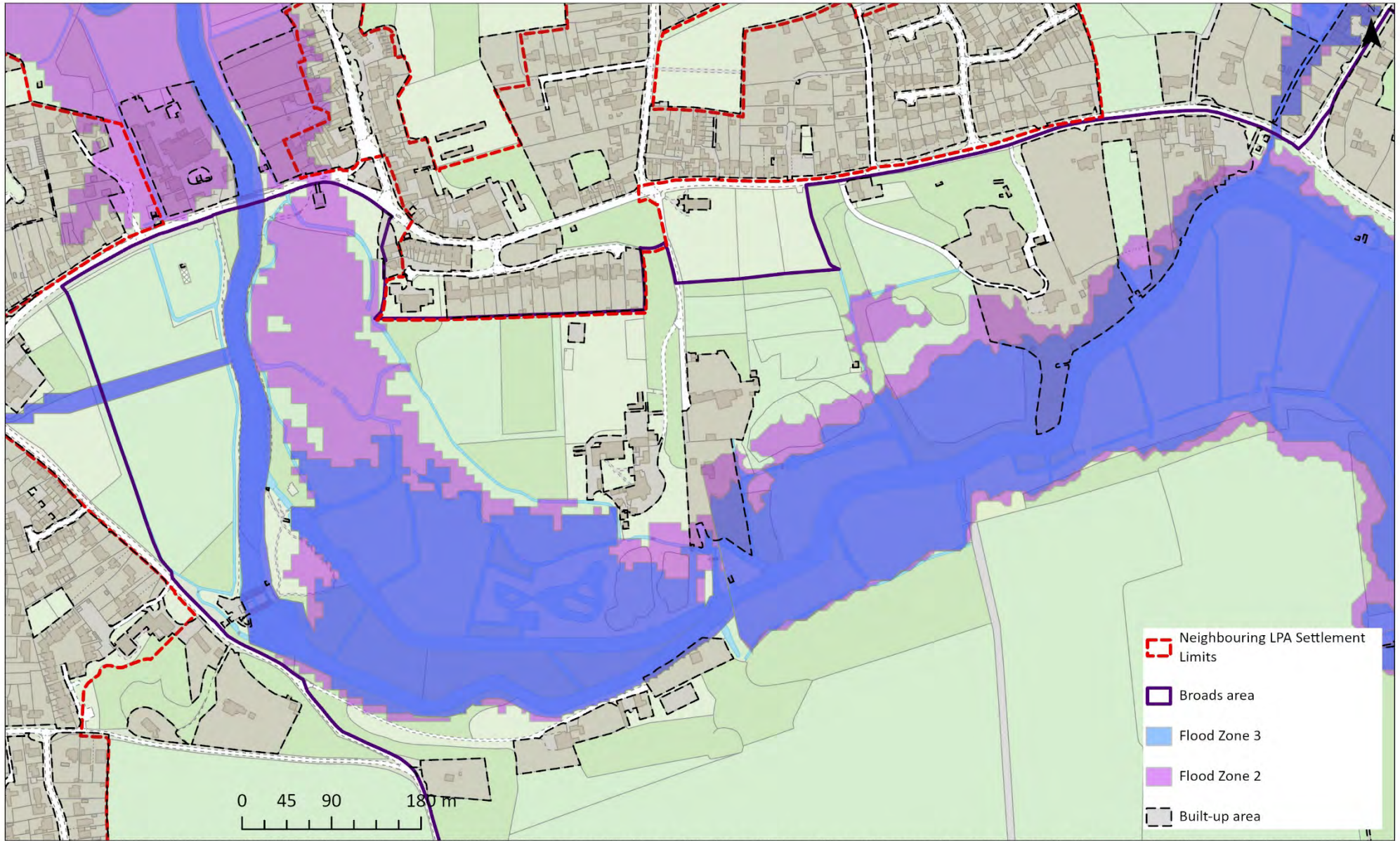
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Coltishall

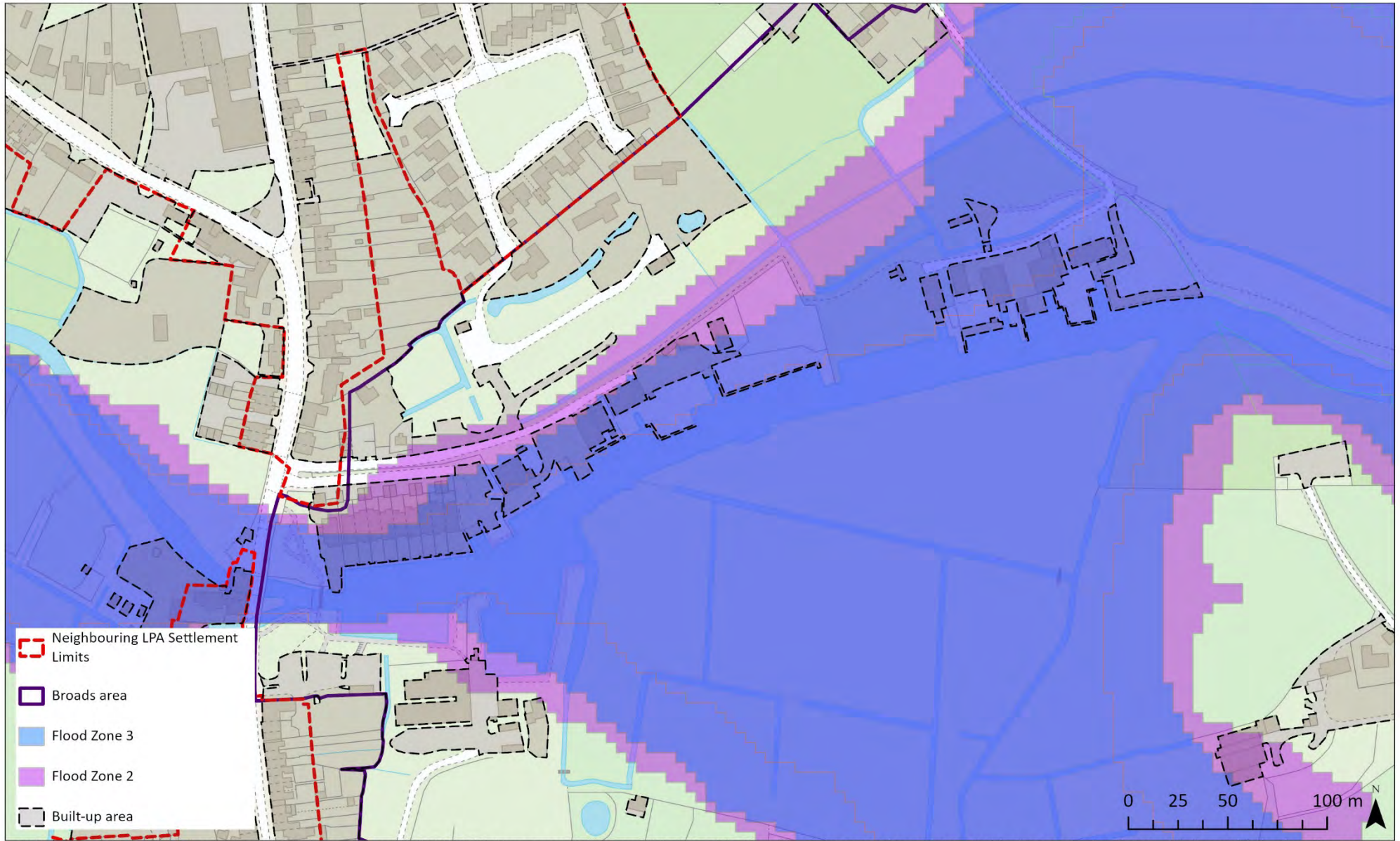
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Chedgrave

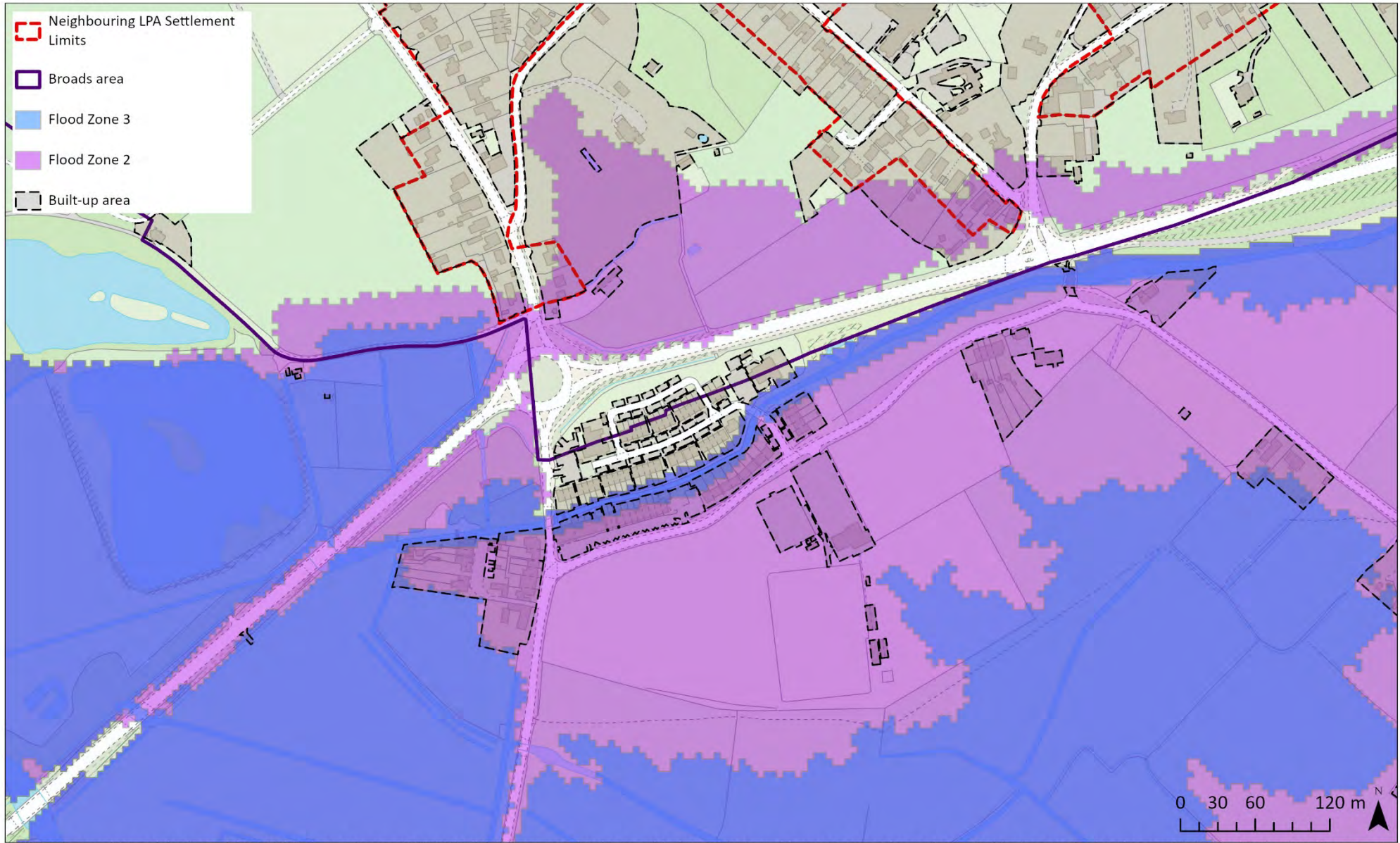
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Ditchingham

