

Planning Committee

08 November 2024

Agenda item number 11

Local Plan for the Broads Publication Version- Agreeing to consult

Report by Planning Policy Officer

Summary

The Local Plan is ready for pre-submission consultation. This report introduces the Local Plan, Habitats Regulation Assessment and Sustainability Appraisal. The approach to consultation is also set out. The recommendations and timeline all depend on when the new NPPF is released. As such, various scenarios are discussed and there will be some element of delegation.

Recommendations

The recommendations are lengthy and reflect the uncertainty about when the new NPPF will be released and what the transition arrangements to the new NPPF and new Local Plan system will be. Three different scenarios are outlined and members are asked to note that each provides a different recommendation. Only one will be implemented depending on which scenario is implemented.

1. It is recommended that the Local Plan, HRA and SA be endorsed for consultation.
2. It is recommended that the approach to consultation is endorsed.
3. **Scenario 1:** if the new NPPF is not received by 14 February 2025. It will be presumed that the Local Plan must be submitted by the end of June 2025. The Local Plan would be examined under the current (December 2023) NPPF. Then
 - a) It is recommended to start the consultation on the Local Plan no later than 14 February 2025.
 - b) The assessment of the comments received, the proposed responses to the comments and the decision to submit the Local Plan to the Planning Inspectorate is delegated to the Director of Strategic Services in consultation with the Chair of the Broads Authority, the Chair of Planning Committee, the Chief Executive, and the Head of Planning.
4. **Scenario 2:** if the new NPPF is received by 14 February 2025 and the transition arrangements to be examined under the new NPPF are broadly the same as those

proposed in the consultation document, and so too are the transition arrangements to the new Local Plan production system. Then

- a) The new NPPF will be checked by the Planning Policy Officer, and it is recommended that any minor amendments are made and delegated to be agreed with the Director of Strategic Services in consultation with the Chair of the Broads Authority, the Chair of Planning Committee, the Chief Executive, and the Head of Planning.
 - b) On checking the NPPF, if major amendments are needed to the Local Plan, it is recommended that the amended Local Plan comes back to the Planning Committee and the Broads Authority for agreement to consult.
 - c) It is recommended that comments received and responses as well as agreement to submit the Local Plan to the Planning Inspector comes before Planning Committee at an appropriate future date.
5. **Scenario 3:** if the new NPPF is received by 14 February 2025 but the transition arrangements to be examined under the new NPPF and the transition arrangements to the new Local Plan production system are very different to those proposed in the consultation and they are deemed to affect the production of the Local Plan for the Broads. Then
- a) It is recommended that consultation will be paused, and an update reported to the Planning Committee with a proposed way forward.
6. It is recommended that the Planning Committee requests the Broads Authority to endorse all these recommendations.

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1. Introduction

- 1.1. The Local Plan for the Broads is now ready for Regulation 19 consultation. This stage of consultation is the one prior to submission for Examination by the Planning Inspector.

2. Regulation 19 version of the Local Plan

- 2.1. Included at Appendix 1 is a marked-up version of the Local Plan. This is the Publication version marked up with changes that have been made since the Preferred Options consultation. The changes reflect comments received as part of that consultation, general improvements to the wording and formatting and order of the Local Plan, as well as changes because of evidence that has been completed.
- 2.2. Members have seen the sections with the most significant changes over the last year or so. There is a new policy in the Local Plan that Members have not seen: Policy 52A on extensions. There are other changes that are marked up but have not been to previous Planning Committees. These are generally wording changes to improve clarity.
- 2.3. It is not intended to consult on this marked up version of the Local Plan; a 'clean' version will be produced for consultation, but this version will be available for stakeholders and the public to see the changes if they wish.
- 2.4. Some changes are not marked. These changes are general changes, and it was considered easier just to make them rather than marking them up:
 - a) All policies are now 'PUB' (Publication version) rather than 'PO' (Preferred options).
 - b) Removed the wording at the end that referred to the Sustainability Appraisal (SA) summary, alternative options and how used in previous years.
 - c) Added a 'delivering the policy' section to most policies.
 - d) Climate Change checklist amended to one box to fill in rather than a before and after approach.
- 2.5. Questions that we asked in the Preferred Options version have been removed and, where there was a question, a summary of how the topic of that question has or has not been addressed is included. There are a couple of new questions in the Local Plan, and these are marked up. There will be a final spell check. Also, the page numbers of each policy will be added to the list of policies table. The references to the Design Guide and checklist will be amended accordingly. The Design Guide is another item to be considered by this Planning Committee.
- 2.6. Some changes to policy have arisen as a result of the viability appraisal. These have been discussed in the related item to be considered by this Planning Committee, and summarised here:

- 1) The Affordable Housing policy has been amended in relation to thresholds for off-site contributions.
 - 2) Adaptable dwellings building regulations standard M4(2) will apply to all dwellings unless site constraints dictate otherwise.
 - 3) 10% of affordable housing units of 10 or more will be wheelchair adaptable, which is M4(3).
- 2.7. It is acknowledged that the Local Plan is a long document but should be noted that:
- 1) The red strike through text will be removed in the consultation version.
 - 2) Much of the Flood Risk SPD has been incorporated into the Local Plan. This is because the previous Government removed SPDs from being part of the Development Plan (with some transition arrangements).
 - 3) The Design Guide will be part of the Local Plan. This is to give it weight and because we will not be able to produce any more SPDs (see previous point).

3. Habitats Regulations Assessment (HRA)

- 3.1. A HRA has been produced to assess, inform and support all stages of the Local Plan production. The most recent version relates to the Regulation 19 version of the Local plan and is included at Appendix 2.

4. Sustainability Appraisal (SA)

- 4.1. An SA has been produced to assess, inform and support all stages of the Local Plan production. The most recent version relates to the Regulation 19 version of the Local Plan and is included at Appendix 3.

5. Proposed approach to consultation

- 5.1. The consultation is proposed to run for 8 weeks. Dates are to be confirmed (see next section and recommendations).
- 5.2. The consultation will be advertised by emailing everyone on our consultation database. We will put a notice in the EDP as well as provide Parish Councils with information for them to put up on notice boards, advertise on social media or in parish magazines. We will use social media to advertise the consultation.
- 5.3. We will hold consultation drop-in events for people to talk to officers in our usual way, one in the north, one central and one in the south, all held out of normal working hours and one on a Saturday. The precise location will depend on availability as the dates of the consultation are unknown; again, see the next section.
- 5.4. We will look into ways of engaging young people, ethnic minorities and people with a disability when dates of the consultation are known.

6. The NPPF, the recommendations and the scenarios

- 6.1. Members will be aware that a new NPPF is being produced. It was consulted on over the summer and we await the final version. It was expected by the end of the year, but it seems that responses numbered in the thousands and the release could be in the new year. While the proposed changes to the NPPF do not significantly affect the Local Plan for the Broads, it is preferred to have the Local Plan examined under the new NPPF. What will affect the Local Plan for the Broads is the transition arrangements to the new NPPF and the transition arrangements to the new Local Plan production system. Members will recall that the draft transition arrangements for a Local Plan to be examined under the new NPPF was along the lines of holding Regulation 19 consultation a month after the new NPPF has been released. In draft, the transition arrangements to the new Local Plan production system are that Local Plans to be produced under the current Local Plan production system need to be submitted by the end of June 2025. Whereas the document that accompanied the NPPF that was out for consultation said this date would be December 2026. What this means for the Broads Authority is that we need to plan for a submission date by the end of June 2025, unless the NPPF is released, and another date is included. That being said, we need to plan to start the consultation by a certain date to hit the June 2025 date in case the new NPPF is not released, or the transition arrangements are not as they are proposed. There are three scenarios that the Authority needs to consider and plan for. These are explained as follows, but first there is a rough timeline to work to.
- 6.2. The rough timeline is as follows. If the new NPPF is not released, the Local Plan can still be submitted by June 2025, which is what we need to plan for due to the uncertainty.
- 14 February 2025 – start consultation for 8 weeks
 - 11 April 2025 4pm – consultation ends
 - Give 6 weeks to go through comments and respond. It should be noted that the school Easter Holidays fall during that time. This presumes lots of comments and bringing in other officers to help with responses.
 - Liaise with the Chair of Broads Authority, Chair of Planning Committee and Chief Executive, Director of Strategic Services and Head of Planning w/c 26 May 2023.
 - Submit soon after. So submitted by end of June 2025.
- 6.3. **Scenario 1:** the new NPPF is not received by 14 February 2025. It will be presumed that the Local Plan must be submitted by the end of June 2025. This would mean that the Local Plan would be examined under the current (December 2023) NPPF. The timeline set out in 6.2 would need to be met. Various decisions will need to be delegated in the interest of expediency, as set out in the recommendations related to scenario 1.
- 6.4. **Scenario 2:** the new NPPF is received by 14 February 2025 and the transition arrangements to be examined under the new NPPF are broadly the same as those proposed in the consultation document and so too are the transition arrangements to

the new Local Plan production system. This therefore gives more time than scenario 1. And allows time for decisions by committees (no need for delegation).

- 6.5. **Scenario 3:** the new NPPF is received by 14 February 2025 but the transition arrangements to be examined under the new NPPF and the transition arrangements to the new Local Plan production system are very different to those proposed in the consultation and they are deemed to affect the production of the Local Plan for the Broads. The repercussions are not known. Officers will have to assess what this means and then respond accordingly.
- 6.6. Essentially, the situation is complicated and very much uncertain.

7. Next steps

- 7.1. In terms of the immediate next steps, officers will prepare the consultation as much as possible within the confines of the uncertainty set out in this report. Everything will be set and ready to go. The consultation will start as set out in this report.
- 7.2. In terms of the consultation itself, section 5 of this report sets out the proposed approach to the consultation.
- 7.3. When the consultation ends (and indeed, during the consultation when comments are received), all comments will be logged and responded to. A schedule of proposed changes will be produced; the Authority cannot change the Local Plan before it is submitted, but a schedule of proposed changes was produced for the last Local Plan and was welcomed by the Inspector. If major issues are identified, officers will consider how to take the Local Plan forward.
- 7.4. Either through delegation or at a future Planning Committee, depending on the scenario as set out elsewhere in this report, agreement to submit the Local Plan to the Planning Inspector for examination will be sought.

8. Submission to the Planning Inspector and what to expect through examination

- 8.1. All the documents produced to support the Local Plan, and the Local Plan itself, will be sent to the Planning Inspector. An Inspector will be appointed, and they will start to work through the Local Plan and related issues. It is likely we will be written to, explaining how the Inspector will proceed. We will then get many matters, issues and questions to respond to. Hearings will be held, which may be online or in person and it is likely that some further work may be identified by the Inspector for the Authority to complete. There will be modifications to the Local Plan, and these will be consulted on. A final report will be produced. Assuming the Local Plan is found sound, it will then be adopted by resolution of the Broads Authority. All of this could take around a year or so, depending on the issues identified and other workloads of the Inspector and of course summer holidays.

9. Potential issues that could arise

- 9.1. As part of the Regulation 19 Local Plan, we are holding a call for sites. Sites may come forward through that and we will need to assess their appropriateness for allocation, and we would liaise with the Inspector.
- 9.2. Members will be aware that we are not likely to meet our housing need. We would have completed three calls for sites, allocated appropriate sites that we can and would have duty to cooperate agreements in place, but meeting housing need is a priority for the Government.
- 9.3. Meeting the Gypsy and Traveller need in Great Yarmouth Borough may be an issue for both the Authority and Great Yarmouth Borough Council.
- 9.4. The proposed policies do set a high bar for various topic areas, such as development on peat. The Local Plan proposed 20% BNG, M4(2) on all dwellings and off-site affordable housing contributions on a lower threshold than currently.
- 9.5. There may of course be other issues raised through the consultation and the examination, but this is the nature of Local Plan production – there will be debates and some stakeholders may not support some policies. That is for the examination to assess and determine the way forward.

10. Financial implications

- 10.1. During the consultation, costs will be incurred through printing, press notice and hiring of venues.
- 10.2. The examination itself is a large expense that the Authority will need to meet. Experts may also need to be called in to assist in justifying our approach to policies. We do budget for the examination in the years between examinations.
- 10.3. There will then be printing and press notice costs for the main modifications' consultation – drop in events would not be held for that consultation stage.

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Date of report: 14 October 2024

The following appendix 1 is available to view on [Planning Committee - 08 November 2024 \(broads-authority.gov.uk\)](#)

Appendix 1 – Local Plan for the Broads Publication (Regulation 19) version

Appendix 2 – [Habitats Regulations Assessment](#)

Appendix 3 – [Sustainability Appraisal](#)

Local Plan for the Broads: Review Period 2021 to 2041 Publication Consultation

Habitats Regulations Assessment

October 2024



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



Local Plan for the Broads: Review Period 2021 to 2041 Publication Consultation

Habitats Regulations Assessment

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Front Cover: Ward Way along the River Yare

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Acronyms & Abbreviations

AA	Appropriate Assessment
AADT	Annual Average Daily Traffic
ALS	Abstraction License Strategy
APIS	Air Pollution Information System
AWS	Anglian Water Services
BLP	Broads Local Plan
CAMS	Catchment Abstraction Strategy
CIEEM	Chartered Institute of Ecology and Environmental Management
CJEU	Court of Justice of the European Union
DfT	Department for Transport
DMRB	Design Manual for Roads and Bridges
DLUHC	Department for Levelling Up, Housing and Communities
DTA	David Tyldesley and Associates
EA	Environment Agency
FLL	Functionally Linked Land
GI	Green Infrastructure
GIRAMS	Green Infrastructure & Recreational Avoidance and Mitigation Strategy
HDV	Heavy Duty Vehicle
HRA	Habitats Regulations Assessment
IAQM	Institute of Air Quality Management
IROPI	Imperative Reasons of Overriding Public Interest
IRZ	Impact Risk Zone
IUCN	International Union for Conservation of Nature
JNCC	Joint Nature Conservation Committee
LPA	Local Planning Authority
LSE	Likely Significant Effect
LTP	Local Transport Plan
NBP	Norfolk Biodiversity Partnership
NPPF	National Planning and Policy Framework
NSPF	Norfolk Strategic Planning Framework
RAMS	Recreational impact Avoidance and Mitigation Strategy
RBMP	River Basin Management Plan
SAC	Special Area of Conservation
SANG	Suitable Alternative Natural Greenspace
SIP	Site Improvement Plan
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

SWMC	Surface Water Management Catchment
TraC	Transitional and Coastal
WFD	Water Framework Directive
WMS	Waterways Management Strategy
WRC	Wastewater Recycling Centre
WRMP	Water Resource Management Plan
WRZ	Water Resource Zones
WwTW	Wastewater Treatment Works
ZOI	Zone of Influence

Executive Summary

About this report

- E1. Lepus Consulting has been appointed, on behalf of the Broads Authority, to undertake a Habitats Regulations Assessment (HRA) in compliance with the Habitats Regulations (as amended)¹ of the Publication Broads Local Plan at Regulation 19.
- E2. This report provides the outputs of the HRA process which has been undertaken alongside preparation of the Local Plan.

Screening outcomes (HRA Stage 1)

- E3. The Local Plan for the Broads is not directly connected with or necessary to the management of any habitats site. Consideration was therefore given to potential links or causal connections between the effects of the Local Plan and habitats sites within the study area to identify Likely Significant Effects (LSEs). This exercise was undertaken through the collation of information for each habitats site and application of a 'source-pathway-receptor' model.
- E4. Taking no account of mitigation measures, the screening stage concluded that that the Local Plan has the potential to have LSEs at the following habitats sites:
- Benacre to Easton Bavents SPA – recreational LSEs;
 - Breckland SPA – recreational LSEs;
 - Breckland SAC – recreational LSEs;
 - Breydon Water SPA – water quality/quantity, recreational and urbanisation LSEs;
 - Breydon Water Ramsar – water quality/quantity, recreational and urbanisation LSEs;
 - Broads SAC – air quality, water quality/quantity, recreational and urbanisation LSEs;
 - Broadland Ramsar – air quality, water quality/quantity, recreational and urbanisation LSEs;
 - Broadland SPA – air quality, water quality/quantity, recreational and urbanisation LSEs;
 - Dersingham Bog Ramsar – recreational LSEs;
 - Great Yarmouth and North Denes SPA – recreational and urbanisation LSEs;
 - Norfolk Valley Fens SAC – water quantity and recreational LSEs;
 - North Norfolk Coast Ramsar – recreational LSEs;
 - North Norfolk Coast SAC – recreational LSEs;
 - North Norfolk Coast SPA – recreational LSEs;
 - Outer Thames Estuary SPA – urbanisation LSEs;
 - River Wensum SAC – water quantity LSEs;

¹ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents> [Accessed: 03/10/24] as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Accessed: 03/10/24].

- Roydon and Dersingham Bog SAC – recreational LSEs;
- Roydon Common Ramsar – recreational LSEs;
- The Wash and North Norfolk Coast SAC – recreational LSEs;
- The Wash Ramsar – recreational LSEs;
- The Wash SPA – recreational LSEs; and
- Winterton-Horsey Dunes SAC – recreational and urbanisation LSEs.

E5. The identification of LSEs at the screening stage triggered the requirement for an Appropriate Assessment (AA), stage 2 of the HRA process.

Appropriate Assessment outcomes (HRA Stage 2)

Air quality Appropriate Assessment

E6. The assessment evaluated ecological impacts of air pollution on the Broads SAC, Broadland Ramsar and Broadland SPA and focused on qualifying and supporting habitat within 200m of strategic road links. Baseline air quality levels across these habitats sites were analysed and background air pollution contributions from different sectors in the context of air quality trends were reviewed, including agriculture and transport. Results showed that there has been a decline in nitrogen deposition at the Broads SAC, Broadland Ramsar and Broadland SPA since 2003 and an associated overall decline in acid deposition. It is noted that the overall housing delivery target for Broads is 358 dwellings (see Local Plan Policy POSP15) over the plan period. The Local Plan allocates a total of 250 dwellings (at one site - Utilities Site) and 43 residential moorings over the 20-year Plan period (around 20 dwellings per year). The remaining need (which is part of the overlapping District's need and not additional to) will be achieved through allocations, windfall, completions and permissions. Allocations PUBTHU1 (16 dwellings) and PUBOUL2 (76 dwellings) already have planning permission but are also included in the Local Plan until they are built out. This scale of development is likely to lead to a small increase in traffic emissions, predominantly on rural roads. Taking these factors into consideration, alongside Local Plan protective policies and national policy, it was concluded in the assessment that no adverse impacts on the site integrity of any habitats sites will arise due to a change in air quality from the Local Plan alone or in-combination.

Water Quality and Water Quantity Appropriate Assessment

E7. The assessment considered the potential effects of a change in water quality and quantity on hydrologically sensitive habitats sites associated with Local Plan development. This took into account the high-level regulatory water quality and quantity protective frameworks which address Local Plan and in-combination growth in neighbouring areas. It also took into consideration Local Plan requirements as well as local measures in the form of plans, programmes, environmental operating procedures and strategies. In addition, nutrient neutrality mitigation requirements were considered to ensure no adverse impacts upon the Broads SAC and Broadland Ramsar designations either alone or in-combination. This information was analysed in the context of the conservation objectives for each habitats site. It was concluded that no adverse impacts on the site integrity at any habitats site due to a change in water quality or quantity will arise as a result of the Local Plan either alone or in-combination.

Recreation and Urbanisation Appropriate Assessment

- E8. To provide an evaluation of the ecological impacts of recreation and urbanisation effects on habitats sites due to the Local Plan both alone and in-combination, the assessment took into consideration existing mitigation requirements which are already in operation, and which have been adopted by the Broads Authority. These included the Norfolk Recreational disturbance Avoidance and Mitigation Strategy (Norfolk RAMS) and the Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (Suffolk RAMS). These strategies address in-combination development within a defined Zone of Influence. This data was evaluated in the context of the Local Plan allocations. Taking into consideration Local Plan policy wording which secures appropriate mitigation for both alone and on-combination recreational impacts, it was concluded that no adverse recreational or urbanisation impact on the site integrity of any habitats site will arise from increased development.

Next steps

- E9. The purpose of this report is to inform the HRA of the Publication Local Plan using best available information. The Broads Authority, as the Competent Authority, is responsible for preparing the Integrity Test, which can be undertaken in light of the conclusions set out in this report.
- E10. This report will be submitted to Natural England, the statutory nature conservation body, for formal consultation. The Broads Authority must 'have regard' to their representations under the provisions of Habitats Regulations prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

1 Introduction

1.1 Background

1.1.1 The Broads Authority (the Authority) is the local planning authority (LPA) for the Broads and is responsible for producing the Local Plan for the Broads. The purpose of a local plan is to guide development in the area and is used in determining planning applications. Local plans should be reviewed to assess whether they need updating at least once every five years². The existing local plan³ was adopted in 2019 and covers the period up to 2036.

1.1.2 The adopted local plan commits to a review 18 months after adoption. As such, the Authority is currently undertaking a review of the Local Plan which aims to update policies in light of changes to the National Planning Policy Framework (NPPF)⁴ and address issues such as climate change.

1.1.3 Between October and December 2022, the Authority published the Issues and Options consultation which was designed to obtain views on key issues and current policies⁵. The Authority consulted on the Preferred Options Consultation in March 2024⁶. The responses to these consultations have informed the Publication Local Plan at Regulation 19.

1.2 The Broads Authority

1.2.1 The Broads Authority is a Special Statutory Authority established under the 1988 Norfolk and Suffolk Broads Act. The Authority has a statutory duty to manage the Broads for the following three purposes:

- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
- Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
- Protecting the interests of navigation.

² Department for Levelling Up, Housing and Communities (2023). Para 33 of the National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 27/09/24].

³ The Broads Authority (2019) Local Plan for the Broads. Available at: <https://www.broads-authority.gov.uk/planning/planning-policies/development> [Date Accessed: 27/09/24].

⁴ Department for Levelling Up, Housing and Communities (2023). National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 27/09/24].

⁵ The Broads Authority (2022) The Local Plan for the Broads Review Issues and Options Consultation July 2022. Available at: <https://www.broads-authority.gov.uk/about-us/how-we-work/transparency/consultations> [Date Accessed: 27/09/24].

⁶ The Broads Authority (March 2024) The Local Plan for the Broads: Review Plan period 2021 to 2041 Preferred Options consultation. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0032/513599/Preferred-Options-February-2024.pdf [Date Accessed: 27/09/24].

- 1.2.2 The designated Broads Authority executive area covers parts of Norfolk and North Suffolk and extends around the floodplains and lower reaches of the main rivers which flow through the area (Bure, Yare and Waveney) and their tributaries (Thurne, Ant, Wensum and Chet) as illustrated in **Figure 1.1**.
- 1.2.3 The Executive Area includes areas of Broadland District, South Norfolk District, North Norfolk District, Great Yarmouth Borough, Norwich City, and East Suffolk Council. The councils for these areas do not have planning powers in the Broads area but retain all other local authority powers and responsibilities. Norfolk County Council and Suffolk County Council are the county planning authority for their respective part of the Broads, with responsibilities that include minerals and waste planning. These authorities are also the Lead Local Flood Authority in their respective geographic jurisdictions.



Figure 1.1: The Broads Authority executive area⁷

⁷ Broads Authority (2023) Member’s Handbook. Broads Authority executive area.

1.3 Habitats Regulations Assessment

1.3.1 The application of Habitats Regulations Assessment (HRA) to land-use plans is a requirement of the Conservation of Habitats and Species Regulations 2017 (as amended)⁸. HRA applies to plans and projects, including all Local Development Documents in England and Wales.

1.3.2 Where a plan is likely to have a significant effect on a habitats site (either alone or in combination) and is not directly connected with or necessary to the management of the habitats site, Regulation 105 of the Habitats Regulations notes that the plan making authority for that plan must, before the plan is given effect, make an Appropriate Assessment (AA) of the implications for the site in view of that site's conservation objectives. These tests are referred to collectively as an HRA.

1.3.3 The Habitats Regulations⁹ provide a definition of a European site at Regulation 8. These sites include Special Areas of Conservation (SAC), Sites of Community Importance, Special Protection Areas (SPA) and sites proposed to the European Commission in accordance with Article 4(1) of the Habitats Directive. In addition, policy in England and Wales notes that the following sites should also be given the same level of protection as a European site¹⁰. European sites together with sites set out in national policy (listed below) are referred to in England and Wales as a habitats site¹¹. The term 'habitats site' is therefore also used in this HRA report.

- A potential SPA (pSPA)
- A possible / proposed SAC (pSAC)
- Listed and proposed Ramsar Sites (wetland of international importance)
- In England, sites identified or required as compensation measures for adverse effects on statutory European sites, pSPA, pSAC, and listed or proposed Ramsar sites.

⁸ The Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

⁹ Conservation of Habitats and Species Regulations 2017 SI No. 2017/1012, TSO (The Stationery Office), London, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

¹⁰ Department for Levelling up, Housing and Communities & Local Government (2023). National Planning Policy Framework. Para 187.

¹¹ Habitats site: Any site which would be included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites. Ministry of Housing, Communities & Local Government (2021). National Planning Policy Framework. Para 181. Available in Annex 2 (Glossary) at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [Date Accessed: 30/09/24].

1.4 Previous HRA work

1.4.1 The Issues and Options consultation (2022) of the Local Plan review was supported by an HRA (the Preliminary HRA Scoping Report), which included a preliminary screening of issues and options and made recommendations to inform policy wording¹². It concluded potential LSEs at a number of habitats sites from air quality, hydrology and recreational disturbance, urbanisation effects and habitat loss / fragmentation impact pathways.

1.4.2 The Preferred Options Consultation was also supported by an HRA which screened in air quality, water, recreational and urbanisation effects at several habitats sites and provided recommendations for the next stages in the Plan making process¹³. Natural England indicated they were satisfied that the HRA at Regulation 18 provided a comprehensive assessment of the likely significant effects of the Local Plan on habitats sites¹⁴.

1.5 Purpose of this report

1.5.1 Lepus Consulting has prepared this report to inform the HRA of the Regulation 19 Local Plan on behalf of the Authority. The Authority, as the Competent Authority, will have responsibility to make the Integrity Test. This can be undertaken in light of the conclusions set out in this report, having regard to representations made by Natural England under the provisions of the Habitats Regulations.

1.5.2 This HRA report has been prepared in accordance with the Habitats Regulations and has been informed by the following guidance:

- Planning Practice Guidance: Appropriate Assessment¹⁵; and
- The Habitat Regulations Assessment Handbook - David Tyldesley and Associates (referred to hereafter as the DTA Handbook), 2013 (in particular Part F: 'Practical Guidance for the Assessment of Plans under the Regulations')¹⁶.

¹² Lepus Consulting. July 2022. Habitats Regulations Assessment of the Local Plan for the Broads. Issues and Options Consultation. Preliminary HRA Scoping Report.

¹³ Lepus Consulting (2024) Preferred Options Habitats Regulations Assessment of the Local Plan for the Broads.

¹⁴ Natural England (2024) Broads Authority Local Plan Review - Preferred Options and Validation Checklist – Plan Period 2021 to 2041 17th May 2024 [Letter]

¹⁵ Department for Levelling Up, Housing and Communities (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

¹⁶ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (June) (2024) edition UK: DTA Publications Limited.

2 Methodology

2.1 Overview

2.1.1 HRA is a rigorous precautionary process centred around the conservation objectives of a habitats site's qualifying interests. It is intended to ensure that habitats sites are protected from impacts that could adversely affect their integrity. A step-by-step guide to the methodology followed for the HRA, as outlined in the DTA Handbook, is illustrated in **Figure 2.1**. This HRA report provides outputs from Stage 1 and Stage 2 of the HRA process.

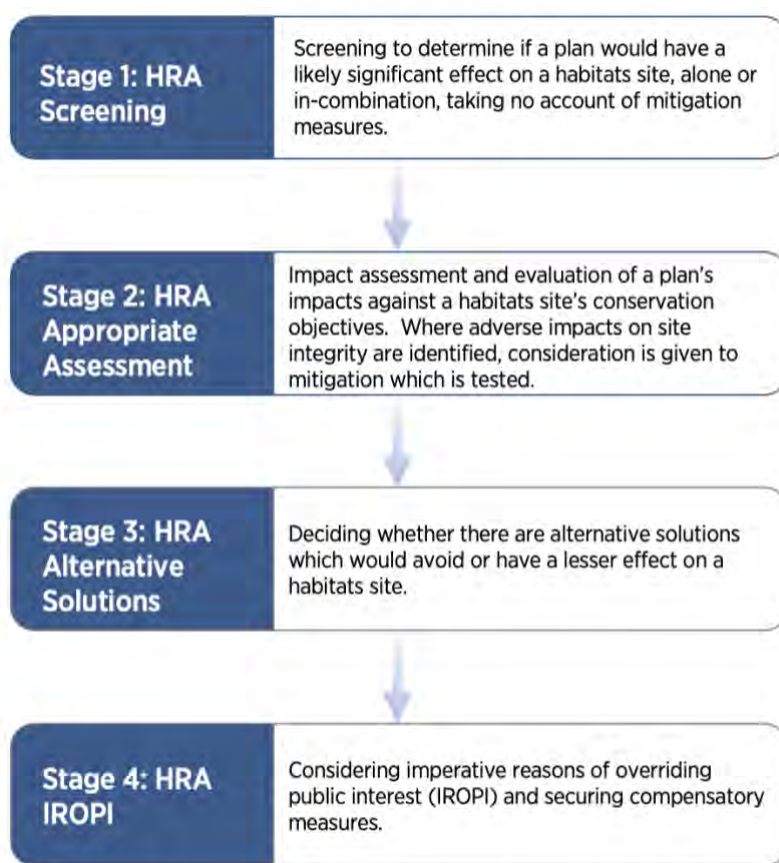


Figure 2.1: Stages in the Habitats Regulations Assessment process¹⁷

¹⁷Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (January) (2021) edition UK: DTA Publications Limited.

2.2 Stage 1: Screening for Likely Significant Effects

- 2.2.1 The first stage in the HRA process comprises the screening stage (see **Figure 2.1**). The purpose of the screening process is to firstly determine whether a plan is either (1) exempt (because it is directly connected with or necessary to the management of a habitats site), (2) whether it can be excluded (because it is not a plan), or (3) eliminated (because there would be no conceivable effects), from the HRA process. If none of these conditions apply, it is next necessary to identify whether there are any aspects of the plan which may lead to an LSE at a habitats site, either alone or in-combination with other plans or projects.
- 2.2.2 Screening was undertaken of the Local Plan as part of both the Issues and Options and Preferred Options consultations (see **paragraph 1.1.4**) which concluded that it had the potential to have LSEs on a number of habitats sites. It was therefore concluded that the Local Plan would be screened into the HRA process, and an AA would be required (Stage 2 - **Figure 2.1**).
- 2.2.3 Where elements of the Local Plan have been updated in response to both stages of Regulation 18 consultation, these components have been re-screened to determine whether the Publication Regulation 19 Local Plan is likely to have an LSE alone or in-combination. The codes set out in **Table 2.1** are used to inform the formal screening decision (Column 2). The results of this re-screening exercise are presented in **Chapter 4** of this report.

Table 2.1: Screening evaluation and reasoning categories from Part F of the DTA Handbook¹⁸

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013):	Screen in / screen out
A. General statements of policy / general aspirations	Screen Out
B. Policies listing general criteria for testing the acceptability / sustainability of proposals.	Screen Out
C. Proposal referred to but not proposed by the Plan.	Screen Out
D. General plan-wide environmental protection / designated site safeguarding / threshold policies.	Screen Out
E. Policies or proposals that steer change in such a way as to protect habitats sites from adverse effects.	Screen Out
F. Policies or proposals that cannot lead to development or other change.	Screen Out
G. Policies or proposals that could not have any conceivable or adverse effect on a site.	Screen Out
H. Policies or proposals the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in-combination with other aspects of this or other plans or projects).	Screen Out
I. Policies or proposals with a Likely Significant Effect on a site alone.	Screen In
J. Policies or proposals unlikely to have a significant effect alone.	Screen Out

¹⁸ Tyldesley, D., and Chapman, C. (2013) The Habitats Regulations Assessment Handbook (December) (2019) edition UK: DTA Publications Limited. Available at: <http://www.dtapublications.co.uk/> [Accessed: 30/09/24].

Screening evaluation and reasoning categories from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2013):	Screen in / screen out
K. Policies or proposals unlikely to have a significant effect either alone or in-combination.	Screen Out
L. Policies or proposals which might be likely to have a significant effect in-combination.	Screen In
M. Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a habitats site.	Screen In

2.2.4 The judgement by the European Court of Justice on the interpretation of the Habitats Directive in the case of *People Over Wind and Sweetman vs Coillte Teoranta* (Case C-323/17¹⁹) determined that mitigation measures are only permitted to be considered as part of the Appropriate Assessment stage of the HRA process. The HRA screening process has therefore taken no account of incorporated mitigation or avoidance measures that are intended to avoid or reduce harmful effects on a habitats site when assessing the LSEs of the Local Plan on habitats sites. These are measures which, if removed (i.e. should they no longer be required for the benefit of a habitats site), would still allow the lawful and practical implementation of a plan.

2.3 In-combination effects

2.3.1 Should screening conclude there are no LSEs from the Local Plan alone, it is necessary to then consider whether the effects of the Local Plan in-combination with other plans and projects would combine to result in an LSE on any habitats site. It may be that the Local Plan alone will not have an LSE but could have a residual effect which may contribute to in-combination LSEs on a habitats site. The in-combination assessment is compliant with the *Wealden Judgement* (2017)²⁰.

2.3.2 Plans and projects considered to be of most relevance to the in-combination assessment of the Local Plan include those that have similar impact pathways (see **Appendix A**). These include those plans and projects which have the potential to increase development in the HRA study area including the following Local Planning Authority (LPA) local development plans:

- Greater Norwich Development Partnership (Broadland District Council, South Norfolk Council and Norwich City Council)²¹;
- North Norfolk District Council²²;
- Great Yarmouth Borough Council²³; and

¹⁹ InfoCuria (2018) Case C-323/17. Available at:

<http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN> [Date accessed: 10/01/24].

²⁰ Wealden District Council & Lewes District Council before Mr Justice Jay. Available at:

<http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html> [Date Accessed: 04/09/24].

²¹ GNDP (2024) Greater Norwich Local Plan. Available at: <https://www.gnlp.org.uk/local-plan-examination-local-plan-examination-document-library/j-inspectors-report-and-adoption> [Accessed: 27/09/24]

²² North Norfolk District Council (2022) North Norfolk Local Plan: Proposed Submission Version. Available at:

<https://www.north-norfolk.gov.uk/tasks/planning-policy/local-plan-new/> [Accessed: 27/09/24]

²³ Great Yarmouth Borough Council (2021) Great Yarmouth Local Plan Part 2. Available at: <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan> [Accessed: 27/09/24]

- East Suffolk District Council²⁴.

2.3.3 In addition, other plans and projects with the potential to increase traffic across the study area have the potential to act in-combination with the Local Plan such as the Norfolk County Council Local Transport Plan 2021-2036²⁵ and the Suffolk County Council Local Transport Plan 2011-2031²⁶ and waste and mineral plans. Plans which allocate water resources or are likely to influence water quality in the study area have also been considered, including the Anglian River Basin Management Plan (RBMP)²⁷, Anglian Water Resource Management Plan (WRMP)²⁸, Essex and Suffolk WRMP²⁹ and Drought Plans (see **Appendix A** for more details).

2.4 Stage 2: Appropriate Assessment and Integrity Test

2.4.1 Stage 2 of the HRA process comprises the AA and Integrity Test. The purpose of the AA is to undertake an assessment of the implications of a plan for a habitats site in light of its conservation objectives³⁰.

2.4.2 As part of this process, plan makers should take account of the potential consequences of no action, the uncertainties inherent in scientific evaluation and they should consult interested parties on the possible ways of managing the risk, for instance, through the adoption of mitigation measures. Mitigation measures should aim to avoid, minimise or reduce significant effects on habitats sites. Mitigation measures may take the form of policies within the Local Plan, or mitigation proposed through other plans or regulatory mechanisms. All mitigation measures must be deliverable and able to mitigate the adverse effects for which they are targeted.

²⁴ East Suffolk Council (2019) Waveney Local Plan. Available at:

<https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf>
[Accessed: 27/09/24]

²⁵ Norfolk County Council (2022) Local Transport Plan. Available at: <https://www.norfolk.gov.uk/localtransportplan> [Date accessed: 27/09/24]

²⁶ Suffolk County Council (2011) Suffolk County Council Local Transport Plan. Available at: <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans?nodeId=f87fcf06-0383-5bf4-91c9-936ee5d7e16e&entryId=1acccd42-c53c-5753-ad60-0efcc29d1e33> [Date accessed: 30/09/24]

²⁷ Environment Agency (2022) Anglian river basin district River basin management plan. Available at: <https://www.gov.uk/guidance/anglian-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 30/09/24].

²⁸ Anglian Water (2024) Water Resources Management Plan. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/revised-draft-wrmp24-main-report-v2.pdf> [Date accessed: 30/09/24]

²⁹ Essex and Suffolk Water (2024) Water Resources Management Plan. Available at: <https://www.nwg.co.uk/responsibility/environment/wrmp/> [Date accessed: 30/09/24]

³⁰ Department of Levelling Up, Housing and Communities (July 2019) Planning Practice Guidance Note, Appropriate Assessment, Guidance on the use of Habitats Regulations Assessment.

2.4.3 The AA aims to present information in respect of all aspects of the Local Plan and ways in which it could, either alone or in-combination with other plans and projects, impact a habitats site. The plan making body (as the Competent Authority) must then ascertain, based on the findings of the AA, whether the Local Plan will adversely affect the integrity of a habitats site either alone or in-combination with other plans and projects. This is referred to as the Integrity Test.

2.5 Dealing with uncertainty

2.5.1 Uncertainty is an inherent characteristic of HRA, and decisions can be made using currently available and relevant information. This concept is reinforced on the 7th of September 2004 ‘Waddenzee’ ruling³¹ as stated below:

2.5.2 ‘However, the necessary certainty cannot be construed as meaning absolute certainty since that is almost impossible to attain. Instead, it is clear from the second sentence of Article 6(3) of the Habitats Directive that the competent authorities must take a decision having assessed all the relevant information which is set out in particular in the Appropriate Assessment. The conclusion of this assessment is, of necessity, subjective in nature. Therefore, the competent authorities can, from their point of view, be certain that there will be no adverse effects even though, from an objective point of view, there is no absolute certainty’.

2.6 The Precautionary Principle

2.6.1 The HRA process is characterised by the Precautionary Principle which is embedded in the Integrity Test. The Precautionary Principle aims to ensure a higher level of environmental protection through preventative decision-taking in the case of risk³².

³¹ EC Case C-127/02 Reference for a Preliminary Ruling ‘Waddenzee’ 7th September 2004 Advocate General’s Opinion (para 107).

³² EUR-Lex. The Precautionary Principle. Available at: <https://eur-lex.europa.eu/EN/legal-content/summary/the-precautionary-principle.html> [Accessed: 27/09/24].

3 Scoping of threats and pressures at habitats sites

3.1 Introduction

3.1.1 An important initial stage of the screening process is gathering information on habitats sites which may be affected by the Local Plan. This is informally known as scoping and provides an understanding of potential impact pathways from the Local Plan and connections to habitats sites and their vulnerabilities. This information is then used to inform the screening assessment (**Chapter 4**). This chapter presents an update to baseline information obtained at Regulation 18 for each habitats site and their associated threats and pressures in the context of potential impacts from the Local Plan at Regulation 19.

3.2 Identification of a HRA study area

3.2.1 Each habitats site has its own intrinsic qualities, besides the habitats or species for which it has been designated, that enables the site to support its particular ecosystems. An important aspect of this is that the ecological integrity of each site can be vulnerable to change from natural and human induced activities in the surrounding environment (known as pressures and threats). For example, sites can be affected by land use plans in a number of different ways, including the direct land take of new development, the type of use the land will be put to (for example, an extractive or noise-emitting use), or the pollution / threat a development generates (air pollution, water pollution or increased recreational pressure), and the resources used (water abstraction).

3.2.2 An intrinsic quality of any habitats site is its functionality at the landscape ecology scale. This refers to how the site interacts with its immediate surroundings as well as the wider area. This is particularly the case where there is potential for development resulting from a plan to generate water or air-borne pollutants, use water resources or otherwise affect water levels. Adverse effects may also occur via impacts to mobile species occurring outside a designated site boundary, but which are qualifying features of the site. For example, there may be effects on protected birds, bats and fish which use land outside a designated site for foraging, feeding, roosting, breeding or other activities.

3.2.3 There is no guidance that defines the study area for inclusion in an HRA. Planning Practice Guidance for AA (listed above) indicates that: 'The scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. 'Appropriate' is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site.'

3.2.4 This scoping exercise will help to determine the HRA study area and therefore which habitats sites will be considered in the HRA process.

3.3 Scoping impact pathways

- 3.3.1 Threats and pressures to which habitats sites are vulnerable have been identified through reference to data held by the JNCC and Natural England and through reference to Ramsar Information Sheets and Site Improvement Plans (SIPs). This information provides current and predicted issues at each habitats site and is summarised in **Appendix B**.
- 3.3.2 Supplementary advice notices prepared by Natural England often provide more recent information on threats and pressures upon habitats sites than SIPs and have therefore also been reviewed. A number of threats and pressures are unlikely to be exacerbated by the Local Plan and have therefore not been considered.
- 3.3.3 Sites of Special Scientific Interest (SSSIs) are protected areas in the United Kingdom designated for conservation. SSSIs are the building blocks of site-based nature conservation in the UK. A SSSI will be designated based on the characteristics of its fauna, flora, geology and/or geomorphology. Whilst typically analogous in ecological function, the reasons for its designation can be entirely different to those for which the same area is designated as a SAC, SPA or Ramsar.
- 3.3.4 Natural England periodically assesses the conservation conditions of each SSSI unit, assigning it a status. The conservation status of each SSSI highlights any habitats site that is currently particularly vulnerable to threats/pressures. Conservation status is defined as follows:
- Favourable;
 - Unfavourable – recovering;
 - Unfavourable – no change; or
 - Unfavourable – declining.
- 3.3.5 SSSI units in either an 'Unfavourable – no change' or 'Unfavourable – declining' condition indicate that the habitats site may be particularly vulnerable to certain threats or pressures. It is important to remember that the SSSI may be in an unfavourable state due to the condition of features unrelated to its designation. However, it is considered that the conservation status of SSSI units that overlap with habitats sites offer a useful indicator of habitat / species health at a particular location.

3.3.6 Natural England defines zones around each SSSI which may be at risk from specific types of development, these are known as Impact Risk Zones (IRZ). These IRZs are 'a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. The IRZs also cover the interest features and sensitivities of habitats sites, which are underpinned by the SSSI designation and "Compensation Sites", which have been secured as compensation for impacts on Natura 2000/Ramsar sites'³³. The location of IRZs has been taken into consideration in this assessment as they provide a useful guide as to the location of Functionally Linked Land (FLL) as defined in **paragraph 4.3.7**, and likely vulnerabilities to development proposed within the Local Plan.

3.3.7 Based on previous HRA work undertaken at Regulation 18, the following potential impact pathways are considered to be within the scope of influence of the Local Plan. Land use planning also has the potential to result in impacts upon qualifying features when located outside a designation boundary and these are known as FLL³⁴ (**paragraph 4.2.2**). This HRA therefore also considers effects upon FLL or mobile species within the following topic assessments.

- Air pollution: Land use planning has the potential to increase atmospheric emissions of pollutants to the air. These can result in adverse effects at habitats sites such as eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)³⁵;
- Water resources and water levels: Urban development can change run off rates from urbanised areas to habitats sites or watercourses which run through them. An increase in housing provision can also influence supply and demand for water within the region which may impact water levels;
- Water quality: Surface water run-off from urban areas has the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through point source effluent discharges from new development at Wastewater Treatment Works (WwTWs) and other controlled discharge sources. Changes in

³³ Natural England (2019) Natural England's Impact Risk Zones for Sites of Special Scientific Interest User Guidance. Available at: https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Accessed: 30/09/24].

³⁴ "The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a European site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the European site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status". Source: Natural England (2016) Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

³⁵ APIS (2016) Ecosystem Services and air pollution impacts. Available at: <http://www.apis.ac.uk/ecosystem-services-and-air-pollution-impacts> [Date Accessed: 30/09/24].

water quality also has the potential to affect functionally linked land³⁶ (land outside a designated site boundary);

- Recreational pressure: Increased development has the potential to increase recreational pressure upon habitats sites which are accessible to the public; and
- Urbanisation: Urban development has the potential to result in disturbing activities (such as noise, lighting and visual disturbance). Disturbance effects may impact upon habitats sites themselves and also their qualifying features when outside a designated site boundary.

3.4 Air Quality

3.4.1 Natural England has developed a standard methodology for the assessment of traffic related air quality impacts under the Habitats Regulations which is relevant to the HRA of land use plans³⁷. This guidance sets a methodology and thresholds for screening of likely significant (air quality) effects at the HRA screening stage (Stage 1 of the HRA process).

3.4.2 Natural England's guidance (in the form of a series of questions below) has been applied to determine potential air quality impact pathways to habitats sites:

- Does the Local Plan give rise to emissions which are likely to reach a habitats site?
- Are the qualifying features of sites within 200m of a road sensitive to air pollution?
- Could the sensitive qualifying features of the site be exposed to emissions?
- Application of screening thresholds (alone and then, if necessary, in-combination).

Does the Local Plan give rise to emissions which are likely to reach a habitats site

3.4.3 The Local Plan will lead to the development of small-scale residential development and residential moorings and supports employment and gypsy and traveller development. It is noted that the overall housing delivery target for Broads is 358 dwellings (see Local Plan Policy POSP15) over the plan period. The Local Plan allocates a total of 250 dwellings (at one site - Utilities Site) and 43 residential moorings over the 20-year Plan period (around 20 dwellings per year). The remaining need (which is part of the overlapping District's need and not additional to) will be achieved through allocations, windfall, completions and permissions. Allocations PUBTHU1 (16 dwellings) and PUBOUL2 (76 dwellings) already have planning permission but are also included in the Local Plan until they are built out. This is likely to result in a small increase in traffic-related emissions.