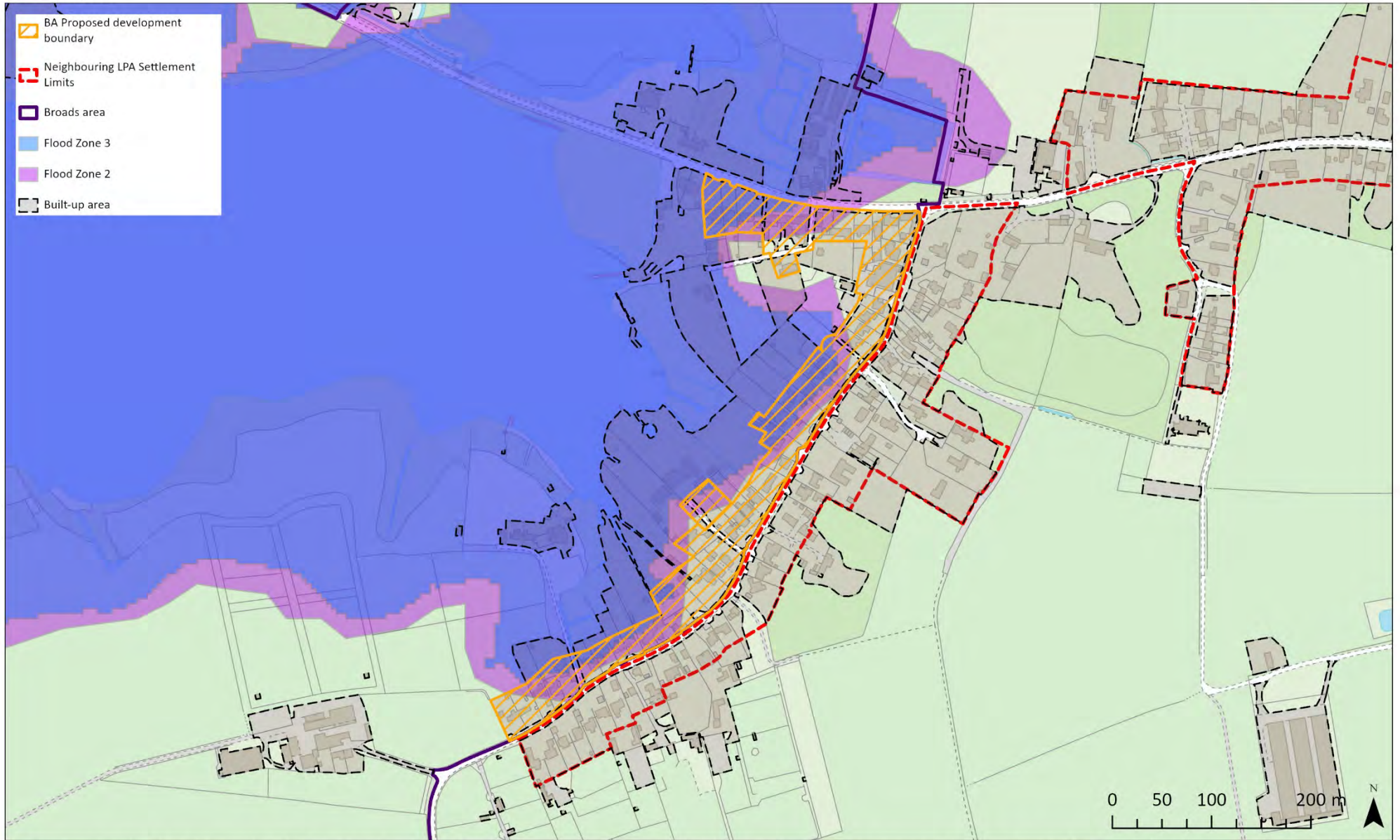
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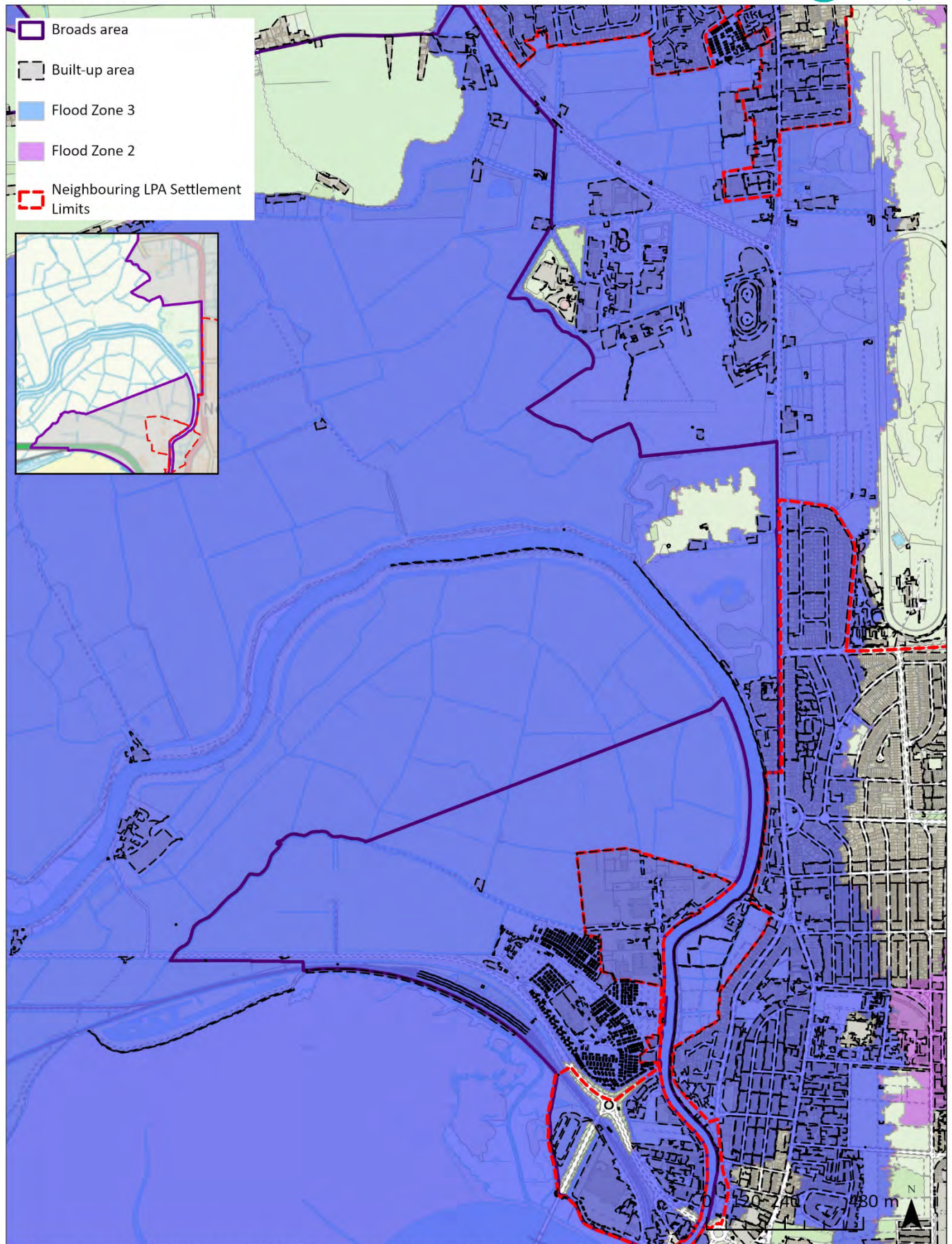
Filby

Scale: 1:5,000



Great Yarmouth

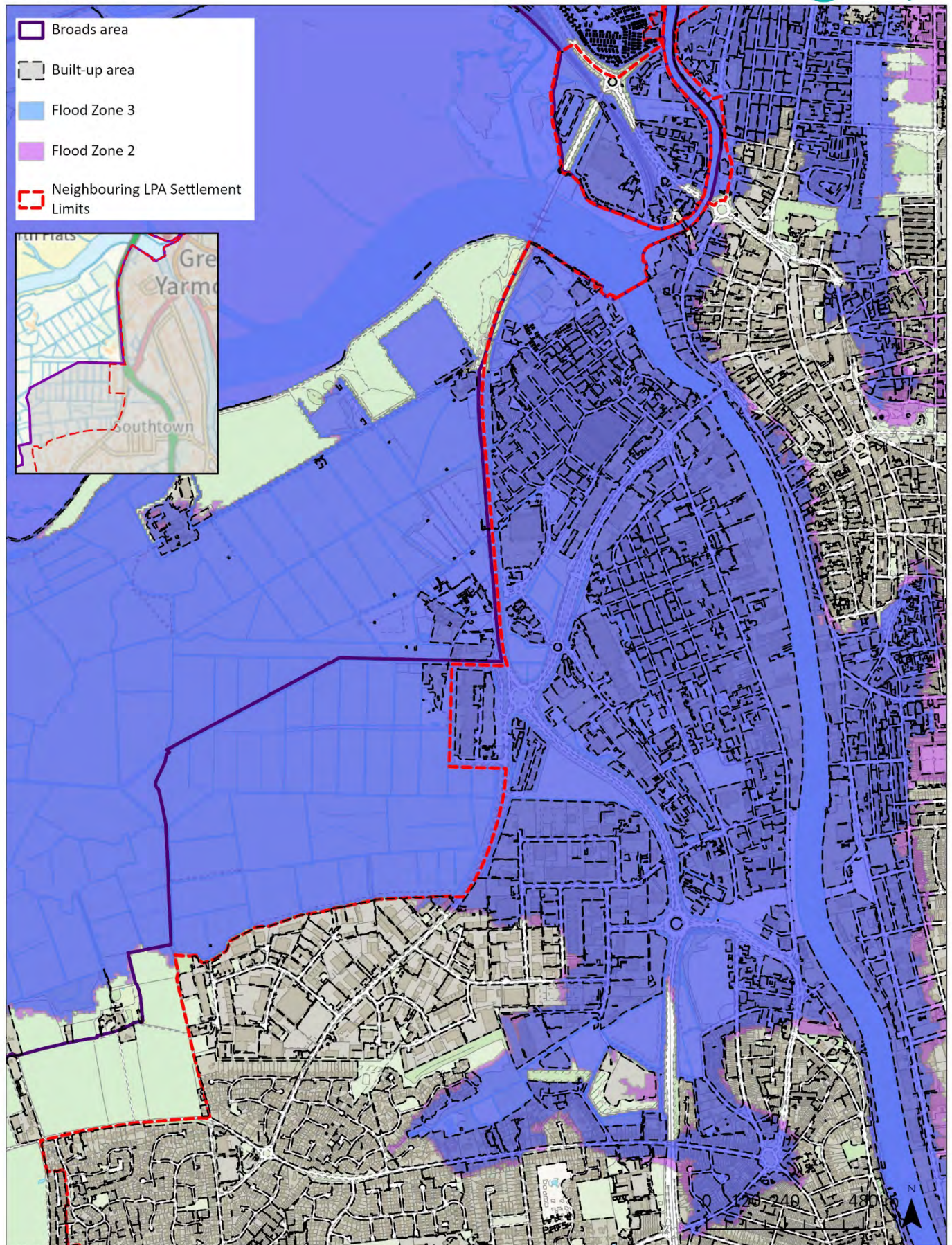
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Great Yarmouth

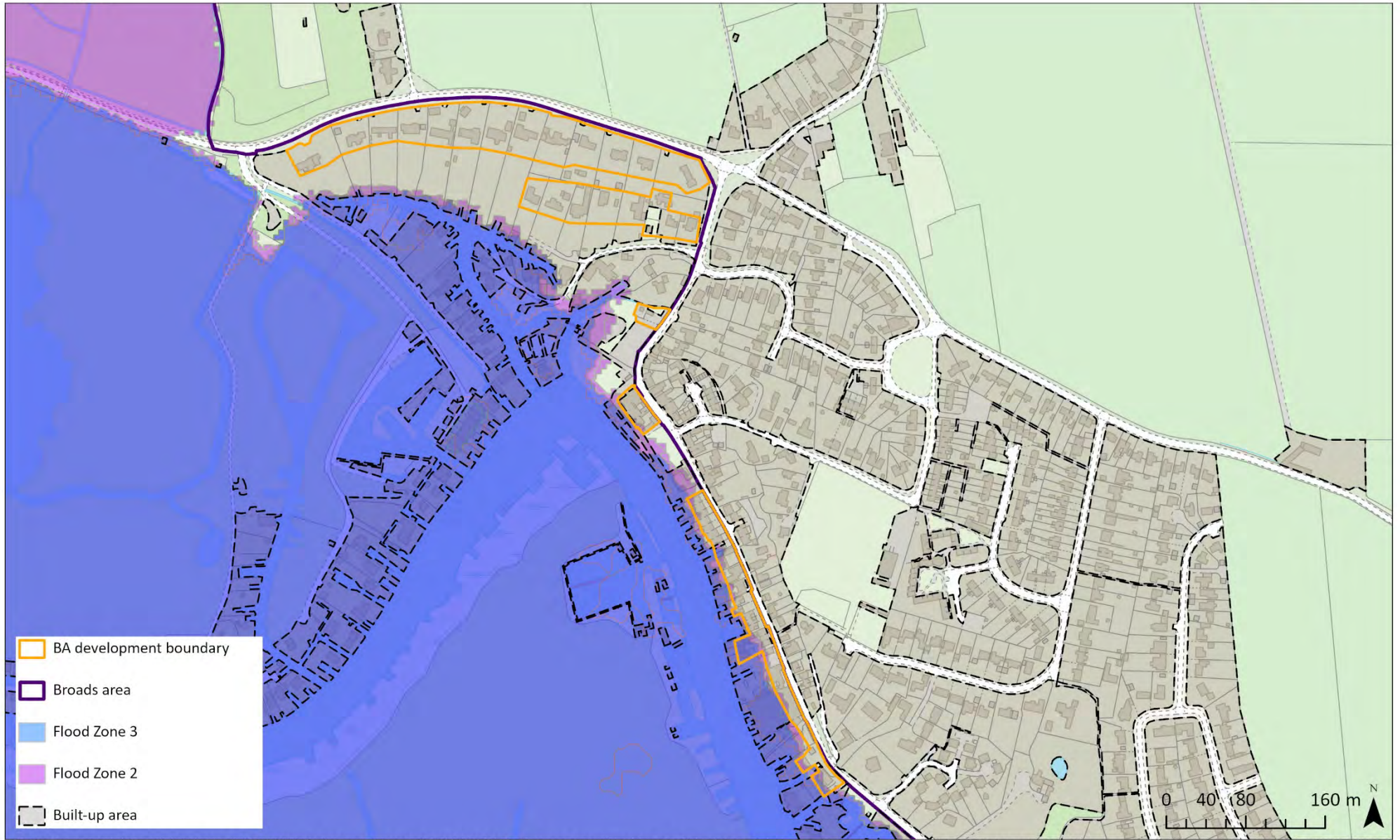
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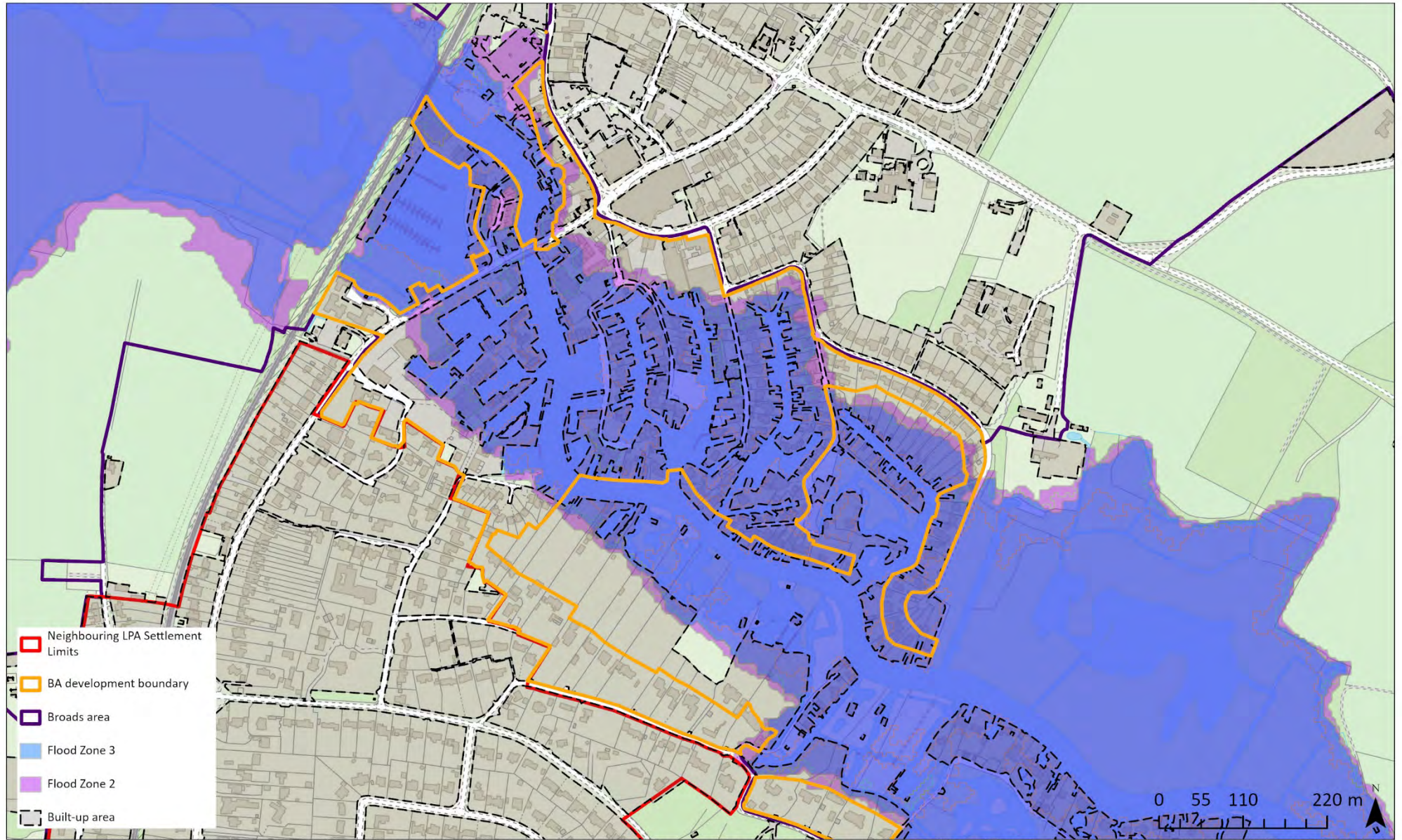
Horning