³⁶ "The term 'functional linkage' refers to the role or 'function' that land or sea beyond the boundary of a Habitats site might fulfil in terms of ecologically supporting the populations for which the site was designated or classified. Such land is therefore 'linked' to the Habitats site in question because it provides an important role in maintaining or restoring the population of qualifying species at favourable conservation status". Source: Natural England. 2016. Commissioned Report. NECR207. Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions.

³⁷ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Accessed: 07/06/24].

- 3.4.4 Air quality impacts have been shown to typically affect habitats sites within 10km of a plan boundary³⁸. Campman and Kite (2021) note that 'this zone is based on professional judgment recognising that the effects of growth from development beyond 10km will have been accounted for in the Nitrogen Futures modelling work business as usual scenario'³⁹. This 10km distance threshold can be a useful guide to identify the general areas that may be impacted by air quality. However, it is noted that consideration should also be given to larger residential or commercial allocations and their wider potential for air quality impacts in the context of the local and regional road network. Given the Local Plan is not proposing large residential or commercial allocations, and taking into consideration the rural nature of the locality, it is considered that 10km represents a reasonable distance within which to consider air quality LSEs. This also reflects the allocation of only one residential development which will be located in central Norwich.
- 3.4.5 Habitats sites within this 10km radius and which are sensitive to air quality impacts⁴⁰ are listed in **Table 3.1**.

Are the qualifying features of sites within 200m of a road sensitive to air pollution?

- 3.4.6 It is widely accepted that air quality impacts are greatest within 200m of a road source, decreasing with distance^{41,42,43}. Baseline mapping data has been used to determine the proximity of habitats sites, and the presence of qualifying habitats, to roads (within 200m) which may result in an exceedance of Natural England's screening thresholds (A and B roads) within a 10km buffer from the Local Plan administrative area⁴⁴ and within the key commuting area.
- 3.4.7 The UK Air Pollution Information System (APIS) provides information on all habitats sites and the sensitivity of their qualifying features (habitats and / or species) to air pollution. This data has been interrogated, alongside a desk-based review of site-based data (**Appendix B**), to determine whether there may be impact pathways from the Local Plan to any habitats site through a change in atmospheric emissions. This review indicates that only the Broads SAC, Broadlands SPA and Broadlands Ramsar are sensitive to a change in air quality and have strategic road links located within 200m of potentially qualifying habitat (see **Table 3.1**).

³⁸ Chapman, C and Kite, B. (2021) Main Report. Guidance on Decision-making Thresholds for Air Pollution. JNCC Report No. 696. Available at: <https://hub.jncc.gov.uk/assets/6cce4f2e-e481-4ec2-b369-2b4026c88447> [Accessed: 30/09/24].

³⁹ JNCC. Nitrogen Future. Available at: <https://jncc.gov.uk/our-work/nitrogen-futures/> [Accessed: 30/09/24].

⁴⁰ Habitats sites which are not sensitive to air quality impacts (as per Natural England Site Improvement Plan information) have not been included.

⁴¹ The Highways Agency, Transport Scotland, Welsh Assembly Government, The Department for Regional Development Northern Ireland (2007) Design Manual for Roads and Bridges, Volume 11, Section 3, Part 1: Air Quality.

⁴² Natural England (2016) The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report NECR 199.

⁴³ Bignal, K., Ashmore, M. & Power, S. (2004) The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁴⁴ As per Nitrogen Futures Modelling Work – see Paragraph 5.4.8.

Could the sensitive qualifying features of the site be exposed to emissions?

3.4.8 As noted in **paragraph 3.4.3**, the Local Plan will trigger the development of residential dwellings (around 20 per year) and residential moorings and supports employment and gypsy and traveller development. As such, it has the potential to increase traffic related emissions along road links within 200m of those habitats sites listed in **Table 3.1**.

Table 3.1: Atmospheric pollution impact pathways to habitats sites⁴⁵

Habitats site name within 10km of Broads Authority executive area and key commuting zone	Is the habitats site sensitive to air quality impacts (as indicated in SIP / NE Supplementary Advice – Appendix B)?	Is there a strategic road link located within 200m of the habitats site?	Are there qualifying habitats present within 200m of strategic road links (using aerial photography and priority habitat mapping data)?	Scope habitats site in to the HRA process?
Benacre to Easton Barents Lagoons SAC Benacre to Easton Barents SPA	No	n/a	n/a	No
Broads SAC	Yes	Yes A1064 This road link runs adjacent to the SAC near Filby.	Yes Reed banks, shrub and tree cover including deciduous woodland and lowland fens; aquatic habitats.	Yes
Broads SAC	Yes	Yes A149 This road link runs adjacent to the SAC near Ormesby St Michael and approximately 113m to the north east of the SAC at Sutton.	Yes Reed banks, shrub and tree cover; aquatic habitats.	Yes
Broads SAC	Yes	Yes A47 This road link runs adjacent to the SAC near Acle.	Yes Grazing marshes, ditches, reeds and river dykes.	Yes

⁴⁵ APIS does not provide air quality information on the sensitivity of specific Ramsar features. However, all Ramsar sites included in this HRA are coincident with either a SAC or SPA designation and therefore air quality information for these habitats sites has been used for this scoping assessment.

Habitats site name within 10km of Broads Authority executive area and key commuting zone	Is the habitats site sensitive to air quality impacts (as indicated in SIP / NE Supplementary Advice – Appendix B)?	Is there a strategic road link located within 200m of the habitats site?	Are there qualifying habitats present within 200m of strategic road links (using aerial photography and priority habitat mapping data)?	Scope habitats site in to the HRA process?
Broads SAC	Yes	Yes B1140 This road is a dead-end road where it meets the railway line to the north of the SAC and therefore it is considered unlikely that air quality will reduce as a result of traffic generated by the Local Plan.	n/a	No
Broads SAC	Yes	Yes B1150 This road link runs adjacent to the SAC at Crostwick	Yes Grazing marshes; lowland fens	Yes
Broadland SPA and Broadland Ramsar	Yes	Yes A1064 This road link runs adjacent to the SAC near Filby.	Yes Deciduous woodland and lowland fens; aquatic habitats.	Yes
Broadland SPA and Broadland Ramsar	Yes	Yes A47 This road link runs adjacent to the SAC near Acle.	Yes Grazing marshes, ditches, reeds and river dykes.	Yes

Habitats site name within 10km of Broads Authority executive area and key commuting zone	Is the habitats site sensitive to air quality impacts (as indicated in SIP / NE Supplementary Advice – Appendix B)?	Is there a strategic road link located within 200m of the habitats site?	Are there qualifying habitats present within 200m of strategic road links (using aerial photography and priority habitat mapping data)?	Scope habitats site in to the HRA process?
Broadland SPA and Broadland Ramsar	Yes	Yes B1140 This road is a dead-end road where it meets the railway line to the north of the SPA and Ramsar and therefore it is considered unlikely that air quality will reduce as a result of traffic generated by the Local Plan.	n/a	No
Broadland SPA and Broadland Ramsar	Yes	Yes B1150 This road link runs adjacent to the SAC at Crostwick	Yes Grazing marshes; lowland fens	Yes
Breydon Water SPA and Breydon Water Ramsar	No	n/a	n/a	No
Great Yarmouth North Denes SPA	Yes	No	n/a	No
Greater Wash SPA	Yes	Yes B1159 This road runs along the coastline and does not provide a strategic link to / from the Plan area.	n/a	No

Habitats site name within 10km of Broads Authority executive area and key commuting zone	Is the habitats site sensitive to air quality impacts (as indicated in SIP / NE Supplementary Advice – Appendix B)?	Is there a strategic road link located within 200m of the habitats site?	Are there qualifying habitats present within 200m of strategic road links (using aerial photography and priority habitat mapping data)?	Scope habitats site in to the HRA process?
Greater Wash SPA	Yes	Yes B1145 This road comes to an end where it runs within 200m of the SPA. Therefore, it is considered unlikely that air quality will reduce as a result of traffic generated by the Local Plan.	n/a	No
Norfolk Valley Fens SAC	Yes	No. No components which are located within 10km of the Broads Authority area	No	No
Outer Thames Estuary SPA	No	n/a	n/a	No
Paston Great Barn SAC	No	n/a	n/a	No
River Wensum SAC	No	n/a	n/a	No
Winterton-Horsey Dunes SAC	Yes	No	n/a	No

Application of screening thresholds (alone and then, if necessary, in-combination)

3.4.9 Natural England’s advice on the assessment of air quality impacts under the Habitats Regulations states that consideration should be given to the risk of road traffic emissions associated with a local plan⁴⁶. This advice states that an assessment of the risks from road traffic emissions can be expressed in terms of the average annual daily traffic flow (AADT as a proxy for emissions). The use of the AADT screening threshold is advocated by Highways England in their Design Manual for Roads and Bridges (DMRB). This screening threshold is intended to be used as a guide to determine whether a more detailed assessment of the impact of emissions from road traffic is required. This non-statutory or guideline threshold is based on a predicted change of daily traffic flows of 1,000 AADT or more (or heavy-duty vehicle flows on motorways (HDV) change by 200 AADT or more).

3.4.10 It is noted that the overall housing delivery target for Broads is 358 dwellings (see Local Plan Policy POSP15) over the plan period. The Local Plan allocates a total of 250 dwellings (at one site - Utilities Site) and 43 residential moorings over the 20-year Plan period (around 20 dwellings per year). The remaining need (which is part of the overlapping District’s need and not additional to) will be achieved through allocations, windfall, completions and permissions. PUBTHU1 (16 dwellings) and PUBOUL2 (76 dwellings) already have planning permission but are also included in the Local Plan until they are built out. Given this scale of development, the Broads Authority has not commissioned traffic modelling to inform the plan’s development. The Local Plan is however likely to trigger a small increase in traffic and therefore the Broads SAC, Broadlands Ramsar and Broadlands SPA will be scoped into the HRA process for further consideration in terms of air quality impacts.

3.5 Water quality and water quantity

3.5.1 Urban development coming forward through the Local Plan has the ability to affect water dependant habitats sites through a number of impacts as listed below. These impacts have the potential to change the water balance (levels) and quality of water entering habitats sites:

- Change in surface permeability and run off rates;
- Increased water demand to supply new homes and businesses;
- Reduced quality of surface water run off; and
- Increased effluent discharge for treatment from Wastewater Treatment Works (WwTWs).

3.5.2 Decisions relating to water abstraction for supply and disposal of water are controlled through a number of licensing mechanisms and a high-level water planning framework which is subject to HRA. This ensures the protection of the water environment and compliance with the Water Framework Directive (WFD).

⁴⁶ Natural England (2018) Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at: <http://publications.naturalengland.org.uk/publication/4720542048845824> [Date Accessed: 30/09/24].

- 3.5.3 This high-level water planning framework includes plans which inform the management of water quality and the supply of water at the catchment scale. The Broads Authority is located within the Anglian River Basin District. This is divided into several surface water management catchment (SWMC), with the Broads Authority executive area situated within the Broadland Rivers and the Anglian Transitional and Coastal (TraC) management catchment areas⁴⁷ (**Figure 3.1**). The Anglian River Basin Management Plan (RBMP)⁴⁸ provides a framework for protecting and enhancing the benefits provided by the water environment. To achieve this, and because water and land resources are closely linked, it also informs decisions on land-use planning.
- 3.5.4 It is a statutory requirement that every five years water companies produce and publish a Water Resources Management Plan (WRMP). The WRMP demonstrates long term plans to accommodate the impacts of population growth, drought, environmental obligations and climate change uncertainty in order to balance supply and demand. The Anglian Water⁴⁹ and Essex and Suffolk Water⁵⁰ WRMP24s cover the Local Plan period and set out objectives in relation to water management in the area, including demand management, water supply schemes and measures to protect the environment and address climate change.
- 3.5.5 The Environment Agency (EA) prepares Abstraction Licensing Strategies (ALS) through its Catchment Abstraction Management Strategy (CAMS) process. These ALSs are prepared for each sub-catchment within a river basin. The CAMS process aims to assess the amount of water available for further abstraction licensing, taking into account environmental needs and implementation of the RBMPs and water abstraction plans⁵¹. The CAMS process is published in a series of ALSs for each river basin. The plan area lies within the Broadland Rivers ALS area.

⁴⁷ Environmental Agency (2023) Anglian River Basin District, Management Catchments. Available at: <https://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/5> [Date Accessed: 30/09/24].

⁴⁸ Environment Agency (2022) Anglian River Basin Management Plan. Available at: <https://www.gov.uk/guidance/anglian-river-basin-district-river-basin-management-plan-updated-2022> [Date Accessed: 30/09/24].

⁴⁹ Anglian Water (2024) Water Resource Management Plan. Available at: <https://www.anglianwater.co.uk/siteassets/household/corporate/wrmp24/wrmp24-main-report.pdf> [Date Accessed: 01/10/24].

⁵⁰ Essex and Suffolk Water (2023) Revised Water Resource Management Plan 2024. Available at: <https://www.eswater.co.uk/services/water/revised-draft-water-resources-management-plan-2024/> [Date Accessed: 01/20/24].

⁵¹ DEFRA. July 2021. Policy Paper: Water Abstraction Plan. Available at: <https://www.gov.uk/government/publications/water-abstraction-plan-2017/water-abstraction-plan> [Date Accessed: 30/09/24].

3.5.6 Anglian Water and Essex and Suffolk Water are the potable water providers for the plan area. The East of England is one of the driest regions of the UK with the Anglian region being classed by the Environment Agency as being under serious water stress⁵². Water companies divide their supply into Water Resource Zones (WRZs). The Broads Authority executive area lies within the 'Norwich and the Broads', 'Happisburgh' and 'North Central' WRZs (**Figure 3.2**), which are classed as being under serious water stress particularly due to Heigham surface water abstraction on the River Wensum⁵³. Water abstraction occurs from these WRZs. Therefore any hydrologically sensitive habitats sites which are also located within WRZs served by the Plan area are considered likely to have a potentially significant water quantity effect as a result of development within the Local Plan and are scoped in for further consideration in the HRA process (see **Table 3.2**).

⁵² Environment Agency. Areas of water stress: final classification. Available at: <https://www.iow.gov.uk/azservices/documents/2782-FE1-Areas-of-Water-Stress.pdf> [Date Accessed: 15/02/24].

⁵³ Anglian Water (2022) Draft WRMP24 Water Resource Zone Summaries. Available at <https://www.anglianwater.co.uk/siteassets/household/wrmp24-norwichandthebroads-dec22.pdf> [Date Accessed: 15/02/24].

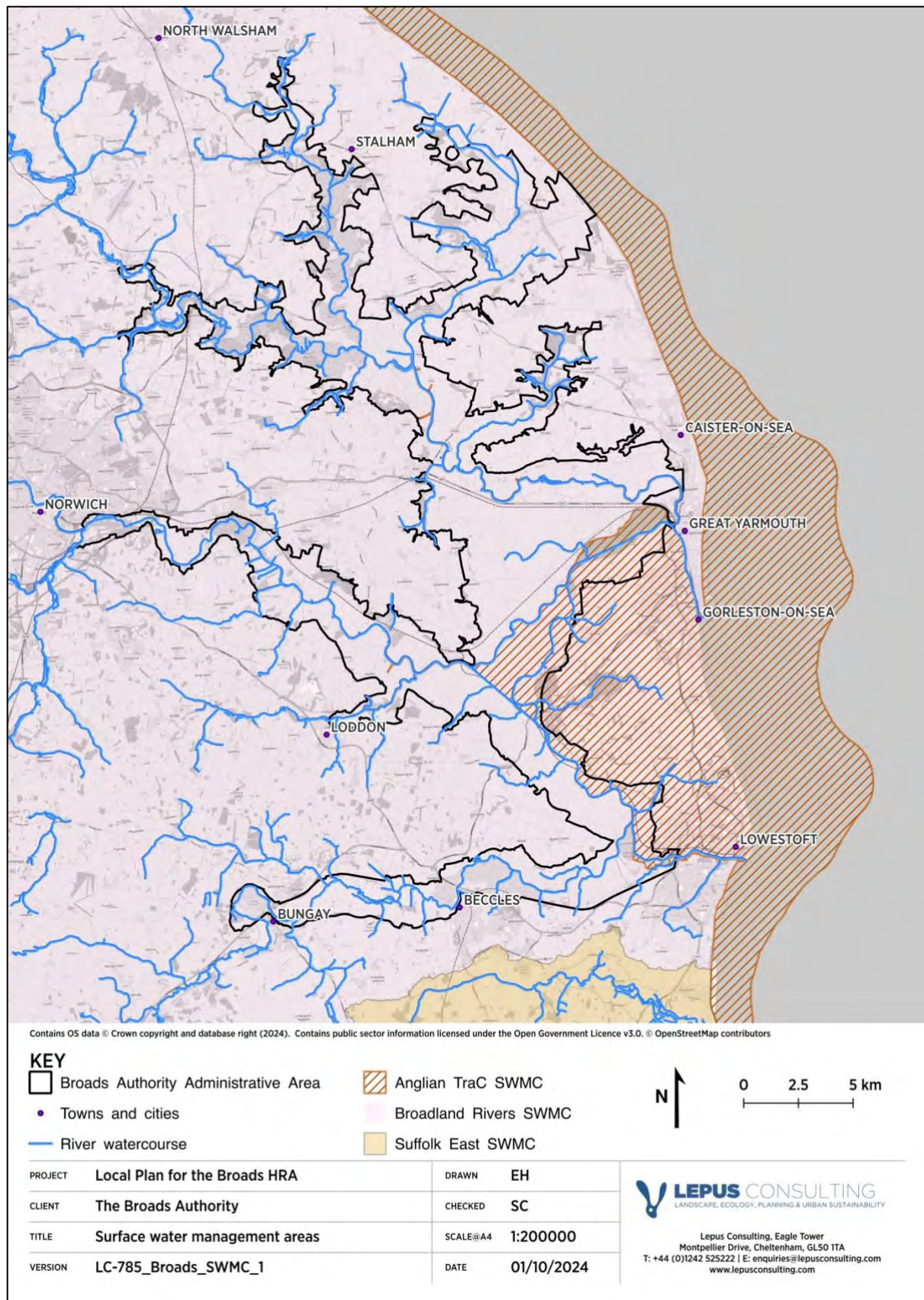


Figure 3.1: Surface water management catchment (SWMC) areas in the Plan area

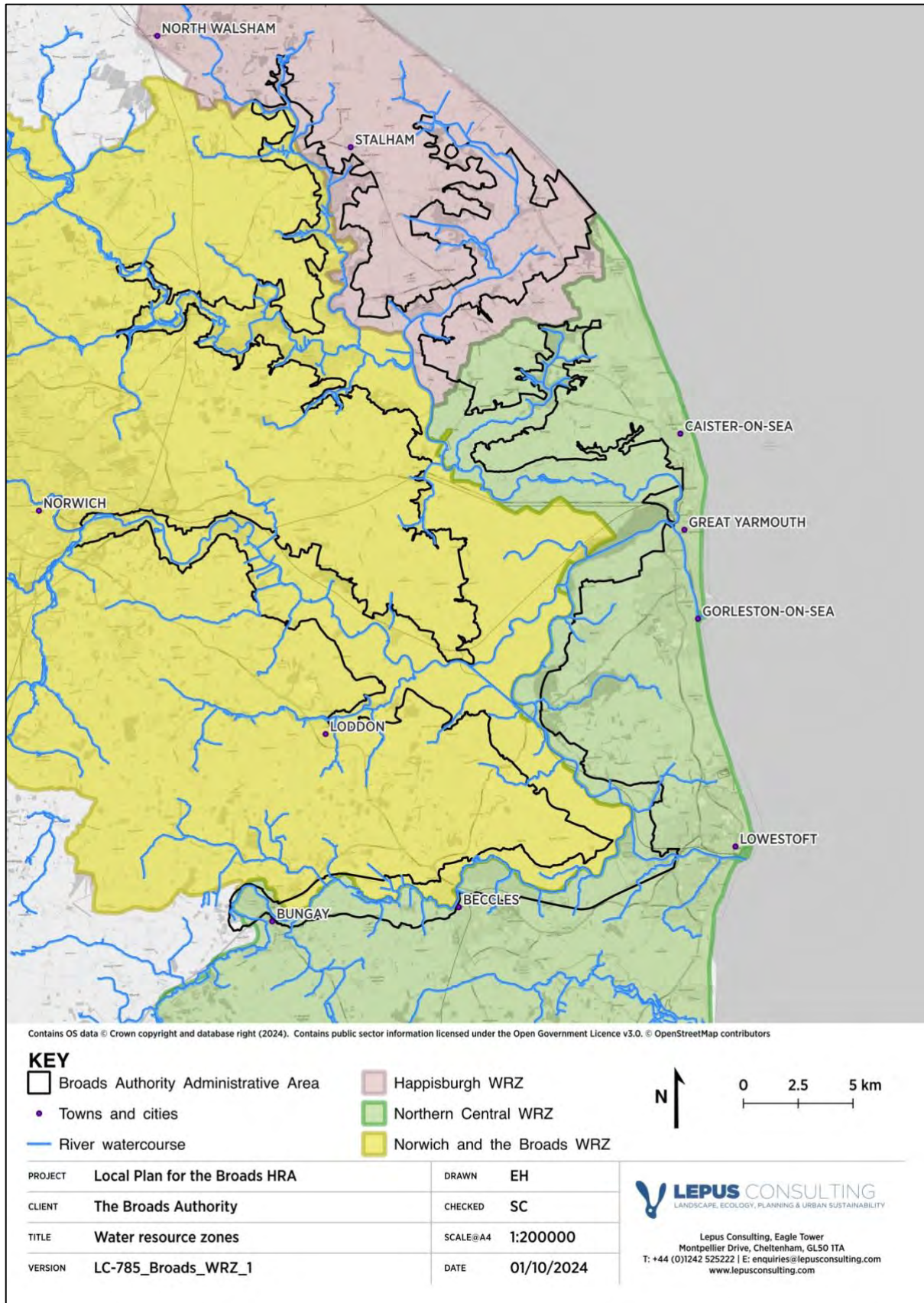


Figure 3.2: Water Resource Zones (WRZs) in the Plan area

- 3.5.7 Urbanisation run-off has the potential to reduce the quality of water entering a catchment. Water quality may also be reduced through effluent discharges from wastewater treatment works and other controlled point source discharges. Any change to water quality at a water sensitive habitats site has the potential to adversely affect the features for which they are designated.
- 3.5.8 Advice from the Chief Planning Officer from the Department for Levelling Up, Housing and Communities (DLUHC) on 16th March 2022⁵⁴ and advice from Natural England on the same date, highlighted the importance of nutrient impacts on The Broads SAC and Broadland Ramsar. This is relevant to components of the SAC and Ramsar which are in an unfavourable condition due to elevated and exceeded nutrient thresholds (see **Figure 3.3**). These components include those underpinned by the following Sites of Special Scientific Interest (SSSIs):
- Ant Broads and Marshes SSSI;
 - Bure Broads and Marshes SSSI;
 - Trinity Broads and Marshes SSSI;
 - Upper Thurne Broads and Marshes SSSI; and
 - Yare Broads and Marshes SSSI.
- 3.5.9 Water quality data at these SSSI designations indicates that the targets for total phosphorus and total nitrogen are being exceeded. Within these areas, four units are achieving the target for Total Nitrogen (Cocksfoot Broad, Filby Broad, Ormesby Little Broad and Rollesby Broad Sailing Club).
- 3.5.10 Natural England's advice requires the Broads Authority (as the Competent Authority) to fully consider the implication of increased nutrient loading on these sites when determining relevant plans or projects in order to secure appropriate mitigation measures. Natural England suggests nutrient neutrality may be a potential solution to enable developments to proceed in the catchment(s) where an adverse effect on site integrity cannot be ruled out⁵⁵. Potential effects on water quality must be considered in the context of this advice.

⁵⁴ Letter from DLUHC to Chief Planning Officers and Local Planning Authorities affected by nutrient pollution. NUTRIENT POLLUTION: NEUTRALITY, SUPPORT AND FUNDING. 16 March 2022. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1061531/Chief_Planer_Letter_about_nutrient_pollution_March_2022.pdf [Date Accessed: 30/09/24].

⁵⁵ Letter from Natural England to LPA Chief Executives & Heads of Planning, County Council Chief Executives and Heads of Planning, EA Area and National Team Directors, Planning Inspectorate, Natural Resources Wales (Cross border sites only) & Secretary of State for Department for Levelling Up Housing & Communities (DLUHC). Advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites. 16 March 2022. [Date Accessed: 30/09/24].



Figure 3.3: European protected sites requiring nutrient neutrality strategic solutions – The Broads SAC⁵⁶

⁵⁶ ©DEFRA (2021) reproduced with the permission of Natural England, © Crown Copyright and database rights 2021. Ordnance Survey License number 100022021.

3.5.11 Taking into consideration potential changes in water levels (through abstraction for water supply) and water quality (through surface water run-off and discharges from wastewater treatment works), habitats sites were screened for potential hydrological impact pathways. **Table 3.2** indicates which habitats sites will be scoped into the screening assessment for further consideration in the HRA process in terms of hydrological impact pathways.

Table 3.2: Review of hydrological impact pathways to habitats sites within the influence of the Local Plan

Habitats site name	Sensitive to hydrological impacts (water quality and water quantity)	Hydrology connectivity	Will the habitats site be scoped in for further assessment in the HRA process
Beancree to Easton Bavents Lagoons SAC Benacres to Easton Bavents SPA	Yes	The SAC and SPA are a series of lagoons (the Denes, Benacre Broad, Covehithe Broad and Easton Broad) located behind a shingle barrier. These can be impacted by poor water quality. Given their location more than 7km to the south of the Plan area change in water quality associated with development set out in the Local Plan is unlikely to have an impact. Whilst the SPA and SAC are located within the same WRZ as the Plan area, they are not sensitive to changes in water levels from abstraction and therefore water LSEs can be scoped out.	No
Breydon Water Ramsar	No	Breydon Water Ramsar is a large stretch of sheltered estuary and wetland habitat which forms the lower reaches of the River Yare and River Waveney. It comprises an inland tidal estuary with extensive areas of mud flats which support a diverse range of habitat types and species. Any change in water levels, flows or water quality has the potential to have direct and indirect effects on the features for which the Ramsar has been notified.	Yes
Breydon Water SPA	Yes	Breydon Water SPA is a large stretch of sheltered estuary and wetland habitat which forms the lower reaches of the River Yare and River Waveney. It comprises an inland tidal estuary with extensive areas of mud flats that are exposed during low tide forming intertidal flats. These habitats provide important feeding areas for internationally important wildfowl and waders which overwinter at the site. Any change in water levels, flows or water quality may indirectly affect the qualifying features of the SPA such as through a change in the availability of food resource.	Yes
Broads SAC	Yes	The Broads SAC is located within the Plan area and is formed of a network of naturally nutrient-rich lakes which were artificially created through peat extraction in medieval times. This network of lakes and ditches in areas of fen and drained marshlands support a range of water dependent habitats and species. Any change in water levels, flows or water quality (In particular in relation to nutrient inputs) has the potential to have direct / indirect effects on the features for which the SAC is designated.	Yes
Broadland Ramsar	Yes	Broadland Ramsar, similarly, to the SAC is located within the Plan area, and comprises a	Yes

Habitats site name	Sensitive to hydrological impacts (water quality and water quantity)	Hydrology connectivity	Will the habitats site be scoped in for further assessment in the HRA process
		series of flooded medieval peat cuttings which support a diverse range of habitat types and species. Any change in water levels, flows or water quality (In particular in relation to nutrient inputs) has the potential to have direct and indirect effects on the features for which the Ramsar has been notified.	
Broadland SPA	Yes	Broadland SPA is located within the Plan area and comprises a low-lying wetland complex created by a series of flooded medieval peat cuttings. It lies within the floodplains of five principal river systems, including the River Bure, River Yare and River Waveney and their major tributaries. It comprises a complex and interlinked mosaic of wetland habitats. Any change in water levels, flows or water quality has the potential to have indirect effects on the features for which the SPA is designated for instance through a change in food resource availability.	Yes
Great Yarmouth and North Denes SPA Winterton-Horsey Dunes SAC	Yes	Great Yarmouth and North Denes SPA and Winterton-Horsey Dunes SAC are located immediately adjacent to the plan area and comprise two component areas, the Great Yarmouth North Denes actively accreting low dune system and beach, together with the beach and foredune ridge at Winterton-Horsey Dunes. Hydrology impacts are identified as a threat associated with changes in the hydro-chemistry of the dune slacks. It is considered unlikely that changes in water levels associated with the scale of development proposed in the Local Plan will have an impact upon the SAC or SPA and therefore these designations can be scoped out of the assessment.	No
Greater Wash SPA	Yes	The Greater Wash SPA is located in the mid-southern North Sea between Bridlington Bay in the north and the Outer Thames Estuary SPA in the south and comprises seabed habitats and subtidal sandbanks. These habitats support a number of birds for which the SPA is designated. Whilst the qualifying features of the SPA are sensitive to changes in water quality, given its location from the Plan area out at sea, a change in water quality associated with the scale of development set out in the Local Plan is unlikely to have an impact. Whilst the SPA is located within the same WRZ as the Plan area, it is not sensitive to changes in water levels from abstraction and therefore water LSEs can be scoped out.	No
Minsmere to Walberswick Heaths & Marshes SAC	Yes	Minsmere to Walberswick Heaths & Marshes SAC and Ramsar comprises a complex of habitats including mudflat, shingle beach, reedbed, heathland and grazing marsh. Heathland is also present along a large continuous stretch of about 400ha at	No

Habitats site name	Sensitive to hydrological impacts (water quality and water quantity)	Hydrology connectivity	Will the habitats site be scoped in for further assessment in the HRA process
Minsmere to Walberswick SPA Minsmere-Wallerswick Ramsar		Minsmere, Dunwich and Westleton Heath with smaller areas at Walberswick. Birds associated with the SPA and Ramsar designations rely on these habitat types. The SAC, SPA and Ramsar are sensitive to water pollution. Given the location of these designations more than 13km to the south of the Plan area, a change in water quality associated with the scale of development set out in the Local Plan is unlikely to have an impact. Whilst these designations are located within the same WRZ as the Plan area, they are not sensitive to changes in water levels from abstraction and therefore water LSEs can be scoped out.	
Norfolk Valley Fens SAC	Yes	The closest component of the Norfolk Valley Fens SAC is located upstream of the Plan area. As such, hydrology pathways of impact are not considered likely. This habitats site is therefore not considered further in terms of water quality impacts. However, the SAC is located within the same WRZ as the Plan area and therefore impacts upon water supply will be considered further.	Yes
Outer Thames Estuary SPA	No	The Outer Thames Estuary SPA comprises shallow and deeper water, mobile mud, sand, silt and gravelly sediments and intertidal mud and sand flats which support a number of bird species. The SPA is not sensitive to change in water quality or levels and therefore can be scoped out of the HRA process.	No
River Wensum SAC	Yes	The River Wensum is a naturally enriched, calcareous lowland river. The SAC designation is situated approximately 5.4km upstream of the plan area to the north-west of Norwich. The Broads Authority area does not coincide with the nutrient neutrality catchment of the River Wensum ⁵⁷ . This habitats site is therefore not considered further in terms of water quality impacts. However, the SAC is located within the same WRZ as the Plan area and therefore impacts upon water supply will be considered further.	Yes

3.6 Recreational pressure

3.6.1 Increased recreational pressure at habitats sites can result in damage to habitats through erosion and compaction, troubling of grazing stock, causing changes in behaviour to animals such as birds at nesting and feeding sites, spreading invasive species, dog fouling, tree climbing etc.

⁵⁷ Natural England. River Wensum Special Area of Conservation - Evidence Pack (TIN201). Available at: <https://publications.naturalengland.org.uk/publication/5893505531772928> [Date Accessed: 15/02/24].

- 3.6.2 A common approach taken across the UK to address recreational impacts at habitat sites is to establish a Zone of Influence (ZOI) based on detailed visitor survey data. The ZOI is the area within which there are likely to be significant effects arising from recreational activities undertaken by additional residents due to growth. This is often calculated by taking the distance at which 75% of interviewees surveyed have travelled to reach a particular site (based on a review of visitor survey data).
- 3.6.3 The broad principle of buffer zones is one component of the HRA screening process for recreational pressures. This process also takes into consideration other factors such as recreational management at sites, proximity to settlements and existing recreational resources.
- 3.6.4 Where available, recreational ZOI distances have been applied to determine potential pathways of recreational effects from the Local Plan. The recreational draw of a habitats site depends on a number of factors. These include the extent and range of facilities provided (in particular parking), accessibility both within the habitats site and links to the wider area, incorporation of a habitats site as part of a wider designation such as a National Park and the site's promotion.
- 3.6.5 In 2015 and 2016 Norfolk County Council/the Norfolk Biodiversity Partnership (NBP) commissioned visitor surveys on behalf of all LPAs, to determine current and projected visitor patterns to habitats sites across Norfolk⁵⁸. Based on this work, a ZOI was established for each habitats site within the study area based on resident and tourist visitor data. Drawing on the visitor survey data, the Councils⁵⁹ and the Broads Authority (working together to address cross-boundary issues and offer a strategic solution through a Norfolk Strategic Planning Framework (NSPF)), prepared a Green Infrastructure (GI) and Recreational Avoidance and Mitigation Strategy (RAMS)⁶⁰. This strategy is referred to as GIRAMS and provides information to support LPAs in Norfolk in their statutory requirement to produce 'sound' i.e. legally compliant local plans for their administrative or plan making areas.

⁵⁸ Panter, C., Liley, D. & Lowen, S. (2016). Visitor surveys at European protected sites across Norfolk during 2015 and 2016. Unpublished report for Norfolk County Council. Footprint Ecology.

⁵⁹ Broadland District Council, Breckland District Council, Great Yarmouth Borough Council, The Borough Council of King's Lynn & West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council.

⁶⁰ Place Services. March 2021. *Draft subject to approval by the Norfolk Strategic Planning Group*. Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS). Habitats Regulations Strategy Document.

3.6.6 On the basis of GIRAMS, the Broads Authority has developed its own guidance for developers on the implementation of Norfolk RAMS⁶¹. Relevant ZOI which were established through the visitor survey work (which include a ZOI for tourism development) have been applied in this assessment to determine recreational impact pathways from the Strategy to habitats sites. These have informed Natural England’s SSSI Impact Risk Zones (IRZs). An overall ZOI map has been prepared for the Norfolk RAMS which covers the whole county. The ZOI for tourist accommodation is also countywide for all habitats sites. Habitats sites covered by this mitigation strategy, and which will be scoped into this HRA in terms of potential recreational LSEs, include the following:

- Brecks sites: Breckland SPA and Breckland SAC
- Broads sites: Broads SAC and Broadland SPA
- East Coast sites: Breydon Water SPA, Winterton-Horsey Dunes SAC and Great Yarmouth and North Denes SPA
- North Coast sites: North Norfolk Coast SAC, North Norfolk Coast SPA, North Norfolk Coast Ramsar and the Wash and North Norfolk Coast SAC
- Norfolk Valley Fens SAC
- Roydon and Dersingham Bog SAC and Ramsar
- The Wash: The Wash SPA, The Wash Ramsar and The Wash and North Norfolk Coast SAC.

⁶¹ Broads Authority Developer Guidance. Available at: <https://www.broads-authority.gov.uk/planning/other-planning-issues/habitat-mitigation> and https://www.broads-authority.gov.uk/_data/assets/word_doc/0024/413754/Norfolk-RAMS-Habitats-Regulations-Assessment-HRA-record-template-DRAFT-002.docx [Date Accessed: 30/09/24].

3.6.7 East Suffolk Council (formally Suffolk Coastal District Council and Waveney District Council), Ipswich Borough Council, Mid Suffolk District Council and Babergh District Council have set out a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) to address recreational pressure at habitats sites within Suffolk^{62,63}. This strategy sets out a tariff-based approach to mitigating the impact of recreational disturbance on habitats sites resulting from increased residential development across the local authority areas. It also sets out the requirement for additional mitigation measures such as Suitable Alternative Natural Greenspace (SANG) or GI measures such as enhanced walking routes and connections to the Public Right of Way network. A ZOI for each habitats site has been developed based on visitor survey data, to determine where likely significant recreational effects may take place. For all habitats sites covered by the strategy this ZOI is defined as 13km. The only habitats site to fall within 13km of the Broads Authority executive area is the Benacre to Easton Bavents SPA. Although not involved in the production of the Suffolk Coast RAMS, as part of the ZOI fall within the Broads Authority executive area, the Broads Authority are working with the Suffolk Councils to secure appropriate mitigation⁶⁴. As such, this habitats site has been included in this assessment when considering recreational LSEs.

3.7 Urbanisation effects

3.7.1 Urbanisation effects typically occur when development is located close to a habitats site boundary. These may include impacts such as noise disturbance, lighting effects, cat predation, fly-tipping, wildfire, littering and vandalism. Urbanisation may also result in the loss of functionally linked land. Strategic mitigation schemes elsewhere in the UK have set a presumption against development (i.e. no net increase in residential dwellings) on the basis of site-specific evidence to safeguard against these impacts.

3.7.2 As with recreational impacts, urbanisation mitigation strategies have been implemented across the UK through the establishment of buffer zones. Commonly applied urbanisation ZOI extend around 400 – 500m from the edge of a designation as this reflects likely impacts from pets (e.g. cat predation) and the distance from which people access a site on foot. The Thames Basin Heaths Special Protection Area Delivery Framework⁵³ is one such strategy which makes recommendations for accommodating development while also protecting the SPA's qualifying features by establishing a 400m zone where development does not take place.

3.7.3 Habitats sites located within and immediately adjacent to the Broads Authority executive area are considered potentially vulnerable to such impacts and have therefore been scoped into this assessment for further consideration in the HRA process:

⁶² East Suffolk Council. May 2021. Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD). A guide to implementing the Suffolk Coast Disturbance Avoidance and Mitigation Strategy.

⁶³ Footprint Ecology (2019) Habitats Regulations Assessment Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils – Technical Report. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf> [Date Accessed: 12/02/24].

⁶⁴ Broads Authority Developer Guidance. Available at: <https://www.broads-authority.gov.uk/planning/other-planning-issues/habitat-mitigation> [Date Accessed: 12/02/24].

- Breydon Water Ramsar
- Breydon Water SPA
- Broads SAC
- Broadland Ramsar
- Broadland SPA
- Great Yarmouth and North Denes SPA
- Outer Thames Estuary SPA
- Winterton – Horsey Dunes SAC

3.8 Habitats site threats and pressures

3.8.1 **Figures 3.4 to 3.6** illustrate the location of habitats sites which will be scoped into the HRA process for further consideration in the screening assessment (**Chapter 4**). Impact pathways which have the potential to affect these habitats sites are summarised in **Table 3.3**. These will form the basis of the HRA screening assessment (**Chapter 4**).

Table 3.3: Potential impact pathways from the Local Plan at each habitats site.

Air Quality	Water quality and quantity changes LSEs	Recreational pressure LSEs	Urbanisation pressure LSEs
Broads SAC	Breydon Water SPA	Benacre to Easton Barents SPA	Breydon Water SPA
Broadland Ramsar	Breydon Water Ramsar	Breckland SPA	Breydon Water Ramsar
Broadland SPA	Broads SAC	Breckland SAC	Broads SAC
	Broadland Ramsar	Breydon Water SPA	Broadland Ramsar
	Broadland SPA	Breydon Water Ramsar	Broadland SPA
	Norfolk Valley Fens SAC	Broads SAC	Greater Yarmouth & North Denes SPA
	River Wensum SAC	Broadland Ramsar	Outer Thames Estuary SPA
		Broadland SPA	Winterton – Horsey-Dunes SAC
		Greater Yarmouth & North Denes SPA	
		Norfolk Valley Fens SAC	
		North Norfolk Coast SAC	
		North Norfolk Coast SPA	
	North Norfolk Coast Ramsar		
	Roydon and Dersingham Bog SAC		
	Roydon Common Ramsar		
	Dersingham Bog Ramsar		

Air Quality	Water quality and quantity changes LSEs	Recreational pressure LSEs	Urbanisation pressure LSEs
		The Wash & North Norfolk Coast SAC The Wash Ramsar The Wash SPA Winterton – Horsey-Dunes SAC	

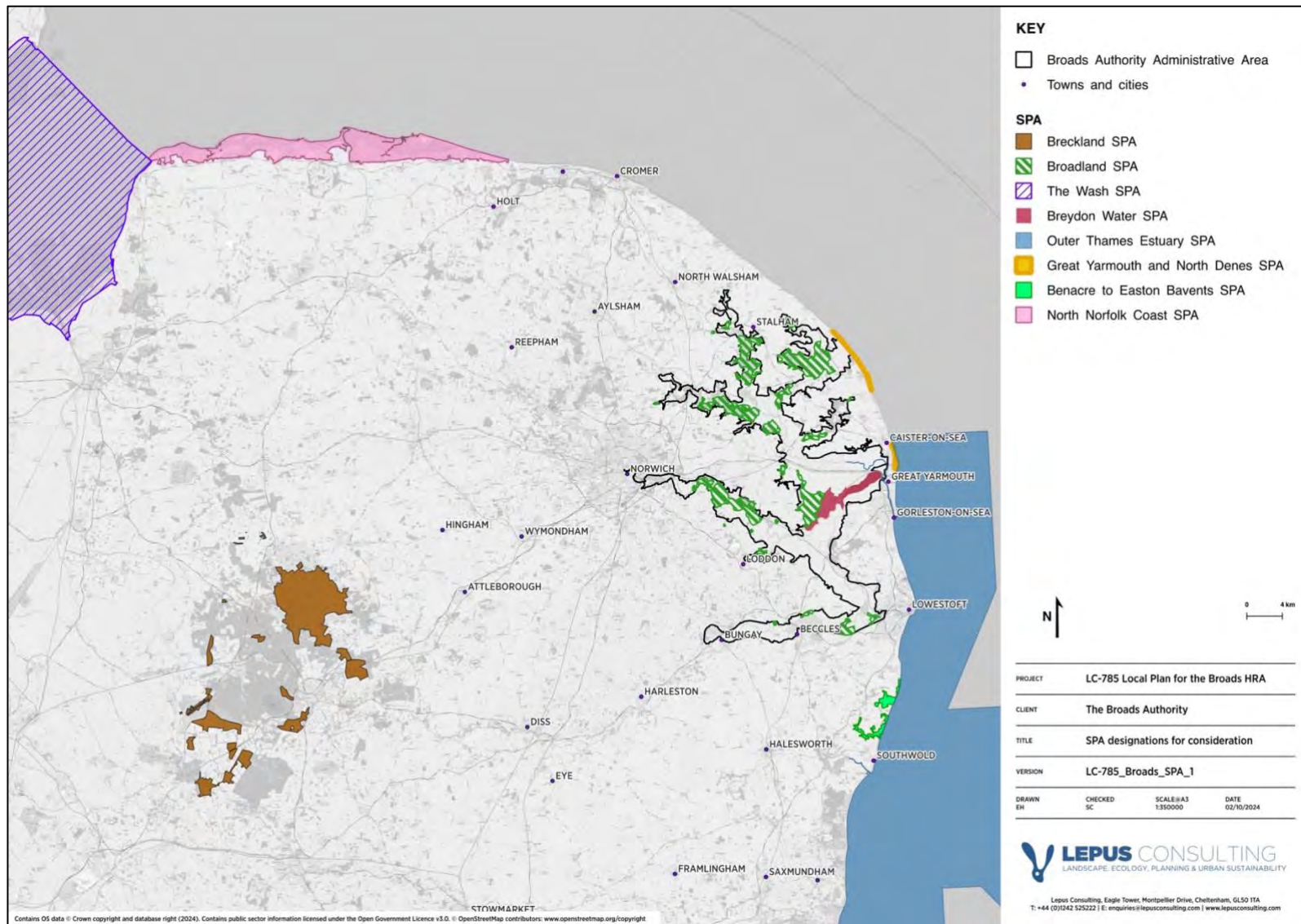


Figure 3.4: SPAs for consideration in the HRA process

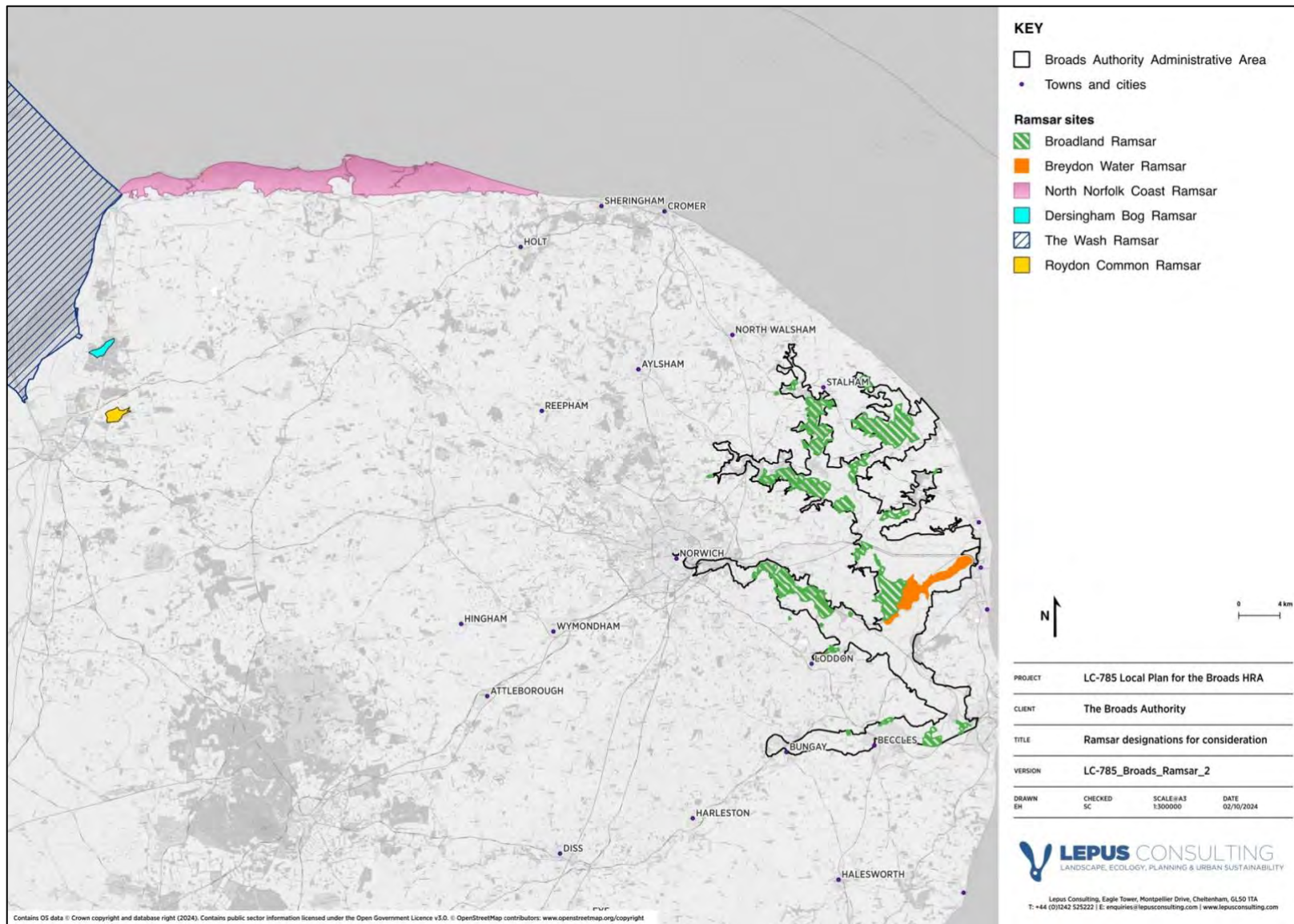


Figure 3.5: Ramsar sites for consideration in the HRA process

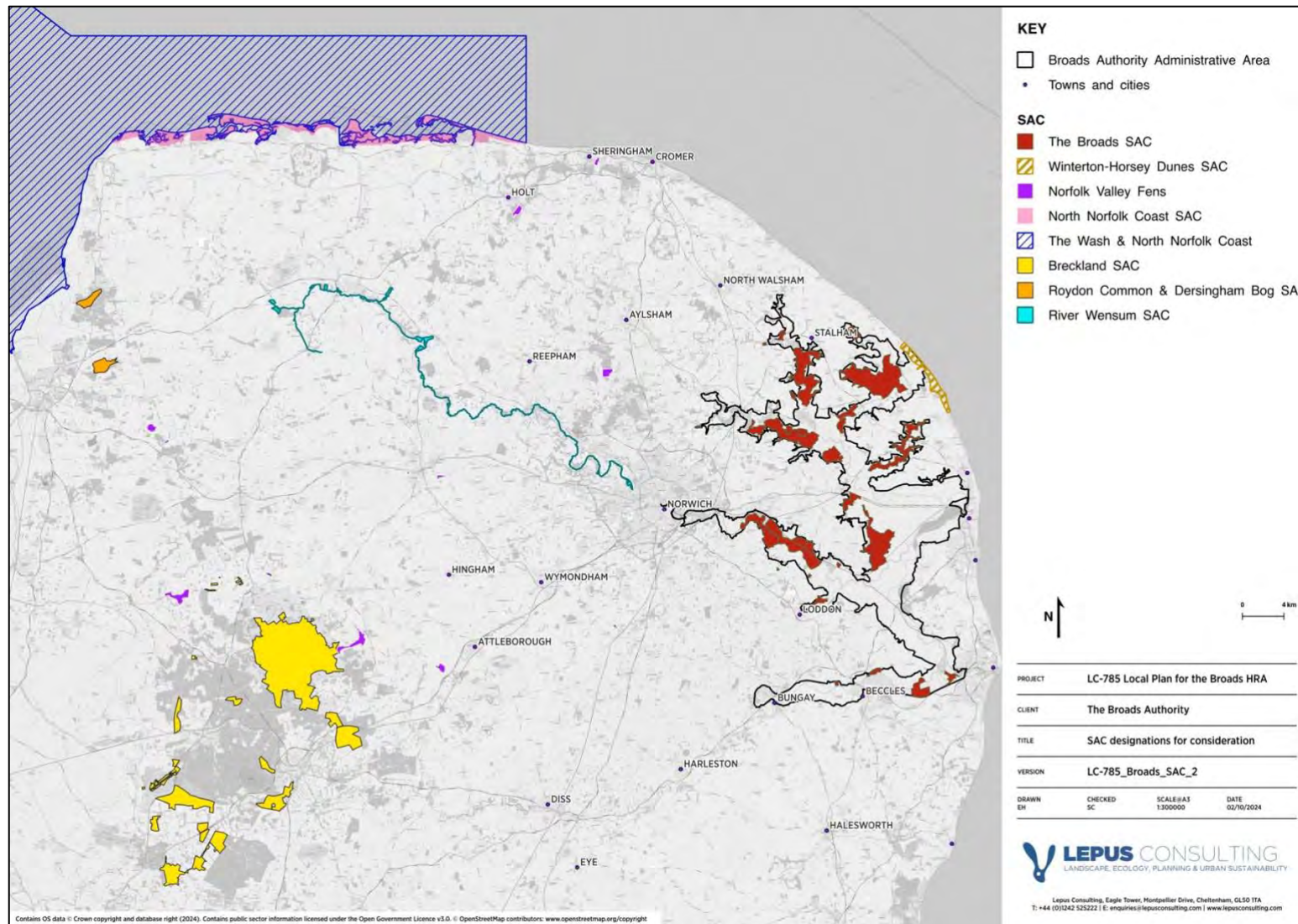


Figure 3.6: SACs for consideration in the HRA process

4 Screening of the Publication Local Plan

4.1 Introduction

4.1.1 This chapter screens each component of the Publication consultation for LSEs and identifies the requirement for AA (**Chapter 5, Chapter 6 and Chapter 7**).

4.2 Screening

4.2.1 Each policy and allocation which forms the Local Plan has been appraised against the HRA pre-screening criteria (see **Table 2.1**), taking into consideration case law and best practice. **Appendix C** provides the output of this screening exercise. This detailed assessment has informed the test of likely significance i.e. will the Local Plan have an LSE, alone or in-combination, at a habitats site.

4.2.2 It is concluded that LSEs, from either the Local Plan alone or in-combination with other plans or projects, could be screened out for a number of components. This is because they fell into the following categories (see **Table 2.1** for a description of each category):

- Category A: General statements of policy / general aspirations
- Category D: Environmental protection / site safeguarding
- Category F: Policies or proposals that cannot lead to development or other change

4.2.3 Those policies and allocations set out in **Table 4.1** are considered to have an LSE in-combination with other plans and projects and have been screened into the AA process.

Table 4.1: Policies and allocations of the Local Plan screened into the HRA process (summarised from Appendix C)

Policy number	Policy name
PUBM11	Green and blue Infrastructure and Public Rights of Way
PUBM14	Re-use, Conversion or Change of Use of Historic Buildings
PUBDM17	Mitigating Recreational Impacts
PUBDM18	Mitigating Nutrient Enrichment Impacts
PUBSP8	Accessibility and Transport
PUBSP9	Recreational Access around the Broads Area
PUBDM29	Transport, Highways and Access
PUBDM30	Recreational Facilities Parking Areas
PUBSP10	A Prosperous Local Economy
PUBDM35	Retail Development in the Broads
PUBSP12	Sustainable Tourism
PUBSP13	Navigable Water Space
PUBDM38	Access to the Water
PUBDM39	Bank Stabilisation
PUBSP14	Mooring Provision
PUBDM40	Mooring, Mooring Basins and Marinas
PUBDM41	The Impact of Replacing Quay Heading on Navigation

Policy number	Policy name
POSP15	Residential Development
PUBDM44	Residential Development within Defined Development Boundaries
PUBDM45	Gypsy, Traveller and Travelling Show People
PUBDM46	New Residential Moorings
PUBNOR1	Utilities Site
PUBTHU1	Tourism development at Hedera House, Thurne
PUBBRU6	Brundall Gardens Marina Residential Moorings
PUBGIL1	Gillingham residential moorings (H. E. Hipperson's Boatyard)
PUBCHE1	Greenway Marine residential moorings
PUBSOM1	Somerleyton Marina Residential Moorings
PUBSTA1	Land at Stalham Staithe (Richardson's Boatyard)
PUBOUL2	Oulton Broad - Former Pegasus/Hamptons Site

4.2.4 The following LSE were identified at habitats sites as follows:

- Air quality LSEs – in-combination
- Water quality and/or quantity LSEs – alone and in-combination
- Recreational impacts – in-combination
- Urbanisation effects – in-combination

4.3 Screening conclusion

4.3.1 As required under Regulation 105 of the Habitats Regulations, an assessment of LSEs of the Local Plan upon habitats sites has been undertaken. The screening checks (**Appendix C**) indicate that the Local Plan has the potential to have LSEs on a number of habitats sites, both alone, and for a number of policies and allocations, in-combination. The Local Plan is not directly connected with or necessary to the management of any habitats site. The screening assessment takes no account of mitigation measures that the Local Plan may incorporate to mitigate adverse impacts upon habitats sites. It is therefore concluded that the Local Plan will be screened into the HRA process. The next stage of the HRA process will be Stage 2 – AA.

5 Air Quality Appropriate Assessment

5.1 Introduction

5.1.1 The following section of the AA focuses on assessing more precisely the ecological impacts of air pollution on the qualifying features of habitats sites as set out in **Chapter 4** due to Local Plan growth alone and in-combination.

5.1.2 The policies set out in **Table 5.1** were screened into the HRA process for consideration in an AA due to likely significant air quality impacts (**Appendix C**):

Table 5.1: Local Plan policies screened into the HRA process due to air quality LSEs (see **Appendix C**)

Policy number	Policy name
PUBDM14	Re-use, Conversion or Change of Use of Historic Buildings
PUBSP10	A Prosperous Local Economy
PUBDM35	Retail Development in the Broads
PUBSP12	Sustainable Tourism
POSP15	Residential Development
PUBDM44	Residential Development within Defined Development Boundaries
PUBDM45	Gypsy, Traveller and Travelling Show People
PUBDM46	New Residential Moorings

5.1.3 All allocations which allocate development (residential, residential moorings and employment, tourism) also have the potential to act cumulatively to increase traffic flows on the local and wider road network and were screened into the HRA process (**Appendix C**). An increase in traffic related emissions from all allocations cumulatively has the potential to change air quality at the above sites both alone and in-combination when considered with growth in neighbouring LPA areas. These allocations include the following:

- Policy PUBNOR1: Utilities Site
- Policy PUBTHU1: Tourism development at Hedera House, Thurne
- Policy PUBBRU6: Brundall Gardens Marina Residential Moorings
- Policy PUBGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)
- Policy PUBCHE1: Greenway Marine residential moorings
- Policy PUBSOM1: Somerleyton Marina Residential Moorings
- Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)
- Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site

5.2 Air quality impacts

- 5.2.1 The main mechanisms through which air pollution can have an adverse effect are through eutrophication (nitrogen), acidification (nitrogen and sulphur) and direct toxicity (ozone, ammonia and nitrogen oxides)⁶⁵. Deposition of air pollutants can alter the soil and plant composition and species which depend upon these.
- 5.2.2 Excess atmospheric nitrogen deposition within an ecosystem or habitat can disrupt the delicate balance of ecological processes interacting with one another. As the availability of nitrogen increases in the local environment, some plants that are characteristic of that ecosystem may become competitively excluded in favour of more nitrophilous plants. It also impacts the ammonium and nitrate balance of the ecosystem, which disrupts the growth, structure and resilience of some plant species.
- 5.2.3 Excess nitrogen deposition often leads to the acidification of soils and a reduction in the soils' buffering capacity (the ability of soil to resist pH changes). It can also render the ecosystem more susceptible to adverse effects of secondary stresses, such as frost or drought, and disturbance events, such as foraging by herbivores.

5.3 Baseline air quality information

- 5.3.1 The qualifying features of the Broads SAC and Broadland SPA are listed in Appendix B. The SIP⁶⁶ for these designations indicates that a number of their qualifying features are sensitive to air pollution. Qualifying habitats can either be sensitive to direct toxicity from air pollution or to changes in soil chemistry associated with nitrogen deposition and acidification. Qualifying species may be indirectly affected by air quality changes where they result in a change in habitat composition and food / resource availability.
- 5.3.2 The Broadland Ramsar information sheet does not identify a threat from air quality⁶⁷. It is recognised that the notified Ramsar features for the Broadland Ramsar are the same as the qualifying features of the SAC and SPA and therefore this AA also applies to the Broadland Ramsar designation.

⁶⁵ APIS (2016) Ecosystem Services and air pollution impacts. Available at: <http://www.apis.ac.uk/ecosystem-services-and-air-pollution-impacts>. [Date Accessed: 30/09/24].

⁶⁶ Natural England (2014) Broadlands Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/5444118129934336> [Date Accessed: 30/09/24].

⁶⁷ Ramsar Information Sheet. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11010.pdf> [Date Accessed: 30/09/24].

- 5.3.3 In an attempt to manage the negative consequences of atmospheric nitrogen deposition and acidification, 'critical loads' and 'critical levels' have been established for ecosystems across Europe. Each habitats site is host to a variety of habitats and species, the features of which are often designated a critical load for nitrogen deposition. The critical loads of pollutants are defined as a '...quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge'⁶⁸. Critical levels are defined as 'concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge'⁶⁹.
- 5.3.4 Appendix D summarises the critical loads and current levels of deposition for the SAC and SPA for each qualifying feature⁷⁰. It also provides source contribution data for nitrogen deposition. This data indicates that nitrogen deposition and acidity is currently exceeding the critical load for a number of qualifying features. APIS indicates that there would be no expected negative impact from increased nitrogen deposition on species broad habitat types for all qualifying features of the SPA, with the exception of Great bittern (*Botaurus stellaris*) and Eurasian marsh harrier (*Circus aeruginosus*) when using fen, marsh and swap habitat for reproducing and Eurasian wigeon (*Anas penelope*) when using literal sediment for wintering activity. For species using open standing water habitat type, the impact of nitrogen deposition will be dependent on whether the water body is nitrogen or phosphorus limited. APIS indicates there would be no expected negative impact from increased acid deposition on the species broad habitat types for all SPA qualifying features.
- 5.3.5 The scoping assessment presented in **Table 3.1** indicates that there are a number of strategic road links within 200m of the SAC and SPA which are capable of carrying traffic which may exceed Natural England's screening thresholds. A review of aerial photography and site mapping data for the SAC and SPA indicates that there is the potential for qualifying habitat to be present within 200m of these road links.

⁶⁸ Coordination Centre for Effects (CCE). Critical load and level definitions. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date Accessed: 30/09/24].

⁶⁹ Coordination Centre for Effects (CCE). Critical load and level definitions. Available at: https://www.umweltbundesamt.de/en/Coordination_Centre_for_Effects [Date Accessed: 30/09/24].

⁷⁰ Air Pollution Information Systems (APIS) Available at: <http://www.apis.ac.uk/> [Date Accessed: 30/09/24]. Data for Ramsar sites is not available on APIS.

5.4 Appropriate Assessment

5.4.1 As set out in Section 3.4, Natural England has developed a standard methodology for the assessment of traffic related air quality impacts under the Habitats Regulations which is relevant to the HRA of land use plans⁷¹. In addition, the Institute of Air Quality Management (IAQM)⁷² and the Chartered Institute of Ecology and Environmental Management (CIEEM)⁷³ have also prepared advice on the assessment of air quality impacts at designated sites. This includes consideration of factors such as:

- The action needed to achieve the conservation objectives for the habitats site(s);
- The expected future trend in pollutants of concern (and the scientific reasonableness of any trend);
- The magnitude of any future 'in combination' dose and how it may change the trend; and
- The physical extent of the affected area as a proportion of that interest feature within the habitats site(s)⁷⁴.

5.4.2 The conservation objectives for the SAC and SPA specify that the integrity of these sites is to 'maintain' or 'reduced' as appropriate, to ensure that they contribute to achieving the Favourable Conservation Status of the SAC's Qualifying Features and ensure that the SPA contributes to achieving the aims of the Wild Birds Directive^{75/76}. In order to achieve this, air quality at the SAC and SPA will need to be maintained (SAC) or reduced (SPA) to 'at or below' critical levels and loads.

5.4.3 A review of background air quality trends provided on APIS⁷⁷ indicates that there has been a decline in nitrogen deposition since 2003 and an associated overall decline in acid deposition (although there was a small peak in 2017 which is now shown to be declining). This may be attributed to national initiatives such as improvements in vehicle technologies (new standard Euro 6/VI vehicles) and the implementation of other catchment wide initiatives.

⁷¹ Natural England (2018) Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001). Available at:

<http://publications.naturalengland.org.uk/publication/4720542048845824> [Date Accessed: 30/09/24].

⁷² Holman et al (2020). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.1, Institute of Air Quality Management, London.

⁷³ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK.

⁷⁴ CIEEM. January 2021. Paragraph 20. Advisory Note: Ecological Assessment of Air Quality Impacts.

⁷⁵ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features The Broads Special Area of Conservation (SAC) Site Code: UK0013577.

⁷⁶ Natural England (2019) European Site Conservation Objectives: Supplementary advice on conserving and restoring site features Broadland Special Protection Area (SPA) Site Code: UK9009253.

⁷⁷ The Air Pollution Information System. Available at: <https://www.apis.ac.uk/>. [Date accessed: 30/09/24]

5.4.4 APIS data indicates that local contributions to nitrogen deposition are predominantly associated with agricultural sources, with 15% of contributions from fertiliser applications and 37.5% from livestock, see **Figure 5.1**. By comparison, road sources only contribute 5.7% to local nitrogen deposition levels. This data suggests that the Local Plan area sits within an agricultural ‘hotspot’. It is clear from this data that steps to avoid critical load exceedance and restore the site to ‘at or below’ critical loads, will require action to reduce emissions from existing agricultural sources as a priority. CIEEM’s guidance notes that where ‘road transport makes only a small contribution to the critical load exceedance, investment to encourage cleaner car technology may be sufficient to regard a new proposal which leads to a small increase in traffic on local roads as acceptable’. This data indicates that in order to ensure conservation objectives are achieved in relation to air quality, a strategic approach towards agricultural emissions will be taken.

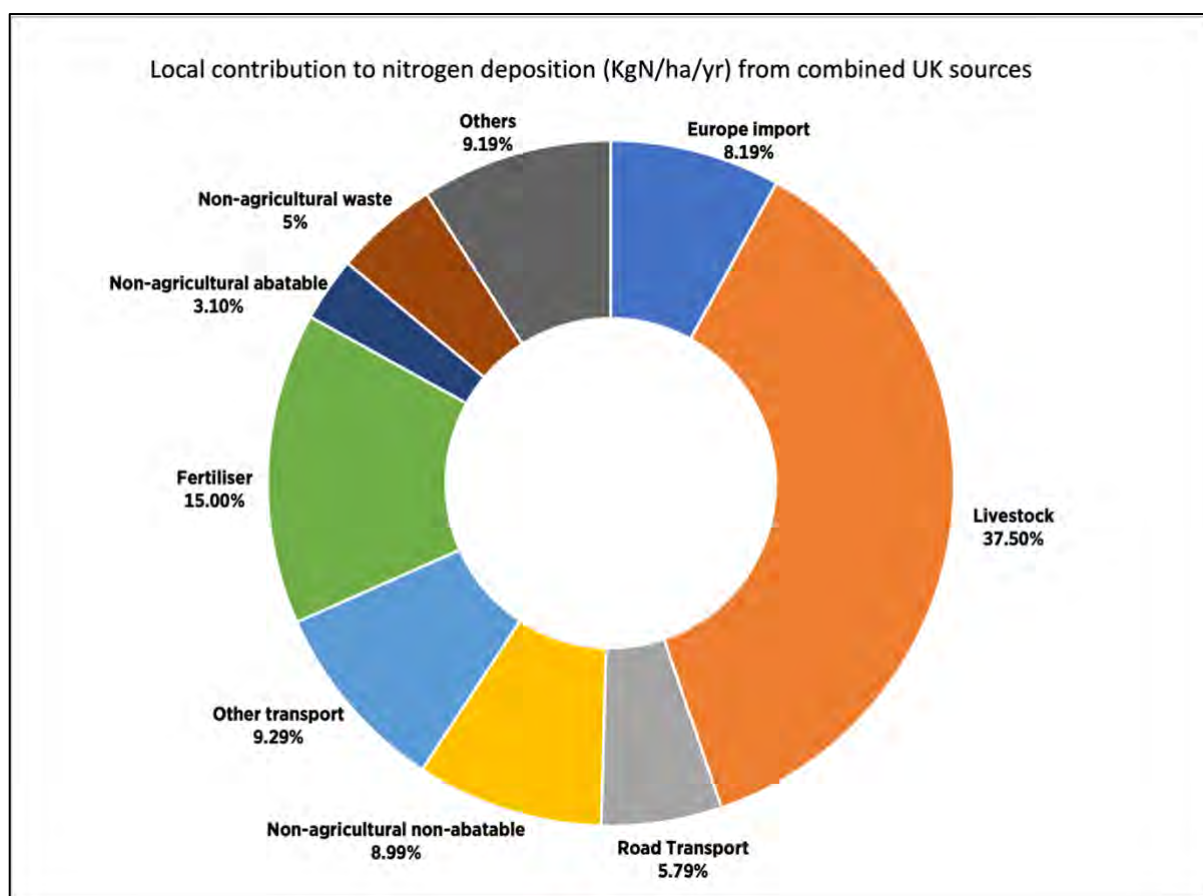


Figure 5.1: Pie chart to illustrate local contributions to nitrogen deposition to the SPA and SAC

5.4.5 Policies set out in the Local Plan incorporate measures for sustainable transport and a requirement to encourage a modal shift, electric vehicles and promote active transport options (PUBDM29: Transport, Highways and Access). Other policies such as Policy PUBSP8 (Accessibility and Transport) and Policy PUBSP9 (Recreational access around the Broads area) and Policy PUBDM30 (Recreation facilities parking areas) also promote sustainable and active forms of transport. Together these policies will have a positive impact upon air quality by discouraging the private car use and encouraging use of electric cars and other sustainable modes of transport.

5.4.6 The Broads Plan is a high-level overarching plan for the Broads which sets out a long-term vision and strategic objectives for the Broads, and draws together and guides a wide range of other Broads plans, programmes and policies. The Broads Plan and other Broads Authority strategic plans and guiding strategies set out a series of measures which will have a positive impact and contribute towards the mitigation of air quality impacts from traffic sources at habitats sites. These include the following:

- The Broads Plan: Several strategic objectives under the theme of climate change aim to reduce climate emissions through initiatives such as replacing all Broads Authority operating vehicles with electric options (A2), initiatives such as 'Electrifying the Broads' and promotion of tourism hotspots with electric vehicle and alternative fuel strategies and visitor green travel (A3). Other objectives under the 'promoting understating and enjoyment' theme support initiatives for active travel around the Broads (E1).
- The Broads Authority Integrated Transport Strategy⁷⁸ aims to encourage sustainable travel choices such as public transport, walking, cycling and non-powered boating, and improve links between public transport provision, visitor destination points and access routes.
- The Norfolk County Council Local Transport Plan (LTP) 4 Strategy⁷⁹ aims to address issues such as air quality and carbon reduction and tackle infrastructure issues in relation to major road, bus and rail connections. It sets out a series of strategies and policies in relation to this. Policy 2 of LTPS4 notes the priority for reducing emissions will be to support a shift to more sustainable modes and more efficient vehicles, including lower carbon technology and cleaner fuels. Policy 3 notes that innovation and new technologies will be embraced and used proactively to meet new targets set by the recently adopted environmental policy. Policy 4 encourages a behaviour change and interventions that can help to increase the use of sustainable transport.
- The Suffolk LTP⁸⁰ sets out a series of priorities which include improvements to air quality through promotion of sustainable transport options and promotion of technological improvements.
- National⁸¹ and local planning policy requires the protection of habitats sites and will apply to all development which requires planning permission. Policy PUBSP5 (Biodiversity) and PUBDM15 (Natural Environment) provide protection for habitats sites and sets out the requirement for compliance with the Habitats Regulations at the project level. Policy PUBDM3 (Pollution and Hazards in

⁷⁸ Broads National Park (2019) Integrated Access Strategy for the Broads.

⁷⁹ Norfolk County Council (2022). Local Transport Plan 4 Strategy 2021 – 2036.

⁸⁰ Suffolk County Council (2011) Local Transport Plan 2011 – 2031. Part 1 Transport Strategy.

⁸¹ Community of Levelling Up, Housing and Communities (2023). National Planning Policy Framework. Para 187. Available at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [Date Accessed: 30/09/24].

development and protecting environmental quality) also sets out measures to protect air quality.

5.4.7 As noted in Section 3.4.10, traffic modelling has not been undertaken as part of the Local Plan for the Broads. It is noted that the overall housing delivery target for Broads is 358 dwellings (see Local Plan Policy POSP15) over the plan period. The Local Plan allocates a total of 250 dwellings (at one site - Utilities Site) and 43 residential moorings over the 20-year Plan period (around 20 dwellings per year). The remaining need (which is part of the overlapping District's need and not additional to) will be achieved through allocations, windfall, completions and permissions. Allocations PUBTHU1 (16 dwellings) and PUBOUL2 (76 dwellings) already have planning permission but are also included in the Local Plan until they are built out. Given this small scale of housing growth, it is considered unlikely that there will be a significant increase in traffic flows on strategic road links from the Local Plan alone or a significant contribution to in-combination effects. In addition, no new roads are proposed within 200m of any habitats site. The Utilities site allocation is located more than 5km from the closest habitats site. Other allocations made in the Local Plan are for residential moorings. In addition, it is noted that road links across the Plan area, and Norfolk as a whole, are rural in nature. A review of mapping data indicates that a total of 0.6% of the Broads SAC and 0.2% of the Broadlands SPA and Broadlands Ramsar designations lie within 200m of strategic road links when compared to the overall coverage of each designation.

5.4.8 The following factors have been taken into consideration in this section of the AA which is consistent with the approach taken in neighboring Districts:

- Local Plan policy wording to encourage a modal shift, promote active forms of transport and encourage uptake of electric vehicles;
- Local Plan policy wording which sets out protection for habitats sites and requirement for project level HRA;
- National and county policy initiatives to encourage a modal shift, electric vehicles, and active transport;
- Housing provision over the Plan period (a need of 358 dwellings and allocation of 250 residential dwellings on one site and 43 residential moorings);
- The overall need for the Broads is part of the need for the neighbouring districts, and not additional to their need;
- Downward local air quality trends and limited road traffic source contribution to nitrogen deposition;
- Key management issues at the SAC and SPA in terms of nitrogen deposition are associated with management of agricultural sources; and
- Total proportion of designations within 200m of strategic road links.

5.4.9 Taking these factors into consideration it is considered unlikely that there will be any adverse impacts on site integrity at the Broads SAC, Broadland Ramsar and Broadland SPA (either alone or in-combination) due to a change in air quality as a result of the Local Plan.

6 Water Appropriate Assessment

6.1 Introduction

6.1.1 The HRA screening process in **Chapter 4** concluded that a number of Local Plan policies and all allocations have the potential to result in likely significant hydrological impacts at the following habitats sites:

- Breydon Water Ramsar
- Breydon Water SPA
- Broads SAC
- Broadland Ramsar
- Broadland SPA
- Norfolk Valley Fens SAC
- River Wensum SAC

6.1.2 This chapter provides an AA which assesses more precisely the ecological impacts associated with a deterioration in water quality and changes to water quantity due to Local Plan growth at each habitats site in view of its qualifying features and conservation objectives.

6.1.3 The following policies were screened into the HRA process for consideration in an AA due to water LSEs (**Table 6.1**):

Table 6.1: Local Plan policies screened into the HRA process due to water LSEs (see **Appendix C**)

Policy number	Policy name
PUBDM14	Re-use, Conversion or Change of Use of Historic Buildings
PUBSP10	A Prosperous Local Economy
PUBDM35	Retail Development in the Broads
PUBSP12	Sustainable Tourism
PUBSP13	Navigable water space
PUBDM38	Access to the water
PUBDM39	Bank stabilisation
PUBSP14	Mooring provision
PUBDM40	Moorings, mooring basins and marinas
PUBDM41	The impact of replacement quay heading on navigation
POSP15	Residential Development
PUBDM44	Residential Development within Defined Development Boundaries
PUBDM45	Gypsy, Traveller and Travelling Show People
PUBDM46	New Residential Moorings

6.1.4 All allocations which allocate development (residential dwellings and residential moorings) also have the potential to act cumulatively to trigger changes in water quality or quantity and were therefore also screened into the HRA process (**Appendix C**). These allocations include the following:

- Policy PUBNOR1: Utilities Site
- Policy PUBTHU1: Tourism development at Hedera House, Thurne

- Policy PUBBRU6: Brundall Gardens Marina Residential Moorings
- Policy PUBGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)
- Policy PUBCHE1: Greenway Marine residential moorings
- Policy PUBSOM1: Somerleyton Marina Residential Moorings
- Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)
- Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site

6.2 Baseline information

Water Quality

- 6.2.1 As noted in Section 3.7, urbanisation has the potential to reduce the quality of water entering a catchment through processes such as sedimentation, accidental spillage of chemicals and materials and operational surface water runoff. Water quality may also be reduced through effluent discharges at wastewater treatment works. This change in water quality can increase nutrient inputs into a catchment which can lead to algal blooms, reduce dissolved oxygen and increased turbidity. This can affect the overall condition of the receiving waterbody and may have adverse effects at hydrologically sensitive and connected habitats sites and their qualifying features.
- 6.2.2 Wastewater treatment in the plan area is provided via Wastewater Recycling Centres (WRCs) operated and maintained by Anglian Water Services (AWS). Treated wastewater is ultimately discharged to nearby waterbodies. Each WRC is connected to development by a network of wastewater pipes (the sewerage system) which collects wastewater generated by homes and businesses to the WRC. The Environment Agency control discharges from WRC through the issue of permits.
- 6.2.3 Given the location of the Plan area within the nutrient sensitive catchments of the Broads SAC and Broadland Ramsar (see Section 3.5) potential impacts upon water quality at these habitats sites is likely. Other water quality impact pathways, e.g. via surface water runoff, may also affect other habitats sites within the plan area such as Broadland SPA, Breydon Water SPA and Breydon Water Ramsar.

Water quantity

6.2.4 Urban development can reduce catchment permeability and the presence of drainage networks may be expected to remove runoff from urbanised catchments. This may result in changes in run off rates from urbanised areas to habitats sites or watercourses which connect to them and therefore water levels. Water mains leakage and sewer infiltration may also affect water levels. In addition, supply to meet water demand associated with new development (residential and employment supported by the Local Plan) also has the potential to affect water balances at hydrologically sensitive habitats sites which are connected to the plan area.

6.2.5 As noted in Section 3.5, the main water service providers for the Broads are Anglian Water and Essex and Suffolk Water. The Anglian Water and Essex and Suffolk Water WRMPs set out objectives to manage water demand. Abstractions for water supply are managed by the Environment Agency through licences issues in line with their CAMS process. The CAMS process is published in a series of ALSs for each river basin, with the Broadland Rivers ALS area being of relevance to the Broads Authority. As set out in Section 3.5, a number of habitats sites are located within the same WRZ as the Plan area and these are therefore potentially susceptible to impacts associated with water abstraction from new development allocated through the Local Plan. These sites include the following:

- Breydon Water SPA
- Breydon Water Ramsar
- Broads SAC
- Broadland Ramsar
- Broadland SPA
- Norfolk Valley Fens SAC
- River Wensum SAC

6.3 Appropriate Assessment

Water quality

6.3.1 Given the unfavourable and declining status of the SSSIs which underpin the Broads SAC and Broadland Ramsar (see Section 3.5), any reduction in water quality would result in an adverse impact on site integrity.

6.3.2 Increased nutrient loading (nitrogen and phosphorus) as a result of new development has the potential to reduce water quality. The Broads contain examples of naturally nutrient-rich lakes. These lakes and the ditches in areas of fen and drained marshlands support relict vegetation of the original fenland flora, and collectively contains one of the richest assemblages of rare and local aquatic species in the UK⁸². The features for which the SAC and Ramsar are designated, as well as the composition of species, are dependent on the condition of water quality.

⁸² WOOD, A., WAKE, H. and MCKENDRICK-SMITH, K (2022) The Broads Special Area of Conservation/Broadland Ramsar – Evidence Pack. Natural England Technical Information Note. TIN205 Natural England.

- 6.3.3 Policy PUBDM18 (Mitigating Nutrient Enrichment Impacts) of the Publication Local Plan contains protective policy wording to ensure that new development (from both the Local Plan alone and in-combination) does not increase nutrient loading.

Policy PUBDM18: Mitigating Nutrient Enrichment Impacts

1. Any development proposal for overnight accommodation which is located within the catchments of the Broads Special Area of Conservation (SAC) and Broadland Ramsar site⁸³, must provide evidence within a shadow HRA to enable the Authority to conclude through a Habitats Regulations Assessment that the proposal will not increase nutrient loads, such that it will not have likely significant effects on the integrity of sites. This can be demonstrated through nutrient neutrality.
2. Planning permission will be granted subject to demonstrating no adverse effect on the integrity of Habitats Sites from nutrient enrichment when considered alone or in-combination.
3. The Norfolk Nutrient Calculator/Natural England Nutrient Calculator will need to be completed. If the calculator concludes an impact from nutrients, these impacts will need to be mitigated using appropriate mitigation, likely secured through a local or national mitigation scheme. The Authority may use legal agreements to ensure this mitigation is secured and in place and will be delivered.

- 6.3.4 One method to achieve this is through nutrient neutrality. Nutrient budgets can be calculated using either the Norfolk Nutrient Calculator or Natural England's Nutrient Calculator. Guidance has been prepared which identifies potential solutions to achieve nutrient neutrality⁸⁴. The Norfolk Environmental Credits⁸⁵ has been set up to invest in local environmental schemes which will provide nutrient neutrality mitigation and generate credits for development to demonstrate that nutrients can be offset.

- 6.3.5 Part 7 of the Levelling Up and Regeneration Act (2023) places a duty on water companies discharging to affected catchment areas to upgrade their Wastewater Treatment Works to achieve the highest technological levels for nutrient removal by 1 April 2030. In addition, Natural England-led Nutrient Mitigation Scheme⁸⁶ is progressing and will allow developers to purchase nutrient credits to demonstrate nutrient neutrality.

- 6.3.6 Under Policy PUBDM18, relevant permissions will only be granted where nutrient neutrality can be demonstrated to ensure compliance with the Habitats Regulations. This policy requires evidence to be submitted to the Authority (as the Competent Authority) to show that on-site or off-site mitigation to achieve nutrient neutrality will be provided for relevant

⁸³ Specifically the Bure Broads and Marshes SSSI, Trinity Broads SSSI, Yare Broads and Marshes SSSI, Ant Broads and Marshes SSSI, Upper Thurne Broads and Marshes SSSI.

⁸⁴ Royal Haskoning DHV (2023) Norfolk Nutrient Guidance.

⁸⁵ Norfolk Environmental Credits. Available at: <https://www.norfolkenvironmentalcredits.co.uk/>. [Date accessed: 30/09/24]

⁸⁶ Natural England Nutrient Mitigation Scheme. Available at <https://www.gov.uk/government/publications/natural-englands-nutrient-mitigation-scheme-for-developers> [Date accessed: 30/09/24]

- 6.3.7 Other policies set out in the Preferred Options Local Plan (Policy PUBDM5: Water Quality, Foul Drainage and Policy PUBDM6: Boat Wash-Down Facilities and Policy PUBSP2: Strategic flood risk policy) will also contribute towards the protection of water quality at the SAC and Ramsar, and other sites listed in **Paragraph 6.2.5**.
- 6.3.8 In addition, Policy PUBDM15: Natural Environment will apply to all allocations, and any other windfall development which comes forward through the Local Plan. This policy includes requirements for development to comply with the Habitats Regulations and ensures no adverse impacts on the site integrity of any habitats site either alone or in combination.
- 6.3.9 The overarching Broads Plan and other Broads Authority strategic plans and guiding strategies (as listed below) also set out a series of local measures, which will have a positive impact and contribute towards the protection of water quality at habitats sites.
- The Broads Plan: Strategic Objective B2 aims to promote best practice water capture and usage across the Broadland Rivers catchment and reduce pollution. It also aims to adopt and implement objectives set out in other water-based plans. Section 1.3 sets out the requirement for all lower tier plans and projects (required to implement the strategic objectives in the Broads Plan) to be undertaken in a manner that is sensitive to the environment. It notes that works will also need to comply with relevant permits and controls to ensure environmental protection on habitats sites, and where relevant, such plans, programmes and works will be subject to HRA. Theme F sets out Natural England’s guidance received on the requirement for new development to achieve nutrient neutrality.
 - Broadland Rivers Catchment Plan aims to reduce run-off of contaminants, soil and nutrients from entering the Broadland Rivers catchment. It also aims to increase water capture and manage water efficiency within the catchment.
 - The Waterways Management Strategy⁸⁷ sets out a series of protective policies and mechanisms within which work will take place to ensure water quality and water levels are protected. It also sets out the requirement for lower tier plan and project HRA. The WMS has been subject to HRA.
 - The Broads Authority also provides guidance on environmentally friendly boating⁸⁸, which includes low wash hulls, guidance on maintaining water quality (from detergents and anti-fouling paints) to protect water quality.

⁸⁷ Broads Authority (2022) Waterways Management Strategy and Action Plan 2022/23 – 2026/27.

⁸⁸ Available at: <https://www.broads-authority.gov.uk/boating/owning-a-boat/environmentally-friendly-boating> [Date Accessed: 30/09/24].

- 6.3.10 The Advocate General’s opinion in the European Court of Justice case C-6/04 *European Commission v United Kingdom* confirmed the progression of assessment that must take place either from higher level to lower-level plans, or as the plan becomes more specific. She notes at paragraph 49: ‘Adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure⁸⁹’.
- 6.3.11 It is important to note that the Local Plan for the Broads does not remove the requirement for lower tier plans and projects to be subject to HRA through the Habitats Regulations. Once detailed information on the exact nature, scope, timing, location and scale of specific applications are known, these will be assessed, and mitigation defined and secured. HRA of lower tiered plans and projects, are required as a matter of law and Government policy.
- 6.3.12 Taking into consideration mitigation secured through policy wording in the Local Plan to protect water quality, it can be concluded that there will be no adverse impacts on the site integrity of any habitats site either alone or in-combination with other plans or projects.

Water quantity

- 6.3.13 HRA is a key requirement associated with the development of the Anglian Water and Essex and Suffolk Water WRMP. These WRMPs take a strategic approach to water planning, and their accompanying HRAs fully assess impacts upon water quantity in-combination with abstraction for other neighbouring LPA areas.
- 6.3.14 Policies in the Local Plan, such as Policy PUBDM7: Water efficiency and re-use, aim to drive down water demand and therefore reduce pressures upon the Anglian region and subsequently at hydrologically sensitive designated sites (see Section 3.5). Policy PUBDM55: (Non-residential development and BREEAM) requires that development achieves three water credits which reflects the location of the Plan area within an area of water stress. In addition, the overarching Broads Plan and other Broads Authority strategic plans and guiding strategies (listed in **Paragraph 6.3.9**) also set out a series of measures to protect water quantity at habitats sites. In particular, the Norfolk Water Strategy Programme aims to look at the significant pressures on water resources in the eastern area and address the effects of climate change.
- 6.3.15 Water supply issues for both the Local Plan area and neighbouring areas will be addressed through the higher-level water planning framework and licencing process (RBMP, WRMP, Drought Plans and CAMS). Local Plan policies to improve water efficiency (Policy PUBDM7) will also ensure water supplies at habitats sites can be met to meet the requirements of Habitats Directive. It can therefore be concluded that there will be no adverse impacts on the integrity of any habitats site, either alone or in-combination, due to a change in water quantity as a result of the Local Plan.

⁸⁹ Opinion available at:

<https://curia.europa.eu/juris/showPdf.jsf?jsessionid=3D44C34DA890BCDA175840065B4AECE4?text=&docid=58359&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=3054642> [Date Accessed: 30/09/24].

7 Recreation and Urbanisation Appropriate Assessment

7.1 Introduction

7.1.1 The following section of the AA focuses on assessing more precisely the ecological impacts of increased recreational pressure and urbanisation from the Local Plan upon the qualifying features of the following habitats sites which were scoped into the HRA process (**Chapter 3**):

- Brecks sites: Breckland SPA and Breckland SAC
- Broads sites: Broads SAC and Broadland SPA
- East Coast sites: Breydon Water SPA, Winterton-Horsey Dunes SAC and Great Yarmouth and North Denes SPA
- Norfolk Valley Fens SAC
- North Coast sites: North Norfolk Coast SAC, North Norfolk Coast SPA, North Norfolk Coast Ramsar and the Wash and North Norfolk Coast SAC
- Roydon and Dersingham Bog SAC and Ramsar
- Suffolk sites: Benacre to Easton Bavents SPA
- The Wash: The Wash SPA, The Wash Ramsar and The Wash and North Norfolk Coast SAC

7.1.2 The following policies were screened into the HRA process for consideration in an AA due to water LSEs (**Table 7.1**):

Table 7.1: Local Plan policies screened into the HRA process due to air quality LSEs (see **Appendix C**)

Policy number	Policy name
PUBDM11	Green and blue Infrastructure and Public Rights of Way
PUBDM14	Re-use, Conversion or Change of Use of Historic Buildings
PUBSP8	Accessibility and Transport
PUBSP9	Recreational access around the Broads Area
PUBDM29	Transport, highways and access
PUBSP12	Sustainable Tourism
POSP15	Residential Development
PUBDM44	Residential Development within Defined Development Boundaries
PUBDM45	Gypsy, Traveller and Travelling Show People
PUBDM46	New Residential Moorings

7.1.3 In addition, all allocations which allocate development (residential and residential moorings) also have the potential to act cumulatively to trigger recreational and urbanisation effects and were therefore also screened into the HRA process (**Appendix C**). These allocations include the following:

- Policy PUBNOR1: Utilities Site
- Policy PUBTHU1: Tourism development at Hedera House, Thurne
- Policy PUBBRU6: Brundall Gardens Marina Residential Moorings

- Policy PUBGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)
- Policy PUBCHE1: Greenway Marine residential moorings
- Policy PUBSOM1: Somerleyton Marina Residential Moorings
- Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)
- Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site

7.2 Baseline information

- 7.2.1 The Broads Plan indicates that more than eight million people a year visit the Broads National Park for recreational activities⁹⁰. These visitors are attracted by the inland waterways, coast and other recreational offerings in the area.
- 7.2.2 Broads Authority monitoring data indicates that in 2022 there were 12,549 craft licenced to use the Broads with the majority being privately owned but a large number also registered to the boat hire industry⁹¹. Other popular recreational activities set out in the Broads Plan include angling, walking, cycling, horse riding, visiting local sites of interest and the draw of local wildlife.
- 7.2.3 Increased development has the potential to result in public access and disturbance pressures at habitats sites which can take the form of urbanisation and / or recreational impacts (as discussed in Section 3.6 and 3.7). Recreational activities including land and water-based pursuits can lead to impacts such as increased erosion of habitats through increased footfall, increased dog fouling causing the eutrophication of habitats, pressures on water related habitats and disturbance to birds from people and dogs. Urbanisation impacts can include vandalism, fly tipping, fragmentation of habitats, lighting and visual pollution and increased fire risk.
- 7.2.4 Whilst the overall need in the Plan area and allocations set out in the Local Plan may not individually have an adverse impact upon a habitats site due to increased recreational pressure, when taken together cumulatively, and in-combination with growth in neighbouring LPA areas, there is the potential for adverse direct and indirect impacts upon their qualifying features.
- 7.2.5 The survey work commissioned in 2015 and 2016 to determine current and projected visitor patterns at habitats sites across Norfolk (see Section 3.6)⁹² included 40 different survey locations where public access and the qualifying features of habitats site coincide. The results of these surveys highlight how an increase in recreational pressure (particularly at the North Coast, the Broads and the Valley Fens) is predicted to be linked to residential and tourism development across multiple local authority areas within Norfolk. This study took into consideration the in-combination impact of development from different LPA areas upon these habitats sites.

⁹⁰ Broads Authority (2022) Broads Plan 2022-27. STEAM data for Broads and area of influence.

⁹¹ Broads Authority (2022). Annual Monitoring Report 2021/2022.

⁹² Panter, C., Liley, D. & Lowen, S. (2016). Visitor surveys at European protected sites across Norfolk during 2015 and 2016. Unpublished report for Norfolk County Council. Footprint Ecology.

7.2.6 Recreational and urbanisation pressures are identified as a threat in the SIPs and Natural England’s supplementary advice for the network of habitats sites within Norfolk and Suffolk (Appendix B). These threats may have direct impacts upon qualifying features and also indirect impacts upon areas of functionally linked land and / or water bodies.

7.3 **Appropriate Assessment**

7.3.1 Policy POSP15 (Residential Development) indicates that the Authority will endeavour to enable housing delivery to meet its objectively assessed housing need throughout the plan period (2021 to 2041). Allocations PUBTHU1 (16 dwellings) and PUBOUL2 (76 dwellings) already have planning permission. The Local Plan allocates a total of 250 dwellings (on one allocation site) and 43 residential moorings as listed in **paragraph 5.1.3** and shown Figure 7.1.