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Hoveton & Wroxham

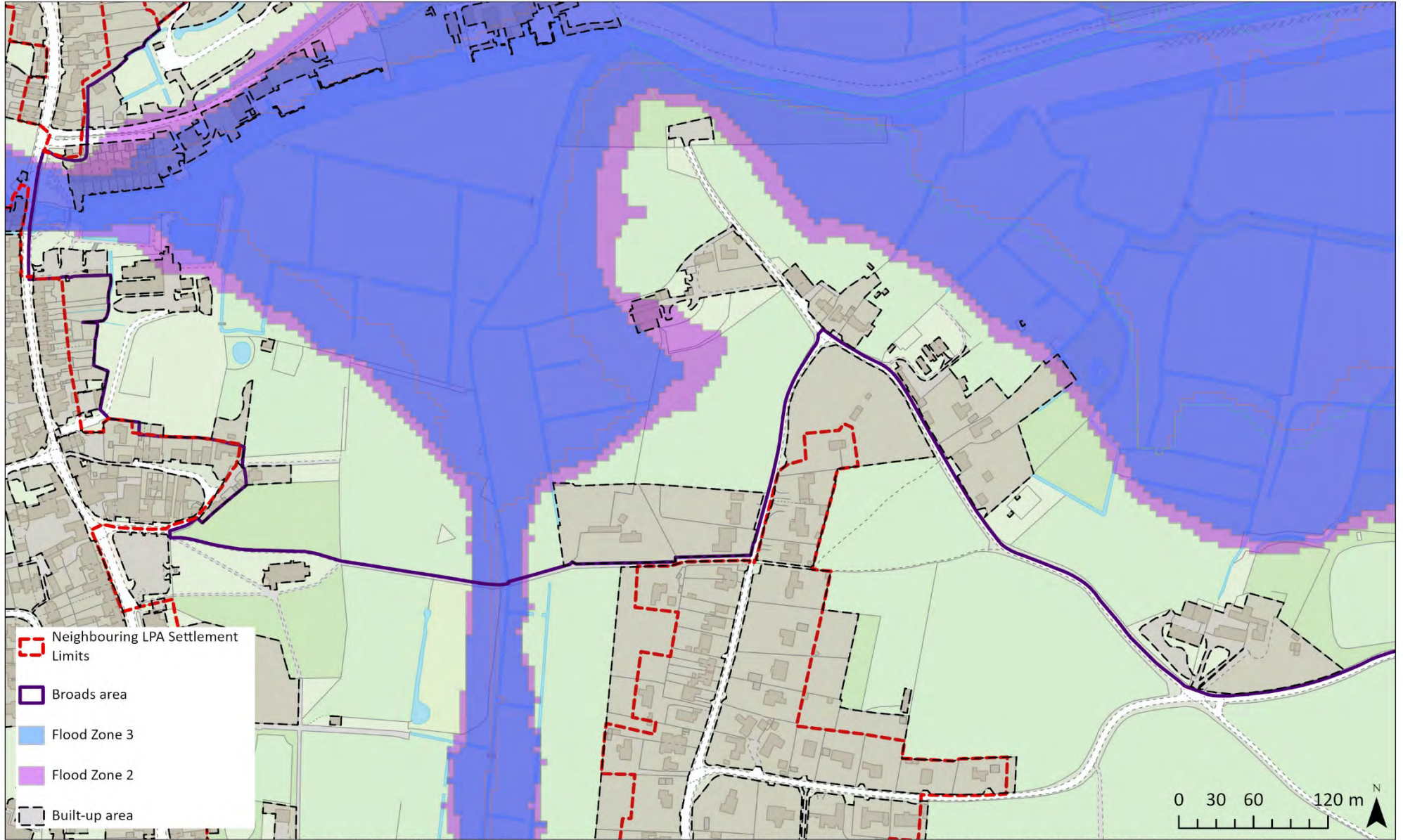
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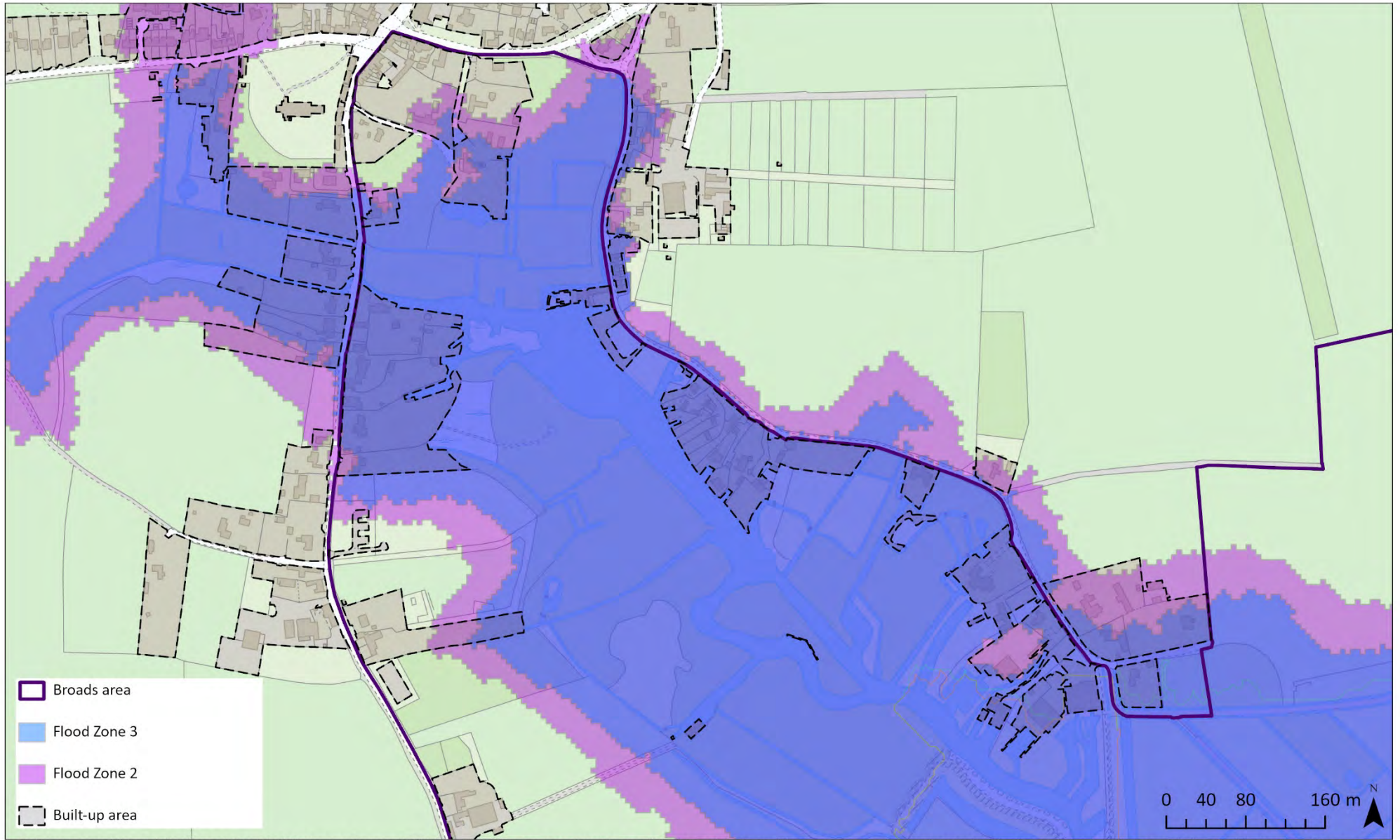
Loddon