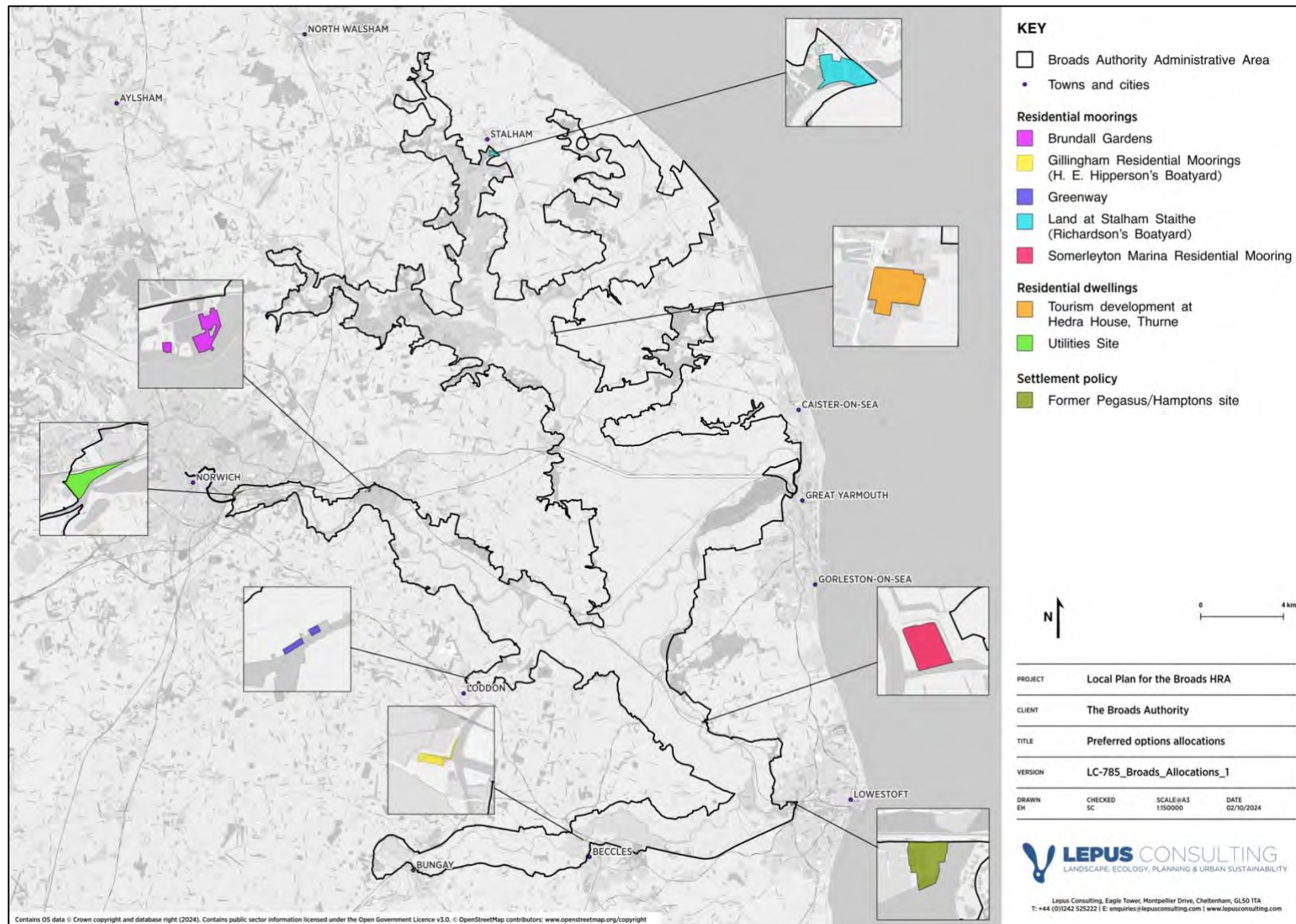


Figure 7.1: Local Plan allocations

- 7.3.2 As noted in Section 3.6, strategic mitigation solutions to address recreational pressures at habitats sites associated with new development in Suffolk and Norfolk have been produced. These are currently implemented by the Authority. These solutions are strategic in nature, considering cross boundary impacts associated with new development across administrative boundaries. Their implementation will ensure appropriate mitigation to address in-combination impacts which will be delivered for new development both inside and outside the Authority’s executive area. These solutions currently identify a ZOI for residential development which covers the following areas:
- 12km Roydon and Dersingham Bog SAC and Ramsar
 - 13km Benacre to Easton Bavents SPA
 - 15km Norfolk Valley Fens SAC
 - 25km Broads Sites: The Broads SAC and the Broadland SPA and Ramsar
 - 26km Brecks Sites; Breckland SPA and SAC
 - 30km East Coast Sites: Breydon Water SPA, Winterton-Horsey Dunes SAC and Great Yarmouth and North Denes SPA
 - 42km North Coast Sites: North Norfolk Coast SAC, SPA, Ramsar and the Wash and North Norfolk Coast SAC
 - 61km The Wash: The Wash SPA, Ramsar and The Wash and North Norfolk Coast SAC
- 7.3.3 The number of ZOI for habitats sites in each LPA area varies depending on the geographical position, however, a single county wide tariff area is recommended for the sake of simplicity in the GIRAMS⁹³. This recommendation reflects the entirety of Norfolk including all partner LPAs and would see a common tariff amount for all net new dwellings in the county. This has been calculated from the RAMS mitigation package to cover the lifetime of the local plans in perpetuity.
- 7.3.4 Development applications must currently be accompanied by a project level HRA and provide appropriate mitigation which can include a contribution towards these strategic mitigation schemes and, where applicable (over 50 units or equivalent), provide an appropriate scale of GI to deliver alternative recreational space⁹⁴.
- 7.3.5 The Norfolk and Suffolk Coast RAMS, which address in-combination recreational impacts, will continue to be secured through the following Local Plan policy.

⁹³ Place Services. March 2021. Draft subject to approval by the Norfolk Strategic Planning Group. Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS). Habitats Regulations Strategy Document.

⁹⁴ Broads Authority planning guidance. Available at: <https://www.broads-authority.gov.uk/planning/planning-permission/habitat-mitigation> [Date accessed: 30/09/24]

Policy PUBDM17: Mitigating Recreational Impacts

1. Any development which results in a net increase in residential development and / or overnight tourism accommodation will need to put in place adequate measures to avoid and mitigate potential adverse recreational impacts on the integrity of Habitats Sites which are identified within the following strategies and Zones of Influence (ZOI):
 - a) Norfolk Recreational disturbance Avoidance and Mitigation Strategy (Norfolk RAMS) – covers the whole of Norfolk.
 - b) Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (Suffolk RAMS) - 13 km ZOI around the relevant Habitats Sites in the Suffolk Coast area.
2. Planning permission will be granted subject to demonstrating no adverse effect on the integrity of Habitats Sites from recreational disturbance when considered alone or in-combination.
3. Proposed adequate measures must be delivered prior to occupation of development, in perpetuity and agreed with Natural England.
4. For development over 50 units, the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of residents as an alternative to visiting the habitats sites is required.

7.3.6 This policy will apply to the following developments:

- New homes;
- Student accommodation;
- Care homes;
- Tourism attractions;
- Tourist accommodation; and
- Permitted development (which gives rise to new overnight accommodation) under the Town and Country Planning (General Permitted Development) (England) Order 2015.

7.3.7 It will apply to all development coming forward through the Local Plan, including allocated sites and also any windfall development which is supported by the Local Plan.

7.3.8 All new development subject to this policy will need to put in place appropriate measures to avoid and mitigate potential adverse recreational impacts on the integrity of habitats sites which form part of the Norfolk and Suffolk RAMS schemes. This mitigation can be delivered through financial contributions towards these mitigation schemes which address both alone and in-combination effects.

7.3.9 The policy wording notes that a bespoke approach may be required for development comprising more than 50 dwellings and in more sensitive locations. This may include the requirement to provide GI in addition to financial contributions towards RAMS. A developer may also provide alternative bespoke mitigation, however this will need to be fit for purpose and agreed and approved with Natural England and the Broads Authority.

- 7.3.10 Policy PUBNOR1 (Utilities Site) allocates over 50 dwellings (250 residential dwellings) and will therefore need to demonstrate that it is able to deliver appropriate GI in line with policy requirements. Policy specific wording in PUBNOR1 incorporates the requirement for this allocation to comply with PUBDM17 and also provide recreational opportunities on site. The Policy notes (at point 5(iii)) the potential for this to be achieved at Whitlingham Country Park and through delivery of a pedestrian/cycle link across the Wensum and Yare between the City Centre and Whitlingham Country Park.
- 7.3.11 It is also noted that all development will need to comply with Policy PUBDM11: Green and blue infrastructure and Public Rights of Way. This policy notes that 'Development shall contribute to the delivery and management of green and blue infrastructure including establishment of new and enhancement of existing green and blue infrastructure'.
- 7.3.12 All mitigation must be in place prior to the occupation of development and delivered in perpetuity in order for it to be effective. This requirement is set out in Policy PUBDM17.
- 7.3.13 The Broads Authority also promotes a number of codes which aim to reduce the impact of recreational activities across the Broads and make them as sustainable as possible. For instance, there is guidance which promotes environmentally friendly boating⁹⁵ and codes of conduct for most waterway activities⁹⁶ including the Paddlers Code⁹⁷. The Broads website also promotes cycling, walking and horse riding routes to avoid sensitive areas⁹⁸ and requires visitors to follow a dog walking code of conduct⁹⁹. These will have a mitigating effect upon recreational impacts.
- 7.3.14 As noted in Section 3.7 urbanisation effects are often considered through the application of a 400m buffer zone. In terms of urbanisation effects, there two residential mooring allocations and one tourism allocation which are located within 400m of a habitats site as listed below:
- Policy POBRU6: Brundall Gardens – up to six residential moorings – less than 50m to the north of the Broads SAC, Broadland SPA and Broadland Ramsar – on the opposite side of the River Yare;
 - Policy PUBTHU1: Tourism Development at Hedera House, Thurne – tourism uses – approximately 130m to the south of the Broads SAC, Broadland SPA and Broadland Ramsar; and
 - Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard) – up to ten residential moorings - approximately 254m to the north west of the Broads SAC, Broadland SPA and Broadland Ramsar.

⁹⁵ Available at: <https://www.broads-authority.gov.uk/boating/owning-a-boat/environmentally-friendly-boating> [Date Accessed: 30/09/24].

⁹⁶ Available at: <https://www.broads-authority.gov.uk/boating/navigating-the-broads> [Date Accessed: 30/09/24].

⁹⁷ Available at: <https://paddlerscode.info/#enjoy> [Date Accessed: 30/09/24].

⁹⁸ Available at: <https://www.visitthebroads.co.uk/discover-the-broads/boating> [Date Accessed: 30/09/24].

⁹⁹ Available at: <https://www.visitthebroads.co.uk/discover-the-broads/walking-and-cycling/bringing-your-dog> [Date Accessed: 30/09/24].

- 7.3.15 The residential mooring allocation at Brundall Gardens is on the opposite side of the River Yare and therefore urbanisation effects are unlikely to have an adverse impact on the integrity of the Broads SAC, Broadland SPA and Broadland Ramsar. Policy PUBDM15 (Natural Environment) will apply to all allocations, and any other windfall development which comes forward in the Local Plan. This policy also includes requirements for development to comply with the Habitats Regulations and ensures no adverse impacts on the site integrity of any habitats site either alone or in-combination.
- 7.3.16 As set out in **Chapter 7**, the Local Plan for the Broads does not remove the requirement for recreation projects to be subject to HRA through the Habitats Regulations. Policy PUBTHU1 and Policy PUBSTA1 therefore contain protective policy wording to secure the protection of habitats sites from development at these sites including the requirement of project level HRA.
- 7.3.17 Policies PUBSP8 (Accessibility and Transport), PUBSP9 (Recreational access around the Broads Area), and PUBDM29 (Transport, highways and access) aim to promote active travel and also recreation by introducing footpaths and cycleways across the Plan area and in particular at waterside locations. Depending on the location of such projects, these improvements have the potential to increase access to areas of the waterside which may be covered by habitats site designations and therefore increase reactional pressures. Each of these policies however contains provisions to ensure sensitive locations associated with habitats sites are avoided.
- 7.3.18 Taking into consideration the policy wording and mitigation secured through the Local Plan, it can be concluded that there will be no adverse recreational or urbanisation impact on the site integrity of any habitats site from increased development either alone or in-combination.

8 Next Steps

8.1 Conclusions

8.1.1 The Local Plan for the Broads is not directly connected with or necessary to the management of any habitats site. Consideration was therefore given to potential links or causal connections between the effects of the Local Plan and habitats sites within the study area to identify Likely Significant Effects (LSEs). This exercise was undertaken through the collation of information for each habitats site and application of a 'source-pathway-receptor' model.

8.1.2 Taking no account of mitigation measures, the screening stage concluded that that the Local Plan has the potential to have LSEs at the following habitats sites:

- Benacre to Easton Barents SPA – recreational LSEs;
- Breckland SPA – recreational LSEs;
- Breckland SAC – recreational LSEs;
- Breydon Water SPA – water quality/quantity, recreational and urbanisation LSEs;
- Breydon Water Ramsar – water quality/quantity, recreational and urbanisation LSEs;
- Broads SAC – air quality, water quality/quantity, recreational and urbanisation LSEs;
- Broadland Ramsar – air quality, water quality/quantity, recreational and urbanisation LSEs;
- Broadland SPA – air quality, water quality/quantity, recreational and urbanisation LSEs;
- Dersingham Bog Ramsar – recreational LSEs;
- Great Yarmouth and North Denes SPA – recreational and urbanisation LSEs;
- Norfolk Valley Fens SAC – water quantity and recreational LSEs;
- North Norfolk Coast Ramsar – recreational LSEs;
- North Norfolk Coast SAC – recreational LSEs;
- North Norfolk Coast SPA – recreational LSEs;
- Outer Thames Estuary SPA – urbanisation LSEs;
- River Wensum SAC – water quantity LSEs;
- Roydon and Dersingham Bog SAC – recreational LSEs;
- Roydon Common Ramsar – recreational LSEs;
- The Wash and North Norfolk Coast SAC – recreational LSEs;
- The Wash Ramsar – recreational LSEs;
- The Wash SPA – recreational LSEs; and
- Winterton-Horsey Dunes SAC – recreational and urbanisation LSEs.

8.1.3 The outputs of the screening assessment therefore triggered the requirement to undertake an AA. The AA explored the following matters in more detail looking at both alone and in-combination impacts:

- Impacts on designated features affected by a possible deterioration in air quality;
- Impacts on water quality and quantity associated with increased levels of built development;

- Impacts associated with increased recreational pressure; and
- Impacts associated with urbanisation effects.

8.1.4 A range of potential threats and pressures that might be exacerbated by the Local Plan alone and in-combination were identified through the AA process. Protective policies set out in the Local Plan, alongside existing protection measures provided in high level strategic and planning policy frameworks and local operating procedures, were factored into the assessment process.

8.1.5 Taking into consideration these factors, the AA concluded that the Local Plan would have no adverse impact on site integrity at any habitats site, either alone or in-combination.

8.2 Next steps

8.2.1 The purpose of this report is to inform the HRA of the Local Plan using best available information.

8.2.2 The Authority, as the Competent Authority, has responsibility to make the Integrity Test, which can be undertaken in light of the conclusions set out in this report.

8.2.3 This report will be submitted to Natural England, the statutory nature conservation body, for formal consultation. The Authority must 'have regard' to Natural England's representations under the provisions of the Habitats Regulations prior to making a final decision as to whether they will 'adopt' the conclusions set out within this report as their own.

Appendix A: In-Combination Assessment

Councils, Plans and Policies	Plan Status	Summary of housing/employment – Key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination Likely Significant Effect (LSE)
Greater Norwich Development Partnership	Broadland District Council, South Norfolk Council and Norwich City Council have formed the Greater Norwich Development Partnership (GNDP). The three councils adopted the Greater Norwich Local Plan 2018 to 2038 ¹ in March 2024.	The Local Plan proposes the delivery of 45,000 new homes and 33,000 new jobs.	An HRA ² was conducted in support of the adopted Local Plan. This concluded there would be no adverse impacts on the integrity of any habitats sites alone or in-combination.	This plan has the potential to act in-combination with the Local Plan through increased residential and employment development which may trigger in-combination air quality, hydrology and recreation LSEs.
North Norfolk District Council	The Council is currently developing a new Local Plan for the period up to 2036 ³ . The Plan is currently undergoing independent examination.	The Proposed Submission Version of the Local Plan proposes the delivery of 12,000 new homes.	An HRA ⁴ was conducted in support of the submission version of the Local Plan. This concluded there would be no adverse impacts on the integrity of any habitats sites alone or in-combination.	This plan has the potential to act in-combination with the Local Plan through increased residential and employment development which may trigger in-

¹ GNDP (2024) Greater Norwich Local Plan. Available at: <https://www.gnlp.org.uk/local-plan-examination-local-plan-examination-document-library/j-inspectors-report-and-adoption> [Accessed: 27/09/24].

² The Landscape Partnership (2021) Habitats Regulations Assessment of published Proposed Submission Greater Norwich Local Plan. Available at: <https://www.gnlp.org.uk/sites/gnlp/files/2021-10/E16845%20GNLP%20Reg%2019%20submission%20plan%20HRA%202021-07-07%20%28003%29.pdf> [Accessed: 27/09/24].

³ North Norfolk District Council (2022) North Norfolk Local Plan: Proposed Submission Version. Available at: <https://www.north-norfolk.gov.uk/tasks/planning-policy/local-plan-new/> [Accessed: 27/09/24].

⁴ Footprint Ecology (2022) North Norfolk Local Plan HRA Submission Version. Available at: <https://www.north-norfolk.gov.uk/media/7456/habitat-regulations-assessment-north-norfolk-local-plan-reg-19-publication.pdf> [Accessed: 27/09/24].

Councils, Plans and Policies	Plan Status	Summary of housing/employment – Key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination Likely Significant Effect (LSE)
				combination air quality, hydrology and recreation LSEs.
Great Yarmouth Borough Council	<p>The Great Yarmouth Local Plan Part 2 2013 to 2030⁵ was adopted in December 2021. This includes amendments to the Core Strategy⁶ which was adopted in 2015.</p> <p>The Council is currently preparing a new Local Plan for development over the period to 2041⁷. The Regulation 18 Public Consultation ran from March to May 2024.</p>	The current Local Plan proposes the delivery of 7,000 new homes.	<p>An HRA was conducted in support of the Regulation 18 version of the Local Plan. This concluded there would be no adverse impacts on the integrity of any habitats sites in relation to most impacts. However, it was not possible to rule out adverse effects on the following habitats sites:</p> <p>Air pollution from vehicle emissions at the following:</p> <ul style="list-style-type: none"> • The Broads SAC, Broadland SPA and Ramsar (direct or functionally linked habitats; birds / invertebrates). • Great Yarmouth North Denes SPA (functionally linked habitat only; birds) • Outer Thames Estuary SPA (direct or functionally linked habitats; birds). • Breydon Water SPA and Ramsar (direct or functionally linked habitats; birds). • Greater Wash SPA (direct or functionally linked habitats; birds). • Benacre to Easton Bavents SPA (functionally linked habitat only; birds). 	This plan has the potential to act in-combination with the Local Plan through increased residential and employment development which may trigger in-combination air quality, hydrology and recreation LSEs.

⁵ Great Yarmouth Borough Council (2021) Great Yarmouth Local Plan Part 2. Available at: <https://www.great-yarmouth.gov.uk/article/2489/Current-Local-Plan> [Accessed: 27/09/24].

⁶ Great Yarmouth Borough Council (2015) Great Yarmouth Local Plan Core Strategy. Available at: https://www.great-yarmouth.gov.uk/media/1884/Adopted-Local-Plan-Core-Strategy-December-2015/pdf/Local_Plan_Core_Strategy_Adopted_2015_NF.pdf?m=1693477376143 [Accessed: 27/09/24].

⁷ Great Yarmouth Borough Council (2024) Emerging Local Plan. Available at: <https://localplan.great-yarmouth.gov.uk>. [Accessed: 27/09/24].

Councils, Plans and Policies	Plan Status	Summary of housing/employment – Key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination Likely Significant Effect (LSE)
			<ul style="list-style-type: none"> Abstraction for water supply at: The Broads SAC, Broadland SPA and Ramsar. 	
East Suffolk District Council	<p>East Suffolk Council came into effect in 2019, incorporating the former districts of Waveney District Council and Suffolk Coastal District Council. East Suffolk Council has therefore inherited the local development plans for each of these councils.</p> <p>The Waveney Local Plan 2014-2036⁸ area lies adjacent to the Broads Authority boundary. The Plan was adopted in March 2019.</p>	The current Local Plan for Waveney proposes 9,000 homes and 5,000 jobs.	An HRA ⁹ was undertaken to support the Waveney Local Plan. This concluded there would be no adverse impacts on the integrity of any habitats sites alone or in-combination.	This plan has the potential to act in-combination with the Local Plan through increased residential and employment development which may trigger in-combination air quality, hydrology and recreation LSEs.
Norfolk Minerals and Waste Local Plan Review	The Norfolk Minerals and Waste Plan Review is currently in preparation for the period up to 2038 ¹⁰ and was submitted to the Secretary of State in December 2023.	The Plan includes a spatial strategy for the allocation of new waste management facilities and areas for minerals development.	An HRA ¹¹ was prepared to support the Minerals and Waste Plan Review. This concluded there would be no adverse impacts on the integrity of any habitats sites alone or in-combination. However, the HRA noted that developers looking to abstract minerals would still need to apply for planning permission.	The combined impact of minerals allocations has potential to act in-combination with the Local Plan which has potential to trigger impacts for air quality and hydrology.

⁸ East Suffolk Council (2019) Waveney Local Plan. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Waveney-Local-Plan/Adopted-Waveney-Local-Plan-including-Erratum.pdf> [Accessed: 27/09/24].

⁹ Hoskin, R. & Liley, D. 2018. Habitats Regulations Assessment of the Waveney Local Plan. Unpublished report for Waveney District Council.

¹⁰ Norfolk County Council (2022) Norfolk Minerals and Waste Local Plan Review. Available at: <https://www.norfolk.gov.uk/mineralsandwastelocalplanreview> [Accessed: 27/09/24].

¹¹ Norfolk County Council (2022) Norfolk Minerals and Waste Plan Habitats Regulations Assessment. Available at: <https://norfolk.oc2.uk/docfiles/53/Final%20HRA%20together%20-reduced%20file%20size%20for%20web.pdf> [Accessed: 27/09/24].

Councils, Plans and Policies	Plan Status	Summary of housing/employment – Key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination Likely Significant Effect (LSE)
Suffolk Minerals and Waste Local Plan	The Suffolk Minerals and Waste Plan for the period up until 2036 ¹² was adopted in July 2020.	The Plan includes a spatial strategy for the allocation of new waste management facilities and areas for minerals development.	An HRA ¹³ was prepared to support the Minerals and Waste Plan. This concluded there would be no adverse impacts on the integrity of any habitats sites alone or in-combination.	The combined impact of waste allocations has potential to act in-combination with the Local Plan which has potential to trigger impacts for air quality and hydrology.
Norfolk County Council Local Transport Plan	The Norfolk Local Transport Plan 4 Strategy 2021 – 2036 ¹⁴ was adopted in July 2022.	The Local Transport Plan sets out a series of strategies and policies that aim to address issues related to air quality and transport infrastructure.	An HRA ¹⁵ was prepared to support the Norfolk Local Transport Plan. This concluded there would be no adverse impacts on the integrity of any habitats sites alone or in-combination. Mitigation measures set out specific project-level HRA requirements for schemes set out within the policies.	The combined impact of transport growth has potential to act in-combination with the Local Plan which has potential to trigger impacts for traffic related air quality.
Suffolk County Council Local Transport Plan	Suffolk County Council has adopted a Local Transport Plan 2011 – 2031 ¹⁶ .	The Local Transport Plan sets out a series of strategies and policies that aim to address issues related to air	An HRA ¹⁷ was prepared to support the Suffolk Local Transport Plan. This concluded there would be no adverse impacts on the integrity	The combined impact of transport growth has potential to act in-

¹² Suffolk County Council (2020) Suffolk Minerals and Waste Plan. Available at: <https://www.suffolk.gov.uk/planning-waste-and-environment/minerals-and-waste-policy/suffolk-minerals-and-waste-development-scheme> [Date accessed: 27/09/24].

¹³ Suffolk County Council (2019) Suffolk Minerals and Waste Plan Modifications Habitats Regulations Assessment. Available at: <https://www.suffolk.gov.uk/asset-library/imported/smwlp-modifications-hra-sept-2019.pdf> [Date accessed 27/09/24].

¹⁴ Norfolk County Council (2022) Local Transport Plan. Available at: <https://www.norfolk.gov.uk/localtransportplan> [Date accessed: 27/09/24].

¹⁵ WSP. June 2021. Norfolk Local Transport Plan 4 Strategy 2021- 2036: Habitats Regulations Screening And Appropriate Assessment. Available at: <https://www.norfolk.gov.uk/localtransportplan> [Date accessed: 27/09/24].

¹⁶ Suffolk County Council (2011) Suffolk County Council Local Transport Plan. Available at: <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans?nodeId=f87fcf06-0383-5bf4-91c9-936ee5d7e16e&entryId=1acccd42-c53c-5753-ad60-0efcc29d1e33> [Date accessed: 30/09/24].

¹⁷ Suffolk County Council (2010) Regulation 61 Assessment for Suffolk Local Transport Plan 3. Available at: <https://www.suffolk.gov.uk/asset-library/imported/ltp-strategic-hra.pdf> [Date accessed: 30/09/24].

Councils, Plans and Policies	Plan Status	Summary of housing/employment – Key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination Likely Significant Effect (LSE)
		quality and transport infrastructure, split into two parts. Part 1 outlines a 20-year strategy including long-term plans for the transport network, and Part 2 acts as a four year implementation plan to address issues identified in Part 1.	of any habitats sites alone or in-combination. As a result of the HRA, mitigations were set out within the Local Transport Plan prior to its adoption, to avoid any likely significant effects.	combination with the Local Plan which has potential to trigger impacts for traffic related air quality.
Anglian River Basin Management Plan (RBMP)	The Anglian RBMP ¹⁸ was updated in December 2022.	The Plan provides an overview of river basin planning in England and Wales for the Anglian River Basin District. It includes objectives for each water body and a summary of the measures necessary to reach those objectives.	The RBMP was supported by an HRA ¹⁹ . It concluded no adverse impacts on the integrity of any habitats sites either alone or in-combination.	The RBMP actions are focused on water body and water dependent habitats site improvements. Whilst development activities arising from Local Development Plans (including the Local Plan) may inhibit the ability of the RBMP to achieve objectives relating to habitats site protected areas, the overall effect of the RBMP is to promote management towards Good Ecological Status (GES).

¹⁸ Environment Agency (2022) Anglian river basin district River basin management plan. Available at: <https://www.gov.uk/guidance/anglian-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 30/09/24].

¹⁹ Environment Agency (2023) Habitats regulations assessment: non-technical summary. Available at: <https://www.gov.uk/government/publications/anglian-river-basin-district-flood-risk-management-plan/habitats-regulations-assessment-non-technical-summary> [Date accessed: 30/09/24].

Councils, Plans and Policies	Plan Status	Summary of housing/employment – Key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination Likely Significant Effect (LSE)
Anglian Water – Water Resource Management Plan	An updated Water Resource Management Plan ²⁰ for Anglian Water was approved by the government and published in 2024.	The WRMP24 sets out how Anglian Water will maintain a sustainable and secure supply of drinking water over the plan period.	The WRMP was supported by an HRA ²¹ . It concluded no adverse impacts on the integrity of any habitats sites either alone or in-combination, so long as adjustments are made to the application of measures described in the individual assessments.	This plan aims to protect the water environment and takes account for future water demand. It is unlikely that the WRMP will have alone or in-combination effects on the water environment.
Essex and Suffolk Water – Water Resource Management Plan	An updated (revised) Water Resource Management Plan ²² for Essex and Suffolk Water was published in 2024.	The WRMP sets out how Essex and Suffolk Water will continue to deliver clean, clear drinking water in the future, even in the most severe droughts.	An HRA was not publicly available on the WRMP website at the time of writing.	This plan aims to protect the water environment and takes account for future water demand. It is unlikely that the WRMP will have alone or in-combination effects on the water environment.
Anglian Water – Drought Plan	The Anglian Water Drought Plan ²³ was published in April 2022.	The Drought Plan outlines the operational steps that will be conducted if we face a drought in the next 5 years. It describes how supplies will be enhanced, demands managed, and environmental impacts	An HRA ²⁴ was prepared in support of the Drought Plan. It concluded no adverse impacts on the integrity of any habitats site either alone or in-combination.	This plan aims to protect the water environment in times of drought. It is unlikely that the WRMP will have alone or in-

²⁰ Anglian Water (2024) Water Resources Management Plan. Available at: <https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp/revised-draft-wrmp24-main-report-v2.pdf> [Date accessed: 30/09/24].

²¹ Mott MacDonald (2023) Anglian Water Revised Draft Water Resource Management Plan 2024 Environmental Report Sub-Report A: Habitats Regulations Assessment (HRA). Available at: <https://www.anglianwater.co.uk/SysSiteAssets/household/about-us/wrmp/revised-draft-wrmp24-environmental-report-sub-report-a---hra.pdf> [Accessed 30/09/24].

²² Essex and Suffolk Water (2024) Revised Water Resources Management Plan 2024: Summary. Available at: <https://www.eswater.co.uk/services/water/revised-draft-water-resources-management-plan-2024/> [Date accessed: 30/09/24].

²³ Anglian Water (2022) Drought Plan. Available at: <https://www.anglianwater.co.uk/corporate/strategies-and-plans/drought-plan/> [Date accessed: 30/09/24].

²⁴ Ricardo (2022) Anglian Water Drought Plan 2022. Habitat Regulations Assessment. Available at: <https://www.anglianwater.co.uk/SysSiteAssets/household/about-us/aws-drought-plan-2022---hra.pdf> [Accessed 30/09/24].

Councils, Plans and Policies	Plan Status	Summary of housing/employment – Key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination Likely Significant Effect (LSE)
		minimised. It proposes ongoing leakage reduction measures, water efficiency and monitoring and metering activities.		combination effects on the water environment.
Essex and Suffolk Water – Drought Plan	The Draft Essex and Suffolk Water Drought Plan ²⁵ was published in 2024.	The Drought Plan outlines the operational steps that will be conducted if we face a drought in the next 5 years. It describes how supplies will be enhanced, demands managed, and environmental impacts minimised. It proposes ongoing leakage reduction measures, water efficiency and monitoring and metering activities.	An HRA was not publicly available on the Drought website at the time of writing.	This plan aims to protect the water environment in times of drought. It is unlikely that the WRMP will have alone or in-combination effects on the water environment.
The Broads Plan ²⁶	The current Broads Plan covers the period 2022-27.	The Broads Plan sets out a long-term vision and strategic objectives to benefit the landscape, environment, local communities and visitors. It is a high-level overarching plan and draws together and guides a wide range of plans, programmes and policies relevant to the area.	The Broads Plan HRA ²⁷ took into consideration the hierarchical nature of plan making and existing protection measures are set out in high level strategic policy frameworks and strategic mitigation strategies that serve to help overcome the identified potential adverse effects. Local protective policy frameworks such as the Broads Authorities Environmental Standard Operating Procedures and codes of conduct were also relevant. The HRA made a series of recommendations during the development of the Broads Plan aimed at strengthening the plan's wording to ensure adequate policy protection is provided. The	The Broads Plan sets out the overarching framework for other plans in the Broads Authority area. The protective policy wording within it will have a positive impact in combination with the Local Plan upon habitats sites.

²⁵ Essex and Suffolk Water (2022) Draft Drought Plan. Available at: <https://www.nwg.co.uk/globalassets/corporate/environment-pdfs/drought-plan/esw/drought-management-plan-summary-esw-final.pdf> [Date accessed: 30/09/24].

²⁶ The Broads Authority (2022) Broads Plan. Available at: [https://www.broads-authority.gov.uk/about-us/how-we-work/strategy#:~:text=The%20Sustainable%20Tourism%20Strategy%20\(2016,closely%20with%20the%20Broads%20Authority](https://www.broads-authority.gov.uk/about-us/how-we-work/strategy#:~:text=The%20Sustainable%20Tourism%20Strategy%20(2016,closely%20with%20the%20Broads%20Authority). [Date Accessed: 03/10/24].

²⁷ Lepus Consulting (2022) Habitats Regulations Assessment of the Broads Plan.

Councils, Plans and Policies	Plan Status	Summary of housing/employment – Key elements of the Local Plan that could cause in-combination effects	Summary of HRA findings	Potential in-combination Likely Significant Effect (LSE)
			HRA concluded no adverse impact on site integrity at any habitats site.	
The Broads Sustainable Tourism Strategy (2016 – 2020)	The Broads Sustainable Tourism Strategy ²⁸ was published in 2016 and is currently under review.	Tourism has the potential to increase navigational and recreational pressures upon inland waterways and also at coastal sites a number of which are designated as habitats sites or have the potential to provide supporting habitat.	An HRA ²⁹ was prepared by Lepus to support the updated version of the Sustainable Tourism Strategy currently in preparation. It concluded no adverse impacts on the integrity of any habitats site either alone or in-combination.	This strategy aims to guide how tourism is development and managed in the Broads. The protective policy wording within it will have a positive impact in combination with the Local Plan upon habitats sites which are vulnerable to recreational impacts in particular.
The Broads. Waterways Management Strategy and Action Plan 2022/23 - 2026/27 ³⁰	The Waterways Management Strategy was updated and published in 2022.	The strategy provides a five-year action plan and a framework for sustainable and cost effective management of the Broads navigable waterways.	The HRA ³¹ prepared in support of this Strategy took into consideration the hierarchical nature of plan making and existing Environmental Standard Operating Procedures which apply to project level work in the Broads in relation to waterway management. The Appropriate Assessment concluded that taking these into account the Strategy would have no adverse impact on site integrity at any habitats site either alone or in-combination.	The protective policy wording within this Strategy will have a positive impact in combination with the Local Plan upon water habitats sites.

²⁸ The Tourism Company. 2016. Sustainable Tourism in the Broads. Available at: https://www.broads-authority.gov.uk/_data/assets/pdf_file/0023/226247/Sustainable-Tourism-in-the-Broads-2016-20-May-2016.pdf [Date Accessed: 03/10/24].

²⁹ Lepus Consulting (2024). Habitats Regulations Assessment (HRA) of the Strategy for Sustainable Tourism in the Broads 2024-2029.

³⁰ The Broads Authority (2022) Waterways Management Strategy and Action Plan 2022/23 - 2026/27. Available at: [https://www.broads-authority.gov.uk/about-us/how-we-work/strategy#:~:text=The%20Sustainable%20Tourism%20Strategy%20\(2016,closely%20with%20the%20Broads%20Authority.](https://www.broads-authority.gov.uk/about-us/how-we-work/strategy#:~:text=The%20Sustainable%20Tourism%20Strategy%20(2016,closely%20with%20the%20Broads%20Authority.) [Date Accessed: 03/10/24].

³¹ Lepus Consulting (2022) Habitats Regulations Assessment of The Broads Authority Waterways Management Strategy.

Appendix B: Habitats site conservation objectives, qualifying features, threats and pressures

The Broads SAC¹

Conservation objectives:

- Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying Features:

H3140. Hard oligo-mesotrophic waters with benthic vegetation of *Chara* spp.; Calcium-rich nutrient-poor lakes, lochs and pools

H3150. Natural eutrophic lakes with Magnopotamion or *Hydrocharition*-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed

H6410. *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinia caeruleae*); Purple moor-grass meadows

H7140. Transition mires and quaking bogs; Very wet mires often identified by an unstable `quaking` surface

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)*

H7230. Alkaline fens; Calcium-rich springwater-fed fens

H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains*

S1016. *Vertigo moulinsiana*; Desmoulin`s whorl snail

S1355. *Lutra lutra*; Otter

S1903. *Liparis loeselii*; Fen orchid

S4056. *Anisus vorticulus*; Little whorlpool ram's-horn snail

* denotes a priority natural habitat or species (supporting explanatory text on following page)

Threats and pressures at habitats site which may be affected by the Local Plan²:

- Water Pollution
- Hydrological changes
- Water Abstraction
- Public Access / Disturbance
- Air Pollution

Broadland SPA³

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

¹ Natural England (2014) The Broads SAC Conservation Objectives .Available at:
<https://publications.naturalengland.org.uk/publication/6190476679970816> [Date Accessed:12/01/24].

² Natural England (2014) Broadlands Site Improvement Plan. Available at:
<https://publications.naturalengland.org.uk/publication/5444118129934336> [Date Accessed:16/01/24].

³ Natural England (2014) Broadland SPA Conservation Objective. Available at:
<https://publications.naturalengland.org.uk/publication/5310905998901248> [Date Accessed: 12/01/24].

Broadland SPA³**Qualifying Features:**

- A021 *Botaurus stellaris*; Great bittern (Breeding)
 A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
 A038 *Cygnus cygnus*; Whooper swan (Non-breeding)
 A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
 A051 *Anas strepera*; Gadwall (Non-breeding)
 A056 *Anas clypeata*; Northern shoveler (Non-breeding)
 A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
 A082 *Circus cyaneus*; Hen harrier (Non-breeding)
 A151 *Philomachus pugnax*; Ruff (Non-breeding)

Threats and pressures at habitats site which may be affected by the Local Plan⁴:

- Water Pollution
- Hydrological changes
- Water Abstraction
- Public Access / Disturbance
- Air Pollution

Broadland Ramsar⁵

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	<p>The site supports a number of rare species and habitats within the biogeographical zone context, including the following Habitats Directive Annex I features:</p> <ul style="list-style-type: none"> • H7210 Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i> Calcium-rich fen dominated by great fen sedge (saw sedge). • H7230 Alkaline fens Calcium-rich springwater-fed fens. • H91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i>, <i>Alnion incanae</i>, <i>Salicion albae</i>) Alder woodland on floodplains <p>Annex II species</p> <ul style="list-style-type: none"> • S1016 <i>Vertigo moulinsiana</i> Desmoulin's whorl snail • S1355 <i>Lutra lutra</i> Otter • S1903 <i>Liparis loeselii</i> Fen orchid. <p>The site supports outstanding assemblages of rare plants and invertebrates including nine British Red Data Book plants and 136 British Red Data Book invertebrates.</p>
6	<p>Qualifying Species/populations (as identified at designation): Species with peak counts in winter:</p> <ul style="list-style-type: none"> • Tundra swan, <i>Cygnus columbianus bewickii</i>, NW Europe - 196 individuals, representing an average of 2.4% of the GB population (5-year peak mean 1998/9- 2002/3) • Eurasian wigeon, <i>Anas penelope</i>, NW Europe - 6769 individuals, representing an average of 1.6% of the GB population (5-year peak mean 1998/9-2002/3) • Gadwall, <i>Anas strepera strepera</i>, NW Europe - 545 individuals, representing an average of 3.1% of the GB population (5-year peak mean 1998/9- 2002/3)

⁴ Natural England (2014) Broadland Site Improvement Plan. Available at:

<https://publications.naturalengland.org.uk/publication/5444118129934336> [Date Accessed:16/01/24].

⁵ JNCC (2008) Information Sheet on Ramsar Wetlands. Broadlands Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11010.pdf> [Date Accessed:17/01/24].

Ramsar Criterion	Justification for the application of each criterion
	<ul style="list-style-type: none"> • Northern shoveler, <i>Anas clypeata</i>, NW & C Europe - 247 individuals, representing an average of 1.6% of the GB population (5-year peak mean 1998/9- 2002/3) <p>Species/populations identified subsequent to designation for possible future consideration under criterion 6.</p> <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> • Pink-footed goose, <i>Anser brachyrhynchus</i>, Greenland, Iceland/UK - 4263 individuals, representing an average of 1.7% of the population (5-year peak mean 1998/9-2002/3) • Greylag goose, <i>Anser anser anser</i>, Iceland/UK, Ireland - 1007 individuals, representing an average of 1.1% of the population (Source period not collated) <p>Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually</p>

Threats and Pressures at habitats site which may be affected by the Local Plan⁶:

- Water Pollution
- Hydrological changes
- Water Abstraction
- Public Access / Disturbance
- Air Pollution

Breydon Water SPA⁷

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

- A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)
- A132 *Recurvirostra avosetta*; Pied avocet (Non-breeding)
- A140 *Pluvialis apricaria*; European golden plover (Non-breeding)
- A142 *Vanellus vanellus*; Northern lapwing (Non-breeding)
- A151 *Philomachus pugnax*; Ruff (Non-breeding)
- A193 *Sterna hirundo*; Common tern (Breeding)A Waterbird assemblage

Threats and pressures at habitats site which may be affected by the Local Plan⁸:

- Public Access / Disturbance
- Hydrological changes

⁶ Natural England (2014) Broadlands Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/5444118129934336> [Date Accessed:16/01/24].

⁷ Natural England (2014) Breydon Water SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6376690053808128> [Date Accessed:12/01/24].

⁸ Natural England (2014) Breydon Water SPA Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/6364048115367936> [Date Accessed: 16/01/24].

Breydon Water Ramsar⁹

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
5	Assemblages of international importance: Species with peak counts in winter: 68175 waterfowl (5-year peak mean 1998/99-2002/2003)
6	Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species with peak counts in winter: <ul style="list-style-type: none"> • Pink-footed goose, <i>Anser brachyrhynchus</i>, Greenland, Iceland/UK - 5816 individuals, representing an average of 2.4% of the population (5-year peak mean 1998/9-2002/3) • Eurasian wigeon, <i>Anas penelope</i>, NW Europe- 15624 individuals, representing an average of 1% of the population (5-year peak mean 1998/9- 2002/3) • Northern shoveler, <i>Anas clypeata</i>, NW & C Europe - 478 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9- 2002/3) • European golden plover, <i>Pluvialis apricaria apricaria</i>, <i>P. a. altifrons</i> Iceland & Faroes/E Atlantic - 10656 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9-2002/3) • Black-tailed godwit, <i>Limosa limosa islandica</i>, Iceland/W Europe - 1100 individuals, representing an average of 3.1% of the population (5-year peak mean 1998/9-2002/3) Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually.

Threats and Pressures at habitats site which may be affected by the Local Plan¹⁰:

No identified threats or pressures to Braydon Water Ramsar

Outer Thames Estuary SPA¹¹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

- A001 *Gavia stellata*; Red-throated diver (Non-breeding)
 A193 *Sterna hirundo*; Common tern (Breeding)
 A195 *Sternula albifrons*; Little tern (Breeding)

⁹ JNCC (2008) Information Sheet on Ramsar Wetlands. Breydon Water Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11008.pdf> [Date Accessed: 04/01/24].

¹⁰ JNCC (2008) Information Sheet on Ramsar Wetlands. Breydon Water Ramsar <https://jncc.gov.uk/jncc-assets/RIS/UK11008.pdf> [Date Accessed: 04/01/24].

¹¹ Natural England (2014) Outer Thames Estuary SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/4927106139029504> [Date Accessed: 12/01/24].

Threats and pressures at habitats site which may be affected by the Local Plan¹²:

Within the Site improvement Plan there are not threats or pressures.

Great Yarmouth and North Denes SPA¹³

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site

Qualifying features:

A195 *Sterna albifrons*; Little tern (Breeding)

Threats and pressures at habitats site which may be affected by the Local Plan¹⁴:

- Public Access / Disturbance
- Hydrological Changes
- Air Pollution

Winterton – Horsey Dunes SAC¹⁵

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the qualifying natural habitats
- The structure and function (including typical species) of the qualifying natural habitats, and,
- The supporting processes on which the qualifying natural habitats rely

Qualifying features:

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2150. Atlantic decalcified fixed dunes (*Calluno-Ulicetea*)*

H2190. Humid dune slacks

* denotes a priority natural habitat or species

Threats and pressures at habitats site which may be affected by the Local Plan¹⁶:

- Public Access / Disturbance
- Hydrological Changes
- Air Pollution

¹² Natural England (2014) Outer Thames Estuary Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/4668757523824640> [Date Accessed:16/01/24].

¹³ Natural England (2014) Great Yarmouth and North Denes SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/516529365556096> [Date Accessed:12/01/24].

¹⁴ Natural England (2014) Great Yarmouth Winterton Horsey Site Improvement Plan (to cover Great Yarmouth North Denes SPA and Winterton-Horsey Dunes SAC). Available at: <http://publications.naturalengland.org.uk/file/6277135286665216> [Date Accessed: 16/01/24].

¹⁵ Natural England (2014) Winterton – Horsey Dunes SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/5518326646177792> [Date Accessed:12/01/24].

¹⁶ Natural England (2018) Great Yarmouth Winterton Horsey Site Improvement Plan (to cover Great Yarmouth North Denes SPA and Winterton-Horsey Dunes SAC). Available at: <http://publications.naturalengland.org.uk/file/6277135286665216> [Date Accessed: 04/01/24].

Norfolk Valley Fens SAC¹⁷

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath H4030.

European dry heaths

H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*FestucoBrometalia*); Dry grasslands and scrublands on chalk or limestone

H6410. Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*); Purple moor-grass meadows

H7210. Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae*; Calcium-rich fen dominated by great fen sedge (saw sedge)*

H7230. Alkaline fens; Calcium-rich springwater-fed fens

H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains*

S1014. *Vertigo angustior*; Narrow-mouthed whorl snail

S1016. *Vertigo moulinsiana*; Desmoulin's whorl snail

* denotes a priority natural habitat or species

Threats and pressures at habitats site which may be affected by the Local Plan¹⁸:

- Hydrological changes
- Water Pollution
- Water Abstraction
- Air Pollution

The Wash and North Norfolk Coast SAC¹⁹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying features:

H1150. Coastal lagoons*

H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves H1420. Mediterranean and thermo-Atlantic *halophilous* scrubs (*Sarcocornetea fruticosi*); Mediterranean saltmarsh scrub

H2110. Embryonic shifting dunes

¹⁷ Natural England (2014) Norfolk Valley Fens SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6684666086031360> [Date Accessed:16/01/24].

¹⁸ Natural England (2014) Norfolk Valley Fens Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/6261291761008640> [Date Accessed: 16/01/24].

¹⁹ Natural England (2017) The Wash & North Norfolk Coast SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/5950176598425600> [Date Accessed: 16/01/24].

The Wash and North Norfolk Coast SAC¹⁹

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*

H2190. Humid dune slacks

S1355. *Lutra lutra*; Otter

S1395. *Petalophyllum ralfsii*; Petalwort

* denotes a priority natural habitat or species

Threats and Pressures at habitats site which may be affected by the Local Plan²⁰:

- Public Access / Disturbance
- Air Pollution

North Norfolk Coast SAC²¹

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying features:

H1150. Coastal lagoons*

H1220. Perennial vegetation of stony banks; Coastal shingle vegetation outside the reach of waves H1420. Mediterranean and thermo-Atlantic *halophilous* scrubs (*Sarcocornetea fruticosi*); Mediterranean saltmarsh scrub

H2110. Embryonic shifting dunes

H2120. Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes"); Shifting dunes with marram

H2130. Fixed dunes with herbaceous vegetation ("grey dunes"); Dune grassland*

H2190. Humid dune slacks

S1355. *Lutra lutra*; Otter

S1395. *Petalophyllum ralfsii*; Petalwort

* denotes a priority natural habitat or species

Threats and Pressures at habitats site which may be affected by the Local Plan²²:

- Public Access / Disturbance
- Air Pollution

North Norfolk Coast SPA²³

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely

²⁰ Natural England (2014) The Wash and North Norfolk Coast Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date Accessed: 16/01/24].

²¹ Natural England (2014) North Norfolk Coast SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6270240262455296> [Date Accessed: 16/01/24].

²² Natural England (2014) The Wash and North Norfolk Coast Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date Accessed: 16/01/24].

²³ Natural England (2014) North Norfolk Coast SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/4732349359063040> [Date Accessed:16/01/24].

North Norfolk Coast SPA²³
<ul style="list-style-type: none"> • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site <p>Qualifying features: A021 <i>Botaurus stellaris</i>; Great bittern (Breeding) A040 <i>Anser brachyrhynchus</i>; Pink-footed goose (Non-breeding) A046a <i>Branta bernicla bernicla</i>; Dark-bellied brent goose (Non-breeding) A050 <i>Anas penelope</i>; Eurasian wigeon (Non-breeding) A081 <i>Circus aeruginosus</i>; Eurasian marsh harrier (Breeding) A084 <i>Circus pygargus</i>; Montagu's harrier (Breeding) A132 <i>Recurvirostra avosetta</i>; Pied avocet (Breeding) A143 <i>Calidris canutus</i>; Red knot (Non-breeding) A191 <i>Sterna sandvicensis</i>; Sandwich tern (Breeding) A193 <i>Sterna hirundo</i>; Common tern (Breeding) A195 <i>Sterna albifrons</i>; Little tern (Breeding) Waterbird assemblage</p> <p>Threats and Pressures at habitats site which may be affected by the Local Plan²⁴:</p> <ul style="list-style-type: none"> • Public Access / Disturbance • Air Pollution

North Norfolk Ramsar²⁵	
<p>Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.</p>	
Ramsar Criterion	Justification for the application of each criterion
1	The site is one of the largest expanses of undeveloped coastal habitat of its type in Europe. It is a particularly good example of a marshland coast with intertidal sand and mud, saltmarshes, shingle banks and sand dunes. There are a series of brackish-water lagoons and extensive areas of freshwater grazing marsh and reed beds.
2	Supports at least three British Red Data Book and nine nationally scarce vascular plants, one British Red Data Book lichen and 38 British Red Data Book invertebrates.
5	Assemblages of international importance: Species with peak counts in winter: 98462 waterfowl (5-year peak mean 1998/99-2002/2003)
6	<p>Qualifying Species/populations (as identified at designation):</p> <p>Species regularly supported during the breeding season:</p> <ul style="list-style-type: none"> • Sandwich tern, <i>Sterna (Thalasseus) sandvicensis sandvicensis</i>, W Europe - 4275 apparently occupied nests, representing an average of 7.7% of the breeding population (Seabird 2000 Census) • Common tern, <i>Sterna hirundo hirundo</i>, N & E Europe - 408 apparently occupied nests, representing an average of 4% of the GB population (Seabird 2000 Census) • Little tern, <i>Sterna albifrons albifrons</i>, W Europe - 291 apparently occupied nests, representing an average of 2.5% of the breeding population (Seabird 2000 Census) <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> • Red knot, <i>Calidris canutus islandica</i>, W & Southern Africa (wintering) - 30781 individuals, representing an average of 6.8% of the population (5-year peak mean 1998/9-2002/3) <p>Species with peak counts in winter:</p>

²⁴ Natural England (2014) The Wash And North Norfolk Coast Site Improvement Plans. Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date Accessed: 16/01/24].

²⁵ JNCC (2008) Information Sheet on Ramsar Wetlands. North Norfolk Ramsar. Available at <https://jncc.gov.uk/jncc-assets/RIS/UK11048.pdf> [Date Accessed:17/01/24].

<ul style="list-style-type: none"> • Pink-footed goose, <i>Anser brachyrhynchus</i>, Greenland, Iceland/UK - 16787 individuals, representing an average of 6.9% of the population (5-year peak mean 1998/9-2002/3) • Dark-bellied brent goose, <i>Branta bernicla bernicla</i>, - 8690 individuals, representing an average of 4% of the population (5-year peak mean 1998/9- 2002/3) • Eurasian wigeon, <i>Anas penelope</i>, NW Europe - 17940 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9-2002/3) • Northern pintail, <i>Anas acuta</i>, NW Europe - 1148 individuals, representing an average of 1.9% of the population (5-year peak mean 1998/9-2002/3) <p>Species/populations identified subsequent to designation for possible future consideration under criterion 6.</p> <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> • Ringed plover, <i>Charadrius hiaticula</i>, Europe/Northwest Africa - 1740 individuals, representing an average of 2.3% of the population (5-year peak mean 1998/9-2002/3) • Sanderling, <i>Calidris alba</i>, Eastern Atlantic - 1303 individuals, representing an average of 1% of the population (5-year peak mean 1998/9- 2002/3) • Bar-tailed godwit, <i>Limosa lapponica lapponica</i>, W Palearctic - 3933 individuals, representing an average of 3.2% of the population (5-year peak mean 1998/9-2002/3) <p>Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually.</p>
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Threats and Pressures at habitats site which may be affected by the Local Plan:

No threats or pressures were identified for North Norfolk Coast Ramsar.

River Wensum SAC²⁶

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying features:

H3260. Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitriche-Batrachion* vegetation; Rivers with floating vegetation often dominated by water-crowfoot

S1016. *Vertigo moulinsiana*; Desmoulin`s whorl snail

S1092. *Austropotamobius pallipes*; White-clawed (or Atlantic stream) crayfish

S1096. *Lampetra planeri*; Brook lamprey

S1163. *Cottus gobio*; Bullhead

Threats and Pressures at habitat site which may be affected by the Local Plan²⁷:

- Water Pollution and Abstraction

²⁶ Natural England (2014) River Wensum SAC Conservation Objectives. Available at:

<https://publications.naturalengland.org.uk/publication/6039440396910592> [Date Accessed: 18/01/24].

²⁷ Natural England (2014) River Wensum SAC Site Improvement Plan. Available at:

<https://publications.naturalengland.org.uk/publication/6720168281505792> [Date Accessed:18/01/24].

Ramsar Criterion	Justification for the application of each criterion
1	The site is an extensive example of spring-fed lowland base-rich valley, remarkable for its lack of fragmentation.
2	The site supports many rare and scarce invertebrates, including a population of the fen raft spider <i>Dolomedes plantarius</i> .
3	The site supports many rare and scarce invertebrates, including a population of the fen raft spider <i>Dolomedes plantarius</i> . The diversity of the site is due to the lateral and longitudinal zonation of the vegetation types characteristic of valley mires.

Threats and Pressures at habitats site which may be affected by the Local Plan:

No threats or pressures were identified for Redgrave and South Lopham Fens Ramsar.

Breckland SPA²⁸

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

A133 *Burhinus oedicnemus*; Stone-curlew (Breeding)

A224 *Caprimulgus europaeus*; European nightjar (Breeding)

A246 *Lullula arborea*; Woodlark (Breeding)

Threats and Pressures at habitat site which may be affected by the Local Plan²⁹:

- Water Pollution
- Air Pollution
- Public Access and disturbance
- Habitat Fragmentation

Breckland SAC³⁰

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Qualifying features:

H2330. Inland dunes with open *Corynephorus* and *Agrostis* grasslands; Open grassland with grey-hair grass and common bent grass of inland dunes

H3150. Natural eutrophic lakes with *Magnopotamion* or *Hydrocharition*-type vegetation; Naturally nutrient-rich lakes or lochs which are often dominated by pondweed

²⁸ Natural England (2014) Breckland SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/4572292419944448> [Date Accessed:18/01/24].

²⁹ Natural England (2014) Breckland SPA Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/5075188492271616> [Date Accessed: 18/01/24].

³⁰ Natural England (2014) Breckland SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6145904885104640> [Date Accessed:18/01/24].

H4030. European dry heaths
 H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*FestucoBrometalia*); Dry grasslands and scrublands on chalk or limestone
 H91E0. Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (*Alno-Padion*, *Alnion incanae*, *Salicion albae*); Alder woodland on floodplains*
 S1166. *Triturus cristatus*; Great crested newt
 * denotes a priority natural habitat or species

Threats and Pressures at habitat site which may be affected by the Local Plan³¹:

- Water Pollution
- Air Pollution
- Public Access and disturbance
- Habitat Fragmentation

Roydon and Dersingham Bog SAC³²

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely

Qualifying features:

H4010. Northern Atlantic wet heaths with *Erica tetralix*; Wet heathland with cross-leaved heath
 H4030. European dry heaths
 H7150. Depressions on peat substrates of the *Rhynchosporion*

Threats and Pressures at habitat site which may be affected by the Local Plan³³:

- Hydrological changes
- Air Pollution
- Water Pollution

Dersingham Bog Ramsar³⁴

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	Ramsar criterion 2 Supports an important assemblage of invertebrates - nine British Red Data Book species have been recorded.

³¹ Natural England (2014) Breckland SAC Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/5075188492271616> [Date Accessed: 18/01/24].

³² Natural England (2014) Roydon Common and Dersingham Bog SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/4858619669512192> [Date Accessed:18/01/24].

³³ Natural England (2014) Roydon Common and Dersingham Bog SAC Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/4809467120058368> [Date Accessed: 18/01/24].

³⁴ JNCC (2008) Information Sheet on Ramsar Wetlands. Dersingham Bog Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11019.pdf> [Date Accessed: 17/01/24]

Threats and Pressures at habitats site which may be affected by the Local Plan:

No threats or pressures were identified for Roydon and Dersingham Bog Ramsar.

Roydon Common Ramsar³⁵

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
2	Ramsar criterion 2 Supports an important assemblage of invertebrates - nine British Red Data Book species have been recorded.

Threats and Pressures at habitats site which may be affected by the Local Plan:

No threats or pressures were identified for Roydon Common Ramsar.

Benacre to Easton Bavents SPA³⁶

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site

Qualifying features:

A021 *Botaurus stellaris*; Great bittern (Breeding)
 A081 *Circus aeruginosus*; Eurasian marsh harrier (Breeding)
 A195 *Sterna albifrons*; Little tern (Breeding)

Threats and pressures at habitat site which may be affected by the Local Plan³⁷:

- Public Access / Disturbance
- Water Pollution

The Wash SPA³⁸

Conservation objectives:

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features

³⁵ JNCC (2008) Information Sheet on Ramsar Wetlands. Roydon Common Ramsar. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11061.pdf> [Date Accessed: 17/01/24]

³⁶ Natural England (2014) Benacre to Easton Bevent SPA Conservation Objective. Available at: <https://publications.naturalengland.org.uk/publication/4750287944286208> [Date Accessed: 16/01/24]

³⁷ Natural England (2014) Benacre to Easton Bavents Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/4812476415737856> [Date Accessed:16/01/24].

³⁸ Natural England (2014) The Wash SPA Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/5747661105790976> [Date Accessed: 16/01/24].

The Wash SPA³⁸

- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Qualifying features:

- A037 *Cygnus columbianus bewickii*; Bewick’s swan (Non-breeding)
 A040 *Anser brachyrhynchus*; Pink-footed goose (Non-breeding)
 A046a *Branta bernicla bernicla*; Dark-bellied brent goose (Non-breeding)
 A048 *Tadorna tadorna*; Common shelduck (Non-breeding)
 A050 *Anas penelope*; Eurasian wigeon (Non-breeding)
 A051 *Anas strepera*; Gadwall (Non-breeding)
 A054 *Anas acuta*; Northern pintail (Non-breeding)
 A065 *Melanitta nigra*; Black (common) scoter (Non-breeding)
 A067 *Bucephala clangula*; Common goldeneye (Non-breeding)
 A130 *Haematopus ostralegus*; Eurasian oystercatcher (Non-breeding)
 A141 *Pluvialis squatarola*; Grey plover (Non-breeding)
 A143 *Calidris canutus*; Red knot (Non-breeding)
 A144 *Calidris alba*; Sanderling (Non-breeding)
 A149 *Calidris alpina alpina*; Dunlin (Non-breeding)
 A156 *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
 A157 *Limosa lapponica*; Bar-tailed godwit (Non-breeding)
 A160 *Numenius arquata*; Eurasian curlew (Non-breeding)
 A162 *Tringa totanus*; Common redshank (Non-breeding)
 A169 *Arenaria interpres*; Ruddy turnstone (Non-breeding)
 A193 *Sterna hirundo*; Common tern (Breeding)
 A195 *Sterna albifrons*; Little tern (Breeding)

Waterbird assemblage

Threats and Pressures at habitat site which may be affected by the Local Plan³⁹:

- Public Access / Disturbance
- Coastal Squeeze
- Air Pollution: impact of atmospheric nitrogen deposition

The Wash Ramsar⁴⁰

Ramsar sites do not have Conservation Objectives in the same way as SPAs and SACs. Information regarding the designation of Ramsar sites is contained in JNCC Ramsar Information Sheets. Ramsar Criteria are the criteria for identifying Wetlands of International Importance. The relevant criteria and ways in which this site meets the criteria are presented in the table below.

Ramsar Criterion	Justification for the application of each criterion
1	The Wash is a large shallow bay comprising very extensive saltmarshes, major intertidal banks of sand and mud, shallow water and deep channels.
3	Qualifies because of the inter-relationship between its various components including saltmarshes, intertidal sand and mud flats and the estuarine waters. The saltmarshes and the plankton in the estuarine water provide a primary source of organic material which, together with other organic matter, forms the basis for the high productivity of the estuary.
5	Assemblages of international importance: Species with peak counts in winter: 292541 waterfowl (5-year peak mean 1998/99-2002/2003)
6	Species/populations occurring at levels of international importance.

³⁹ Natural England (2018) The Wash SPA Site Improvement Plan. Available at: <https://publications.naturalengland.org.uk/publication/5327498292232192> [Date Accessed: 04/01/24].

⁴⁰ JNCC (2008) Information Sheet on Ramsar Wetlands. The Wash. Available at: <https://jncc.gov.uk/jncc-assets/RIS/UK11072.pdf> [Date Accessed: 16/02/24].

Ramsar Criterion	Justification for the application of each criterion
	<p>Qualifying Species/populations (as identified at designation):</p> <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> • Eurasian oystercatcher, <i>Haematopus ostralegus ostralegus</i>, Europe & NW Africa -wintering 15616 individuals, representing an average of 1.5% of the population (5-year peak mean 1998/9-2002/3) • Grey plover, <i>Pluvialis squatarola</i>, E Atlantic/W Africa -wintering 13129 individuals, representing an average of 5.3% of the population (5-year peak mean 1998/9-2002/3 - spring peak) • Red knot, <i>Calidris canutus islandica</i>, W & Southern Africa (wintering) 68987 individuals, representing an average of 15.3% of the population (5-year peak mean 1998/9-2002/3) • Sanderling, <i>Calidris alba</i>, Eastern Atlantic 3505 individuals, representing an average of 2.8% of the population (5-year peak mean 1998/9-2002/3) • Eurasian curlew, <i>Numerius arquata arquata</i>, <i>N. a. arquata</i> Europe (breeding) 9438 individuals, representing an average of 2.2% of the population (5-year peak mean 1998/9-2002/3) • Common redshank, <i>Tringa totanus totanus</i>, 6373 individuals, representing an average of 2.5% of the population (5-year peak mean 1998/9-2002/3) • Ruddy turnstone, <i>Arenaria interpres interpres</i>, NE Canada, Greenland/W Europe & NW Africa 888 individuals, representing an average of 1.7% of the GB population (5-year peak mean 1998/9- 2002/3) <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> • Pink-footed goose, <i>Anser brachyrhynchus</i>, Greenland, Iceland/UK 29099 individuals, representing an average of 12.1% of the population (5-year peak mean 1998/9-2002/3) • Dark-bellied brent goose, <i>Branta bernicla bernicla</i>, 20861 individuals, representing an average of 9.7% of the population (5-year peak mean 1998/9-2002/3) • Common shelduck, <i>Tadorna tadorna</i>, NW Europe 9746 individuals, representing an average of 3.2% of the population (5-year peak mean 1998/9-2002/3) • Northern pintail, <i>Anas acuta</i>, NW Europe 431 individuals, representing an average of 1.5% of the GB population (5-year peak mean 1998/9- 2002/3) • Dunlin, <i>Calidris alpina alpina</i>, W Siberia/W Europe 36600 individuals, representing an average of 2.7% of the population (5-year peak mean 1998/9-2002/3) • Bar-tailed godwit, <i>Limosa lapponica lapponica</i>, W Palearctic 16546 individuals, representing an average of 13.7% of the population (5-year peak mean 1998/9-2002/3) <p>Species/populations identified subsequent to designation for possible future consideration under criterion 6.</p> <p>Species with peak counts in spring/autumn:</p> <ul style="list-style-type: none"> • Ringed plover, <i>Charadrius hiaticula</i>, Europe/Northwest Africa 1500 individuals, representing an average of 2% of the population (5-year peak mean 1998/9- 2002/3) • Black-tailed godwit, <i>Limosa limosa islandica</i>, Iceland/W Europe 6849 individuals, representing an average of 19.5% of the population (5-year peak mean 1998/9-2002/3) <p>Species with peak counts in winter:</p> <ul style="list-style-type: none"> • European golden plover, <i>Pluvialis apricaria apricaria</i>, <i>P. a. altifrons</i> Iceland & Faroes/E Atlantic 22033 individuals, representing an average of 2.3% of the population (5-year peak mean 1998/9-2002/3) • Northern lapwing, <i>Vanellus vanellus</i>, Europe - breeding 46422 individuals, representing an average of 1.3% of the population (5-year peak mean 1998/9-2002/3) <p>Contemporary data and information on waterbird trends at this site and their regional (sub-national) and national contexts can be found in the Wetland Bird Survey report, which is updated annually.</p>

Threats and Pressures at habitats site which may be affected by the Local Plan:

No threats or pressures were identified for The Wash Ramsar.

Appendix C: Screening of the Publication Local Plan for the Broads

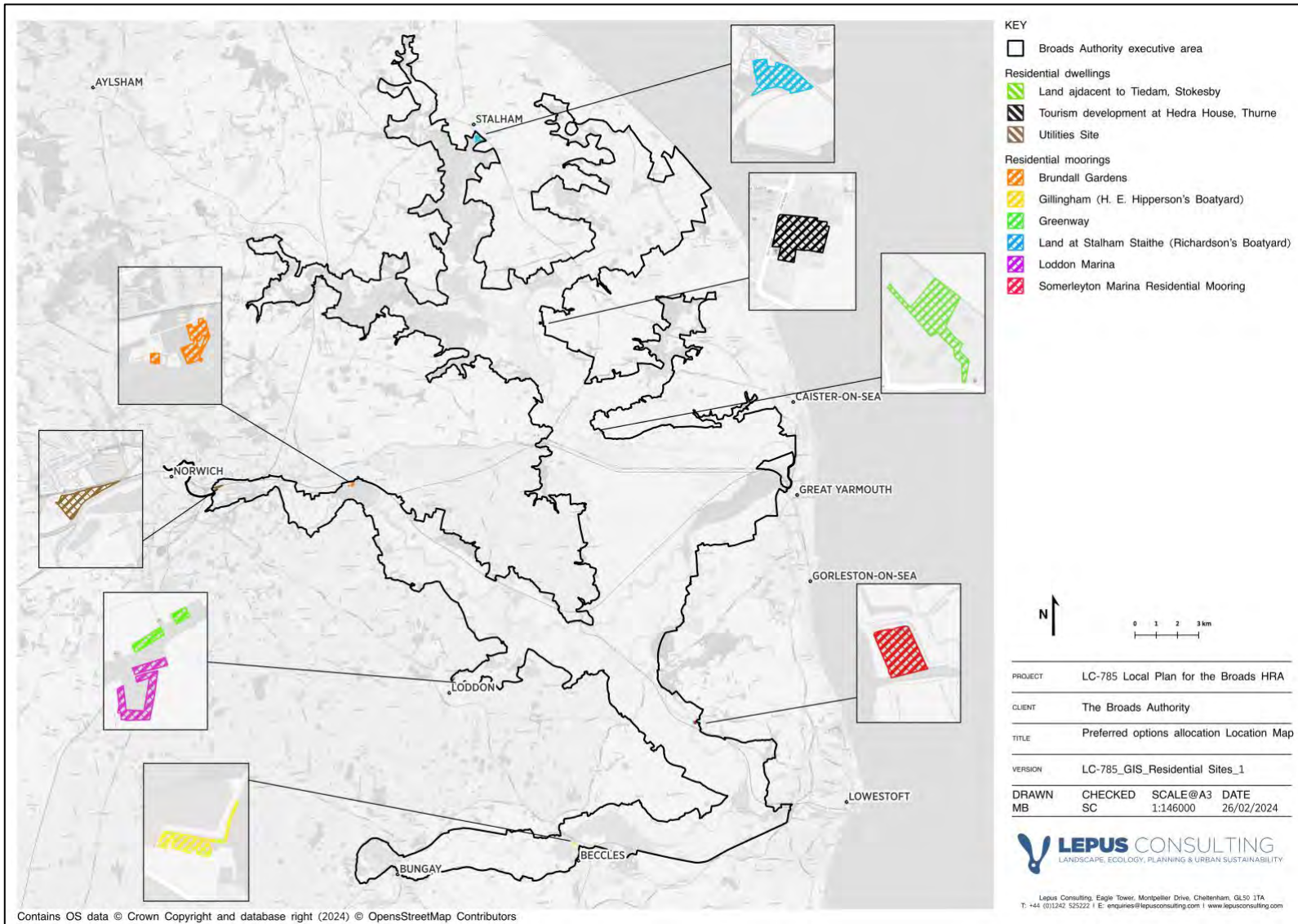


Figure C.1: Preferred Options allocation location map

Chapter 1 – 9

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
n/a	These chapters provide administrative text, background and context for the Local Plan.	Screen Out Administrative text

Chapter 10: Vision and Objectives

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
Vision	The vision provides general aspirations for the Borough over the Plan period.	Screen Out Category A
Objectives	Strategic objectives central to achieving the delivery of the vision for the Broads Authority, centred around the community, the economy and the environment. These are general aspirations for the Local Plan.	Screen Out Category A

Chapter 11: The rest of the Publication version Local plan

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
n/a	This chapter locates proposed policies in the Local Plan.	Screen Out Administrative text

Chapter 12: Sustainable development in the Broads

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM1 – Major Development in the Broads	This policy defines ‘major development’ and sets out the requirements for proposals. It does not allocate any development or trigger any change. As such, this policy is unlikely to have an LSE on any habitats site.	Screen Out Category B
PUBDM2 – Embodied Carbon	This policy is a Plan wide environmental protection policy in relation to embodied carbon. It encourages development to reduce embodied carbon content through materials, avoiding demolition, the circular economy and the calculation of whole-lifecycle carbon emissions. The policy does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE on any Habitats site and will not be considered further in the HRA process.	Screen Out Category D

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM3 – Pollution and Hazards in development and protecting environmental quality	This policy is a Plan wide environmental protection policy requiring all development proposals to protect the quality of the environment. Proposals must comply with statutory environmental quality standards and demonstrate that development will not cause adverse impacts. The policy does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE on any Habitats site and will not be considered further in the HRA process.	Screen Out Category D

Chapter 13: Climate Change

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
Policy PUBSP1 – Responding to the Climate Emergency	This policy is a Plan wide environmental protection policy focusing on climate change. The policy sets out requirements for development to reduce greenhouse gas emissions and adapt to climate change throughout its lifetime. The Authority will support proposals that help combat climate change. It does not allocate any development or trigger any change. This policy is unlikely to have LSE on any habitats site itself and will not be considered further in the HRA process.	Screen Out Category D
Policy PUBDM4 – Climate change adaption and resilience checklist	This policy is a Plan wide environmental protection policy which requires certain development proposals to demonstrate how climate change has been accounted for through design by submitting a Climate Smart Checklist. It does not allocate any development or trigger any change which would impact a Habitats site. As such this policy is unlikely to have an LSE on any habitats site itself and would not be considered further in the HRA process.	Screen Out Category D

Chapter 14: Water use and quality

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM5 – Water quality and foul drainage	This policy is a Plan wide environmental protection policy to protect water quality and quantity. Development will be permitted where it will not have an adverse impact on surface and ground waterbodies. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have LSEs and will be screened out of the HRA process.	Screen Out Category D
PUBDM6 – Boat wash-down facilities	This policy protects water quality by preventing anti fouling paint residues entering the water system and stopping the spread of invasive species. It requires a designated area with adequate facilities for the wash-down of vessels to. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have LSEs and will be screened out of the HRA process.	Screen Out Category D

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM7 – Water efficiency and re-use	This policy requires all new development to have a water demand at minimum equivalent to 110l/person/day and for all non-domestic buildings to be water efficient. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have LSEs and will be screened out of the HRA process.	Screen Out Category D

Chapter 15: Flooding

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP2 – Strategic flood risk policy	This policy is a Plan wide environmental protection policy in relation to flood risk. It sets out criteria for all new development including the incorporation of suitable surface water drainage mitigation measures and location to minimise flood risk from all sources. It does not allocate any development or trigger any change which would impact a Habitats site. As such this policy is unlikely to have LSEs on any habitats site itself and will not be considered further in the HRA process.	Screen Out Category D
PUBDM8 – Development and flood risk	This policy is a Plan wide environmental protection policy in relation to flood risk. It sets out the requirements of development located within areas at risk of floods and the Site-Specific Flood Risk Assessment. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have LSEs on any Habitats site itself and will not be considered further in the HRA process.	Screen Out Category D
PUBDM9 – Surface water run-off	This policy is a Plan wide environmental protection policy in relation to surface water run-off. It requires all development proposals to incorporate appropriate measures to attenuate surface water run off. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have LSEs on any Habitats site itself and will not be considered further in the HRA process.	Screen Out Category D

Chapter 16: Open space, play and allotments

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM10 – Open space on land, play space, sports fields and allotments	This policy protects existing open space and requires the provision of new open space to reduce recreation pressure on sensitive designated wildlife sites. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F

Chapter 17: Green and blue infrastructure and Public Rights of Way

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM11 – Green and blue Infrastructure and Public Rights of Way	This policy requires green infrastructure (GI) and blue infrastructure (BI) to be central to the design of schemes. Proposals must enhance and integrate with the local GI and BI and Public Rights of Way (PRoW) and access will be protected, enhanced and promoted. The promotion of new PRoW and access will need to be mindful of potential LSEs from increased recreational pressure at sensitive habitats sites depending on location – to be assessed on a site-by-site basis. This policy will therefore be screened into the HRA process.	Screen In Category I

Chapter 18: Soils

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP3 - Soils	This policy sets out criteria to ensure the protection of soils. It is a Plan wide environmental protection policy and does not allocate any development or trigger any change. As such this policy is unlikely to have LSEs on any habitats site and will be screened out of the HRA process.	Screen Out Category D
PUBDM12 – Peat soils	This policy protects, enhances and preserves peat soil sites. It is a Plan wide environmental protection policy and does not allocate any development or trigger any change. As such this policy is unlikely to have LSEs on any habitats site and will be screened out of the HRA process.	Screen Out Category D

Chapter 19: Heritage and historic assets

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP4 – Historic Environment	This policy seeks to protect and enhance the historic environment of the Broads. It will not trigger any development or change. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBDM13 – Heritage Assets	This policy sets out the expectations of all development to protect, preserve or enhance the significance and setting of historic, cultural and architectural heritage assets and elements that give Broads its distinctive character. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F
PUBDM14 – Re-use, Conversion or Change of Use of Historic Buildings	This policy provides criteria for the re-use, conversion or change of a designated or non-designated heritage asset. For the re-use of non-designated heritage assets, employment, recreation and tourism uses will be the next preference. Should re-uses relate to residential / tourism development there may be an in-combination LSE with other plans and projects on a habitats site in terms of increased recreational and nutrient impacts. Taking a precautionary approach this policy will therefore be screened into the HRA process for further consideration.	Screen In Category L

Chapter 20: Natural Environment

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP5 – Biodiversity	This policy requires development to be planned around the protection and enhancement of nature. It sets out the requirements if development, including to protect the value and integrity of nature conservation objectives, provide biodiversity net gains and incorporate biodiversity features within development proposals. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have LSEs and will be screened out of the HRA process.	Screen Out Category D
PUBDM15 – Natural Environment	This policy sets out requirements of development in terms of the natural environment, including minimising the fragmentation of Habitats, adhering to the mitigation hierarchy, and assist in the delivery of Local Nature Recovery Strategies. This policy is a Plan wide environmental protection policy in respect of protected sites. It does not allocate any development or trigger any change which would impact a habitats site.	Screen Out Category D
PUBDM16 – Biodiversity Net Gain	This policy requires all development types to achieve a minimum of 10% Biodiversity Net Gain on site. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have LSEs and will be screened out of the HRA process.	Screen Out Category D
PUBDM17 – Mitigating Recreational Impacts	This policy secures mitigation for recreational impacts at Habitats sites to ensure compliance with Norfolk and Suffolk Recreational disturbance Avoidance and Mitigation Strategy (RAMS) schemes. It provides mitigation wording and will therefore be screened into the HRA process.	Screen In Category M
PUBDM18 – Mitigating Nutrient Enrichment Impacts	This policy requires development for overnight accommodation within the Broads SAC or Ramsar sites to not increase nutrient loads. The policy secures mitigation for nutrient impacts at Habitats sites and therefore will therefore be screened into the HRA process.	Screen In Category M
PUBDM19 – Trees, woodlands, hedges, scrub and shrubs and development	This policy protects trees, woodlands and significant hedge and shrub masses and areas of scrub that make a positive landscape contribution or are of ecological importance. It sets out the criteria of development requiring the loss of trees, woodlands, hedgerows, shrub or scrub.	Screen Out Category D

Chapter 21: Renewable energy

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM20 – Energy demand and performance of new buildings (including extensions)	This policy sets out the requirements of development in terms of energy use and efficiency. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE on any Habitats site and will not be considered further in the HRA process.	Screen Out Category F

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM21 – Renewable and low carbon energy	This policy sets out the requirements of renewable/low carbon energy proposals including their scale, design and impact. Renewable energy has the potential to have an adverse impact upon mobile features for which several Habitats sites are designated e.g. birds. Selection of any sites for allocation will need to ensure compliance with the criteria set out in this policy and best practice guidance such as: Natural England (2017) Evidence review of the impact of solar farms on birds, bats, and general ecology (NEER 012) ¹ . RSPB (2017) Solar Power Briefing Note. ² This policy does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to directly have LSEs and will be screened out of the HRA process.	Screen In Category D

Chapter 22: Landscape character

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP6 – Landscape character	This policy conserves and enhances the high quality, diverse and distinct landscapes and seascapes of the Broads. It requires development proposals to ensure the location or intensity of the use is appropriate to the character of the Broads. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category D
PUBDM22 – Development and landscape	This policy requires development to conserve and enhance the key positive landscape characteristics of the Broads. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category D
PUBDM23 – Land raising	This policy requires proposals to raise land to justify the approach and will not be permitted if they have adverse effects which cannot be satisfactorily mitigated. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F
PUBDM24 – Excavated material	This policy sets criteria regarding excavated material. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F

¹ Natural England (2017) Evidence review of the impacts if solar farms on birds, bats and general ecology 2016 (NEER012). Available at: <http://publications.naturalengland.org.uk/publication/6384664523046912> [Date Accessed: 22/02/24].

²RSPB (2023) Working with solar developments to tackle the climate and ecological emergencies. Available at: <https://community.rspb.org.uk/ourwork/b/actionfornature/posts/working-with-solar-developments-to-tackle-the-climate-and-ecological-emergencies> [Date Accessed: 22/02/24].

PUBDM25 – Utilities infrastructure development	This policy sets out criteria which must be met for utilities infrastructure and associated development. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F
PUBDM26 – Protection and enhancement of settlement fringe landscape character	This policy aims to protect the distinctive characteristics and special qualities of the Broads landscape. It sets out the criteria for development within settlement fringe areas. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F

Chapter 23: Amenity

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM27 – Amenity	The policy sets out the requirements of new development to provide high standards of amenities to ensure a suitable living environment. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F

Chapter 24: Tranquillity and Light Pollution

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP7 – Tranquillity in the Broads	This policy is a Plan wide environmental protection policy to protect and conserve tranquillity in the Broads. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category D
PUBDM28 – Light pollution, dark skies and nocturnal character	This policy conserves and enhances the tranquillity, nocturnal character and dark sky experience of the Broads. All developments must ensure they do not add to light pollution. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category D

Chapter 25: Transport

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP8 – Accessibility and Transport	This policy promotes the reduction of travel, use of alternative forms of transport (e.g. public and electric) and active travel options. It will have a positive impact upon air quality at habitats sites. It does however contain wording which notes 'The improvement of access to and views of the waterside by the introduction of additional footpaths and cycle ways;'. This may increase access to areas of the waterside which may be part of Habitats site designations – depending on location. LSEs are therefore possible, and this policy will be screened into the HRA assessment for further consideration. It is noted that protective policy wording is also included to mitigate for these impacts on habitats sites which will be considered in the HRA process.	Screen In Category M and L

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP9 – Recreational access around the Broads Area	This policy promotes access to waterside areas which may be designated as habitats sites. This policy will therefore be screened into the HRA process. Wording is included which only permits improved access where adverse impacts on the natural and historic environment have been considered and addressed in line with other policies in this Local Plan. LSEs are therefore possible, and this policy will be screened into the HRA assessment for further consideration. It is noted that protective policy wording is also included to mitigate for these impacts on habitats sites which will be considered in the HRA process.	Screen In Category M and L
PUBDM29 – Transport, highways and access	This policy promotes the reduction of travel, use of alternative forms of transport (e.g. public and electric) and active travel options. It will have a positive impact upon air quality at Habitats sites. It does however contain wording which supports improvement of access to the waterside. This may increase access to areas of the waterside which may be covered by habitats sites designations – depending on location. LSEs are therefore possible, and this policy will be screened into the HRA assessment for further consideration. It is noted that protective policy wording is also included to mitigate for these impacts which will also be considered in the HRA process.	Screen In Category M and L
PUBDM30 – Recreation facilities parking areas	This policy sets out requirements in terms of parking facilities. It supports limited parking and as such, depending on location of car parks, may have an LSE at a habitats site. This policy will be screened into the HRA assessment for further consideration. It is noted that protective policy wording is also included to mitigate for these impacts which will also be considered in the HRA process.	Screen In Category M and L

Chapter 26: The Broads economy

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP10 – A prosperous local economy	This policy supports proposals that contribute towards sustainable economic growth, prosperity and employment. It sets out how the Authority will support and strengthen the local and rural economy. Therefore, this policy will be screened into the HRA assessment for further consideration. It is noted that protective policy wording is also included to mitigate for these impacts which will also be considered in the HRA process.	Screen In Category L
PUBDM31 – New employment development	This policy sets out the criteria for new employment use (classes B2, B8 and E(g)) proposals. This policy does not allocate any employment sites and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F
PUBDM32 – Protecting general employment	This policy protects current employment uses. It sets general acceptability criteria where change may be supported. It does not trigger development or a change. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM33 – Farm diversification	This policy permits farm diversification / new development / farm shops provided several criteria are met. It does not allocate development itself or trigger any direct change. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F
PUBSP11 – Waterside sites	This policy sets out the criteria for maintaining the network of waterside sites in employment and commercial use. This policy does not allocate any employment sites and therefore does not trigger any change or development directly. It sets a list of criteria to protect employment and commercial waterside sites. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F
PUBDM34 – Development on waterside in employment or commercial use, including boatyards	This policy does not allocate any employment sites and therefore does not trigger any change or development directly. It supports development of new boatsheds and other buildings at waterside sites to meet operational requirements, subject to several criteria. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F

Chapter 27: Retail

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM35 – Retail development in the Broads	This policy supports maintaining and enhancing the vitality and viability of centres. It sets out the criteria for retail development proposals. Therefore, this policy will be screened into the HRA assessment for further consideration. It is noted that protective policy wording is also included to mitigate for these impacts which will also be considered in the HRA process.	Screen In Category L

Chapter 28: Sustainable tourism

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP12 – Sustainable tourism	This policy supports the creation, enhancement and expansion of high quality and inclusive tourism. This policy sets requirements for sustainable tourism and related infrastructure. Tourism development has the potential to have a likely significant recreational impact upon several sensitive habitats sites. As such this policy will be screened into the HRA process.	Screen In Category L
PUBDM36 – Sustainable tourism and recreation development	This policy does not allocate any employment sites and therefore does not trigger any change or development directly. It sets a list of criteria that applications for employment must meet in order to be supported. As such this policy is unlikely to have an LSE on any habitats site and therefore has been screened out of the HRA process.	Screen Out Category F

PUBDM37 – Holiday / tourism accommodation – new provision and retention	This policy sets requirements in relation to holiday / tourism accommodation and protects existing development. It does not allocated development or trigger any change which would have an LSE on any habitats site and therefore has been screened out of the HRA process.	Screen Out Category F
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Chapter 29: Navigation

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP13 – Navigable water space	This policy will maintain and enhance navigable / recreational water spaces and provide opportunities for extension or creation of new water spaces. Given that watercourses link the Broads SAC, Broadlands SPA and Ramsar sites, this policy has the potential to have downstream LSEs on habitats sites and will be screened into the HRA process.	Screen In Category L
PUBDM38 – Access to the water	This policy permits development that supports and encourages the use of waterways subject to requirements. Given that waterways are designated as part of the Broads SAC, Broadlands SPA and Ramsar sites, this policy has the potential to have an LSE on habitats sites and will be screened into the HRA process.	Screen In Category L
PUBDM39 – Bank stabilisation	This policy sets criteria for development proposals which require bank stabilisation. Given that waterways are designated as part of the Broads SAC, Broadlands SPA and Ramsar sites, this policy has the potential to have LSEs on habitats sites and will be screened into the HRA process.	Screen In Category L
PUBSP14 – Mooring provision	This policy encourages the provision of short term visitor moorings and sets out requirements for mooring proposals. Given that waterways are designated as part of the Broads SAC, Broadlands SPA and Ramsar sites, this policy has the potential to have an LSE on habitats sites and will be screened into the HRA process.	Screen In Category L
PUBDM40 – Moorings, mooring basins and marinas	This policy permits new moorings where they contribute to the network of facilities around the Broads system and sets out requirements for new or replacement mooring proposals. Given that waterways are designated as part of the Broads SAC, Broadlands SPA and Ramsar sites, this policy has the potential to have an LSE on a habitats site and will be screened into the HRA process.	Screen In Category L
PUBDM41 – The impact of replacement quay heading on navigation	This policy permits the replacement of quay headings on waterways less than 30m in width on a case-by-case basis and subject to assessment. Any in-river work has the potential to have an LSE on downstream habitats sites e.g. Broads SAC, Broadland SPA and Ramsar. As such this policy will be screened into the HRA process.	Screen In Category L
PUBDM42 – Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks as well as piling	This policy sets requirement in respect of the use of materials. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and would not be considered further in the HRA process.	Screen Out Category F

Chapter 30: Housing and residential moorings

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
POSP15 – Residential development	This policy sets out a list of criteria which would apply to any replacement dwellings. It does not in itself trigger any development or change and will therefore have no LSE. As such it will be screened out of the HRA process.	Screen Out Category F
PUBDM43 – Affordable housing	This policy sets out requirements for affordable housing. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBDM44 – Residential development within defined Development Boundaries	This policy sets out the spatial strategy of the Development Plan. These areas are located close to / upstream of several habitats sites. As such development would have the potential to have an LSE and this policy will be screened into the HRA process.	Screen In Category L
PUBDM45 – Gypsy, Traveller and Travelling Show people	This policy supports development proposals for the provision of permanent or transit accommodation. This policy contains mitigation wording which relates to the protection of habitats sites. As such this policy will be screened into the HRA process for further consideration.	Screen In Category L
PUBDM46 – New residential moorings	This policy sets out the delivery of 48 residential moorings. The policy sets out a list of criteria which such development must meet in order to be permitted. Any new mooring would have the potential to have an LSE upon habitats sites and therefore this policy would be screened into the HRA process.	Screen In Category L
PUBDM47 – Permanent and temporary dwellings for rural enterprise workers	This policy sets out the criteria of the development of new dwellings/residential moorings for rural enterprise workers outside the defined development boundaries. It does not in itself trigger any development or change and will therefore have no LSE. As such it will be screened out of the HRA process	Screen Out Category F
PUBDM48 – Elderly and specialist needs housing	This policy supports proposals for the development of or change to elderly or specialist needs housing subject to criteria. It does not in itself trigger any development or change and will therefore have no LSE. As such it will be screened out of the HRA process	Screen Out Category F
PUBDM49 – Residential ancillary accommodation	This policy sets out a list of criteria which would apply to any residential ancillary accommodation. It does not in itself trigger any development or change and will therefore have no LSE. As such it will be screened out of the HRA process	Screen Out Category F
PUBDM50 – Replacement dwellings	This policy sets out a list of criteria which would apply to any replacement dwellings. It does not in itself trigger any development or change and will therefore have no LSE. As such it will be screened out of the HRA process.	Screen Out Category F

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM51 – Custom/self-build	This policy outlines criteria for custom/self-build dwelling proposals and indicates that they will be 'considered' in accordance with the Local Plan. It encourages developers of multi-dwelling sites to set aside plots for custom/self-build dwellings. It does not in itself trigger any development or change and will therefore have no LSE. As such it will be screened out of the HRA process	Screen Out Category F

Chapter 31: Design

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP16 – Strategic Design Policy	This policy protects and enhances the distinctive built and landscape character of the Broads. It requires development proposals to be of a high quality and resilient to climate change. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBDM52 – Design	This policy sets out design requirements for residential extensions. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F
Policy PUBDM52A - Proposals for residential extensions	This policy sets out design requirements for development. It requires development to be of a high standard and integrate effectively with the surroundings. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBDM53 – Source of heating	This policy sets requirements for the heating of new buildings. It encourages the heating system to be as high up the heating method hierarchy as is feasible. It does not allocate any development or trigger any change. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBDM54 – Heat resilient design	This policy sets out the design requirements of new buildings to prevent and minimise the impacts of overheating in the built environment. It does not allocate any development or trigger any change. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBDM55 – Non-residential development and BREEAM	This policy sets out the minimum BREEAM standard non-residential development must achieve. It does not allocate any development or trigger any change which would impact a Habitats site. As such this policy is unlikely to have an LSE on any habitats site itself and would not be considered further in the HRA process.	Screen Out Category F
PUBDM56 – Electric Vehicles (EV) Charging Points – fire safety, design, location, and lighting	This policy welcomes the installation of EV charging points and sets out their requirements. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F

PUBDM57 – Fibre to the Premises (FTTP)	This policy relates to provision of fibre connections to the premises. It does not allocate any development or trigger any change which would impact a Habitats site. As such this policy is unlikely to have an LSE on any habitats site itself and will not be considered further in the HRA process.	Screen Out Category F
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Chapter 32: Visitor and community facilities and services

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSP17 – Community facilities	This policy protects community facilities and supports new facilities where there is justification. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will not be considered further in the HRA process.	Screen Out Category F
PUBDM58 – Visitor and community facilities and services	This policy sets criteria for the change of use of existing community facilities and for new facilities. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will not be considered further in the HRA process.	Screen Out Category F

Chapter 33: Health and wellbeing

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM59 – Designing places for healthy lives	This policy supports development which promote healthy choices and behaviours and reduce health inequalities. It does not allocate or trigger any development or a change. As such this policy is unlikely to have an LSE on any habitats site and would not be considered further in the HRA process.	Screen Out Category F

Chapter 34: Planning obligations / developer contribution

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM60 – Planning obligations and developer contributions	This policy seeks contributions from developments to serve the development and its occupants where development will introduce additional pressure on the Broads Authority Executive Area. It includes contributions to address nutrient neutrality and recreational impacts. The policy does not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F

Chapter 35: Other Development Management policies

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDM61 – Advertisement and signs	This policy sets out the requirements of advertisements and signs to have regard to the character of the area. This policy will not trigger new development or a change with an LSE on any habitats site.	Screen Out Category F
PUBDM62 – Re-use, conversion or change of use of buildings	This policy supports the re-use, conversion or change to use of buildings and structures to employment, tourism, recreation and community uses subject to criteria. It does not allocate any development or trigger any change which would impact a Habitats site. As such this policy is unlikely to have an LSE and will not be considered further in the HRA process.	Screen Out Category F
PUBDM63 – Leisure plots, amenity plots, conservation plots and mooring plots	This policy sets restrictions and protection for leisure plots, amenity plots, conservation plots and mooring plots. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will not be considered further in the HRA process.	Screen Out Category F

Chapter 36: Site specific policies

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
n/a	Introduction text to site specific policies	Screen Out Category A

Chapter 37: Acle

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBACL1 – Acle Cemetery extension	This policy supports the extension of the cemetery at Acle. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBACL2 – Acle Playing Field extension	This policy allocates land for the extension of the playing field at Acle Recreation Centre. It does not allocate any development or trigger any change which would impact a habitats site. As such this policy is unlikely to have an LSE and will be screened out of the HRA process.	Screen Out Category F

Chapter 38: Brundall Riverside

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBBRU1 – Riverside chalets and mooring plots	This policy outlines the management of riverside chalet and mooring plots to retain its contribution to the river scene. It limits further development and sets out the factors for which permission will not be granted. The policy also sets out the criteria of extensions to existing buildings and replacement buildings. This policy does not allocate any development or change which would trigger an LSE at a European site.	Screen Out Category F
PUBBRU2 – Riverside Estate Boatyards, etc., including land adjacent to railway line	This policy supports the development and retention of boatyards. It outlines the requirements of proposals including biodiversity enhancements and flood risk resilience. This policy does not allocate any development or change which would trigger an LSE at a European site.	Screen Out Category F
PUBBRU3 – Brundall Mooring Plots	The aim of this policy is to protect this area for mooring plots. The policy will not trigger any development or change itself. It does not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBBRU4 – Brundall Marina	This policy aims to protect Brundall Marina for marina, boatyard, and related uses. The policy will not trigger any development or change itself but welcomes the provision of an appropriate number of visitor moorings. It sets out criteria which development must meet if taken forward in this area and supports the development of marina related development. It does not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBBRU5 – Land east of the White Heron Public House	This policy outlines that built development will generally not be permitted to help conserve trees, biodiversity and visual amenity of the area. It does not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBBRU6 – Brundall Gardens Marina Residential Moorings	This policy supports additional residential mooring proposals (of up to eight in total). It sets out the requirements for these sites. Given the location of this site on the banks of the River Yare and its location adjacent to the Broads SAC, Broadland SPA and Ramsar site and within the Broads nutrient neutrality and GIRAMS area – any residential moorings will need to take account of protective policy wording set out in the Local Plan. This is noted within the policy itself which sets out requirements for HRA. This policy will be screened into the HRA process as it has the potential for LSEs.	Screen In Category L