Scale: 1:4,000



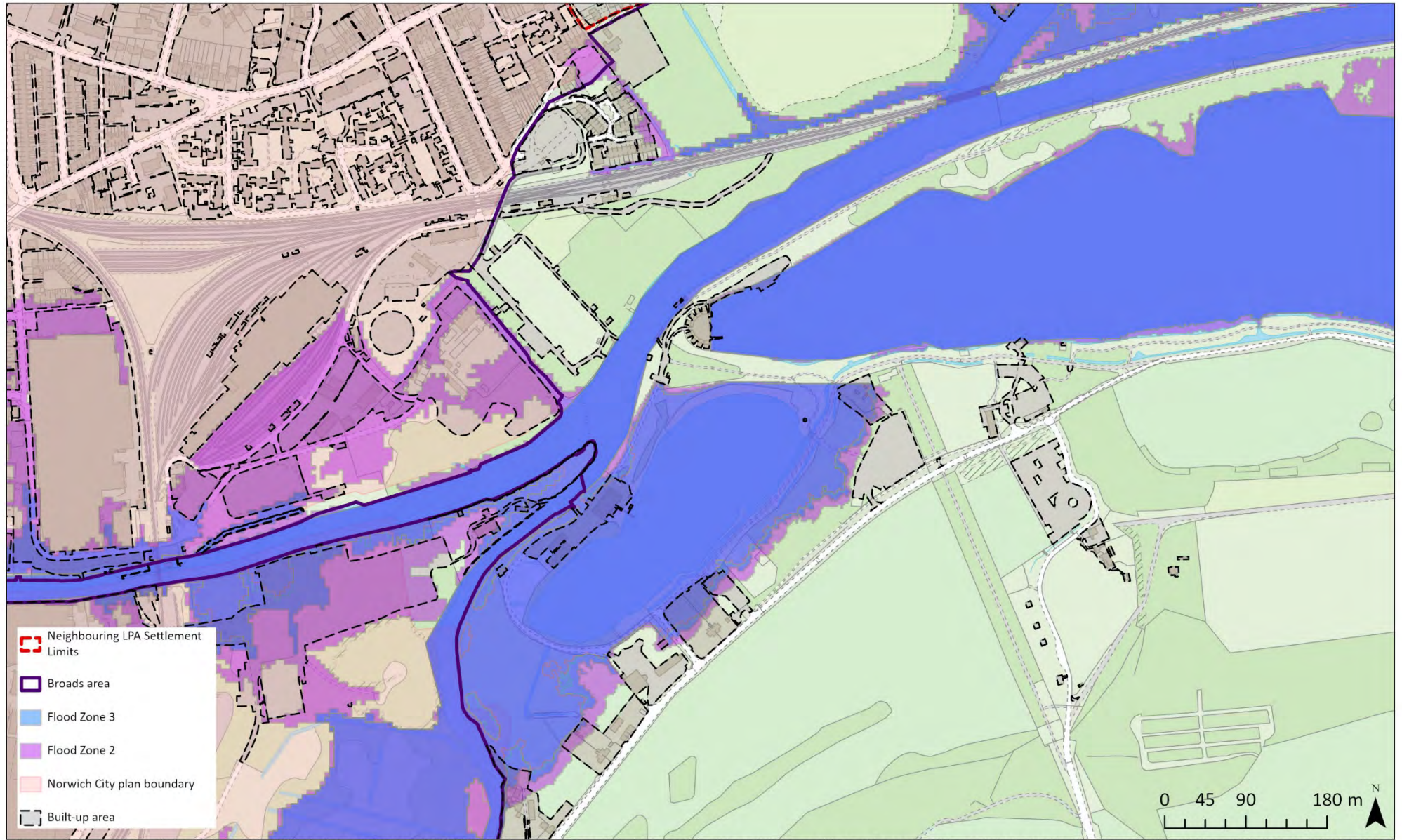
Ludham

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Norwich

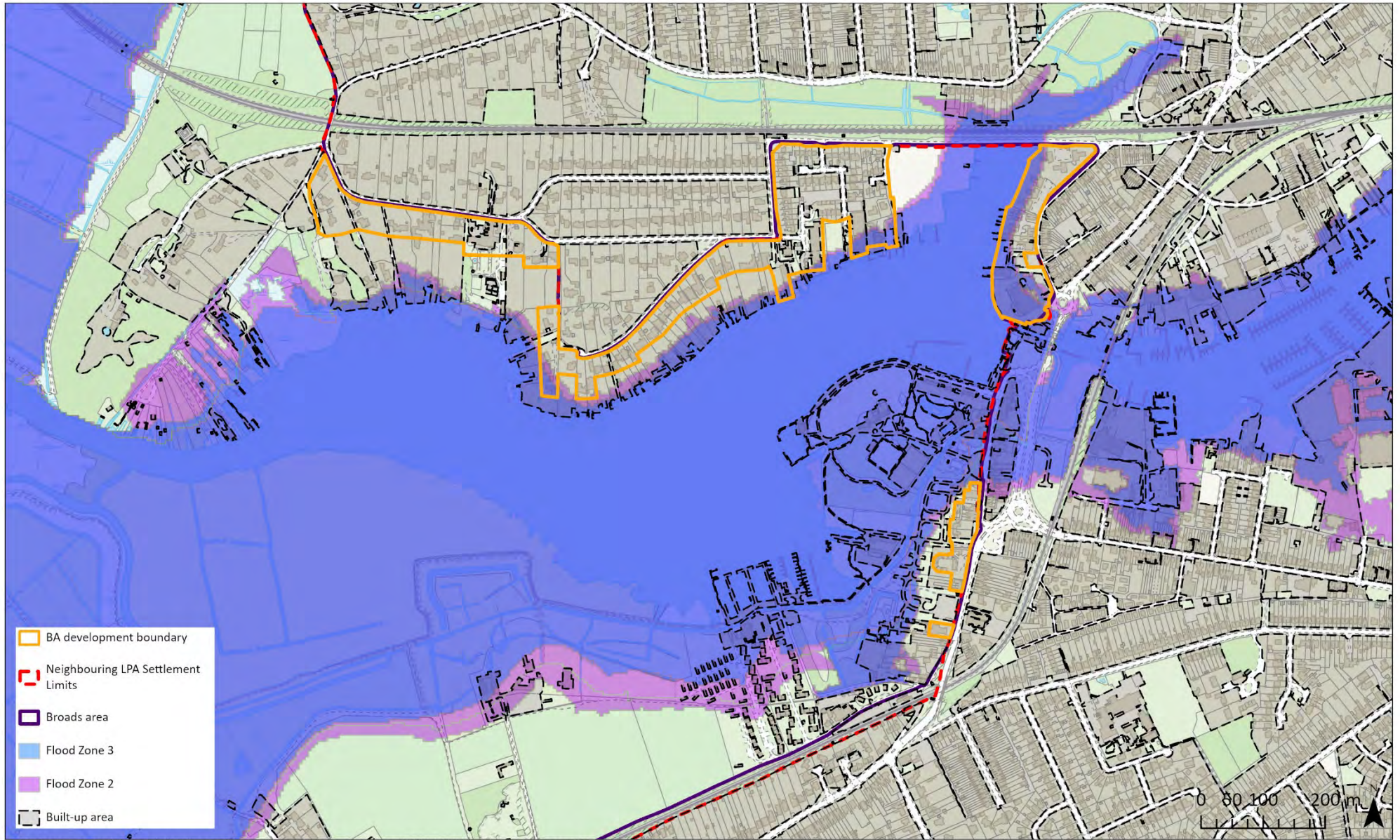
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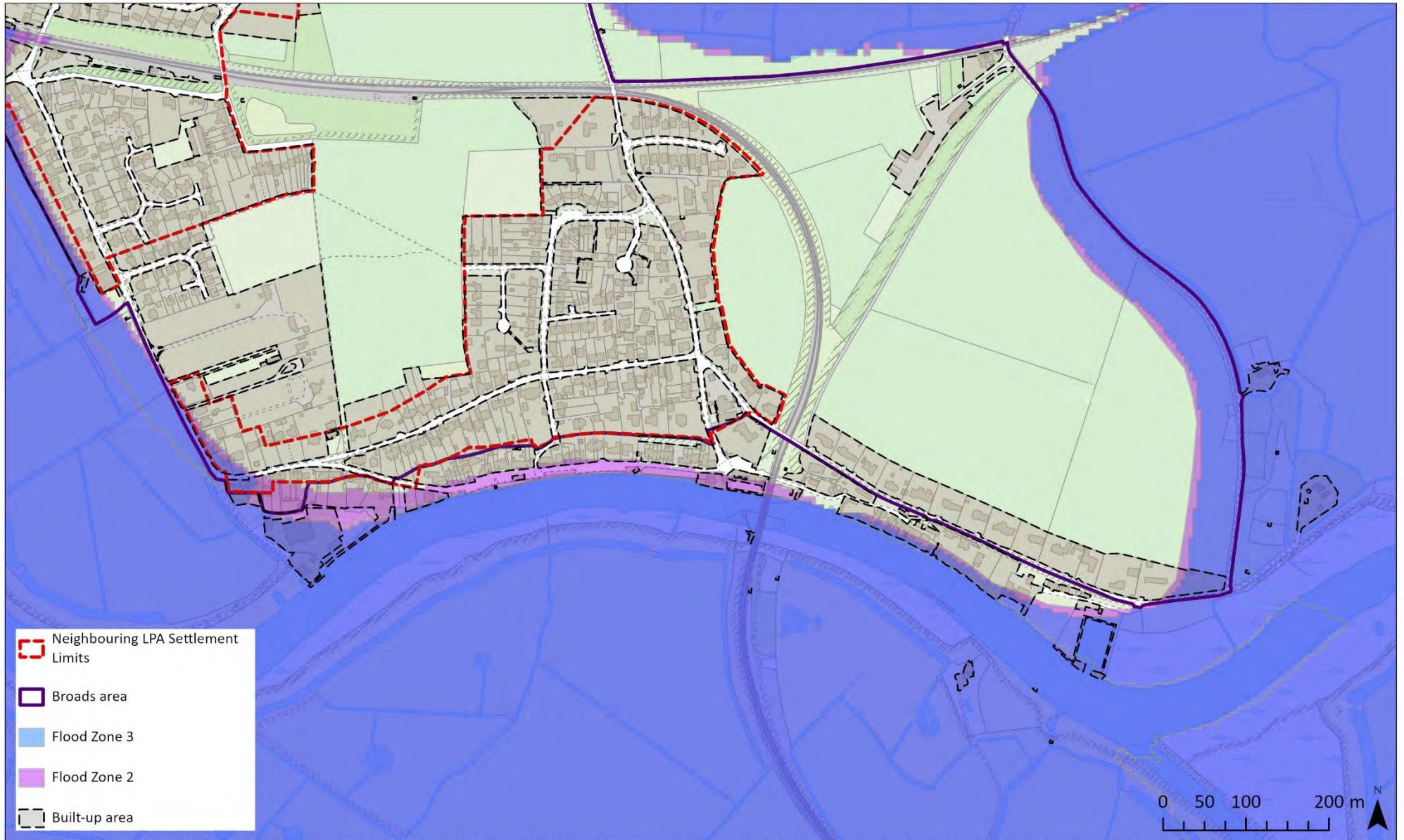
Oulton Broad

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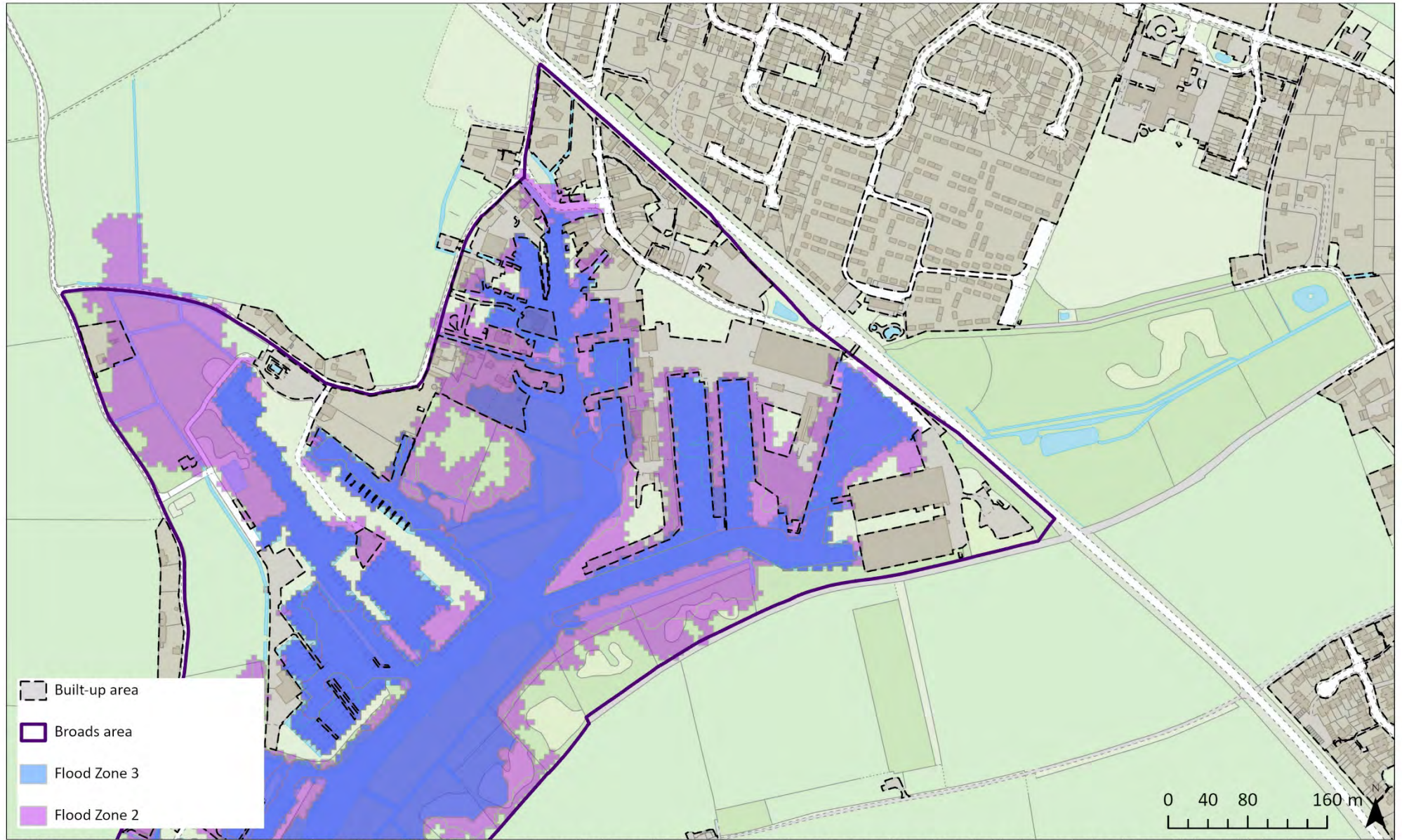
Reedham

Scale: 1:6,000



Stalham

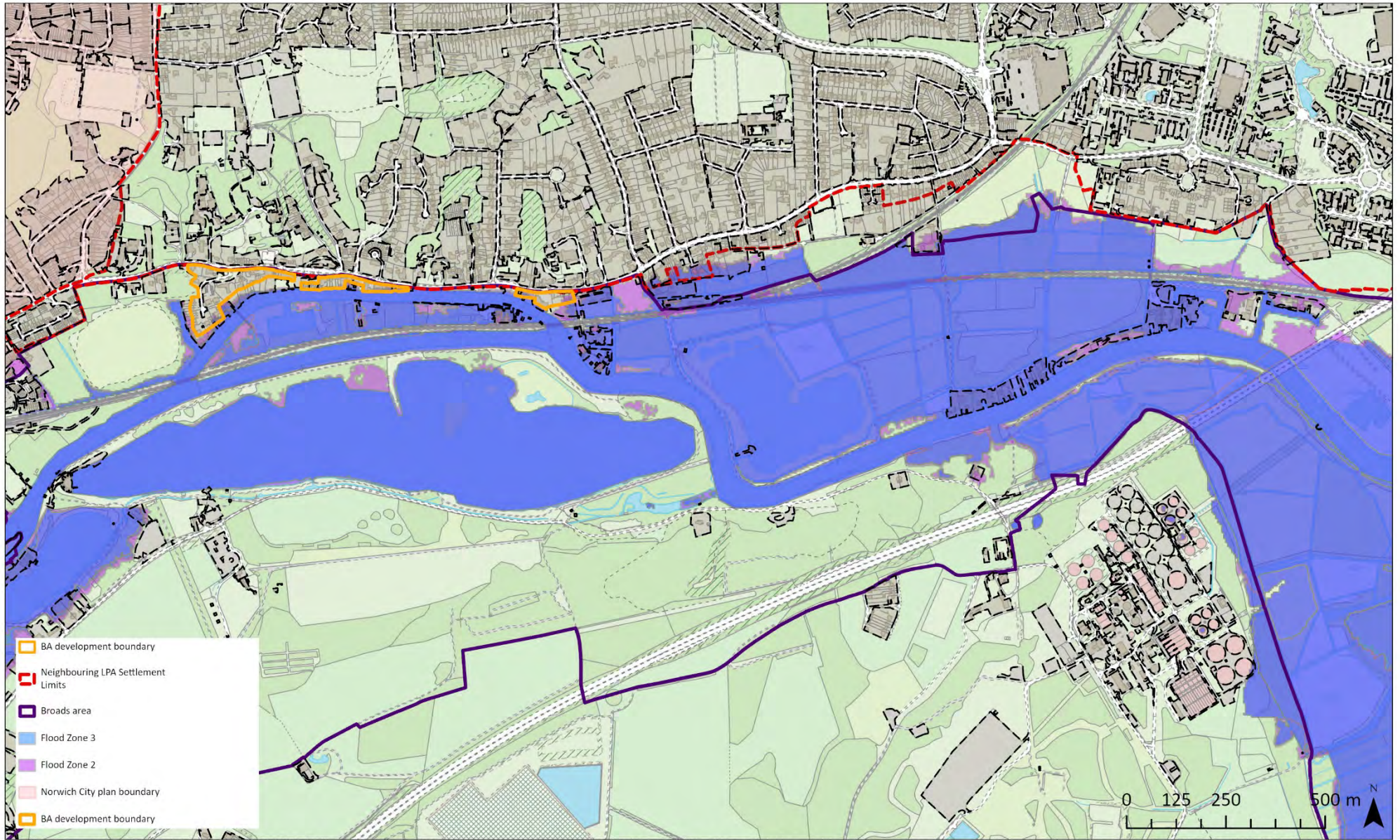
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Thorpe St Andrew

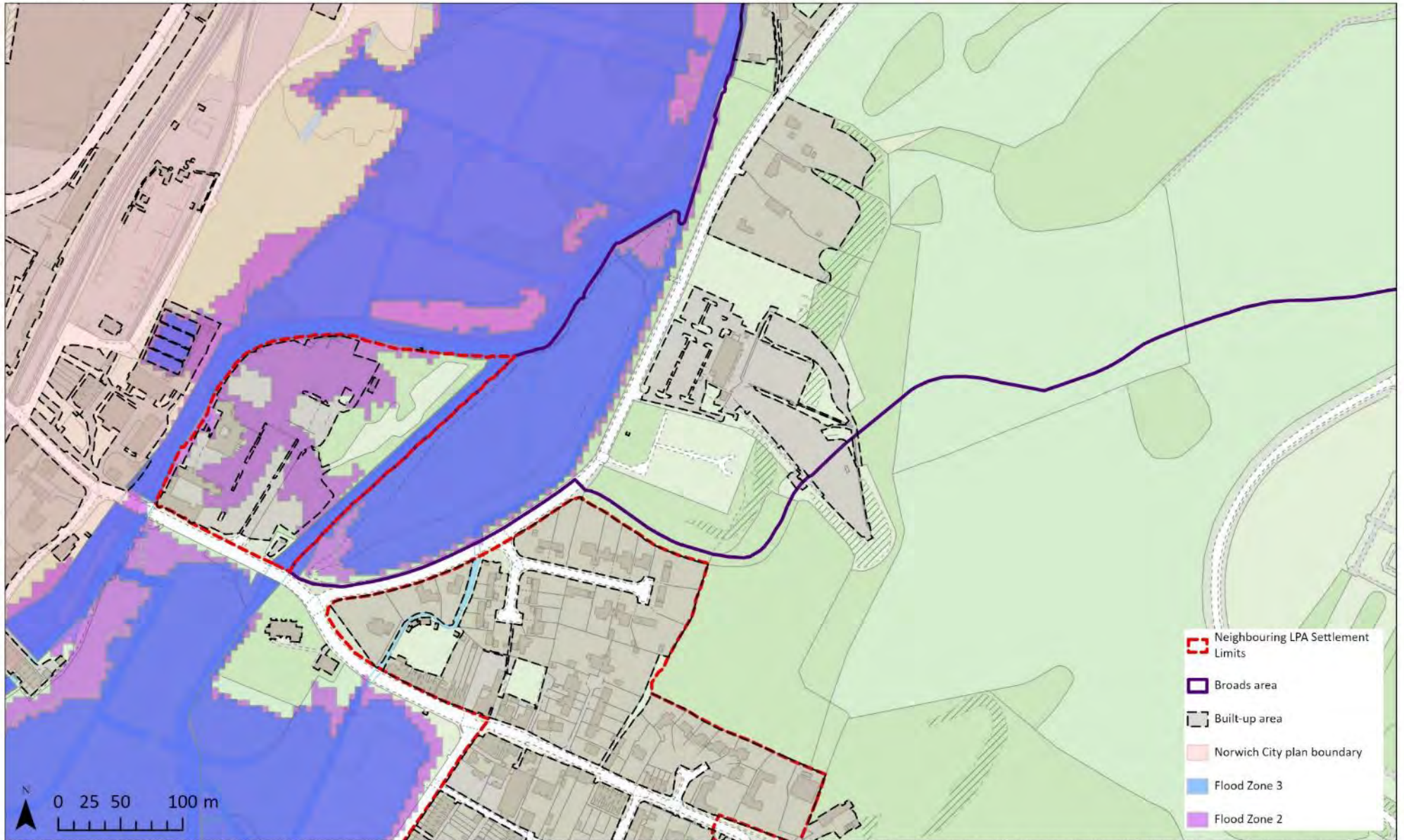
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Trowse with Newton

Scale: 1:4,000



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Appendix 3: Issues and Options comments

Between October and December 2022, the Issues and Options version of the Local Plan was consulted on. The comments received with the BA response is as follows.

Question	Respondent	Comment	BA response	Action for Local Plan
Question 37	Bradwell Parish Council	No comment	Noted.	No further action.
Question 37	Broads Society	The Society has no objections to the current development boundaries relating to the areas currently identified.	Noted.	No further action.
Question 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.
Question 37	East Suffolk Council	<p>Oulton Broad</p> <p>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.</p> <p>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.</p> <p>The Oulton Broad Development Boundary extends southwards from Broadview Road and westwards from Commodore Road towards the water and includes housing that is not</p>	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.

Question	Respondent	Comment	BA response	Action for Local Plan
		included within the Waveney Local Plan Settlement Boundary. It is not considered necessary for the Development Boundary to be redrawn in the Broads Local Plan.		
Question 37	East Suffolk Council	<p>Beccles</p> <p>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.</p>	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.
Question 37	East Suffolk Council	<p>Bungay</p> <p>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.</p>	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.
Question 37	East Suffolk Council	<p>Somerleyton</p> <p>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.</p>	Agreed.	No further action.
Question 37	South Norfolk Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.

Question	Respondent	Comment	BA response	Action for Local Plan
Question 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.
Question 37	Wroxham Parish Council	map incorrectly labelled "Hoveton" - map shows Hoveton & Wroxham.	Noted. Will ensure correct title.	Ensure title says 'Hoveton and Wroxham'.
Question 37	Broadland Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
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.
Question 38	Bradwell Parish Council	No comment	Noted.	No further action.
Question 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.

Question	Respondent	Comment	BA response	Action for Local Plan
Question 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.
Question 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.
Question 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.
Question 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.

Question	Respondent	Comment	BA response	Action for Local Plan
Question 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.
Question 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.
Question 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.
Question 38	Sequence UK LTD/Brundall Riverside Estate Association	2.90 No 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.
Question 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.

Question	Respondent	Comment	BA response	Action for Local Plan
Question 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.
Question 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.
Question 39	Bradwell Parish Council	No Comment	Noted.	No further action.
Question 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	This seems to be about the actual form of the development boundary and the	Liaise with districts about how they draw development boundaries to see if the BA ones should

Question	Respondent	Comment	BA response	Action for Local Plan
		<p>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</p>	<p>idea is logical and we will look into that.</p>	<p>be changes to fit with their approach.</p>
<p>Question 39</p>	<p>RSPB</p>	<p>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.</p>	<p>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.</p>	<p>No further action.</p>
<p>Question 39</p>	<p>Sequence UK LTD/Brundall Riverside Estate Association</p>	<p>2.92 We 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.</p> <p>2.93 In 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.</p> <p>2.94 We recognise the majority of the Riverside Estate lies within the higher risk flood zones</p>	<p>Noted, but the Brundall Riverside area is over the railway. See also response to question 40.</p>	<p>No further action.</p>

Question	Respondent	Comment	BA response	Action for Local Plan
		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.		
Question 39	South Norfolk Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
Question 39	Broadland Council	The approach appears to be generally consistent with Agreement 3 of the NSPF.	Support noted.	No further action.
Question 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.
Question 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.
Question 40	RSPB	None	Noted.	No further action.
Question 40	Sequence UK LTD/Brundall	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).	Noted. Although by providing a development	Consider this advice as the approach to development

Question	Respondent	Comment	BA response	Action for Local Plan
	Riverside Estate Association	<p>2.96 The 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. 2.97 The 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.</p>	<p>boundary there, that would effectively be promoting the area for residential dwellings, rather than holiday homes and businesses. Flood risk is a key issue with the area almost entirely flood zone 3a and indicative flood zone 3b so residential might not be allowed there to reflect flood risk.</p>	<p>boundaries is worked up.</p>

Appendix 4: Sustainability Appraisal of development boundaries policy options

This is a new appendix.