Chapter 39: Cantley

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
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PUBCAN1 – Cantley Sugar Factory	This policy defines the site is defined as an employment site. This policy supports development at the factory site which secures and enhances the sugar works’ contribution to the economy of the Broads and wider area. It is noted that the factory is not located within the Broads SAC nutrient neutrality catchment area and will not allocate any residential development. It does not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
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Chapter 40: Chedgrave

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBCHE1 – Greenway Marine residential moorings	This policy supports up to five additional residential moorings subject to criteria. Given the location of the moorings on the banks of the River Chet and its location adjacent to the Broads SAC, Broadland SPA and Ramsar site this policy will be screened into the HRA process as it has the potential for LSEs.	Screen In Category L

Chapter 41: Dilham

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDIL1 – Dilham Marina (Tyler’s Cut Moorings)	This policy protects Dilham Marina for the continued use for mooring of boats and uses incidental to that activity. It does not allow for residential moorings. It will not trigger any development or change itself. As such, this policy is unlikely to have an LSE on any habitats site. It will be screened out of the HRA process.	Screen Out Category F

Chapter 42: Ditchingham Dam

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBDIT1 – Maltings Meadow Sports Ground, Ditchingham	This policy aims to protect sports facilities and sets criteria for proposals to improve existing and provide new facilities development. It does not trigger new development or change. As such, this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBDIT2 – Ditchingham Maltings Open Space, Habitat Area and Alma Beck	This policy allocates sites for protection as an open space and habitat area. These allocations as open space contribute to amenity, townscape and recreation and provide important pedestrian links. Habitat areas will be conserved and enhanced. This policy is a protective policy and allocates sites for protection. Therefore, it will be screened out of the HRA process.	Screen Out Category F

Chapter 43: Fleggburgh

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBFLE1 – Broadland Sports Club	This policy protects sports facilities and sets criteria for improvements or new facilities. It does not trigger new development or any change. As such, this policy is unlikely to have an LSE on any habitats site. It will be screened out of the HRA process.	Screen Out Category F

Chapter 44: Gillingham

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBGIL1 – Gillingham residential moorings (H.E. Hipperson’s Boatyard)	This policy supports up to five additional residential moorings subject to criteria. The site is located upstream of several components of the Broads SAC, Broadlands SPA and Ramsar sites on the River Waveney. As such it has the potential to have an LSE and will be screened into the HRA process.	Screen In Category L

Chapter 45: Great Yarmouth

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBGTY1 – Marina Quays (Port of Yarmouth Marina)	This policy encourages use of the site for river and leisure users and appropriate redevelopment subject to criteria. It does not trigger new development or any change. As such, this policy is unlikely to have an LSE on any habitats site. It will be screened out of the HRA process.	Screen Out Category F

Chapter 46: Horning

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBHOR1 – Horning Car Parking	This policy retains this area of land for continued car park use. It does not trigger any new development or change which is likely to have a significant effect on any habitats site.	Screen Out Category F
PUBHOR2 – Horning Open Space (public and private)	This policy protects Horning Open Space from development for their contribution to character and landscape of Horning and amenity purposes. It does not trigger any new development or change which is likely to have a significant effect on any habitats site.	Screen Out Category F

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBHOR3 – Waterside plots	This policy protects the area from over-intensive development but encourages the maintenance/upgrading of existing buildings. It sets out the criteria for maintenance/upgrading proposals. It does not trigger new development or any change. As such, this policy is unlikely to have an LSE on any habitats site. It will be screened out of the HRA process.	Screen Out Category F
PUBHOR4 – Horning Sailing Club	This policy supports the continued use of the island for sailing facilities as well as the maintenance/upgrading of existing buildings subject to criteria. It does not trigger new development or any change. As such, this policy is unlikely to have an LSE on any habitats site. It will be screened out of the HRA process.	Screen Out Category F
PUBHOR5 – Crabbet’s Marsh	This policy protects this area for its landscape and nature conservation value. All development will be resisted. As such, it does not trigger any development or change and would therefore not have an LSE and would be screened out of the HRA process.	Screen Out Category F
PUBHOR6 – Horning – Boatyard, etc. at Ferry Road and Ferry View Road	This policy does not allocate development in itself but provides a series of requirements that any new development should meet to protect the area from impacts. It does not trigger new development or any change. As such, this policy is unlikely to have an LSE on any habitats site. It will be screened out of the HRA process.	Screen Out Category F
PUBHOR7 – Woodbastwick Fen moorings	This policy conserves the area which will be kept generally free of development. The policy will not trigger any development or change itself. As such, this policy is unlikely to have an LSE on any habitats site and would be screened out of the HRA process.	Screen Out Category F
PUBHOR8 – Land on the corner of Ferry Road, Horning	This policy protects existing use at these units. It does not propose a change in use and therefore will not trigger any development or change itself. As such, this policy is unlikely to have an LSE on any habitats site and would be screened out of the HRA process.	Screen Out Category F

Chapter 47: Hoveton and Wroxham

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBHOV1 – Green infrastructure	This policy identifies, maintains and enhances Green Infrastructure (GI) in the Plan area. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBHOV2 – Station Road car park	This policy protects Station Road car park for continued car park use. It does not trigger any new development or change which is likely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBHOV3 – Brownfield land off station Road, Hoveton	This policy supports the redevelopment of the site for appropriate uses subject to criteria. It does not trigger new development or any change. As such, this policy is unlikely to have an LSE on any habitats site. It will be screened out of the HRA process.	Screen Out Category F
PUBHOV4 – BeWILDerwood Adventure Park	This policy supports ancillary development to meet the operational needs at the park subject to criteria. It does not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBHOV5 – Hoveton Village Centre and areas adjacent to the Village Centre	This policy supports residential use in the allocated areas subject to criteria. It also supports proposals for new retail and leisure growth for town centre uses subject to criteria. It does not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F

Chapter 48: Norwich

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBNOR1 – Utilities Site	This policy sets out the redevelopment of this area to realise its potential contribution to the strategic need of the wider Norwich area. The policy allocates the site for mixed-use development including approximately 250 dwellings. The redevelopment proposals will be supported subject to criteria. This policy will trigger development, as such it has the potential to have an LSE at habitats sites in the study area and will be considered further in the HRA.	Screen In Category L
PUBNOR2 – Riverside walk and cycle path	This policy seeks to safeguard land for a riverside walk and cycle path along the Wensum/Yare at Whitlingham Country Park to the southeast of Norwich. This footpath runs along the northern bank of the River Yare only in a short section to the north of the Whitlingham Great Broad. It is not located within or adjacent to any habitats site and therefore it is unlikely to have an LSE and would be screened out of the HRA process.	Screen Out Category F

Chapter 49: Ormesby St. Michael

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
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PUBORM1 – Ormesby waterworks	This policy protects Ormesby treatment works from development to allow its continued functioning. Development required for its operation will be supported subject to requirement. It does not trigger any new development or change which is likely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
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Chapter 50: Oulton Broad

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBOUL1 – Boathouse Lane Leisure Plots	This policy protects the rural and semi-natural character of the area, its contribution to the views from the Broad, and floodwater capacity. Development will be managed to support these aims. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site.	Screen Out Category F
PUBOUL2 – Oulton Broad – Former Pegasus / Hamptons site	This policy allocates land for a boatyard and optional other uses (housing, recreation, entertainment, or employment uses where compatible with the boatyard use, road access, neighbouring uses, and flood risk). Whilst it is noted that this allocation has received planning permission, given its incorporation in the Local Plan and the fact that it has not been built out, this policy and allocation have been screened into the HRA process for further consideration as it has the potential to have an LSE on a habitats site.	Screen In Category L
PUBOUL3 – Oulton Broad District Shopping Centre	This policy permits New Town Centre Use Development subject to criteria and sets out the criteria for changes to ground floor premises within the shopping centre. It does not allocate any development or trigger any change specifically which would impact a habitats site would not be considered further in the HRA process.	Screen Out Category F

Chapter 51: Potter Heigham / Repps with Bastwick

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBPHRB1 – Bridge Area	This policy sets out the development and enhancements of the area around Potter Heigham Bridge for river related leisure and tourism subject to criteria. It does not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBPHRB2 – Waterside plots	This policy aims to conserve the area, and protect the area from over development and suburbanisation, while considering the maintenance and replacement of existing buildings. It does not trigger development or change which could cause an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBPHRB3 – Green Bank Zones	This policy does not permit development within the identified 'green bank zones' to conserve the remaining openness and rural character of the area. It does not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F

Chapter 52: St. Olaves

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSOL1 – Riverside area moorings	This policy aims to protect this riverside area for moorings. The policy will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F

Chapter 53: Somerleyton

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSOM1 – Somerleyton Marina Residential Moorings	This policy supports the provision of up to 15 residential moorings subject to criteria. The site is in close proximity to several components of the Broads SAC, Broadlands SPA and Ramsar site. As such it has the potential to have an LSE and will be screened into the HRA process.	Screen In Category L

Chapter 54: Stalham

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSTA1 – Land at Stalham Staithe (Richardson’s Boatyard)	This policy supports up to 10 residential moorings subject to criteria. The site is located adjacent to the Broadland SPA, The Broads SAC and Broadland Ramsar site. As such it has the potential to have an LSE and will be screened into the HRA process.	Screen In Category L

Chapter 55: Thorpe St. Andrew

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBTSA1 – Cary’s Meadow	This policy aims to conserve and enhance land at Cary’s Meadow for its contribution to the landscape, its biodiversity and recreational use. It does not trigger new development or any change and is therefore unlikely to have an LSE on any habitats site.	Screen Out Category F
PUBTSA2 – Thorpe Island	This policy sets out the management of development on Thorpe Island. This policy supports development of up to 25 private moorings subject to criteria. It does however not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBTSA3 – Griffin Lane – boatyards and industrial area	This policy supports environmental and landscape improvements in this area whilst protecting the existing dockyard and boatyard uses. It will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBTSA4 – Bungalow Lane – mooring plots and boatyards	This policy permits extensions to existing buildings and replacement buildings subject to criteria. It will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBTSA5 – River Green Open Space	This policy protects the area of River Green, allocated as open space, for its contribution to amenity, townscape and recreation. It will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F

Chapter 56: Thurne

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBTHU1 – Tourism development at Hedera House, Thurne	This policy allocates Hedera House for tourism development and sets out the criteria for development proposals. Whilst it is noted that this allocation has received planning permission, given its incorporation in the Local Plan and the fact that it has not been built out, this policy and allocation have been screened into the HRA process for further consideration as it has the potential to have an LSE on a habitats site.	Screen In Category L

Chapter 57: Trowse and Whitlingham

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBWHI1 – Whitlingham Country Park plus adjacent land	This policy supports development within the Country Park for sustainable recreation, leisure and visitor uses subject to criteria. It does however not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBWHI2 – Land at Whitlingham Lane	This policy supports the retention of the site as a boatyard. Proposals for a change of use are subject to criteria. This policy supports the appropriate reuse and enhancement of existing facilities at the former rowing club and boatyard at Whitlingham Lane. It does however not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F

Chapter 58: Non-Settlement Based Policies

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSSTRI – Trinity Broads	This policy protects the special nature, character, and tranquillity of the Trinity Broads. It will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBSSUT – Upper Thurne	This policy protects the special nature, character, and tranquillity of the Upper Thurne. It will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBSSPUBS – Pubs network	This policy identifies and protects public houses as key parts of a network of community, visitor, and boating facilities. It will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBSSROADS – Main road network	This policy sets out requirements to protect the main road network. It will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBSSTRACKS – Former rail trackways	This policy protects former railway track beds for their potential for walking, cycling, and/or horse-riding routes. It does however not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBSSSTATIONS – Railway stations / halts	This policy aims to protect use at several railway stations / halts as key parts of the local railway network. The Authority supports proposals subject to criteria. It will not trigger any development or change and will therefore not have an LSE and will be screened out of the HRA process.	Screen Out Category F
PUBSSSTAITHES - Staithes	This policy protects staithes from development, obstruction and encroachment. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBSSCOAST – The Coast	This policy conserves the Coastal area and its special nature, character and tranquillity for low-key quiet recreation and as a wild bird and seal refuge. Operational development will therefore not be permitted. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBSSMILLS – Drainage Mills	This policy supports proposals that maintain, repair and restore drainage mills and associated buildings subject to criteria. . It does however not allocate any development and therefore does not trigger any change or development directly. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
PUBSSLGS – Local Green Space	This policy identifies and protects areas as Local Green Space. The policy will not trigger any development or change itself. As such this policy is unlikely to have an LSE on any habitats site and will be screened out of the HRA process.	Screen Out Category F
PUBSSA47 – Road schemes on the Acle Straight (A47T)	This policy commits the Authority to working proactively with promoters and designers of schemes/proposals for changes to the Acle Straight. Road scheme proposals are subject to criteria. This policy does not allocate any development and therefore will be screened out of the HRA process.	Screen Out Category F

Chapter 59: Implementation, monitoring, and review

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
n/a	Administrative text	Screen Out Administrative text

Chapter 60: Next steps

Policy Name	Summary of Policy and Identification of LSEs	Screening Conclusion
n/a	Administrative text	Screen Out Administrative text

Appendix D: Baseline air quality information (Source: APIS)

APIS¹ provides current levels of nitrogen deposition and acidification at the Broads SAC and Broadland SPA alongside critical loads for each qualifying feature, these are summarised below.

Table C.1: Nitrogen critical load information for The Broads SAC

Qualifying feature	Critical load class	Critical load (N) kg/ha/yr	Current levels of deposition Kg/ha/yr
Transition mires and quaking bogs	Valley mires, poor fens and transition mires	5-15	Maximum: 17.532 Minimum: 13.646 Average: 15.309
Fen orchid (<i>Liparis loeselii</i>)	Moist to wet dune slacks	5-15	Maximum: 17.532 Minimum: 13.646 Average: 15.309
Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>)	Moist and wet oligotrophic grasslands: <i>Molinia caerulea</i> meadows	15-25	Maximum: 17.532 Minimum: 13.646 Average: 15.309
Calcareous fens with <i>Cladium mariscus</i> and species of the (<i>Caricion davallianae</i>)	Rich fens	15-25	Maximum: 17.532 Minimum: 13.646 Average: 15.309
Alkaline fens	Rich fens	15-25	Maximum: 17.532 Minimum: 13.646 Average: 15.309
Desmoulin's whorl snail (<i>Vertigo moulinsiana</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.364 Average: 9.786
Otter (<i>Lutra lutra</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.364 Average: 9.786
Ramshorn snail (<i>Anisus vorticulus</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.364 Average: 9.786

¹ Air Pollution Information System (APIS). Available at: <http://www.apis.ac.uk/src/> [Date Accessed: 24/01/24].

Qualifying feature	Critical load class	Critical load (N) kg/ha/yr	Current levels of deposition Kg/ha/yr
Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara spp</i>	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.364 Average: 9.786
Northern crested newt (<i>Triturus Cristatus</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.364 Average: 9.786
Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (<i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i>)	Designated feature / feature habitat not sensitive to eutrophication	No critical loads available for this feature	Maximum: 33.138 Minimum: 25.867 Average: 29.073
Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.364 Average: 9.786

Table C.2: Acidity critical load information for the Broads SAC (only qualifying features sensitive to acidity are included)

Qualifying feature	Critical load class	Critical load keq/ha/yr	Current levels of deposition Nitrogen / Sulphur (keq/ha/yr):
Transition mires and quaking bogs	Bogs	MaxCLminN:0.32 MaxCLmaxN:0.52 MaxCLmaxS:0.20 MinCLmaxN:0.32 MinCLmaxN:0.49 MinCLmaxS:0.17	Maximum: 1.289 Minimum: 0.981 Average: 1.121
Molinia meadows on calcareous, peaty or clayey-silt-laden soils (<i>Molinia caerulea</i>)	Acid grassland	No critical loads available for this feature	Maximum: 1.289 Minimum: 0.981 Average: 1.121
Fen orchid (<i>Liparis loeselii</i>)	Calcareous grassland (using base cation)	MaxCLminN:1.07 MaxCLmaxN:5.07 MaxCLmaxS:4.00 MinCLmaxN:0.85 MinCLmaxN:4.85 MinCLmaxS:4.00	Maximum: 1.289 Minimum: 0.981 Average: 1.121
Desmoulin's whorl snail (<i>Vertigo moulinsiana</i>)	Freshwater	No critical loads available for this feature	Maximum: 0.968 Minimum: 0.615 Average: 0.732
Otter (<i>Lutra lutra</i>)	Freshwater	No critical loads available for this feature	Maximum: 0.968 Minimum: 0.615 Average: 0.732
Ramshorn snail (<i>Anisus vorticulus</i>)	Freshwater	No critical loads available for this feature	Maximum: 0.968 Minimum: 0.615 Average: 0.732

Table C.3: Nitrogen critical load information for Broadlands SPA qualifying features broad habitat types²

Qualifying feature	Nitrogen critical load class	Critical load (N) kg/ha/yr	Current levels of deposition Kg/ha/yr
Northern Shoveler (<i>Anas clypeata</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.376 Average: 9.871
Eurasian wigeon (<i>Anas Penelope</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.376 Average: 9.871
Gadwell (<i>Anas strepera</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.376 Average: 9.871
Eurasian bittern (<i>Botaurus stellaris</i>)	Rich Fens	15-25	Maximum: 13.237 Minimum: 8.376 Average: 9.871
Western marsh harrier (<i>Circus aeruginosus</i>)	Rich Fens	15-25	Maximum: 13.237 Minimum: 8.376 Average: 9.871
Hen harrier (<i>Circus cyaneus</i>)	Northern wet heath: Callunadominated wet heath (upland)	5-15	Maximum: 13.237 Minimum: 8.376 Average: 9.871
	Atlantic upper-mid & mid-low salt marshes	10-20	
	Rich Fens	15-25	
Tundra swan (<i>Cygnus columbianus</i>)	Species broad habitat not sensitive to eutrophication	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.376 Average: 9.871
Whooper swan (<i>Cygnus cygnus</i>)	Species broad habitat not sensitive to eutrophication	No critical loads available for this feature	Maximum: 13.237 Minimum: 8.376 Average: 9.871

² Table only includes broad habitats which are sensitive to nitrogen.

Qualifying feature	Nitrogen critical load class	Critical load (N) kg/ha/yr	Current levels of deposition Kg/ha/yr
Ruff (<i>Philomachus pugnax</i>)	Atlantic upper – mid & mid – low salt marshes, Low and medium altitude hay meadows	10-20	Maximum: 13.237 Minimum: 8.376 Average: 9.871

Table C.4: Acid deposition information for Broadlands SPA qualifying features broad habitat types³

Broad habitat types for SPA qualifying features	Qualifying features	Acidity critical load keq/ha/yr	Current levels of deposition Nitrogen / Sulphur (keq/ha/yr):
Northern Shoveler (<i>Anas clypeata</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 0.93 Minimum: 0.61 Average: 0.72
Eurasian wigeon (<i>Anas Penelope</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum: 0.93 Minimum: 0.61 Average: 0.72
Gadwell (<i>Anas strepera</i>)	No comparable habitat with established critical load estimate available	No critical loads available for this feature	Maximum:0.93 Minimum: 0.61 Average: 0.72
Whooper swan (<i>Cygnus cygnus</i>)	Species Broad habitat not sensitive to eutrophication	MaxCLminN:1.03 MaxCLmaxN:5.16 MaxCLmaxS:4.13	Maximum: 0.93 Minimum: 0.61 Average: 0.72

³ Table only includes broad habitats which are sensitive to acidity.

Broad habitat types for SPA qualifying features	Qualifying features	Acidity critical load keq/ha/yr	Current levels of deposition Nitrogen / Sulphur (keq/ha/yr):
Tundra swan (<i>Cygnus columbianus</i>)	Species Broad habitat not sensitive to eutrophication	No critical loads available for this feature	Maximum: 0.968 Minimum: 0.615 Average: 0.738
Ruff (<i>Philomachus pugnax</i>)	Atlantic upper – mid & mid – low salt marshes. Low and medium altitude hay meadows	MaxCLminN:1.07 MaxCLmaxN:5.07 MaxCLmaxS:4.00 MinCLmaxN:0.85 MinCLmaxN:4.85 MinCLmaxS:4.00	Maximum: 0.968 Minimum: 0.615 Average: 0.738



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CHELTENHAM

Broads Local Plan

Publication version

Sustainability Appraisal

November 2024

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1 Introduction

The Publication Version includes draft policies. It is the third stage of the Local Plan production. This Sustainability Assessment (SA) assesses the policies against a series of Sustainability Assessment Objectives.

The Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) be undertaken for plans such as Local Plans. The term “sustainability appraisal” is used to describe a form of assessment that considers the social, environmental and economic effects of implementing a particular plan or planning policy document. It is intended that the SA process helps plans meet the objective of contributing to the achievement of sustainable development. The results of the sustainability appraisal will inform the Authority’s decisions on the Local Plan, and the planning inspector’s judgement on the Local Plan’s legal compliance and soundness.

2 Previous versions of the SA

2.1 SA Scoping Report

This Scoping Report¹ forms the starting point for a process of sustainability appraisal which will guide the evolution and assessment of the Broads Local Plan. A key aim of the scoping procedure is to help ensure the sustainability appraisal process is proportionate and relevant to the Local Plan being assessed.

This Scoping Report sets the context and objectives, establishing the baseline and decides the scope. It:

- a) Identifies other relevant policies, plans and programmes and sustainability objectives;
- b) Collects baseline information;
- c) Identifies sustainability issues and problems;
- d) Develops the sustainability appraisal framework; and
- e) Consults the consultation bodies on the scope of the sustainability report.

The Scoping Report was consulted on between 23 July 2021 and 27 August 2021. The Authority consulted Natural England, English Heritage and Environment Agency as well as the RSPB, New Anglia LEP, Norfolk and Suffolk Nature Recovery Partnership, and the Marine Management Organisation, Norfolk and Suffolk County Council, Broadland, East Suffolk, South Norfolk and North Norfolk District Councils, Great Yarmouth Borough Council and Norwich City Council.

The scoping report was generally well received. Some comments were received, and these are set out at [Appendix 1](#).

2.2 Issues and Options SA

This accompanied the Issues and Options document that was out for consultation in November and December 2022. It assessed the high-level options that were put forward to address some issues in the Broads. The comments received are at [Appendix 6: Comments received during the Issues and Options consultation](#).

¹ <https://www.broads-authority.gov.uk/planning/planning-policies/local-plan-for-the-broads/local-plan-for-the-broads-review>

2.3 Preferred Options SA

This accompanied the Preferred Options document that was out for consultation from March to May 2024. It assessed the draft policy text as well as alternative options. The comments received are at [Appendix 8](#).

3 Baseline

The baseline that was set out in the SA Scoping Report has been updated. This is at [Appendix 2](#).

Map 1: Broads Authority Executive Area

A map of the Broads with more information is on p2 of [Broadcaster 2022 by Countrywide Publications](#)



The Broads executive area, at around 303km², sits at the end of the much larger Broadland Rivers Catchment (c.3200km²)

4 Literature Review

There is a comprehensive review of relevant studies in the SA Scoping Report, Issues and Options SA and Preferred Options SA. [Appendix 3](#) includes additional documents that have been assessed for this version of the SA.

5 Sustainability Appraisal Framework

The Sustainability Appraisal Objectives are as follows. Decision making questions are included at [Appendix 4](#).

5.1 Environmental 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 where appropriate enhance the cultural heritage, historic environment, heritage assets and their settings.

ENV10: To achieve the highest quality of design that is innovative, imaginative, 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.

5.2 Social SA Objectives

SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.

SCO2: To reduce poverty, inequality and social exclusion.

SOC3: To improve education and skills including those related to local traditional industries.

SOC4: To enable a 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.

5.3 Economic SA Objectives

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.

6 The Publication Sustainability Appraisal

The NPPG sets out the requirements for a Sustainability Appraisal at various stages of the Local Plan production. The table below discusses the requirements and how this SA addresses them.

Developing and refining alternatives and assessing effects	
Test the Local Plan objectives against the sustainability appraisal framework	The objectives and vision from the current Local Plan are the basis for the new Local Plan and have been assessed.
Develop the Local Plan options including reasonable alternatives	There is an assessment of how each policy and reasonable alternative rate against each SA Objective. This is in Appendix 5 .
Evaluate the likely effects of the Local Plan and alternatives	
Consider ways of mitigating adverse effects and maximising beneficial effects	The policies have been amended as required when assessing them against the SA Objectives.
Propose measures to monitor the significant effects of implementing the Local Plan	Monitoring indicators are part of the Local Plan.

A Sustainability Appraisal is designed to inform policy content following the assessments against the SA Objectives. The following symbols are used:

? uncertain effect

+ rates positive

- rates negative

7 Other effects

The table at [Appendix 7](#) identifies other effects of the proposed policies, as explained below.

7.1 Compatibility of the SA Objectives and plan objectives

An assessment of the SA Objectives against the objectives of the Local Plan will check compatibility.

7.2 Reasonable alternatives

If a strategy or policy area is identified, reasonable alternatives to addressing that issue need to be identified and assessed. This could include a 'do nothing' scenario. This process will assist in the identification of, and justify, the most appropriate policy response, if any.

7.3 Short, medium and long-term effects

Regulations require the assessment of the effects of a plan or programme over short, medium and long terms. The time periods for these are:

- Short term – 0-5 years
- Medium term – 5-10 years
- Long term – longer than 10 years

7.4 Permanent and temporary effects

The process will identify if the effect of the proposed strategic action or policy will be permanent or temporary.

7.5 Positive and negative effects

The SA process will assess the proposed strategy or policy approach, or site allocation, and identify any negative impacts of positive impacts relating to the SA Objectives. The process will seek to minimise any negative impacts and maximise any positive impacts.

7.6 Secondary effects

These effects arise not as a direct result of the strategy or policy, but away from the original effect or as a result of a complex pathway.

7.7 Cumulative effects

An assessment of the cumulative impacts of the strategic actions or policies is required. This matrix will identify the impacts of the Local Plan on the various SA Objectives, taken as a whole.

7.8 Synergistic effects

These are effects that interact to produce a total effect greater than the sum of the individual effects.

Appendix 1 – Comments received on the SA Scoping Report

Ref	Name	Organisation	Comment	BA response	Amendments
#1	Laura Mundy	East Suffolk Council	<p>The Literature Review at Appendix 2 does not appear to include the local plans of neighbouring authorities. Whilst there is mention of the relevant authorities in the main body of the text, it may be worth including those plans within Appendix 2 for completeness. The key plans that we are aware of are:</p> <ul style="list-style-type: none"> • Great Yarmouth Local Plan Part 1 (includes Core Strategy 2013-2030). Part 2 currently under preparation; • East Suffolk Council- Waveney Local Plan (2018-2036); • Greater Norwich Local Plan, Submission Version (2021); • Joint Core Strategy for Broadland, South Norfolk and Norwich (2014); • South Norfolk Local Plan Site Allocations Document (2015); • South Norfolk Local Plan Development Management Policies Document (2015); • Broadland District Council Development Management DPD (2015); • Broadland District Council Site Allocations DPD (2016); • North Norfolk District Council Core Strategy and Development Management Policies (2008); • North Norfolk Site Specific Allocations DPD (2011). 	<p>We are of course aware of these documents. A separate piece of work will be assessing them as we produce the policies. We will wait a few months to produce this piece of work as we are aware of the examination into the Greater Norwich Local Plan, the GYBC Local Plan will soon be adopted and the next round of consultation on the NNDC Local Plan is expected by the end of the year.</p>	<p>In future SA, include link to separate piece of work that assesses the Local Plans that are relevant to the Broads in detail.</p>

Ref	Name	Organisation	Comment	BA response	Amendments
#2	Laura Mundy	East Suffolk Council	<p>In addition to the Local Plans listed above, there are several other locally specific documents that we have picked up through our scoping exercises that you may want to also consider including in Appendix 2 (see also response to Q3):</p> <ul style="list-style-type: none"> • Norfolk Ambition 'The Community Strategy for Norfolk', 2003-2023 (refreshed in 2008); • Great Yarmouth Local Air Quality Management Review, ongoing; • Great Yarmouth Strategic Flood Risk Assessment, 2017; • Great Yarmouth Landscape Character Assessment, 2008; • Suffolk's Local Transport Plan, 2011-2031; • Transforming Suffolk Community Strategy 2008-2028; • Suffolk Growth Strategy, 2013; • Suffolk's Inclusive Growth Framework – updated Nov 2020; • Suffolk Health and Wellbeing Strategy 2012-2022 (Strategy Refresh 2019-2022); • Suffolk Climate Change Partnership - Suffolk Climate Action Plan 3, 2017; • Suffolk Biodiversity Action Plan, 2012; • Suffolk Flood Risk Management Strategy, March 2016; • Suffolk Minerals and Waste Local Plan, 2020; • Suffolk Historic Landscape Characterisation Map; • East Suffolk Tourism Strategy, 2017-2022; • Suffolk Local Authorities – Air Quality Management and New Development, 2011; • Suffolk Coastal and Waveney SFRA, 2018; • Waveney District Council Water Cycle Study, 2017; • East Suffolk Housing Strategy 2017-23; • Waveney District Council Landscape Character Assessment, 2008; • Environment Agency East Suffolk Abstraction Licencing Strategy, 2020; • Environment Agency Catchment Flood Management Plan East Suffolk (CFMPs), 2009; • Suffolk Shoreline Management Plan – Lowestoft Ness to Felixstowe Landguard Fort (2015); • Kelling to Lowestoft Ness Shoreline Management Plan (SMP) (2012); • Environment Agency River Basin Management Plan for the Anglian River Basin District (2016). 	Noted. We will assess relevant documents in the next version of the SA.	Assess documents as part of the next version of the SA.
#3	Laura Mundy	East Suffolk Council	The list provided on pages 10 & 11 of the draft Scoping Report adequately describes the special qualities of the Broads. You may, however, want to add reference to 'dark skies' against h). Dark skies are picked up as a strength in the SWOT analysis and in the SA framework, therefore including refence here would ensure consistency.	Noted. We will consider this amendment.	Consider adding dark skies to the special qualities.
#4	Laura Mundy	East Suffolk Council	We welcome and the baseline chapter as a comprehensive overview of the existing environmental, economic and social characteristics of the area. You note in the introduction to this section that much of the data is based on the 2011 Census and that future SA reports will take account of the 2021 Census. For clarity, you may also want to note here that many of the census date refers to 'Waveney' which no longer exists as a local authority.	Noted, but the Waveney and Suffolk Coastal data is the only Census data that exists at the moment. It is presumed that the 2021 Census Data will relate to the East Suffolk area and therefore will be included in future Sustainability Appraisals.	No change.

Ref	Name	Organisation	Comment	BA response	Amendments
#5	Laura Mundy	East Suffolk Council	<p>Within the Baseline chapter there are references to some documents that do not appear within the Literature Review. These are:</p> <ul style="list-style-type: none"> • Page 19- Reference is made to the Broadland Rivers Catchment Flood Management Plan. However, this is not included in the literature review. • Page 19- Reference is made to the Broadland Rivers Catchment Abstraction Management Strategy. However, this is not included in the literature review. • Pages 4, 5, 9, 12, 19 and 20- Reference is made to the Natural Capital Evidence Compendium for Norfolk and Suffolk (2020). However, this is not included in the literature review. • Pages 22 and 23- Reference is made to the STEAM Report. However, this is not included in the literature review. 	Noted. Will include these in the literature review for the next version of the SA.	Include these documents in the next version of the SA Literature Review.
#6	Laura Mundy	East Suffolk Council	No significant comments on this section, there is however a small typo at the end of t) - 'compendium8'.	Noted. That is a footnote reference and should be superscript.	Amend in next version of the SA.
#7	Laura Mundy	East Suffolk Council	<p>The SA Objectives reflect the identified characteristics, baseline data, and SWOT analysis. The following comments relate to the decision-making criteria set out in Appendix 5 of the draft Scoping Report.</p> <p>ENV1 - Could include cycling distance from key services.</p> <p>ENV5 - Could make reference to flood risk, specifically that arising as the result of climate change.</p> <p>ENV7 - Could reference contaminated land. Should consider agricultural land quality.</p> <p>ENV8 - Should consider potential increases in waste production.</p> <p>ENV10 - Could include reference to residential amenity</p> <p>SOC4 - Should also consider specialist housing.</p> <p>SOC6 - Could include cycling distance from key services.</p>	<p>ENV1 - agreed</p> <p>ENV5 - ENV6 covers flood risk adequately</p> <p>ENV7 - agreed</p> <p>ENV8 - consider this is covered adequately in the framework</p> <p>ENV10 - agreed</p> <p>SOC4 - agreed</p> <p>SOC6 - agreed</p>	<p>ENV1 - add cycle distance to decision making questions.</p> <p>ENV5 - no change</p> <p>ENV7 - include contaminated land and agricultural land quality</p> <p>ENV8 - no change</p> <p>ENV10 - add reference to amenity</p> <p>SOC4 - add reference to older persons and specialist housing</p> <p>SOC6 - add cycle distance to decision making questions</p>
#8	Liam Robson	Environment Agency	This is generally adequate. This would benefit from a basic map showing an outline of the of the area boundary, to help with interpretation of other maps shown, such as in appendix 3.	Agreed.	Include map of the area of the Broads in next version of SA.
#9	Liam Robson	Environment Agency	In regards to Appendix 3a – the baseline data shown here is comprehensive but would benefit from explanation of some terms such as 'meeting PSA target' in table 1, and 'wasted peat' in map 4.	Agreed.	Ensure terms are explained in future documents.
#10	Liam Robson	Environment Agency	In regards to Appendix 3a – 'WFD Ecological Status 2013' is mentioned – this sentence needs updating, as 2019 status is available (as in map 7).	Agreed.	Update reference.
#11	Liam Robson	Environment Agency	In regards to Appendix 3a –There is a paragraph mentioning phosphate specifically and this could be updated and have a map too to show that many waterbodies do meet WFD P status.	Agreed.	Update and include map.

Ref	Name	Organisation	Comment	BA response	Amendments
#12	Liam Robson	Environment Agency	Appendix 2 is very comprehensive but also need to give consideration to water cycle studies, such as the Greater Norwich WCS which is updated / being updated in 2021.	Noted. We will assess relevant documents in the next version of the SA.	Assess documents as part of the next version of the SA.
#13	Liam Robson	Environment Agency	Please refer to the latest climate change guidance and allowances available on the following link: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances This has recently been updated.	Noted	Will include in the literature review section.
#14	Liam Robson	Environment Agency	As you are aware the Environment Agency are working with the Broads Authority to deliver the Broadlands Futures Initiative. This will be an important piece of work in understanding the longer-term management of the Broads. We are pleased to note that the BFI will inform the Local Plan as and when the information becomes available.	Noted	No change.
#15	Liam Robson	Environment Agency	As part of the BFI the Environment Agency are reviewing and updating the hydraulic modelling for fluvial, tidal and coastal flooding relevant to the Broads area. This work is underway, but due to the size of the project it is not due to be completed for some time (around the end of 2023). As well as informing the BFI this modelling will update our understanding of flood risk to communities in the Broads and help us identify locations where flood risk management could be improved this includes communities such as Geldeston, Dockeney and Gillingham. Other communities may be identified as part of this modelling.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#16	Liam Robson	Environment Agency	The Environment Agency are also currently working on the following flood risk management projects in the Broads Authority area.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#17	Liam Robson	Environment Agency	Great Yarmouth flood defences Project The Environment Agency is currently delivering the Great Yarmouth flood defences Epoch 2 (2016 –2021) project to refurbish and improve approximately 4km of flood defences and the supporting quayside in the town to help manage the flood risk to around 2000 homes and 700 businesses. Epoch 3 (2021-2026) is at an early stage of business case development. A substantial amount of partnership funding will again need to be secured in order for this project to progress as planned. Partners are beginning work to identify funding sources for Epoch 3 and to identify a sustainable income stream to meet future investment required to manage flood risk to the town.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#18	Liam Robson	Environment Agency	Beccles Flood Risk Management Project We are in the early stages of a project to investigate ways to reduce the number of people and properties at risk of flooding from the River Waveney in Beccles. We have undertaken an 'initial assessment' report which produced a number of potential ways to improve the management of flood risk in Beccles. Options include: Maintaining the existing flood wall but replacing the flood boards with flood gates. Individual Property Flood Resilience (PFR) measures i.e. flood doors or barriers, air brick covers. We will be undertaking a number of surveys and additional assessments of the existing	Noted. Will include in the baseline data section.	Will include in the baseline data section.

Ref	Name	Organisation	Comment	BA response	Amendments
			defences in Beccles. This along with information from the flooding in December 2020 will help to inform the projects next steps.		
#19	Liam Robson	Environment Agency	Bungay Flood Risk Management Project We are in the early stages of a project in Bungay. We are updating our flood risk model of the River Waveney to help improve our understanding of flood risk in Bungay and the surrounding area. This update will use information obtained from the December flood event to make the modelling as representative as possible. This modelling will help inform an 'initial assessment' to explore options to manage the flood risk, working with the community and our partners, such as East Suffolk Council, Suffolk County Council and Norfolk County Council.	Noted. Will include in the baseline data section.	Will include in the baseline data section.
#20	Liam Robson	Environment Agency	We are pleased to note that consideration will be given to the need to review the SFRA. Guidance on when to update your SFRA is available on the following link: https://www.gov.uk/guidance/local-planning-authorities-strategic-flood-risk-assessment#when-to-review-or-update-your-sfra	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#21	Liam Robson	Environment Agency	The modelling used to inform the previous SFRA relevant to the Broads Authority area has not been updated since the SFRA's publication. As mentioned above the majority of the models will be updated by the modelling supporting the BFI. Please see the table below for more details. <Table is at Appendix B>	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#22	Liam Robson	Environment Agency	Please note the table above only details the models which cover the Broads Authority area. The previous SFRA covered several LPA districts, so more models were used than listed above. Some models outside of the Broads Authority area have been updated since its publication. This will mean other authorities will have new flood models available to update the SFRA. Should the SFRA be updated consideration will need to be given to how to do this due to the cross over with other authority areas.	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#23	Liam Robson	Environment Agency	In addition to updated modelling you should also consider the updated climate change allowances and guidance provided in the hyperlink above. Since the SFRA was published our climate change guidance and the allowances for fluvial flooding and sea level rise have been updated. Our modelling does not currently reflect these changes. Therefore there is an option for you to update the SFRA to ensure it considers the latest climate change guidance. However the new climate change allowances will be incorporated in the model updates undertaken as part of the BFI work, so you could wait until the modelling we are undertaking is completed.	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.

Ref	Name	Organisation	Comment	BA response	Amendments
#24	Liam Robson	Environment Agency	In determining whether to update the SFRA it is important to understand if the local plan review will involve changing or updating the current development allocations. This will dictate if an assessment against fluvial, tidal and coastal flood risk is required and therefore if the SFRA should be updated. If allocations are in flood risk areas, you are likely to need an updated evidence base to consider the latest climate change. This would need to be updateable in the future so it can consider our new modelling for the Broads and coast once it is complete.	Noted. We produced the SFRA with other Norfolk Authorities and will use this information as and when discussions are held about a review.	No change.
#25	Liam Robson	Environment Agency	ENV2 In relation to policy ENV2, we would recommend revising as follows: To safeguard a sustainable supply of water, to protect and improve water quality, and to use water efficiently. The addition of the word 'protect' covers the requirements of water framework directive to protect and prevent deterioration.	Agreed.	Change ENV 2 to: To safeguard a sustainable supply of water, to protect and improve water quality, and to use water efficiently
#26	Liam Robson	Environment Agency	ENV 5. It would be good if the document could include the word resilient in this objective. It's similar to the word adapt but it is more consistent with the wording in EA2025 and other government policy which aims to help communities to become more resilient to a changing climate. Suggestion for ENV5 SA Objective wording: To adapt, become resilient and mitigate against the impacts of climate change. The decision criteria question could be: Will the plan help communities become more resilient and adapt to the impacts of climate change?	Agreed.	Change ENV5 to: To adapt, become resilient and mitigate against the impacts of climate change and add Will the allocation/policy/strategic action help communities become more resilient and adapt to the impacts of climate change to the decision-making questions.
#27	Liam Robson	Environment Agency	ENV6 – The decision making criteria are a little muddled and repetitive please see ideas below. <ul style="list-style-type: none"> · Bullet point 1 could be changed to: Will the plan guide inappropriate development away from flood risk areas? · Bullet point 2 could be changed to: Does the plan ensure that where development in flood risk areas is permitted, the risks to people and property are managed/mitigated? · Bullet point 4 implies development should be located in the areas at highest risk of flooding? Development should be located in areas at lowest risk. · Bullet point 7 – This could be changed to: Will the plan consider the risk of flooding to communities/allocations both now and in the future taking account of climate change? · Bullet point 13 – Could this be changed to consider flood risk in general and not just the coast. We would not want the local plan to impact future flood risk management projects/schemes or impact on the outcome of the BFI. Could it be changed to: Does the policy affect opportunities for future flood and coastal risk management? · Bullet point 14 – As above could this be changed to: Does the allocation/policy/strategic action restrict choice for managing flood risk and the coast in the future? 	Agreed.	Decision making criteria amended to reflect these comments.
#28	Ian Robinson	RSPB	Page 11 3.7 – Water. Last sentence is inaccurate. Deficiency is affecting the entirety now and isn't just a factor which may affect the Broads during peak tourist season, influx during this season will only exacerbate the problem.	Agreed.	Will amend this section to reflect this comment.

Ref	Name	Organisation	Comment	BA response	Amendments
#29	Ian Robinson	RSPB	Page 18 3.9 – the statement ‘parts of the Yare Broads and Marshes are unfavourable due to excess water levels – this doesn’t align with the unit condition assessment.	Noted.	Will check the assessment and amend as required.
#30	Ian Robinson	RSPB	In addition need to state the pattern of inundation/rainfall is changing and species are unable to adapt to these changes.	Noted.	Will add this to the text.
#31	Ian Robinson	RSPB	<p>Consideration needs to be given to translocating species ahead of any irreversible changes resulting from climate change or sea level rise. Follow up comment:</p> <p>If species such as fen orchid or any of the 66 species which are found exclusively in the Broads and which have been the subject of conservation action and management for many years were deemed worthy of protection organisations and protected landscape should consider how to maintain populations in the short term.</p> <p>Part of that approach would need to be ensuring management is optimal to at least maintain and ideally increase numbers.</p> <p>In parallel there needs to be planning and input from statutory agencies (e.g. NE, EA, BA) as well as NGO’s and landowners regarding how to deal with species which have niche requirements (like fen orchid) and which would be difficult to maintain in situ (in the face of climate change and sea level rise).</p> <p>The decision might be one of maintain with the ultimate view that the species will ultimately be lost, or it may be maintain with the aim of finding alternative sites further inland which could become sites able to accept species in the Broads under threat, and which have suitable conditions to support successful translocation.</p> <p>The point I was trying to make is to start considering these issues now and looking for potential donor sites and planning in advance of irreversible changes. It really requires a partnership approach and where a species is championed by an organisation that organisation should act as lead supported by others.</p> <p>There will also be a need to communicate the likelihood of change, along the lines that Broadland Futures Initiative and Water Resources East are doing.</p>	The Broads Authority have been discussing actual species translocation, species translocation via habitat connectivity with partners for decades and have supported several active projects within the Broads. We are supporting BFI who are reviewing salinity and hydrological connection to assess climate change or sea level rise risk factors. Our Biodiversity Audit outlines some of this risk.	No change to document but will consider this comment as produce the Local Plan for the Broads and Broads Plan.
#32	Ian Robinson	RSPB	General Comment – a lot of the maps are useful, but the resolution is too fine and makes it difficult to make use of them/see detail	Noted. These were how the maps were sent to us.	Will liaise with data provider about ways to present data in future iterations of the SA.
#33	Ian Robinson	RSPB	Page 23 STEAM report Fig 4 – acronyms need clarifying. The information provided is useful but is hard to interpret	Noted. In future iterations, will provide some explanation.	In future versions, explain the STEAM data.
#34	Ian Robinson	RSPB	Page 32 Map 16 – relevance. Much of the dark blue area is farmland and has negligible issues related to housing. The map provides a disproportionate assessment of reality.	LSOAs (Lower-layer Super Output Areas) are small areas designed to be of a similar population size, with an average of approximately 1,500 residents or 650 households. The issue may be as to how much of a LSOA is actually within the Broads, and the recently completed Indices of Multiple Deprivation Topic Paper	No change.

Ref	Name	Organisation	Comment	BA response	Amendments
				shows things in more detail and provides estimates of the amount of a LSOA that is within the Broads.	
#35	Ian Robinson	RSPB	Page 39 Map 17 Page 40 Map 18 and Page 43 Map 19 – of very little use due to there being too much information crammed into a very small area. Might be better to provide a link to enable interpretation with better resolution	Noted. These were how the maps were sent to us.	Will liaise with data provider about ways to present data in future iterations of the SA.
#36	Ian Robinson	RSPB	Page 44 Map 20 – don't understand the relevance of this map, needs context	As stated in the report, this map shows incidences of crime near to the Broads in Norwich along the banks of the River Wensum.	No change.
#37	Ian Robinson	RSPB	Page 14 etc 6.4 – opportunity. Add 'educate residents in and adjacent to the National Park in wiser, more sustainable use of water resource.'	Comment noted. Whilst the BA does have an education function, that tends to be more in relation to school children rather than homeowners. We think that Essex and Suffolk Water and Anglian Water Services are best placed to deliver such education.	No change.
#38	Ian Robinson	RSPB	Page 19 8.4 – are the timescales fixed? I wonder if there could be alignment with Shoreline Management Plan terminology and use of the timescales used therein e.g. short=0-25 years, medium=25-50 years, long= 50-100 years.	Various other Suffolk and Norfolk LPAs and National Park Authorities were asked what timescales they use in their SA and the timescales as set out in the SA Scoping Report seem to be common.	No change.
#39	Ian Robinson	RSPB	8.8 – does the word cumulative mean the same as in-combination	In combination would be the correct term for HRA, but this is SA. Note that 8.9 relates to synergistic effects and that is like in combination.	No change.
#40	Ian Robinson	RSPB	Page 39 – ENV2 – misses the main factor namely use of/demand for water by householders is too high and unsustainable	Point noted and that is inferred in the wording that relates to the zone being in deficit.	No change.
#41	Ian Robinson	RSPB	ENV3 – add physical management and maintenance of habitats	Agreed.	Add this to decision making criteria for ENV3.
#42	Ian Robinson	RSPB	ENV5 -add impact of shoreline management plans.	More relevant to ENV6 - agree and add that to decision making criteria.	Amend decision making criteria for ENV6: Does the allocation/policy/strategic action affect the shoreline management plan?