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.

Policy assessment – development boundaries or criteria-based policy.

		A: Criteria-based development boundary policy	B: Plan based development boundary policy
ENV1	?	<p>In general, the effect of this approach is uncertain as it depends on the criteria and how they are applied. On one hand, this approach could help protect the character of the Broads, but on the other hand, development would not necessarily be focussed in existing build up areas</p>	+ The development boundaries will be around areas with key services that could be accessed by all modes of transport.
ENV2			
ENV3	?		? Development boundaries could mean development in areas where general impacts on biodiversity are less than in more rural areas. But with Biodiversity net gain coming in, the impact of habitat being lost could be reduced. But on the other hand, preventing loss rather than replacing could be seen as better.
ENV4	?		+ Development boundaries could mean development in areas where general impacts on landscape are minimal because the area is generally built up.
ENV5			
ENV6			
ENV7	?		+ Development boundaries may contain areas of brownfield land that could be used for development and therefore there could be benefits relating to efficient use of land.
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1	?		+ The development boundaries will be around areas with key services that could be accessed by all walking, cycling and wheeling.
SOC2	?		+ By directing development to built up areas, the likelihood of isolated dwellings and social isolation would be reduced.
SOC3			
SOC4	?	+ In theory, housing is acceptable within a development boundary, subject to details.	
SOC5			
SOC6	?	+ The development boundaries will be around areas with key services that could be accessed by all modes of transport.	
SOC7			
ECO1			
ECO2			
ECO3			

Areas to potentially apply development boundaries.

	Brundall Riverside	Horning	Hoveton and Wroxham	Oulton Broad	Thorpe St Andrew	Filby
ENV1	- The access for pedestrians and vehicles to the area is constrained. There is a level crossing and the road on the northern side of the level crossing does not have a footway for the entire length and given the elevations either side of the road and that the land seems to be in private ownership, it is not clear how footways can be provided. People would have to walk in the road so that could detract from walking. The access is a concern to the Highways Authority.	+ No obvious impact on roads. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. With key services in the settlement, there is potential for these to be accessed by walking and cycling.	+ No obvious impact on roads. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. With key services in the settlement, there is potential for these to be accessed by walking and cycling.	+ No obvious impact on roads. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. With key services in the settlement, there is potential for these to be accessed by walking and cycling.	+ No obvious impact on roads. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. With key services in the settlement, there is potential for these to be accessed by walking and cycling.	+ No obvious impact on roads. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. With key services in the settlement, there is potential for these to be accessed by walking and cycling.
ENV2						
ENV3	+ No protected sites within the proposed development boundary. Broadland SPA over the river. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. Nutrient enrichment and recreation impacts will need to be mitigated for.	- No protected sites within the proposed development boundary. Broadland SPA over the river. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. Recreation impacts will need to be mitigated for. Water Recycling Centre has issues associated with flows which ultimately affect nutrient load.	+ No protected sites within the proposed development boundary. No protected sites close by. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. Nutrient enrichment and recreation impacts will need to be mitigated for.	+ No protected sites within the proposed development boundary. Broadland SPA over the Broad. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. Recreation impacts will need to be mitigated for.	+ No protected sites within the proposed development boundary. Near Carey's Meadow, but not likely to cause issues. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. Nutrient enrichment and recreation impacts will need to be mitigated for.	+ No protected sites within the proposed development boundary. Close to SAC and SSSI. Part of Filby in SSSI impact zone. Any scheme would be assessed on its own merits against local and national policy in terms of impacts. Recreation impacts will need to be mitigated for.
ENV4	+ Generally, as development would be directed to these already built-up areas, the impact on landscape is likely to be minimal and there are other local plan policies that will be of relevance.	+ Generally, as development would be directed to these already built-up areas, the impact on landscape is likely to be minimal and there are other local plan policies that will be of relevance.	+ Generally, as development would be directed to these already built-up areas, the impact on landscape is likely to be minimal and there are other local plan policies that will be of relevance.	+ Generally, as development would be directed to these already built-up areas, the impact on landscape is likely to be minimal and there are other local plan policies that will be of relevance.	+ Generally, as development would be directed to these already built-up areas, the impact on landscape is likely to be minimal and there are other local plan policies that will be of relevance.	+ Generally, as development would be directed to these already built-up areas, the impact on landscape is likely to be minimal and there are other local plan policies that will be of relevance. Whilst out the rear of the dwellings, there are long gardens which are characteristic of the area, these have been excluded from the development boundary. Furthermore, the settlement fringe landscape character type has influenced the proposed development boundary.
ENV5						
ENV6	? Whilst there are some areas of flood risk, there are also areas which are of lower risk of flooding. National and local flood risk policy will apply. Also note that development boundaries are relevant to windfall residential moorings.	? Whilst there are some areas of flood risk, there are also areas which are of lower risk of flooding. National and local flood risk policy will apply. Also note that development boundaries are relevant to windfall residential moorings.	? Whilst there are some areas of flood risk, there are also areas which are of lower risk of flooding. National and local flood risk policy will apply. Also note that development boundaries are relevant to windfall residential moorings.	? Whilst there are some areas of flood risk, there are also areas which are of lower risk of flooding. National and local flood risk policy will apply. Also note that development boundaries are relevant to windfall residential moorings.	? Whilst there are some areas of flood risk, there are also areas which are of lower risk of flooding. National and local flood risk policy will apply. Also note that development boundaries are relevant to windfall residential moorings.	? Whilst there are some areas of flood risk, there are also areas which are of lower risk of flooding. National and local flood risk policy will apply. Also note that development boundaries are relevant to windfall residential moorings.
ENV7	? Development boundaries may contain areas of brownfield land that could be used for development and therefore there could be benefits relating to efficient use of land. However, in this area, there does not seem	+ Development boundaries may contain areas of brownfield land that could be used for development and therefore there could be benefits relating to efficient use of land.	+ Development boundaries may contain areas of brownfield land that could be used for development and therefore there could be benefits relating to efficient use of land.	+ Development boundaries may contain areas of brownfield land that could be used for development and therefore there	+ Development boundaries may contain areas of brownfield land that could be used for development and therefore there	+ Development boundaries may contain areas of brownfield land that could be used for development and therefore there could be benefits relating to efficient use of land.

	Brundall Riverside	Horning	Hoveton and Wroxham	Oulton Broad	Thorpe St Andrew	Filby
	to be any land that could be developed for dwellings and as such this rates as a ?. The boatyards are generally protected by other local plan policies.			could be benefits relating to efficient use of land.	could be benefits relating to efficient use of land.	
ENV8						
ENV9	? There are some heritage assets within or nearby to the development boundary that will need to be considered. National and local heritage policy will apply.	? There are some heritage assets within or nearby to the development boundary that will need to be considered. National and local heritage policy will apply.	? There are some heritage assets within or nearby to the development boundary that will need to be considered. National and local heritage policy will apply.	? There are some heritage assets within or nearby to the development boundary that will need to be considered. National and local heritage policy will apply.	? There are some heritage assets within or nearby to the development boundary that will need to be considered. National and local heritage policy will apply.	+ No heritage assets withing or nearby the development boundary.
ENV10						
ENV11						
ENV12						
SOC1	? There are key services within walking distance and walking and cycling benefit health. That being said there is no footway for the entire length of Station Road and as such, people would have to walk in the road so that could detract from walking.	+ Key services tend to be within walking and cycling distance, with associated infrastructure tending to be in place – walking and cycling benefits health.	+ Key services tend to be within walking and cycling distance, with associated infrastructure tending to be in place – walking and cycling benefits health.	+ Key services tend to be within walking and cycling distance, with associated infrastructure tending to be in place – walking and cycling benefits health.	+ Key services tend to be within walking and cycling distance, with associated infrastructure tending to be in place – walking and cycling benefits health.	+ Key services tend to be within walking and cycling distance, with associated infrastructure tending to be in place – walking and cycling benefits health.
SOC2	+ By directing development to built up areas, the likelihood of isolated dwellings and social isolation would be reduced.	+ By directing development to built up areas, the likelihood of isolated dwellings and social isolation would be reduced.	+ By directing development to built up areas, the likelihood of isolated dwellings and social isolation would be reduced.	+ By directing development to built up areas, the likelihood of isolated dwellings and social isolation would be reduced.	+ By directing development to built up areas, the likelihood of isolated dwellings and social isolation would be reduced.	+ By directing development to built up areas, the likelihood of isolated dwellings and social isolation would be reduced.
SOC3						
SOC4	+ In theory, housing is acceptable within a development boundary, subject to details	+ In theory, housing is acceptable within a development boundary, subject to details	+ In theory, housing is acceptable within a development boundary, subject to details.	+ In theory, housing is acceptable within a development boundary, subject to details	+ In theory, housing is acceptable within a development boundary, subject to details	+ In theory, housing is acceptable within a development boundary, subject to details
SOC5						
SOC6	- There are key services nearby which can be accessed using the bridge over the railway or the level crossing by walking and level crossing by cycling. However, there is not a footway for the entire length north of the level crossing. People walk in the road so that could detract from walking. The Highways Authority have concerns.	+ Key services in settlement of shop and employment (boat yards). Bus service to higher order settlement within walking distance of the centre.	+ Many key services within settlement within walking and cycling distance.	+ Many key services within settlement within walking and cycling distance.	+ Many key services within settlement within walking and cycling distance.	+ key services within settlement within walking and cycling distance: a primary school, everyday shop and post office.
SOC7						
ECO1						
ECO2						
ECO3						

Appendix 5: Proposed draft development boundary Policy

Policy PUBDM44: Residential development within defined development boundaries

See Development Boundaries Map Bundle: <https://www.broads-authority.gov.uk/development-boundaries.pdf>

1. New residential development will only be permitted within defined development boundaries and must ~~be compatible~~ comply with other policies of the Development Plan.
2. Development will be of a scale that is suitable and appropriate for the size of the site and settlement and will reflect the character of the area.
3. Development boundaries are identified on the policies maps for the following settlement areas:
 - a) Oulton Broad
 - b) Thorpe St Andrew
 - c) Wroxham and Hoveton
 - d) [Filby](#)