Ref	Name	Organisation	Comment	BA response	Amendments
#43	Andrew Marsh	Historic England	<p>We recommend that the special qualities of the Broads, point 'J' is renamed 'Historic Environment'. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage, and both designated and non-designated heritage assets. Point 'J' should then list heritage asset using terminology consistent with the NPPF, namely:</p> <ul style="list-style-type: none"> • Listed Buildings • Scheduled Monuments • Conservation Areas • Registered Parks and Gardens • Registered Battlefields • Protected Wrecks • Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings • Heritage at Risk 	Agree with the change to the text. The list could be included as a footnote.	Amend point j to Historic Environment and add list as a footnote.
#44	Andrew Marsh	Historic England	We welcome the identification of sustainability issues and problems set out in section 6, particularly those related to the historic environment, and are particularly pleased to see reference within the section to setting, archaeology, waterlogged heritage, and heritage at risk.	Support noted.	No change.
#45	Andrew Marsh	Historic England	We are however disappointed that no opportunities have been identified in relation to / for the historic environment, for example are does the Plan offer any opportunities to tackle heritage at risk, or to improve access to and appreciation of heritage assets?	The SWOT analysis does not relate just to the Local Plan. It is a SWOT analysis of the area. That being said, comment noted and working with the Historic Environment Manager, we will include the opportunities, for example the Water Mills and Marshes work.	Incorporate opportunities relating to heritage and the historic environment into the SWOT analysis.
#46	Andrew Marsh	Historic England	We very much welcome the Sustainability Appraisal Objectives set out within section 7.1, particularly Objective ENV9, 'To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings'. Overall the objectives demonstrate an integrated approach to the conservation and enhancement of the historic environment which sees the interrelationship between conservation and other spatial planning goals recognised within several different policies rather than in isolation.	Support noted.	No change.
#47	Andrew Marsh	Historic England	We look forward to engaging with you as these proposals progress over the coming months. Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that these would have an adverse impact upon the historic environment.	Noted.	No change.

Appendix 2 – The Baseline

The baseline has been updated and can be referenced here: [Publication SA Appendix 2: Baseline July 2024](#).

Geodiversity information can be referenced here: [Norfolk geodiversity audit database for Broads](#).

Appendix 3 – Literature Review

The SAs of previous versions of the Local Plan reviewed many documents and these can be found here:

- SA Scoping Report: https://www.broads-authority.gov.uk/data/assets/pdf_file/0024/405618/Appendix-2-literature-review.pdf
- Issues and Options SA: https://www.broads-authority.gov.uk/data/assets/pdf_file/0023/440465/Literature-Review-Issues-and-Options-April-2022.pdf
- Preferred Options SA: https://www.broads-authority.gov.uk/data/assets/pdf_file/0026/513368/Literature-Review-Issues-and-Options-Jan-2024.pdf (erroneously called Issues and Options, but it is the literature review for the Preferred Options).

The documents reviewed in this SA are new ones that have been reviewed. Go [here](#) for the additions to the literature review.

Appendix 4 – Sustainability Appraisal Framework

SA Objective	SEA General Theme	Decision making criteria/prompting questions
<p>ENV1: To reduce the adverse effects of traffic (on roads and water).</p>	<p>Climate change, air and pollution.</p>	<ul style="list-style-type: none"> • How does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> ○ Walking, cycling, public transport? ○ Air quality? ○ Amenity? ○ Single occupancy car use? ○ Use of waterways? ○ Access to special qualities of the Broads by sustainable transport modes? ○ The net impact of transport infrastructure such as road signage, lighting, conspicuous structures and parking? • What is the resulting impact of traffic on <ul style="list-style-type: none"> ○ Heritage? ○ Landscape? ○ People? ○ Water? • Is the allocation within walking distance² or cycling distance³ of key services⁴? • Will routes be <ul style="list-style-type: none"> ○ functional and accessible for all? ○ safe and attractive public spaces? • Does it consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles?

² Manual for Streets says this is 10 minutes/800m

³ Suffolk County Council and Norfolk County Council do not have official cycling distances. Suffolk County Council suggested between 5km and 10km and Norfolk County Council suggested up to 5 miles. For the purposes of the SA assessment, a distance of around 3 to 6 miles or 30 minute is used, but taking into consideration gradient, safety (or perception of) and convenien of routes.

SA Objective	SEA General Theme	Decision making criteria/prompting questions
ENV2: To safeguard a sustainable supply of water, to protect and improve water quality and to use water efficiently.	Land, water and soil resources.	<ul style="list-style-type: none"> • How does the policy/allocation/strategic action affect <ul style="list-style-type: none"> ○ Water quality? ○ Water quantity? ○ Surface water run off? Does it reduce run-off rates? Does it increase water absorption / management? ○ Wastewater? ○ Drainage? ○ Pathways for pollutants?
ENV3: To protect and enhance biodiversity and geodiversity.	Biodiversity.	<ul style="list-style-type: none"> • How does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> ○ The ability to retain and maintain soil carbon? ○ Geological interests? ○ The potential for managed accessible geological feature exposures? ○ County Wildlife Sites? ○ Local and National Nature Reserves? ○ Ramsar Sites? ○ SPAs, SACs? ○ SSSIs? ○ BAP Priority Species and habitats? ○ Habitat connectivity and Ecological Networks? ○ Trees and hedgerows? ○ Waterbodies? ○ Green Infrastructure? ○ physical management and maintenance of habitats? ○ Habitat creation? ○ Habitat restoration?

SA Objective	SEA General Theme	Decision making criteria/prompting questions
ENV4: To conserve and enhance the quality and local distinctiveness of landscapes and towns/villages.	Cultural heritage, landscape and townscape.	<ul style="list-style-type: none"> • How does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> ○ The setting of the Broads? ○ The perception of the Broads? ○ The Landscape Character? ○ Cultural heritage and heritage assets? ○ Dark skies and tranquillity? ○ The special qualities of the Broads⁵? ○ Landscape features? ○ Peat? ○ Conservation Areas? ○ Designated and undesignated heritage assets? ○ The quality and local distinctiveness of the Broads towns/villages/buildings? ○ Open Space? ○ Green Infrastructure? ○ Harmful incremental change?
ENV5: To adapt, become resilient and mitigate against the impacts of climate change	Climate change, air and pollution.	<ul style="list-style-type: none"> • How does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> ○ Emissions of greenhouse gases? ○ Sequestering carbon dioxide? ○ Single occupancy car use? ○ HGV/delivery movements? ○ Public transport? ○ Cycling/walking?

⁵ Taken from the Climate Change Adaptation Plan: Open water in lakes and rivers, Breydon Water (estuary), Fens / reed beds, Grazing marshes and ditches, Wet woodlands, Historic buildings, especially mills, Boating and the riverside economy, Farmland (including rights of way), Open landscapes, big skies and tranquillity and the coast.

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> ○ Boat emissions? ○ The ability of communities to adapt? ○ The ability of habitats and species to adapt? ○ Peat? ○ Energy use? ○ Open Space? ○ Green Infrastructure? ○ Solar shade/solar gain? ○ Mitigating/adapting to overheating? ○ Nature based solutions over hardscape (SuDS, attenuation, screening, etc.), where relevant ● Will the allocation/policy/strategic action help communities become more resilient and adapt to the impacts of climate change
<p>ENV6: To avoid, reduce and manage flood risk and to become more resilient to flood risk and coastal change.</p>	<p>Land, water and soil resources. Climate change, air and pollution.</p>	<ul style="list-style-type: none"> ● Will the allocation/policy/strategic action <ul style="list-style-type: none"> ○ guide inappropriate development away from flood risk areas? ○ ensure that where development in flood risk areas is permitted, the risks to people and property are managed/mitigated? ○ consider the risk of flooding to communities/allocations both now and in the future taking account of climate change? ○ affect opportunities for future flood and coastal risk management? ○ restrict choice for managing flood risk and the coast in the future? ● Does the policy consider different sources of flooding⁶? ● Does the allocation/policy/strategic action affect the shoreline management plan?
<p>ENV7: To manage resources sustainably through the effective use of land, energy and materials.</p>	<p>Land, water and soil resources.</p>	<ul style="list-style-type: none"> ● Is the allocation on:

⁶ Including from rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems, and from reservoirs, canals and lakes and other artificial sources.

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> ○ Brownfield Land? ○ Greenfield Land? • Does the allocation use land effectively? • Does the allocation/policy/strategic action affect energy efficiency? • Are there any safeguarded mineral sites? • Will it prevent the sterilisation of known or suspected mineral resources by development? • Does the policy consider origin of resource/where resource derived from? • Is the allocation on: <ul style="list-style-type: none"> ○ Contaminated land ○ Best and most versatile agricultural land
ENV8: To minimise the production and impacts of waste through reducing what is wasted and re-using and recycling what is left.	Population and human health. Climate change, air and pollution.	<ul style="list-style-type: none"> • Does the policy help reduce waste, reuse waste or recycle/compost?
ENV9: To conserve and enhance the cultural heritage, historic environment, heritage assets and their settings	Cultural heritage, landscape and townscape.	<ul style="list-style-type: none"> • Does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> ○ The quality and local distinctiveness of the Broads towns/villages/buildings? ○ Designated and undesignated heritage assets? ○ Conservation Areas? ○ Archaeology? ○ Local culture and traditions? ○ The wider cultural heritage of the broads? ○ The history, traditions, customs and the spaces and places these rely upon or relate to?
ENV10: To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.	Cultural heritage, landscape and townscape.	<ul style="list-style-type: none"> • Does the allocation/policy/strategic action <ul style="list-style-type: none"> ○ Appreciate what is special about the site? ○ Relate to the site's setting in the landscape/townscape?

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> ○ Appreciate the rich cultural heritage of the area? ○ Address/consider residential amenity? ● Are these issues considered? <ul style="list-style-type: none"> ○ local character (including landscape setting) ○ safe, connected and efficient streets ○ a network of greenspaces (including parks) and public places ○ crime prevention ○ security and lighting measures in the context of dark skies ○ access and inclusion ○ efficient use of natural resources ○ cohesive & vibrant neighbourhoods ○ layout – the way in which buildings and spaces relate to each other ○ form – the shape of buildings ○ scale – the size of buildings ○ detailing – the important smaller elements of building and spaces ○ materials – what a building is made from ○ sensitive design of road infrastructure? (E.g. reduced signage road markings, use of local materials and alternative traffic calming methods). ○ efficient use of land in sustainable locations for higher density development ○ housing design that promotes good space standards
ENV11: To improve air quality and minimise noise, vibration and light pollution.	Population and human health. Climate change, air and pollution.	<ul style="list-style-type: none"> ● Does the allocation/policy/strategic action affect: <ul style="list-style-type: none"> ○ Air quality? ○ Noise production? ○ Vibration?

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> ○ Light pollution/dark skies? ● How does the allocation/policy/strategic action relate to Air Quality Management Areas? ● Would the allocation make additional noise or be sensitive to the prevailing acoustic environment? ● Have cumulative impacts of development/change been considered? ● Does the allocation/policy/strategic action affect the tranquillity of the Broads?
<p>ENV12: To increase the proportion of energy generated through renewable/low carbon processes without unacceptable adverse impacts to/on the Broads landscape</p>	<p>Climate change, air and pollution. Cultural heritage, landscape and townscape.</p>	<ul style="list-style-type: none"> ● Does the allocation/policy/strategic action affect <ul style="list-style-type: none"> ○ Renewable/low carbon energy generation? ○ Renewable/low carbon energy transmission? ○ The setting of the Broads? ○ The perception of the Broads? ○ The Landscape Character? ○ The special qualities of the Broads? ● Have Cumulative impacts of renewable/low carbon energy generation been considered?
<p>SOC1: To improve the health and wellbeing of the population and promote a healthy lifestyle.</p>	<p>Population and human health.</p>	<ul style="list-style-type: none"> ● Does the allocation/policy/strategic action: <ul style="list-style-type: none"> ○ Affect physical and/or mental health? ○ Affect wellbeing? ○ Promote active lifestyles? ○ Promote active travel? ● Does the allocation/policy/strategic action include: <ul style="list-style-type: none"> ○ Publicly accessible open space? ○ Sports facilities? ○ Health infrastructure? ● Does the policy enable active use of water space?

SA Objective	SEA General Theme	Decision making criteria/prompting questions
SOC2: To reduce poverty, inequality and social exclusion.	Population and human health. Inclusive communities.	<ul style="list-style-type: none"> • Does the allocation/policy/strategic action affect any of these domains? <ul style="list-style-type: none"> ○ Income ○ Employment ○ Health and Disability ○ Education, Skills and Training ○ Barriers to Housing and Services ○ Crime ○ Living Environment • Does the allocation/policy/strategic action affect inclusive communities? • Does it affect community cohesion? • Does it affect quality of life? • Does the policy avoid potential for inequality or serve to positively address existing identified inequalities through its implementation? • Does the allocation/policy mean lack of accessibility or the need to travel longer distances?
SOC3: To improve education and skills including those related to local traditional industries.	Population and human health. Economic Activity.	<ul style="list-style-type: none"> • Is the allocation/policy/strategic action for an education/skills establishment? • Does the policy/allocation/strategic action enable improved understanding of the special qualities, pressures and management of the Broads to all? • Does it relate to Traditional Broads industries? • Will it facilitate improved access to vocational training, education and skills for all, including young people? • Will it facilitate opportunity for delivery and uptake of traditional skills training which may benefit wider Broads purposes? • Does the allocation/policy mean lack of accessibility or the need to travel longer distances?
SOC4: To enable suitable stock of housing meeting local needs including affordability.	Population and human health. Inclusive communities.	<ul style="list-style-type: none"> • Does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> ○ Housing?

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> ○ Affordable Housing? ○ Gypsy and Traveller accommodation? ○ Residential moorings/boats used as residences? ○ Older persons housing? ○ Specialist housing?
SOC5: To maximise opportunities for new/ additional employment	Economic activity.	<ul style="list-style-type: none"> ● Does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> ○ Employment land uses? ○ Numbers of jobs? ○ Tourism? ○ Does it relate to Traditional Broads industries?
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.	Population and human health. Inclusive communities.	<ul style="list-style-type: none"> ● Is the allocation/policy/strategic action within walking distance (800m) from Key Services? ● Is the allocation within a settlement boundary? ● Is the allocation/policy/strategic action for a key service? ● Will the allocation/policy/strategic action affect public transport, walking and cycling? ● Does the policy/allocation/strategic action relate to Local Green Space? ● Will routes be functional and accessible for all? ● Will routes be safe and attractive public spaces? ● Does it consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles? ● Will it support the retention of key facilities and services ensuring that local needs are met locally wherever possible or alternative sustainable access is provided?
SOC7: To build community identity, improve social welfare and reduce crime and anti-social activity.	Population and human health. Inclusive communities.	<ul style="list-style-type: none"> ● Does the policy/allocation/strategic action relate to: <ul style="list-style-type: none"> ○ Designing out crime? ○ Designing in community safety?

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> ○ An inclusive environment? ○ Robust structure and identity? ○ Interaction with other uses positively? ○ Avoiding opportunities for conflict?
<p>ECO1: To support a flourishing and sustainable economy and improve economic performance in rural areas.</p>	<p>Economic activity.</p>	<ul style="list-style-type: none"> ● Will it provide the spaces and infrastructure to support self-employment opportunities and business start-up? ● Will it support existing business viability and local employment growth? ● Does it contribute to a thriving rural community? ● Does it contribute to a prosperous rural community?
<p>ECO2: To ensure the economy actively contributes to social and environmental well-being.</p>	<p>Economic activity. Population and human health. Inclusive communities</p>	<ul style="list-style-type: none"> ● How does the policy/allocation/strategic action affect 'Social Capital'? <ul style="list-style-type: none"> ○ Skills development ○ Community cohesion ○ Amenity ○ Job provision ○ Quality of life ● How does it affect 'Low Carbon'? <ul style="list-style-type: none"> ○ Innovation ○ Resource efficiency ● How does it affect 'Natural Capital'? <ul style="list-style-type: none"> ○ Landscape ○ Biodiversity
<p>ECO3: To offer opportunities for Tourism and recreation in a way that helps the economy, society and the environment.</p>	<p>Economic activity. Population and human health. Inclusive communities.</p>	<ul style="list-style-type: none"> ● Does the policy/allocation/strategic action affect: <ul style="list-style-type: none"> ○ Sustainable tourism. ○ Responsible tourism.

SA Objective	SEA General Theme	Decision making criteria/prompting questions
		<ul style="list-style-type: none"> • Does it: <ul style="list-style-type: none"> ○ Promote enjoyment and understanding of the Broads? ○ Raise awareness of the Broads as a special destination? ○ Drive up the quality of the visitor experience? ○ Strengthen tourism performance across the whole Broads area? ○ Maintain the Broads' position as a premier inland boating destination in the UK? ○ Respect the sensitive environment of the Broads? ○ Provide the right conditions for successful tourism businesses? ○ Will it maximise benefits and minimise impacts from visitors to communities?

Appendix 5 – Assessment of each policy and reasonable alternatives against the SA Objectives.

Policy PUBDM1: Major Development in the Broads

	A: Proposed Publication version policy	B: No policy	C: Original 2019 Local Plan policy
ENV1			
ENV2			
ENV3	+ Biodiversity is a special quality of the Broads, and the policy refers to protecting European protected sites.	?	+ Biodiversity is a special quality of the Broads, and the policy refers to protecting European protected sites.
ENV4	+ The landscape character is protected through the policy.	?	+ The landscape character is protected through the policy.
ENV5			
ENV6			
ENV7			
ENV8			
ENV9	+ Heritage is protected through the policy.	?	+ Heritage is protected through the policy.
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			

		A: Proposed Publication version policy	B: No policy	C: Original 2019 Local Plan policy
SOC6				
SOC7				
ECO1				
ECO2	+	Policy relates to development that does not impact the special qualities of the Broads.	?	+ Policy relates to development that does not impact the special qualities of the Broads.
ECO3	+		?	

Policy PUBDM2: Embodied Carbon

	A: Proposed Publication version policy	B: No specific policy
ENV1		
ENV2		
ENV3		
ENV4	? The choice of materials can impact a landscape and townscape. Choice of materials is an important consideration for schemes in the Broads.	?
ENV5	+ Policy addresses carbon emissions.	?
ENV6		
ENV7	+ Policy seeks re-use of buildings and materials rather than demolition and disposal.	?
ENV8	+ Policy seeks re-use of buildings and materials rather than demolition and disposal.	?
ENV9	? The choice of materials can impact a heritage asset. Choice of materials is an important consideration for schemes in the Broads.	?
ENV10	? Choice of materials is an important consideration for schemes in the Broads.	?
ENV11		
ENV12		

The impacts are uncertain. That being said, if there is no policy that does not seek to justify demolition, more buildings could be demolished without due consideration as there are no other policy levers available.

		A: Proposed Publication version policy	B: No specific policy
SOC1	+	There are benefits to health and wellbeing by responding to climate change.	?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			

Policy PUBDM3: Pollution and Hazards in development and protecting environmental quality

		A: No policy	B: Proposed Publication version policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>		
ENV2	?		+	Policy refers to water pollution.
ENV3	?		+	Fundamentally, the policy seeks to protect the environment.
ENV4				
ENV5	?		+	Taken in the round, there could be benefits of the policy to climate change.
ENV6				
ENV7				
ENV8	?		+	Taken in the round, there could be benefits of the policy in terms of waste.
ENV9				
ENV10				
ENV11	?		+	Policy refers to air and light pollution.
ENV12				
SOC1	?		+	Fundamentally, the policy seeks to reduce emissions and protect things like water quality with associated health benefits.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				

		A: No policy	B: Proposed Publication version policy
ECO2			
ECO3			

Policy PUBSP1: Responding to the Climate Emergency

		A: Proposed Publication version policy	B: No specific policy	C: Original 2019 Local Plan policy	
ENV1	+	Policy refers to locating development with good access to services and facilities.	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.		
ENV2					
ENV3					
ENV4					
ENV5	+	Policy relates to climate change.		+	Policy relates to climate change.
ENV6	+	Policy refers to SuDS			
ENV7	+	Policy refers to construction and the lifecycle of the development.		+	Policy refers to the lifecycle of the development.
ENV8					
ENV9					
ENV10					
ENV11					
ENV12	+	Policy refers to renewable energy.		+	Policy refers to renewable energy.
SOC1	+	There are benefits to health and wellbeing by responding to climate change.		+	There are benefits to health and wellbeing by responding to climate change.
SOC2					
SOC3					
SOC4					
SOC5					
SOC6	+	Policy refers to locating development with good			

	A: Proposed Publication version policy	B: No specific policy	C: Original 2019 Local Plan policy
	access to services and facilities.		
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBDM4: Climate change adaptation and resilience checklist

		A: Proposed Publication version policy	B: No specific policy	
ENV1			The impacts are uncertain. That being said, if there is no policy that does not seek to prompt applicants about how their scheme will operate and function in a changing climate, they may not consider this.	
ENV2				
ENV3				
ENV4				
ENV5	+	The policy is about adapting to and becoming resilient to climate change.		?
ENV6				
ENV7				
ENV8				
ENV9				
ENV10	+	Generally, by adapting to climate change and being resilient the design will be good.		?
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				

Policy PUBDM5: Water quality and foul drainage

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2	+ Fundamentally, the policy is about the use of water.	+ Fundamentally, the policy is about the use of water.	?
ENV3	+ Protecting water quality benefits biodiversity.	+ Protecting water quality benefits biodiversity.	?
ENV4			
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1	+ Water is important to the health and wellbeing of people.	+ Water is important to the health and wellbeing of people.	?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty.

Policy PUBDM6: Boat wash-down facilities

There are no reasonable alternatives identified at this stage.

	A: Proposed Publication version policy	
ENV1		
ENV2	+	A key aim of the policy is to reduce paint residues and copper levels in sediment.
ENV3	+	Paint residues and Copper in sediment can harm biodiversity. The policy also relates to biosecurity and invasive species.
ENV4		
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10		
ENV11		
ENV12		
SOC1		
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		
SOC7		

		A: Proposed Publication version policy
ECO1	?	This extra requirement could add costs to a business.
ECO2	+	Appropriate wash down facilities will mean that businesses contribute to environmental wellbeing.
ECO3	?	The types of boats affected by this policy are used for recreation purposes. On one hand this policy requirement helps the environment but on the other it could be an extra financial burden.

There are no reasonable alternatives. Given the importance of addressing the issue of biosecurity and anti-fouling paint, so not to have a policy is seen as an unreasonable alternative

Policy PUBM7: Water efficiency and re-use

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2	+ Fundamentally, the policy is about the use of water.	+ Fundamentally, the policy is about the use of water.	?
ENV3			
ENV4			
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1	+ Water is important to the health and wellbeing of people.	+ Water is important to the health and wellbeing of people.	?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2	+ Policy ensures that it is not just residential schemes that consider and address water efficiency.	+ Policy ensures that it is not just residential schemes that consider and address water efficiency.	?

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty.

ECO3	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy

Policy PUBSP2: Strategic flood risk policy

		A: Proposed Publication version policy	B: No policy	
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed; a policy provides certainty.</p>	
ENV2				
ENV3	+	Policy refers to biodiversity and habitats.		?
ENV4				
ENV5	+	Flooding is likely to get worse as a result of climate change.		?
ENV6	+	Policy relates to flooding.		?
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1	+	Flooding impacts health and wellbeing.		?
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBDM78 Development and flood risk

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2			
ENV3	+ Policy refers to biodiversity and habitats.	+ Policy refers to biodiversity and habitats.	?
ENV4			
ENV5	+ Flooding is likely to get worse as a result of climate change.	+ Flooding is likely to get worse as a result of climate change.	?
ENV6	+ Policy relates to flooding.	+ Policy relates to flooding.	?
ENV7			
ENV8			
ENV9			
ENV10	+ Generally, design is an important consideration when addressing flood risk.	+ Generally, design is an important consideration when addressing flood risk.	?
ENV11			
ENV12			
SOC1	+ Flooding impacts health and wellbeing.	+ Flooding impacts health and wellbeing.	?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

Not having a policy does not mean that these issues will not be considered or addressed; a policy provides certainty.

ECO3	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy

Policy PUBDM9: Surface water run-off

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2			
ENV3	+ Policy refers to biodiversity and habitats.	+ Policy refers to biodiversity and habitats.	?
ENV4	+ Design principles reflect public realm and landscape impact.	+ Design principles reflect public realm and landscape impact.	?
ENV5	+ Flooding is likely to get worse as a result of climate change.	+ Flooding is likely to get worse as a result of climate change.	?
ENV6	+ Policy relates to flooding.	+ Policy relates to flooding.	?
ENV7			
ENV8			
ENV9	+ Design principles reflect impact on the historic environment.	+ Design principles reflect impact on the historic environment.	?
ENV10	+ Generally, design is an important consideration when addressing flood risk and SuDS	+ Generally, design is an important consideration when addressing flood risk and SuDS	?
ENV11			
ENV12			
SOC1	+ Flooding impacts health and wellbeing.	+ Flooding impacts health and wellbeing.	?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			

Not having a policy does not mean that these issues will not be considered or addressed; a policy provides certainty.

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBDM10: Open space on land, play space, sports fields and allotments.

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ENV1		
ENV2		
ENV3	+ Policy talks of enhancing the biodiversity value.	+ Policy talks of enhancing the biodiversity value.
ENV4	+ The various types of open spaces are part of the land and town scape.	+ The various types of open spaces are part of the land and town scape.
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10		
ENV11		+ The policy refers to dark skies and appropriate lighting.
ENV12		
SOC1	+ Open space and play enable people to be active as well as benefitting nutrition through growing food.	+ Open space and play enable people to be active as well as benefitting nutrition through growing food.
SOC2	+ Open spaces and allotments provide a place for people to meet and interact.	+ Open spaces and allotments provide a place for people to meet and interact.
SOC3	+ Open spaces are valued as spaces for social prescribing/volunteering and skills building activities	+ Open spaces are valued as spaces for social prescribing/volunteering and skills building activities
SOC4		
SOC5		

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
SOC6	+ The policy requires any replacement open space to be in as convenient location as the current. It also says that cemeteries need to be sustainable located.	+ The policy requires any replacement open space to be in as convenient location as the current. It also says that cemeteries need to be sustainable located.
SOC7	+ Open spaces and allotments provide a place for people to meet and interact.	+ Open spaces and allotments provide a place for people to meet and interact.
ECO1		
ECO2		
ECO3	+ Open spaces and allotments provide a place for people to meet and interact.	+ Open spaces and allotments provide a place for people to meet and interact.

Policy PUBDM111: Green and blue infrastructure and Public Rights of Way

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ One of the elements of GI is movement routes.	+ One of the elements of GI is movement routes. Policy refers to public rights of ways.	?
ENV2	+ Policy refers to blue infrastructure so there could be benefits relating to water quality.		
ENV3	+ Refers to ecological networks and Local Nature Recovery Strategies and wetland recreation.	+ Refers to ecological networks. Refers to biodiversity net gain and ecological services.	?
ENV4	+ GI in the area is integral to the landscape of the area.	+ GI in the area is integral to the landscape of the area.	?
ENV5	+ Policy refers to GI's role in adaptation and mitigation.	+ Policy refers to GI's role in adaptation and mitigation as well as resilience.	?
ENV6	+ Policy refers to SuDS.		
ENV7			
ENV8			
ENV9	+ GI in the area is integral to the area.	+ GI in the area is integral to the area.	?
ENV10	+ Policy refers to design of GI as well as GI adding to the design of a scheme.	+ Policy refers to design of GI as well as GI adding to the design of a scheme.	?
ENV11			
ENV12			
SOC1	+ GI can benefit mental and physical health and wellbeing.	+ GI can benefit mental and physical health and wellbeing.	?
SOC2			

Not having a policy does not mean that the benefits of having a policy will not be realised. A policy adds certainty.

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3	+ GI can be a reason why people come to the area.	+ GI can be a reason why people come to the area.	?

Policy PUBSP3: Soils

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>		
ENV2	?		+ Policy refers to soil erosion and contamination of water environment.	+ Policy refers to soil erosion and contamination of water environment.
ENV3	?		+ Policy refers to invasive species.	+ Policy refers to invasive species.
ENV4				
ENV5	?			+ Policy refers to carbon sinks.
ENV6				
ENV7	?		+ Policy seeks protection of soils and re use of topsoil locally.	+ Policy seeks protection of soils and re use of topsoil locally.
ENV8	?		+ Policy refers to local re use of topsoil.	+ Policy refers to local re use of topsoil.
ENV9				
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				

	A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO3			

Policy PUBDM12: Peat soils

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.			
ENV2					
ENV3	?			+ Fundamentally, the policy seeks to protect peat which is a habitat.	+ Fundamentally, the policy seeks to protect peat which is a habitat.
ENV4					
ENV5	?			+ Policy seeks protection of peat, which is a carbon sink. + Talks about requirements of keeping peat wet if it is removed.	+ Policy seeks protection of peat, which is a carbon sink. Talks about requirements of keeping peat wet if it is removed.
ENV6					
ENV7					
ENV8					
ENV9	?			+ If peat is to be removed, policy talks of palaeoenvironments and archaeology.	+ If peat is to be removed, policy talks of palaeoenvironments and archaeology.
ENV10					
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO1				
ECO2				
ECO3				

Policy PUBSP4: Historic Environment

		A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.			
ENV2					
ENV3					
ENV4	?			+ The historic environment is part of the landscape of the area.	+ The historic environment is part of the landscape of the area.
ENV5					
ENV6					
ENV7					
ENV8					
ENV9	?			+ Fundamentally, the policy relates to the historic environment.	+ Fundamentally, the policy relates to the historic environment.
ENV10	?			+ Design is an important element of the policy.	+ Design is an important element of the policy.
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					
ECO2					

	A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy
ECO3			

Policy PUBDM13: Heritage Assets

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2			
ENV3	+ Often, heritage assets can be home to biodiversity and so by protecting them, biodiversity would benefit.	+ Often, heritage assets can be home to biodiversity and so by protecting them, biodiversity would benefit.	?
ENV4	+ Heritage assets add to the character of an area.	+ Heritage assets add to the character of an area.	?
ENV5			
ENV6			
ENV7			
ENV8		+ Policy seeks re-use of materials.	?
ENV9	+ Fundamentally, the policy relates to heritage assets.	+ Fundamentally, the policy relates to heritage assets.	?
ENV10	+ Policy seeks high quality meeting and design.	+ Policy seeks high quality meeting and design.	?
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

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

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ECO3	+	Heritage assets are sometimes the reason why people come to an area.	+	Heritage assets are sometimes the reason why people come to an area.	?

Policy PUBDM14: Re-use, Conversion or Change of Use of Historic Buildings

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2			
ENV3	+ Often, heritage assets can be home to biodiversity and so by protecting them, biodiversity would benefit. Policy also talks of biodiversity.	+ Often, heritage assets can be home to biodiversity and so by protecting them, biodiversity would benefit. Policy also talks of biodiversity.	?
ENV4	+ Heritage assets add to the character of an area.	+ Heritage assets add to the character of an area.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9	+ Fundamentally, the policy relates to heritage assets.	+ Fundamentally, the policy relates to heritage assets.	?
ENV10	+ Policy seeks high quality meeting and design.	+ Policy seeks high quality meeting and design.	?
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

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

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ECO1			
ECO2			
ECO3	+ Heritage assets are sometimes the reason why people come to an area.	+ Heritage assets are sometimes the reason why people come to an area.	?

Policy PUBSP5: Biodiversity

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2				
ENV3	+ Fundamentally, the policy seeks to protect and enhance biodiversity.	+ Fundamentally, the policy seeks to protect and enhance biodiversity.		?
ENV4	+ Essentially, the landscape supports and benefits wildlife by providing habitats. So protecting the landscape will benefit biodiversity and vice versa to some extent.	+ Essentially, the landscape supports and benefits wildlife by providing habitats. So protecting the landscape will benefit biodiversity and vice versa to some extent.		?
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ECO1			
ECO2			
ECO3			

Policy PUBDM15: Natural Environment

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2			
ENV3	+ Fundamentally, the policy seeks to protect and enhance biodiversity.	+ Fundamentally, the policy seeks to protect and enhance biodiversity.	?
ENV4	+ Essentially, the landscape supports and benefits wildlife by providing habitats. So protecting the landscape will benefit biodiversity and vice versa to some extent.	+ Essentially, the landscape supports and benefits wildlife by providing habitats. So protecting the landscape will benefit biodiversity and vice versa to some extent.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

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

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ECO1			
ECO2			
ECO3			

Policy PUBDM16: Biodiversity Net Gain

	A: Proposed Publication version policy	B: No policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2			
ENV3	+ Fundamentally, the policy seeks to protect and enhance biodiversity.		?
ENV4	+ Essentially, the landscape supports and benefits wildlife by providing habitats. So by providing BNG, the landscape will benefit biodiversity and vice versa to some extent.		?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

	A: Proposed Publication version policy	B: No policy
ECO1		
ECO2		
ECO3		

Policy PUBDM17: Mitigating Recreation Impacts

	A: Proposed Publication version policy	B: No policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2			
ENV3	+ Fundamentally, the policy seeks to protect and enhance biodiversity.		?
ENV4	+ Essentially, the landscape supports and benefits wildlife by providing habitats. So protecting the landscape will benefit biodiversity and vice versa to some extent.		?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1	+ The mitigation put in place could enable active lifestyles.		?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

	A: Proposed Publication version policy	B: No policy
ECO1		
ECO2		
ECO3		

Policy PUBDM178 Mitigating Nutrient Enrichment Impacts

	A: Proposed Publication version policy	B: No policy
ENV1		
ENV2	+ Fundamentally, the quality of water will improve.	?
ENV3	+ Fundamentally, the policy seeks to protect and enhance biodiversity.	?
ENV4	+ Essentially, the landscape supports and benefits wildlife by providing habitats. So protecting the landscape will benefit biodiversity and vice versa to some extent.	?
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10		
ENV11		
ENV12		
SOC1		
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		
SOC7		

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

	A: Proposed Publication version policy	B: No policy
ECO1		
ECO2		
ECO3		

Policy PUBDM19: Trees, woodlands, hedges and shrubs and development

		A: No specific policy. Rely on GI policy and the natural environment policy.	B: Amend policies GI and Natural Environment to include a greater emphasis on trees, woodlands, hedges and shrubs.	C: Proposed Publication version policy
ENV1	?	The existing policies (with the amendments as set out elsewhere in the Local Plan and SA), do not go into the detail that the options B and C do. Whilst trees and hedgerows may be part of schemes and are related to these two policies, the effects are uncertain due to lack of detail.	+ Trees and other vegetation planted in the right places can help improve urban air quality on a local scale by forming a barrier between people and pollutants. They also remove some particulate pollution from the air by catching the tiny particles on their leaf surfaces	+ Trees and other vegetation planted in the right places can help improve urban air quality on a local scale by forming a barrier between people and pollutants. They also remove some particulate pollution from the air by catching the tiny particles on their leaf surfaces
ENV2				
ENV3	?		+ Trees etc enhance biodiversity.	+ Trees etc enhance biodiversity.
ENV4	?		? The right tree in the right place can help enhance landscapes and townscapes.	? The right tree in the right place can help enhance landscapes and townscapes.
ENV5	?		+ Trees etc are able to sequester carbon dioxide.	+ Trees etc are able to sequester carbon dioxide.
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11	?		+ Trees and other vegetation planted in the right places can help improve urban air quality on a local scale by forming a barrier between people and pollutants. They also remove some	+ Trees and other vegetation planted in the right places can help improve urban air quality on a local scale by forming a barrier between people and pollutants. They also remove some particulate pollution from

		A: No specific policy. Rely on GI policy and the natural environment policy.	B: Amend policies GI and Natural Environment to include a greater emphasis on trees, woodlands, hedges and shrubs.	C: Proposed Publication version policy
			particulate pollution from the air by catching the tiny particles on their leaf surfaces	the air by catching the tiny particles on their leaf surfaces
ENV12				
SOC1	?		+ There are health and wellbeing benefits of retaining plantings	+ There are health and wellbeing benefits of retaining plantings
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBDM20: Energy demand and performance of new buildings (including extensions)

	A: Proposed Publication version policy		B: Original 2019 Local Plan policy		C: No specific policy	
ENV1					<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2						
ENV3						
ENV4						
ENV5	+	Policy refers to energy demand and therefore relates to emissions.	+	Policy refers to energy demand and therefore relates to emissions.		?
ENV6						
ENV7	+	Policy refers to energy efficiency.	+	Policy refers to energy efficiency.		?
ENV8						
ENV9	+	Policy has a section on appropriate energy efficiency measures for older buildings.	+	Policy has a section on appropriate energy efficiency measures for older buildings.		?
ENV10						
ENV11						
ENV12	+	Policy refers to renewable or low carbon energy.	+	Policy refers to renewable or low carbon energy.		?
SOC1						
SOC2						
SOC3						
SOC4						
SOC5						
SOC6						
SOC7						

	A: Proposed Publication version policy	B: Original 2019 Local Plan policy	C: No specific policy
ECO1			

Policy PUBDM21: Renewable and low carbon energy

		A: Proposed Publication version policy	B: No policy	C: Original 2019 Local Plan policy
ENV1				
ENV2				
ENV3	+	Impact on the special qualities of the Broads is included in the policy, including the natural environment. There is also reference to protecting birds and bats.	?	+ Impact on the special qualities of the Broads is included in the policy, including the natural environment.
ENV4	+	Impact on the special qualities of the Broads is included in the policy, including the landscape.	?	+ Impact on the special qualities of the Broads is included in the policy, including the landscape.
ENV5	+	The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.	?	+ The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.
ENV6				
ENV7	+	Seeks use of previously developed land for proposals if possible.	?	+ Seeks use of previously developed land for proposals if possible.
ENV8	?	If the scheme is for Anaerobic Digestion, this would use waste materials.	?	? If the scheme is for Anaerobic Digestion, this would use waste materials.
ENV9	+	Impact on the special qualities of the Broads is included in the policy, including heritage assets.	?	+ Impact on the special qualities of the Broads is included in the policy, including heritage assets.
ENV10	+	Fundamentally, the policy taken together means that any scheme is designed appropriately for the area.	?	+ Fundamentally, the policy taken together means that any scheme is designed appropriately for the area.
ENV11	+	The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.	?	+ The benefit of renewable/low carbon energy is that it does not have the emissions associated with burning fossil fuels.

		A: Proposed Publication version policy	B: No policy	C: Original 2019 Local Plan policy
ENV12	+	Fundamentally, the policy relates to renewable and low carbon energy generation.	?	+ Fundamentally, the policy relates to renewable and low carbon energy generation.
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	+	The policy enables appropriate renewable and low carbon energy schemes that could benefit businesses in the area.	?	+ The policy enables appropriate renewable and low carbon energy schemes that could benefit businesses in the area.
ECO2	+		?	
ECO3	+		?	

Policy PUBSP6: Landscape character

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>			
ENV2					
ENV3					
ENV4	?			<p>Fundamentally, the policy + seeks to protect the landscape of the Broads.</p>	<p>Fundamentally, the policy seeks + to protect the landscape and seascape of the Broads.</p>
ENV5					
ENV6					
ENV7					
ENV8					
ENV9					
ENV10					
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					
ECO2					
ECO3					

Policy PUBDM22: Development and landscape

	A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1	<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>			
ENV2			+ Policy refers to planting needing to be water smart.	
ENV3				
ENV4		?	+ Fundamentally, the policy seeks to protect the landscape of the Broads.	+ Fundamentally, the policy seeks to protect the landscape and seascape of the Broads.
ENV5				+ Policy refers to planting needing to consider climate change as well as slat water inundation.
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				

	A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO3			

Policy PUBDM23: Land raising

	A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy	
ENV1	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.			
ENV2				
ENV3		?	+ Policy seeks protection of habitats.	+ Policy seeks protection of habitats.
ENV4		?	+ Policy seeks protection and consideration of landscape impact.	+ Policy seeks protection and consideration of landscape impact.
ENV5				
ENV6		?	+ Policy refers to flood risk as a consideration.	+ Policy refers to flood risk as a consideration.
ENV7				
ENV8				
ENV9		?	+ Policy refers to impact on archaeology and heritage assets. Wording is stronger than original policy.	+ Policy refers to impact on archaeology and heritage assets.
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				

	A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy
ECO2			
ECO3			

Policy PUBDM24: Excavated material

		A: No policy	B: Proposed Publication version policy
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	
ENV2			
ENV3			
ENV4			
ENV5			
ENV6			
ENV7	?		+ The policy seeks early consideration about what to do with excavated material.
ENV8	?		+ The policy seeks early consideration about what to do with excavated material.
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBDM25: Utilities infrastructure development

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.		
ENV2				
ENV3	?		+ Policy refers to biodiversity.	+ Policy refers to biodiversity.
ENV4	?		+ Fundamentally, the policy seeks to protect the landscape of the Broads.	+ Fundamentally, the policy seeks to protect the landscape and seascape of the Broads.
ENV5				
ENV6				
ENV7				
ENV8				
ENV9	?		+ Policy refers to historic environment.	+ Policy refers to historic environment.
ENV10				
ENV11	?			+ Policy includes considering impact of lighting.
ENV12				
SOC1	?		+ Policy refers to health impacts of utilities infrastructure.	+ Policy refers to health impacts of utilities infrastructure.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				

	A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO3			

Policy PUBDM26: Protection and enhancement of settlement fringe landscape character

		A: No policy	B: Proposed Publication version policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.		
ENV2				
ENV3				
ENV4	?			Fundamentally, the policy seeks + to protect the landscape of the Broads.
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBDM27: Amenity

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ENV1	+ Amenity is an aspect to consider in terms of the adverse impacts of traffic – some of the aspects of the policy could result from traffic.	+ Amenity is an aspect to consider in terms of the adverse impacts of traffic – some of the aspects of the policy could result from traffic.
ENV2		
ENV3		
ENV4		
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10	+ Good design is linked to protecting amenity.	+ Good design is linked to protecting amenity.
ENV11	+ These issues are mentioned specifically in the policy.	+ These issues are mentioned specifically in the policy.
ENV12		
SOC1	+ Fundamentally, by protecting amenity, there will be benefits to physical and mental health.	+ Fundamentally, by protecting amenity, there will be benefits to physical and mental health.
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
SOC7		
ECO1		
ECO2	+ Amenity is an aspect to consider if the economy is to actively contribute to social wellbeing.	+ Amenity is an aspect to consider if the economy is to actively contribute to social wellbeing.
ECO3		

Policy PUBSP7: Tranquillity in the Broads

		A: Proposed Publication version policy	B: No policy
ENV1	+	Whilst not in the policy itself, roads can impact on the tranquillity of an area.	?
ENV2			
ENV3	+	Nature and wildlife are seen as an element of tranquillity.	?
ENV4	+	Naturel beauty and remoteness are seen as elements of tranquillity.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11	+	Fundamentally, these are detractors from tranquillity.	?
ENV12			
SOC1	+	Tranquil areas can be beneficial to health and wellbeing. Also refers to impact on amenity.	?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

Not having a policy does not necessarily mean that development will impact on tranquillity, but a policy stance adds protection.

	A: Proposed Publication version policy	B: No policy
ECO1		
ECO2		
ECO3		

Policy PUBDM28: Light pollution and dark skies

	A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed; a policy provides certainty.		
ENV2				
ENV3	+ Light pollution can affect wildlife and biodiversity.		?	+ Light pollution can affect wildlife and biodiversity.
ENV4	+ The area has intrinsically dark skies.		?	+ The area has intrinsically dark skies.
ENV5	+ Less lighting or more efficient lighting or lighting that is not on all the time, saves energy,		?	+ Less lighting or more efficient lighting or lighting that is not on all the time, saves energy,
ENV6				
ENV7	+ Less lighting or more efficient lighting or lighting that is not on all the time, saves energy,		?	+ Less lighting or more efficient lighting or lighting that is not on all the time, saves energy,
ENV8				
ENV9				
ENV10	+ The policy requires well designed lighting if it can be justified.		?	+ The policy requires well designed lighting if it can be justified.
ENV11	+ The policy fundamentally addresses light pollution.		?	+ The policy fundamentally addresses light pollution.
ENV12				
SOC1	+ Light pollution can affect health		?	+ Light pollution can affect health
SOC2				
SOC3				
SOC4				
SOC5				

	A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBSP8: Accessibility and Transport

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Fundamentally, the policy is about travel and transport.	+ Fundamentally, the policy is about travel and transport.	
ENV2					
ENV3					
ENV4					
ENV5	?				+ The policy emphasises reducing the need to travel as well as modes of transport alternative to single occupancy car use.
ENV6					
ENV7					
ENV8					
ENV9	?			+ Policy refers to the historic environment.	+ Policy refers to the historic environment.
ENV10					
ENV11					
ENV12					
SOC1	?			+ More sustainable modes of transport, which are addressed in the policy, can include walking and cycling which are active modes of travel.	+ More sustainable modes of transport, which are addressed in the policy, can include walking and cycling which are active modes of travel.
SOC2	?			? / + Lack of access to services can lead to social isolation and so this policy could help address that.	? / + Lack of access to services can lead to social isolation and so this policy could help address that.
SOC3					
SOC4					

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC5				
SOC6	?			+ Policy refers to location of development to reduce the need to travel to services and facilities.
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBSP9: Recreational access around the Broads

		A: No policy	B: Proposed Publication version policy
ENV1	?	<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	+ Fundamentally, the policy is about travel and transport.
ENV2			
ENV3			+ Policy refers to the natural environment.
ENV4			
ENV5			
ENV6			
ENV7			
ENV8			
ENV9	?		+ Policy refers to the historic environment.
ENV10			
ENV11			
ENV12			
SOC1	?		+ More sustainable modes of transport, which are addressed in the policy, can include walking and cycling which are active modes of travel.
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

		A: No policy	B: Proposed Publication version policy
ECO1			
ECO2			
ECO3	?		+ The policy will help visitors to the Broads get around with benefits to tourism industries and the local economy.