Constraints and features

- Depending on location, some of the areas may be affected by surface water flooding, groundwater flooding, reservoir flooding.
- a) **Oulton Broad**
 - Area is within Oulton Broad Conservation Area
 - High potential for archaeological remains in the area
 - Flood risk (mainly zone 1, plus some 2 & 3, by EA mapping and mostly 1 with some 2, 3a and indicative 3b using SFRA 2018)
 - Nearby listed buildings
 - b) **Thorpe St Andrew**
 - Area is within Thorpe St. Andrew Conservation Area
 - Flood risk (mainly zone 2, some zones 1 & 3, by EA mapping and mostly 1 with some 2, 3a and modelled 3b using SFRA 2017)
 - The bounded area includes safeguarded minerals (sand and gravel) resources, but the Minerals Planning Authority has advised this is unlikely to constrain the type and scale of development supported by the Policy
 - Large number of listed buildings
 - c) **Wroxham and Hoveton**
 - Close to SPA and SAC
 - Lies partly within Wroxham Conservation Area
 - Flood risk (mainly zone 3 by EA mapping, and partly zones 1 & 2 and 1, 2, 3a and indicative 3b using SFRA 2017)

- The SFRA shows almost all of the area is at risk of flooding
- Capacity of minor roads in the area
- Wroxham Bridge is a Scheduled Monument
- The Grange - Grade II listed

d) Filby:

- Some protected trees in the area.
- EA flood zone 2 and 3 and SFRA indicative flood zone 3 covers some properties and gardens.
- Close to SAC and SSSI.
- Part of Filby in SSSI impact zone.
- Settlement fringe landscape type nearby.

Reasoned Justification

The purpose of a development boundary is to consolidate development ~~around~~ in sustainable locations within existing built-up communities where there is a clearly defined settlement. ~~and where~~ In these locations further development, if properly designed and constructed, and of an appropriate scale would not be incongruous with ~~or intrusive because of the size of~~ the settlement. Development Boundaries promote sustainable development through ~~have~~ the twin objectives of focusing ~~most of the~~ development towards existing settlements while also protecting the surrounding countryside.

Early in the evolution of the Broads Local Plan, consideration was given to the merits of not having development boundaries, but it was concluded that they are an essential ~~useful~~ tool in promoting sustainable development in the Broads.

Development is directed to areas with Development Boundaries as listed in the policy and defined on the Local Plan Policies Map. Development in these areas could be acceptable in principle, notwithstanding other policies, constraints, and other material considerations. ~~It is important to note that~~ However, just because an area has a Development Boundary, it does not mean that all proposals for development in the area will be approved ~~are necessarily acceptable~~. The sensitivities of the Broads in terms of biodiversity, landscape, cultural heritage, and flood risk mean that careful consideration must be given to the appropriateness of developing a site, and each proposal will be determined against this and other policies of the Local Plan. Outside the defined Development Boundaries, new residential development will not be permitted except in the circumstances defined in the other housing policies.

Recently, Transport East undertook work looking into Transport Related Social Exclusion (TRSE). This could mean being unable to access services such as childcare, health provision and leisure opportunities, having limited choices of good job and education opportunities,

facing poverty and financial hardship because of transport costs or facing significant stress and anxiety from using the transport system as part of everyday life. Transport East says there are several identified contributors to TRSE, including poor provision of local public transport, unsuitable conditions to facilitate walking, cycling and wheeling in car-dominated environments, and a high-level of car dependency that result from these factors. Directing development to areas with services and good public and other sustainable transport provision is important.

To support the Authority's approach, a [Development Boundaries Topic Paper](#) and a [Settlement Study](#) have been produced. This work assesses the suitability of settlements for Development Boundaries and seeks to justify why the three areas (Oulton Broad, Thorpe St Andrew and Wroxham and Hoveton) have Development Boundaries.

Development Boundaries are also important for residential moorings. One of the key criteria of policy [PUBDM46](#) relates to the mooring being within or adjacent to a Development Boundary (a Broads Authority Development Boundary or one of our constituent Councils'). The Authority also regards other sites as suitable for residential moorings that are not adjacent to Development Boundaries. These sites, which are allocated in the Local Plan, are in Brundall ([PUBBRU6](#)), ~~Loddon and~~ Chedgrave (~~POLOD1 and~~ [PUBCHE1](#)) Gillingham ([PUBGIL1](#)), Somerleyton ([PUBSOM1](#)) and Stalham ([PUBSTA1](#)). While the sites covered by these policies are not deemed suitable for Development Boundaries to reflect constraints on the land, they are still accessible to services and facilities that make them suitable for residential moorings.

Some development proposals could be acceptable outside of Development Boundaries in exceptional circumstances, although this will depend on detail, constraints in the area and accordance with other adopted policies and the NPPF, such as [PUBDM47](#) (dwellings for rural enterprises) and [PUBDM50](#) (replacement dwellings).

If a proposal is considered to potentially have an effect on a habitat site, it will need to be considered against the Habitats Regulations and a project level Appropriate Assessment undertaken. With respect to recreation impacts, development would need to mitigate, and this would most easily be done by paying either the Norfolk or Suffolk Coast RAMS tariff (and depending on scale, there may be a need for green infrastructure provision). Proposals for development in Thorpe St Andrew and Wroxham and Hoveton face nutrient enrichment issues and mitigation will be required.

Development Boundary for Hoveton and Wroxham

This combined area is one of the largest concentrations of development, population, and services in the Broads. It has a range of shopping, employment opportunities, leisure and health facilities and relatively frequent rail and bus services. Although there is little

undeveloped land (aside from gardens and public spaces), there has ~~long~~ been a gradual renewal and replacement of buildings and uses within the area, and there is a limited number of derelict or underused sites ~~ripe~~ for redevelopment. The development boundary excludes areas identified as open space and includes boatyards and other development on the south (Wroxham) bank. It also complements the Hoveton ~~Town~~ Village Centre policy (PUBHOV5) in continuing the focus of retail and related development in the village centre. Parts of the area are at risk of flooding and the relevant Local Plan and National Planning Policy Framework Policies will apply. A site-specific flood risk assessment may be required to establish the degree of risk for any planning applications.

Development Boundary for Oulton Broad

Together with Lowestoft, the area has a wide variety of services, facilities, and employment opportunities. Although most of these are at some distance from the area under consideration, there is a bus and train service, and the short distances involved mean that walking and cycling are feasible options. The development boundary has been drawn to generally exclude the edge of the Broad except where there is already significant built development. This is to discourage building on the waterfront for flooding and landscape reasons, and to encourage continuance of the overall level of trees and planting that provides an important part of the setting of the Broad and contributes to its value for wildlife. Parts of the area are at risk of flooding. The relevant Local Plan and National Planning Policy Framework Policies will apply, and a site-specific flood risk assessment may be required to establish the degree of risk to a proposal. In the light of the potential for archaeological remains in the area an archaeological survey may be required in advance of any grant of planning permission.

Development Boundary for Thorpe St Andrew

Only part of the south side of Yarmouth Road in Thorpe St Andrew is within the designated Broads area. Elsewhere, Broadland District Council is the local planning authority, and this part of Thorpe St Andrew is urban in character. Thorpe itself has a range of facilities and services, including employment opportunities and good public transport links to the extensive facilities of Norwich (also within cycling distance). Although there is a range of buildings and uses within the identified boundary, in practice it is not anticipated that there will be a great deal of development ~~in the foreseeable future~~. The development boundary provides additional scope for some redevelopment if opportunities arise, subject to flood risk - the relevant Local Plan and National Planning Policy Framework Policies will apply, and a site flood risk assessment may be required to establish the degree of risk.

Development boundary for Filby

The western side of Thrigby Road is within the designated Broads area. Elsewhere, Great Yarmouth Borough Council is the local planning authority. The part of Filby in the Broads is urban in nature along the road frontage but backs onto Filby Broad. Filby itself has some

facilities and services including, a primary school, everyday shop and post office. Although there is a range of buildings and uses within the identified boundary, in practice it is not anticipated that there will be a great deal of development. The development boundary provides additional scope for some redevelopment if opportunities arise, subject to flood risk - the relevant Local Plan and National Planning Policy Framework Policies will apply, and a site flood risk assessment may be required to establish the degree of risk.

Appendix 6: Comments received as part of the Preferred Options consultation

Section	Name	Organisation	Comment
Development Boundary Topic Paper	Sam Hubbard	Great Yarmouth Borough Council	The preferred approach of not identifying any development boundaries within the Broads area of the Borough and the development limits topic paper that forms part of the evidence base is noted. Whilst the Borough Council considers this approach to largely be consistent with Borough Council's approach to development boundaries in settlements which straddle the shared planning boundary, it is not clear why development boundaries have not been defined within the area west of Thrigby Road in Filby or surrounding River Walk within Great Yarmouth. Whilst parts of these areas are within flood zone 3, the currently adopted Great Yarmouth Local Plan identifies development limits within similar areas of flood risk. It may be more appropriate to include such areas within development boundaries and rely upon the completion of the flood risk sequential and exception tests where applicable.
Development Boundary Topic Paper	Sam Hubbard	Great Yarmouth Borough Council	Appendix 2 of the development limits topic paper does not appear to have taken into account the neighbouring development limit for Filby (to the east of Thrigby Road), as has been mapped in other areas.
PODM43: Residential development within defined Development Boundaries	Dickon Povey	East Suffolk Council	This approach is supported.
PODM43: Residential development within defined Development Boundaries	Dickon Povey	East Suffolk Council	Development Boundary for Oulton Broad section. Presumably this means to say: '...and a site-specific flood risk assessment may be required...
PODM43: Residential development within defined Development Boundaries	Paul Harris	Broadland and South Norfolk Councils	The Council supports the approach to focusing development within areas with services.
PODM43: Residential development within defined	Tessa Saunders	Anglian Water	Anglian Water agrees with the aims of the policy and the need to be consistent with other policies in the plan. We acknowledge that the statement in the supporting text that "development could be acceptable, notwithstanding other policies, constraints and material

Section	Name	Organisation	Comment
Development Boundaries			<p>considerations", would address our key concerns around flood risk, infrastructure capacity, and resilience over the longer term. We agree with the justification for not including a development boundary for Horning in Development Boundary Topic Paper (updated August 2023) - however, it would be helpful to provide a link to the Anglian Water Statement of Fact, in addition to the Joint Position Statement to provide a complete factual position for Horning and capacity at the WRC.</p>