Policy PUBDM29: Transport, highways and access

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Fundamentally, the policy is about travel and transport.	+ Fundamentally, the policy is about travel and transport.
ENV2				
ENV3				
ENV4	?		+ Policy refers to landscape.	+ Policy refers to landscape and the design of signs etc being landscape-led.
ENV5	?			+ The policy emphasises reducing the need to travel as well as modes of transport alternative to single occupancy car use.
ENV6				
ENV7				
ENV8				
ENV9	?		+ Policy refers to the historic environment.	+ Policy refers to the historic environment.
ENV10				
ENV11	?		+ Policy refers to dark skies.	+ Policy refers to dark skies.
ENV12				
SOC1	?	+ More sustainable modes of transport, which are addressed in the policy, can include walking and cycling which are active modes of travel.	+ More sustainable modes of transport, which are addressed in the policy, can include walking and cycling which are active modes of travel.	
SOC2				
SOC3				
SOC4				
SOC5				

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC6	?			+ Policy refers to location of development to reduce the need to travel to services and facilities.
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBDM30: Recreation facilities parking areas

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ The policy refers to parking for various modes of transport.	+ The policy refers to parking for various modes of transport.	?
ENV2			
ENV3		+ The policy refers to biodiversity enhancements.	?
ENV4	+ The policy refers to landscaping.	+ The policy refers to landscaping.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11	+ The policy refers to dark skies.	+ The policy refers to dark skies.	?
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

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

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ECO3	+	The policy relates to attractions in the area such as footpaths and slipways.	+	The policy relates to attractions in the area such as footpaths and slipways.	?

Policy PUBSP10: A prosperous local economy

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.			
ENV2					
ENV3	?			+ The policy refers to the special qualities of the Broads.	+ The policy refers to the special qualities of the Broads.
ENV4	?			+ The policy refers to the special qualities of the Broads.	+ The policy refers to the special qualities of the Broads.
ENV5					
ENV6					
ENV7					
ENV8					
ENV9	?			+ The policy refers to the special qualities of the Broads.	+ The policy refers to the special qualities of the Broads.
ENV10					
ENV11					
ENV12					
SOC1	?			+ Policy refers to the impact of proposals on the amenity of nearby users.	+ Policy refers to the impact of proposals on the amenity of nearby users.
SOC2					
SOC3	?		+ Policy refers to training and apprenticeships.	+ Policy refers to training and apprenticeships.	
SOC4					
SOC5	?		+ The policy relates to employment which would offer a range of job	+ The policy relates to employment which would offer a range of job opportunities for the community.	

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
			opportunities for the community.	
SOC6				
SOC7				
ECO1	?		+ Fundamentally, the policy is about promoting employment.	+ Fundamentally, the policy is about promoting employment.
ECO2	?		+ Fundamentally, the policy is about promoting employment.	+ Fundamentally, the policy is about promoting employment.
ECO3	?		+ Fundamentally, the policy is about promoting employment.	+ Fundamentally, the policy is about promoting employment.

Policy PUBDM31: New employment development

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	<p>+ The location criteria, reference to access by alternative modes of transport as well as reference to impact on highways mean the policy rates positive against this criterion.</p>	<p>+ The location criteria, reference to access by alternative modes of transport as well as reference to impact on highways mean the policy rates positive against this criterion.</p>
ENV2	?		<p>+ Policy refers to water quality.</p>	<p>+ Policy refers to water quality and water efficiency.</p>
ENV3	?		<p>+ Policy refers to impact on biodiversity.</p>	<p>+ Policy refers to impact on biodiversity.</p>
ENV4	?		<p>+ Policy refers to impact on landscape.</p>	<p>+ Policy refers to impact on landscape.</p>
ENV5	?		<p>+ Policy refers to energy efficiency and provision for walking, cycling.</p>	<p>+ Policy refers to energy efficiency and provision for walking, cycling, wheeling. Also refers to adaptation to climate change and resilience.</p>
ENV6	?		<p>+ Policy refers to flood risk.</p>	<p>+ Policy refers to flood risk.</p>
ENV7	?		<p>+ Policy refers to previously developed land.</p>	<p>+ Policy refers to previously developed land.</p>
ENV8				
ENV9	?		<p>+ Policy considers impact on the historic environment.</p>	<p>+ Policy considers impact on the historic environment.</p>
ENV10	?		<p>+ Policy seeks good design.</p>	<p>+ Policy seeks good design and refers to the design guide.</p>
ENV11	?		<p>+ Policy refers to the various types of pollution.</p>	<p>+ Policy refers to the various types of pollution.</p>
ENV12				
SOC1				

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC2				
SOC3	?		+ With employment comes skills and training.	+ With employment comes skills and training.
SOC4				
SOC5	?		+ Policy refers to new employment development.	+ Policy refers to new employment development.
SOC6	?		+ Locational criteria of the policy addresses this to some extent.	+ Locational criteria of the policy addresses this to some extent.
SOC7				
ECO1	?		+ Fundamentally, the policy relates to employment land.	+ Fundamentally, the policy relates to employment land.
ECO2	?		+	+
ECO3	?		+	+

Policy PUBDM32: Protecting general employment

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.		+ Impact on transport network a consideration.	
ENV2					
ENV3					
ENV4					
ENV5					
ENV6					
ENV7	?			+ Policy generally seeks to re-use buildings.	+ Policy generally seeks to re-use buildings.
ENV8					
ENV9					
ENV10					
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1	?			+ Fundamentally, the policy relates to employment land.	+ Fundamentally, the policy relates to employment land.
ECO2	?		+	+	
ECO3	?		+	+	

Policy PUBDM33: Farm Diversification

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy refers to impact on highways network.	+ Policy refers to impact on highways network.
ENV2				
ENV3				
ENV4	?		+ Policy considers impact on landscape character.	+ Policy considers impact on landscape character.
ENV5				
ENV6				
ENV7	?			+ Policy emphasises the use of existing buildings.
ENV8				
ENV9	?			+ Reference made to historic buildings and historic farming practices.
ENV10	?			+ Policy refers to the design and location of development.
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	?		+ Fundamentally, the policy relates to employment land.	+ Fundamentally, the policy relates to employment land.
ECO2	?		+	+

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO3	?		+	+

Policy PUBSP11: Waterside sites

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.			
ENV2					
ENV3	?			+ The policy refers to the special qualities of the Broads.	+ The policy refers to the special qualities of the Broads.
ENV4	?			+ The policy refers to the special qualities of the Broads.	+ The policy refers to the special qualities of the Broads.
ENV5					
ENV6					
ENV7					
ENV8					
ENV9	?			+ The policy refers to the special qualities of the Broads.	+ The policy refers to the special qualities of the Broads.
ENV10					
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5	?		+ The policy relates to employment which would offer a range of job opportunities for the community.	+ The policy relates to employment which would offer a range of job opportunities for the community.	
SOC6					

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC7				
ECO1	?		Fundamentally, the policy is about promoting employment.	Fundamentally, the policy is about promoting employment.
ECO2	?			
ECO3	?			

Policy PUBDM34: Development on waterside sites in employment or commercial use, including boatyards

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>			
ENV2					
ENV3					
ENV4					
ENV5					
ENV6					
ENV7					
ENV8					
ENV9					
ENV10	?				+ Policy refers to the design guide.
ENV11	?				+ Policy refers to dark skies and light pollution.
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5	?		+ The policy relates to employment which would offer a range of job opportunities for the community.	+ The policy relates to employment which would offer a range of job opportunities for the community.	
SOC6					
SOC7					
ECO1	?		+	+	

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO2	?		+ Fundamentally, the policy is about promoting employment.	+ Fundamentally, the policy is about promoting employment.
ECO3	?			

Policy PUBDM35: Retail development in the Broads

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ENV1			<p>Not having a policy does not mean that the benefits of having a policy will not be realised. A policy adds certainty.</p>	
ENV2				
ENV3				
ENV4		+ Policy refers to local character.		?
ENV5				
ENV6				
ENV7				
ENV8				
ENV9		+ Policy refers to impacts on historic character.		?
ENV10		+ Policy refers to local character.		?
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5	+ Retail uses bring employment opportunities.	+ Retail uses bring employment opportunities.	?	
SOC6	+ Retail is a community service and facility and by being in centres, in theory, they are accessible.	+ Retail is a community service and facility and by being in centres, in theory, they are accessible.	?	
SOC7				

		A: Original 2019 Local Plan policy		B: Proposed Publication version policy		C: No policy
ECO1	+	Retail contributes to the economy.	+	Retail contributes to the economy.	?	
ECO2						
ECO3						

Policy PUBSP12: Sustainable tourism

		A: Proposed Publication version policy	B: no policy
ENV1	+	Policy refers to sites needing to be accessible by a variety of transport means.	?
ENV2	+	The policy generally refers to protecting the special qualities of the Broads and water is one of those.	?
ENV3	+	The policy refers to the natural environment.	?
ENV4	+	The policy generally refers to protecting the special qualities of the Broads and landscape character is one of those.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9	+	The policy generally refers to protecting the special qualities of the Broads and heritage is one of the special qualities of the area.	?
ENV10			
ENV11			
ENV12			
SOC1	+	Generally, visiting somewhere can be good for mental health and some of the offers in the Broads will result in physical activity.	?
SOC2			
SOC3			
SOC4			
SOC5	+	Tourism would likely result in job opportunities.	?
SOC6			

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

		A: Proposed Publication version policy	B: no policy
SOC7			
ECO1	+	Generally, tourism will contribute to the economy in the area and this policy seeks this to be done in a sustainable manner.	?
ECO2	+		?
ECO3	+		?

Policy PUBDM36: Sustainable tourism and recreation development

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: no policy	
ENV1	+	Policy refers to sites needing to be accessible by a variety of transport means and sets locations for tourism development.	+	Policy refers to sites needing to be accessible by a variety of transport means and sets locations for tourism development.	?
ENV2	+	The policy refers to water quality.	+	The policy refers to water quality.	?
ENV3	+	The policy refers to biodiversity.	+	The policy refers to biodiversity and RAMS and nutrient enrichment.	?
ENV4	+	The policy refers to landscape character	+	The policy refers to landscape character	?
ENV5					
ENV6					
ENV7					
ENV8					
ENV9	+	The policy refers to heritage.	+	The policy refers to heritage.	?
ENV10	+	Policy seeks good design.	+	Policy seeks good design.	?
ENV11	+	Policy refers to dark skies.	+	Policy refers to dark skies.	?
ENV12					
SOC1	+	Generally, visiting somewhere can be good for mental health and some of the offers in the Broads will result in physical activity.	+	Generally, visiting somewhere can be good for mental health and some of the offers in the Broads will result in physical activity.	?
SOC2					
SOC3					
SOC4					
SOC5	+	Tourism would likely result in job opportunities.	+	Tourism would likely result in job opportunities.	?
SOC6					
SOC7					

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

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy		C: no policy	
ECO1	+	Generally, tourism will contribute to the economy in the area and this policy seeks this to be done in a sustainable manner.	+	Generally, tourism will contribute to the economy in the area and this policy seeks this to be done in a sustainable manner.	?	
ECO2	+		+		?	
ECO3	+		+		?	

Policy PUBDM37: Holiday/tourism accommodation – new provision and retention

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy		C: no policy
ENV1	+	Policy refers to sites needing to be accessible by a variety of transport means and sets locations for tourism development.	+	Policy refers to sites needing to be accessible by a variety of transport means and sets locations for tourism development.	?
ENV2	+	The policy refers to water quality.	+	The policy refers to water quality.	?
ENV3	+	The policy refers to biodiversity.	+	The policy refers to biodiversity and RAMS and nutrient enrichment.	?
ENV4	+	The policy refers to landscape character	+	The policy refers to landscape character	?
ENV5					
ENV6					
ENV7					
ENV8					
ENV9	+	The policy refers to heritage.	+	The policy refers to heritage.	?
ENV10	+	Policy seeks good design.	+	Policy seeks good design.	?
ENV11	+	Policy refers to dark skies.	+	Policy refers to dark skies.	?
ENV12					
SOC1	+	Generally, visiting somewhere can be good for mental health and some of the offers in the Broads will result in physical activity.	+	Generally, visiting somewhere can be good for mental health and some of the offers in the Broads will result in physical activity.	?
SOC2					
SOC3					
SOC4					

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

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy		C: no policy	
SOC5	+	Tourism would likely result in job opportunities.	+	Tourism would likely result in job opportunities.	?	
SOC6						
SOC7						
ECO1	+	Generally, tourism will contribute to the economy in the area and this policy seeks this to be done in a sustainable manner.	+	Generally, tourism will contribute to the economy in the area and this policy seeks this to be done in a sustainable manner.	?	
ECO2	+		+		?	
ECO3	+		+		?	

Policy PUBSP13: Navigable water space

		A: Proposed Publication version policy	B: No policy
ENV1	+	Policy relates to navigation of the waterways.	?
ENV2			
ENV3			
ENV4			
ENV5			
ENV6			
ENV7			
ENV8	+	Policy seeks beneficial re use of dredged material.	?
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1	+	Navigable waterways are important to the local economy.	?
ECO2	+		?
ECO3	+		?

Not having a policy does not necessarily mean that navigation would be lost as the Authority does have some legal powers regarding navigation. A policy is another way of protecting navigation.

Policy PUBDM38: Access to the water

		A: Proposed Publication version policy	B: No policy
ENV1	+	Policy relates to navigation of the waterways.	?
ENV2	+	Policy refers to water quality regulations.	?
ENV3	+	Policy refers to impact on biodiversity.	?
ENV4	+	Policy refers to landscape character impact.	?
ENV5			
ENV6	+	Policy refers to flood risk.	?
ENV7			
ENV8			
ENV9	+	Policy refers to impact on the historic environment.	?
ENV10			
ENV11	+	Policy refers to light pollution and provision of electric hook up/charging points that will mean diesel engines not turned on when boats moored.	?
ENV12			
SOC1	+	Reference to hazardous movements is made in the policy.	?
SOC2			
SOC3			
SOC4			
SOC5			

Not having a policy does not necessarily mean that proposals for access to water will affect the sustainability objectives. A policy however provides more certainty.

		A: Proposed Publication version policy	B: No policy
SOC6			
SOC7			
ECO1	+	Access to the water is important to the local economy.	?
ECO2	+		?
ECO3	+		?

Policy PUBDM39: Bank stabilisation

		A: Proposed Publication version policy	B: No policy
ENV1	+	Policy relates to navigation of the waterways.	?
ENV2	+	Policy refers to water quality regulations.	?
ENV3	+	Policy refers to impact on biodiversity.	?
ENV4	+	Policy refers to landscape character impact.	?
ENV5	+	Policy refers to a changing climate	?
ENV6	+	Policy refers to flood risk.	?
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

Not having a policy does not necessarily mean that banks cannot be stabilised.
 Having a policy emphasises the considerations and provides certainty.

	A: Proposed Publication version policy	B: No policy
ECO3		

Policy PUBSP14: Mooring provision

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ENV1			<p>Not having a policy does not necessarily mean that mooring will not be provided in an acceptable way. A policy provides clarification.</p>	
ENV2				
ENV3				
ENV4	+ Policy refers to an attractive waterway.	+ Policy refers to an attractive waterway.		?
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1	+ Policy refers to a safe waterway	+ Policy refers to a safe waterway	?	
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	+ Moorings are important to the local economy.	+ Moorings are important to the local economy.	?	
ECO2	+	+	?	
ECO3	+	+	?	

Policy PUBDM40: Moorings, mooring basins and marinas

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ Policy relates to navigation of the waterways.	+ Policy relates to navigation of the waterways.	?
ENV2	+ Policy refers to water quality regulations.	+ Policy refers to water quality regulations.	?
ENV3	+ Policy refers to impact on biodiversity.	+ Policy refers to impact on biodiversity.	?
ENV4	+ Policy refers to landscape character impact.	+ Policy refers to landscape character impact.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11	+ Policy refers to provision of electric hook up/charging points that will mean diesel engines not turned on when boats moored.	+ Policy refers to light pollution and provision of electric hook up/charging points that will mean diesel engines not turned on when boats moored.	?
/ENV1 2			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			

Not having a policy does not necessarily mean that mooring will not be provided in an acceptable way. A policy provides clarification.

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
SOC7					
ECO1	+	Moorings are important to the local economy.	+	Moorings are important to the local economy.	?
ECO2	+		+		?
ECO3	+		+		?

Policy PUBDM41: The impact of replacement quay heading on navigation.

		A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy
ENV1				
ENV2				
ENV3				
ENV4				
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.		
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	?		+ Navigable waterways are fundamental to many businesses in the Broads.	+ Navigable waterways are fundamental to many businesses in the Broads.
ECO2	?		+	+
ECO3	?		+	+

Policy PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks.

	A: Proposed Publication version policy	B: No specific policy.
ENV1		
ENV2	+ Policy refers to capturing plastic waste.	?
ENV3	+ Policy refers to capturing plastic waste.	?
ENV4	+ General thrust of the policy is the right material in the right place.	?
ENV5		
ENV6		
ENV7	+ If plastic is to be used, it must be recycled plastic which is therefore efficient use of materials.	?
ENV8	+ If plastic is to be used, it must be recycled plastic which is therefore efficient use of materials.	?
ENV9	+ General thrust of the policy is the right material in the right place.	?
ENV10	+ General thrust of the policy is the right material in the right place.	?
ENV11		
ENV12		
SOC1		
SOC2		
SOC3		

Not having a policy does not mean that these issues will not be considered. Having a policy provides more clarity and certainty.

	A: Proposed Publication version policy	B: No specific policy.
SOC4		
SOC5		
SOC6		
SOC7		
ECO1		

Policy PUBSP15: Residential development

A: Proposed Publication version policy		B: No policy	C: Original 2019 Local Plan policy
ENV1	+ Policy identifies where development is suitable, which seeks to minimise travel.	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. It is also prudent to identify housing need that the plan seeks to address.	+ Policy identifies where development is suitable, which seeks to minimise travel.
ENV2			
ENV3	+ Policy refers to mitigating impacts relating to protected sites. Refers to nutrient enrichment and recreation impacts.		+ Policy refers to mitigating impacts relating to protected sites.
ENV4	+ Policy identifies where development is suitable.		+ Policy identifies where development is suitable.
ENV5			
ENV6			
ENV7	+ Policy highlights the use of previously developed land.		+ Policy highlights the use of previously developed land.
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4	+ Policy identifies the housing need for this Local Plan. Also seeks to address proposals for loss of housing.	+ Policy identifies the housing need for this Local Plan.	
SOC5			

A: Proposed Publication version policy		B: No policy		C: Original 2019 Local Plan policy	
SOC6	+	Policy identifies where development is suitable, which seeks to minimise travel.	?	+	Policy identifies where development is suitable, which seeks to minimise travel.
SOC7					
ECO1					
ECO2					
ECO3					

Policy PUBDM43: Affordable housing

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			+ Refers to rural exceptions sites being well related to settlements to access services and facilities.	?
ENV2				
ENV3				
ENV4	+ Policy refers to landscape character impact of rural exception sites.	+ Policy refers to landscape character impact of rural exception sites.		?
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1				
SOC2			+ Refers to rural exceptions sites being well related to settlements to access services and facilities.	?
SOC3				
SOC4	+ Policy enables affordable housing.	+ Policy enables affordable housing.		?
SOC5				
SOC6			+ Refers to rural exceptions sites being well related to	?

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty.

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
		settlements to access services and facilities.	
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBDM44: Residential development within defined Development Boundaries

		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 built-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.

		A: Criteria-based development boundary policy	B: Plan based development boundary policy
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	? 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	? 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	? 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	? 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	? 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

	Brundall Riverside	Horning	Hoveton and Wroxham	Oulton Broad	Thorpe St Andrew	Filby
	development boundaries are relevant to windfall residential moorings.	development boundaries are relevant to windfall residential moorings.	are relevant to windfall residential moorings.	that development boundaries are relevant to windfall residential moorings.	that development boundaries are relevant to windfall residential moorings.	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 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.	+ 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 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 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

	Brundall Riverside	Horning	Hoveton and Wroxham	Oulton Broad	Thorpe St Andrew	Filby
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						

Policy PUBDM45: Gypsy and Travellers and Travelling Show People

		A: Proposed Publication version policy	B: No policy	C: Original 2019 Local Plan policy
ENV1	+	Access, impact on roads and sustainable location requirements form part of the policy.	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Access, impact on roads and sustainable location requirements form part of the policy.
ENV2	+	Water supply and drainage are considerations raised in the policy.		+ Water supply and drainage are considerations raised in the policy.
ENV3	+	Refers to impact on priority habitat. Biodiversity enhancements, nutrient enrichment, recreation impacts and biodiversity net gain form part of the policy.		+ Refers to impact on priority habitat.
ENV4	+	Impact on landscape character is a consideration in the report.		+ Impact on landscape character is a consideration in the report.
ENV5	+	Policy refers to climate change resilience.		
ENV6	+	Flood risk is referred to in the policy.		+ Flood risk is referred to in the policy.
ENV7	+	Policy promotes brownfield land for sites.		
ENV8	+	Policy refers to ability to dispose of waste.		+ Policy refers to ability to dispose of waste.
ENV9	+	Impact on heritage assets is a consideration in the report.		+ Impact on heritage assets is a consideration in the report.
ENV10	+	Taken together, the criteria in this policy will enable a well-designed site.		+ Taken together, the criteria in this policy will enable a well-designed site.
ENV11	+	Policy refers to addressing any light pollution.		
ENV12				

	A: Proposed Publication version policy		B: No policy		C: Original 2019 Local Plan policy	
SOC1						
SOC2						
SOC3						
SOC4	+	Policy relates to a housing need.		?	+	Policy relates to a housing need.
SOC5						
SOC6	+	Policy requires well located sites.		?	+	Policy requires well located sites.
SOC7						
ECO1						
ECO2						
ECO3						

Policy PUBDM46: New residential moorings

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy		
ENV1	?	<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	+	Policy requires access by means other than the private car to key services.	+	Policy requires access by means other than the private car to key services.
ENV2	?				+	Policy refers to the potential for nutrient enrichment to need to be mitigated.
ENV3	?		+	Policy refers to net gain and protected sites.	+	Policy refers to net gain, RAMS and Nutrient neutrality as well as biodiversity enhancements.
ENV4	?		+	Generally, by directing to areas with access to key services and within marinas and boatyard, landscape impact will be reduced.	+	Generally, by directing to areas with access to key services and within marinas and boatyard, landscape impact will be reduced. Also refers to design of cabinets and storage.
ENV5	?			Supporting text did refer to flood risk, but not the policy.	+	Policy now refers to flood risk.
ENV6						
ENV7						
ENV8						
ENV9	?		+	Generally, by directing to areas with access to key services and within marinas and boatyard, impact on heritage assets is not likely to occur.	+	Generally, by directing to areas with access to key services and within marinas and boatyard, impact on heritage assets is not likely to occur.
ENV10	?				+	Policy refers to the design of storage.
ENV11	?				+	Policy refers to light pollution.
ENV12						
SOC1						
SOC2						

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC3				
SOC4	?		+ Living on boats provides people with somewhere to live.	+ Living on boats provides people with somewhere to live.
SOC5				
SOC6	?		+ Access to key services by modes other than the private car is key to the policy.	+ Access to key services by modes other than the private car is key to the policy.
SOC7				
ECO1	?		+ Residential moorings could help a boatyard be successful.	+ Residential moorings could help a boatyard be successful.
ECO2				
ECO3				

Policy PUBDM47: Permanent and temporary dwellings for rural enterprise workers

		A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	- Likely to be negative. These dwellings are likely to be in isolated locations, away from key services (although close to place of work of course) and so the private car will be relied upon for school, medical and shopping journeys.	- Likely to be negative. These dwellings are likely to be in isolated locations, away from key services (although close to place of work of course) and so the private car will be relied upon for school, medical and shopping journeys.
ENV2				
ENV3	?		+ The policy emphasises biodiversity net gain and HRA related issues.	+ The policy refers to HRA related issues.
ENV4	?		+ Policy refers to impact on landscape.	+ Policy refers to impact on landscape.
ENV5				
ENV6				
ENV7	?		+ The policy seeks the use of existing houses or buildings before new build.	+ The policy seeks the use of existing houses or buildings before new build.
ENV8				
ENV9				
ENV10	?		+ The policy emphasises the importance of good design.	
ENV11				
ENV12				
SOC1				
SOC2	?		? These dwellings will be isolated and away from key services.	? These dwellings will be isolated and away from key services.
SOC3				
SOC4	?	+ Whilst not market dwellings, would still be a dwelling for someone or a family to live in.	+ Whilst not market dwellings, would still be a dwelling for someone or a family to live in.	

		A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy
SOC5				
SOC6	?		- Likely to be negative. These dwellings are likely to be in isolated locations, away from key services (although close to place of work of course) and so the private car will be relied upon for school, medical and shopping journeys.	- Likely to be negative. These dwellings are likely to be in isolated locations, away from key services (although close to place of work of course) and so the private car will be relied upon for school, medical and shopping journeys.
SOC7				
ECO1	?		+ Fundamentally, rural enterprise dwellings will need to be proven to be essential to assist the enterprise to be successful.	+ Fundamentally, rural enterprise dwellings will need to be proven to be essential to assist the enterprise to be successful.
ECO2				
ECO3				

Policy PUBDM48: Elderly and specialist needs housing

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ENV1	+	Policy requires such accommodation to be provided in development boundaries.	+	Policy requires such accommodation to be provided in development boundaries.	?
ENV2			+	Policy specifically refers to water efficiency.	?
ENV3	+	Policy specifically refers to biodiversity.	+	Policy specifically refers to biodiversity.	?
ENV4	+	Policy specifically refers to landscape character.	+	Policy specifically refers to landscape character.	?
ENV5	+	Policy specifically refers to heritage.	+	Policy specifically refers to heritage.	?
ENV6					
ENV7					
ENV8					
ENV9					
ENV10					
ENV11					
ENV12					
SOC1	+	Policy relates to specific accommodation for older people or those with specialist needs which will benefit their health and wellbeing.	+	Policy relates to specific accommodation for older people or those with specialist needs which will benefit their health and wellbeing.	?
SOC2					
SOC3					
SOC4	+	Policy relates to specific accommodation for older people or those with specialist needs.	+	Policy relates to specific accommodation for older people or those with specialist needs.	?

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty.

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
SOC5			
SOC6	+ Policy requires sites to be in development boundaries.	+ Policy requires sites to be in development boundaries.	?
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBDM49: Residential ancillary accommodation

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.		+ Policy highlights that highways impact will be a consideration.
ENV2	?			+ Clarifies that water efficiency policy relates to this type of development.
ENV3	?			+ Policy clarifies that biodiversity impacts will be a consideration.
ENV4	?			+ Policy refers to landscape character being an important consideration.
ENV5	?			+ Clarifies that the accommodation needs to be designed to energy efficient standards.
ENV6	?			+ Policy raises flood risk as an issue
ENV7				
ENV8				
ENV9	?			+ Policy includes reference to the historic environment.
ENV10	?			+ The design and how the accommodation operates is a key consideration.
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC4	?		+ Policy enables appropriate ancillary living accommodation.	+ Policy enables appropriate ancillary living accommodation.
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBDM50: Replacement dwellings

		A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy		
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>			
ENV2						
ENV3				?	+	Policy refers to biodiversity enhancements.
ENV4	+	Policy seeks to retain buildings that are beneficial to the landscape.		?	+	Policy seeks to retain buildings that are beneficial to the landscape.
ENV5						
ENV6						
ENV7				?	+	Policy seeks to promote reuse and retrofit rather than demolition.
ENV8				?	+	Policy seeks to promote reuse and retrofit rather than demolition.
ENV9						
ENV10	+	Policy seeks to retain buildings of good design and beneficial to the area.		?	+	Policy seeks to retain buildings of good design and beneficial to the area.
ENV11				?	+	Policy refers to light pollution.
ENV12						
SOC1						
SOC2						
SOC3						
SOC4						
SOC5						
SOC6						
SOC7						

	A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy
ECO1			
ECO2			
ECO3			

Policy PUBDM51: Custom/self-build

	A: Proposed Publication version policy	B: No policy	C: Original 2019 Local Plan policy
ENV1			
ENV2			
ENV3			
ENV4			
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4	+ Policy relates to provision of dwellings.	?	+ Policy relates to provision of dwellings.
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBPS16: Strategic Design Policy

	A: Proposed Publication version policy	B: No policy
ENV1		
ENV2		
ENV3		
ENV4	+ Policy refers to the distinctive character of the area.	?
ENV5	+ Policy refers to minimising carbon emissions.	?
ENV6		
ENV7		
ENV8	+ Policy refers to minimising waste.	?
ENV9	+ Policy refers to heritage.	?
ENV10	+ Fundamentally, the policy seeks excellent design.	?
ENV11		
ENV12		
SOC1		
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		
SOC7		
ECO1		
ECO2		

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty.

	A: Proposed Publication version policy	B: No policy
ECO3		

Policy PUBDM52: Design

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ENV1	+	Policy refers to provision of appropriate facilities and permeability and accessibility.	+	Policy refers to provision of appropriate facilities and permeability and accessibility	?
ENV2					
ENV3	+	Policy refers to protecting and providing for biodiversity.	+	Policy refers to protecting and providing for biodiversity.	?
ENV4	+	Policy requires schemes to reflect the local area as well as referring to landscaping.	+	Policy requires schemes to reflect the local area as well as referring to landscaping.	?
ENV5			+	Policy refers to sustainable development section.	?
ENV6	+	Policy refers to flood risk and resilience.	+	Policy refers to flood risk and resilience.	?
ENV7					
ENV8	+	Policy refers to waste vehicles and waste storage.	+	Policy refers to waste vehicles and waste storage.	?
ENV9					
ENV10	+	Fundamentally, the policy seeks excellent design.	+	Fundamentally, the policy seeks excellent design.	?
ENV11					
ENV12					
SOC1	+	There are health benefits from well-designed homes, particularly accessible homes.	+	There are health benefits from well-designed homes, particularly accessible homes.	?
SOC2					
SOC3			+	Policy refers particularly to thatch.	?

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

PUBDM52A: Proposals for residential extensions.

		A: Have a policy	B: No policy
ENV1			
ENV2			
ENV3			
ENV4	+	Design and impact on local character important considerations.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9	+	Design and impact on local character important considerations.	?
ENV10	+	Design and impact on local character important considerations.	?
ENV11	+	Design and impact on local character important considerations.	?
ENV12			
SOC1			
SOC2			
SOC3			
SOC4	+	Policy enables suitable extensions so homeowners can improve their housing appropriately.	?
SOC5			
SOC6			

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty

	A: Have a policy		B: No policy	
SOC7				
ECO1				
ECO2				
ECO3				

Policy PODM53: Source of heating

		A: Have a policy	B: No policy	
ENV1			<p>Developers may still implement sources of heating higher up the hierarchy to reflect other reasons. Indeed, the Government may set regulations in place to address the issue the policy seeks to address. Having a policy provides more certainty.</p>	
ENV2				
ENV3				
ENV4				
ENV5	+	Fundamentally, the reason for such a policy is to reduce contributions to climate change.		?
ENV6				
ENV7	+	The hierarchy seeks best ways of producing energy/heat.		?
ENV8				
ENV9				
ENV10				
ENV11				
ENV12	+	The hierarchy would result in more energy produced using renewable/low carbon methods.		?
SOC1				
SOC2	+	By being ready for alternative/new ways of heating, this would make changing cost effective for owners/occupiers.		?
SOC3				
SOC4				
SOC5				
SOC6				

	A: Have a policy		B: No policy	
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBDM54: Heat resilient design

		A: Proposed Publication version policy	B: No specific policy	
ENV1			The impacts are uncertain. That being said, if there is no policy that does not seek to consider shade and cooling and building regulations are not in place for all types of buildings, the current situation will continue.	
ENV2				
ENV3	+	Green roofs and walls will benefit biodiversity.		?
ENV4				
ENV5	+	Policy seeks to adapt and be resilient to a changing climate.		?
ENV6				
ENV7				
ENV8				
ENV9				
ENV10	+	The policy will result in well-designed places.		?
ENV11				
ENV12				
SOC1	+	A key benefit of providing shade and cooling is to health and wellbeing.		?
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				

Policy PUBDM55: Non-residential development and BREEAM

		A: Proposed Publication version policy	B: No specific policy
ENV1	+	Part of the assessment relates to transport and travel.	? . Not setting a BREEAM requirements does not mean that these objectives will not be positively impacted; but having the policy provides more certainty.
ENV2	+	Part of the assessment relates to water.	
ENV3	+	Part of the assessment relates to ecology.	
ENV4			
ENV5			
ENV6			
ENV7	+	Part of the assessment relates to materials and energy.	
ENV8	+	Part of the assessment relates to waste.	
ENV9			
ENV10	+	Fundamentally, meeting the good standard in BREEAM will mean a development is well-designed.	
ENV11			
ENV12			
SOC1	+	Part of the assessment relates to health and wellbeing.	?
SOC2			
SOC3			
SOC4			
SOC5			

	A: Proposed Publication version policy	B: No specific policy
SOC6		
SOC7		
ECO1		
ECO2	+ BREEM covers social and environmental aspects.	?
ECO3		

Policy PUBDM56: Electric Vehicle (EV) Charging Points – fire safety, design, location and lighting.

		A: No policy	B: Proposed Publication version policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>		
ENV2				
ENV3				
ENV4	?			Policy talks of location and + design to reflect the local land and townscape.
ENV5	?			EV charging points are seen as + part of the pathway to Net Zero.
ENV6				
ENV7				
ENV8				
ENV9	?			Policy talks of location and + design to reflect the historic environment.
ENV10	?			The policy refers to the + importance of design of the units.
ENV11	?			+ Light pollution is an important consideration in the policy.
ENV12				
SOC1	?			+ Fundamentally, the policy would hopefully result in fewer fires with devastating outcomes. Also, trip hazards are a consideration.
SOC2				
SOC3				
SOC4				

		A: No policy	B: Proposed Publication version policy
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBDM57: Fibre to Premises

		A: Proposed Publication version policy	B: No specific policy.	
ENV1			Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	
ENV2				
ENV3				
ENV4				
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10	+	Considering fibre to the premises as part of the design will bring benefits.		?
ENV11				
ENV12				
SOC1				
SOC2	+	One of the benefits of the policy will be through digital inclusivity.		?
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	+	Well-connected places attract modern businesses and can create the conditions for new clusters	?	

		A: Proposed Publication version policy	B: No specific policy.
		of digital and creative businesses to emerge.	
ECO2			
ECO3			

Policy PUBSP17: Community facilities

		A: Proposed Publication version policy	B: No policy
ENV1			Not having a policy does not necessarily mean that community facilities will be lost or cannot come forward. But a policy provides certainty.
ENV2			
ENV3			
ENV4			
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1	+	Community facilities can benefit mental and physical health and wellbeing, for example through space for sport in community centres.	?
SOC2	+	Community facilities are important for everyone. They can be places for people to meet.	?
SOC3	+	Community facilities can be places to hold education classes of various types.	?
SOC4			
SOC5			
SOC6			
SOC7			

	A: Proposed Publication version policy		B: No policy	
ECO1				
ECO2				
ECO3				

Policy PUBDM58: Visitor and community facilities and services

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2			
ENV3	+ Policy refers to impact on biodiversity.	+ Policy refers to impact on biodiversity.	?
ENV4	+ Policy refers to impact on landscape character.	+ Policy refers to impact on landscape character.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9	+ Policy refers to impact on historic environment.	+ Policy refers to impact on historic environment.	?
ENV10			
ENV11			
ENV12			
SOC1	+ Community facilities can benefit mental and physical health and wellbeing, for example through space for sport in community centres.	+ Community facilities can benefit mental and physical health and wellbeing, for example through space for sport in community centres.	?
SOC2	+ Community facilities are important for everyone. They can be places for people to meet.	+ Community facilities are important for everyone. They can be places for people to meet.	?
SOC3	+ Community facilities can be places to hold education classes of various types.	+ Community facilities can be places to hold education classes of various types.	?
SOC4			

Not having a policy does not necessarily mean that community facilities will be lost or cannot come forward. But a policy provides certainty.

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBDM59: Designing places for healthy lives

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1		+ The checklist refers to sustainable travel patterns and facilities.	?
ENV2			
ENV3		+ The checklist refers to biodiversity and how that can help health and wellbeing.	?
ENV4			
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1	+ The policy fundamentally related to health and wellbeing.	+ The policy fundamentally related to health and wellbeing.	?
SOC2			
SOC3			
SOC4			
SOC5			
SOC6		+ The checklist refers to services and facilities.	?
SOC7			
ECO1			

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ECO2			
ECO3			

Policy PUBDM60: Planning obligations and developer contributions

There are no reasonable alternatives identified at this stage.

		A: Proposed Publication version policy
ENV1		
ENV2		
ENV3	+	Improvements/mitigation relating to biodiversity are secured through planning obligations.
ENV4		
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10		
ENV11		
ENV12		
SOC1	+	Recreation facilities/contributions are secured through planning obligations.
SOC2		
SOC3		
SOC4	+	Affordable housing is secured through planning obligations.
SOC5		

	A: Proposed Publication version policy	
SOC6		
SOC7		
ECO1		
ECO2		
ECO3		

No reasonable alternative options have been identified. Planning obligations are an accepted and important part of determining planning applications. The amendments to the policy are factual.

Policy PUBDM61: Advertisements and signs

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ENV1		
ENV2		
ENV3		
ENV4	+	+
	Policy seeks advertisements and signs to be designed and located with the character in mind.	Policy seeks advertisements and signs to be designed and located with the character in mind.
ENV5		
ENV6		
ENV7	+	+
	Policy seeks consideration be made about siting, in particular the potential to amalgamate.	Policy seeks consideration be made about siting, in particular the potential to amalgamate.
ENV8		
ENV9	+	+
	Policy seeks advertisements and signs to be designed and located with the character in mind.	Policy seeks advertisements and signs to be designed and located with the character in mind.
ENV10	+	+
	The policy requires appropriately designed signs and adverts.	The policy requires appropriately designed signs and adverts. This policy mentions some specific policy requirements.
ENV11		
ENV12		
SOC1		
SOC2		+
		Policy refers to neurodiverse friendly signage.
SOC3		
SOC4		

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
SOC5		
SOC6		
SOC7		
ECO1		
ECO2		
ECO3		

Policy PUBDM62: Re-use, conversion or change of use of buildings

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ Policy emphasises importance of access to services and facilities.	+ Policy emphasises importance of access to services and facilities.	?
ENV2		+ Policy refers to water efficiency.	?
ENV3	+ Policy identifies biodiversity potential of such buildings.	+ Policy identifies biodiversity potential of such buildings.	?
ENV4	+ Impact on landscape character is a key consideration.	+ Impact on landscape character is a key consideration.	?
ENV5		+ Policy refers to climate change adaptation and resilience.	?
ENV6		+ Policy refers to flood risk resilience.	?
ENV7	+ Policy seeks retention of building rather than demolition.	+ Policy seeks retention of building rather than demolition.	?
ENV8	+ Policy seeks retention of building rather than demolition.	+ Policy seeks retention of building rather than demolition.	?
ENV9			
ENV10	+ Policy highlights that design is important.	+ Policy highlights that design is important.	?
ENV11		+ Policy refers to light pollution.	?
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			

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

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
SOC5			
SOC6	+ Policy emphasises importance of access to services and facilities.	+ Policy emphasises importance of access to services and facilities.	?
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBDM63: Leisure plots, amenity plots, conservation plots and mooring plots

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.			
ENV2					
ENV3	?			+ Policy refers to ecology.	+ Policy refers to ecology.
ENV4	?			+ General principle behind the policy is to prevent landscape character impact.	+ General principle behind the policy is to prevent landscape character impact.
ENV5					
ENV6					
ENV7					
ENV8					
ENV9					
ENV10	?				
ENV11					+ Policy refers to light pollution.
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					
ECO2					
ECO3					

Policy PUBACL1: Acle Cemetery extension

		A: Proposed Publication version policy	B: No policy	C: Original 2019 Local Plan policy		
ENV1			Not having a policy does not necessarily mean that the cemetery would not come forward. An allocation may provide more certainty.			
ENV2	+	Consideration of proposals on water quality is an important consideration.		?	+	Consideration of proposals on water quality is an important consideration.
ENV3	+	The potential for biodiversity enhancements is a consideration in the policy. Also refers to potential for peat impact.		?	+	The potential for biodiversity enhancements is a consideration in the policy.
ENV4	+	Fitting any scheme into the landscape is mentioned in the policy.		?	+	Fitting any scheme into the landscape is mentioned in the policy.
ENV5						
ENV6						
ENV7						
ENV8						
ENV9	+	Archaeology is considered in the policy.		?	+	Archaeology is considered in the policy.
ENV10						
ENV11	+	Policy refers to light pollution.		?	+	Policy refers to light pollution.
ENV12						
SOC1						
SOC2						
SOC3						
SOC4						
SOC5						
SOC6						

	A: Proposed Publication version policy		B: No policy		C: Original 2019 Local Plan policy	
SOC7						
ECO1						
ECO2						
ECO3						

Policy PUBACL2: Acle Playing Field extension

		A: Proposed Publication version policy	B: No policy	
ENV1			<p>Not having a policy does not necessarily mean that the cemetery would not come forward. An allocation may provide more certainty.</p>	
ENV2				
ENV3				
ENV4	+	Policy refers to landscaping		?
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11	+	The policy refers to light pollution.		?
ENV12				
SOC1	+	The field will enable physical activity.		?
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBBRU1: Riverside chalets and mooring plots

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2		+ Policy cross refers to water efficiency policy.	?
ENV3		+ Policy cross refers to natural environment policy.	?
ENV4	+ Policy refers to design and character of the area.	+ Policy refers to design and character of the area.	?
ENV5	+ Policy refers to flood risk.	+ Policy refers to flood risk as well as adapting and becoming resilient to climate change.	?
ENV6	+ Policy refers to flood risk.	+ Policy refers to flood risk.	?
ENV7			
ENV8			
ENV9			
ENV10	+ Policy refers to design and character of the area.	+ Policy refers to design and character of the area.	?
ENV11		+ Policy cross refers to light pollution policy.	?
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

Not having a policy does not mean that these issues will not be considered or addressed; a policy provides certainty.

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ECO1	+ Generally, the thrust of the policy will enable the area to support the local economy.	+ Generally, the thrust of the policy will enable the area to support the local economy.	?
ECO2			
ECO3			?

Policy PUBBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ Policy reflects the access constraints.	+ Policy reflects the access constraints.	?
ENV2	+ Policy refers to water pollution.	+ Policy refers to water pollution. Policy cross refers to water efficiency policy.	?
ENV3		+ Policy cross refers to natural environment policy.	?
ENV4			
ENV5	+ Policy refers to flood risk.	+ Policy refers to flood risk as well as adapting and becoming resilient to climate change.	?
ENV6	+ Policy refers to flood risk.	+ Policy refers to flood risk.	?
ENV7			
ENV8			
ENV9			
ENV10	+ Policy refers to design and character of the area.	+ Policy refers to design and character of the area.	?
ENV11		+ Policy cross refers to light pollution policy.	?
ENV12			
SOC1			
SOC2			
SOC3	+ The land uses covered by the policy tend to be boatyards.	+ The land uses covered by the policy tend to be boatyards.	?
SOC4			
SOC5			
SOC6			

Not having a policy does not mean that these issues will not be considered or addressed; a policy provides certainty.

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
SOC7					
ECO1	+	The land uses covered by the policy tend to be boatyards and this policy guides how those sites can develop.	+	The land uses covered by the policy tend to be boatyards and this policy guides how those sites can develop.	?
ECO2	+		+		?
ECO3	+		+		?

Policy PUBBRU3: Brundall Mooring Plots

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1			
ENV2			
ENV3			
ENV4	+ The policy restricts the type of development to reflect the character.	+ The policy restricts the type of development to reflect the character.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11		+ Policy refers to light pollution.	?
ENV12			
SOC1			
SOC2			
SOC3	+ The area being used for boating will enable the use of traditional skills in terms of boating and using the water.	+ The area being used for boating will enable the use of traditional skills in terms of boating and using the water.	?
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

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

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ECO3	+ The thrust of the policy will benefit tourism and recreational use of the Broads.	+ The thrust of the policy will benefit tourism and recreational use of the Broads.	?

Policy PUBBRU4: Brundall Marina

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ Policy refers to the road limitations as well as in general providing space for moorings boats.	+ Policy refers to the road limitations as well as in general providing space for moorings boats.	?
ENV2	+ Policy refers to water quality.	+ Policy refers to water quality.	?
ENV3			
ENV4	+ The policy restricts the type of development to reflect the character.	+ The policy restricts the type of development to reflect the character.	?
ENV5			
ENV6	+ Policy refers to flood risk.	+ Policy refers to flood risk.	?
ENV7			
ENV8			
ENV9			
ENV10			
ENV11		+ Policy refers to light pollution.	?
ENV12			
SOC1			
SOC2			
SOC3	+ The area being used for boating will enable the use of traditional skills in terms of boating and using the water.	+ The area being used for boating will enable the use of traditional skills in terms of boating and using the water.	?
SOC4			
SOC5			
SOC6			

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

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
SOC7			
ECO1			
ECO2			
ECO3	+ The thrust of the policy will benefit tourism and recreational use of the Broads.	+ The thrust of the policy will benefit tourism and recreational use of the Broads.	?

Policy PUBBRU5: Land east of the White Heron Public House

	B: Proposed Publication version policy	B: No policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2			
ENV3	+ The policy refers to the area benefitting wildlife		?
ENV4	+ The area adds to the character of the wider area.		?
ENV5			
ENV6	+ Policy refers to flood risk.		?
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBBRU6: Brundall Gardens

		A: Keep original policy (other than adding reference to GI RAMS).	B: Amend policy to improve reference to light pollution (and adding reference to GI RAMS).
ENV1			+ Policy refers to access requirements.
ENV2			+ Capacity for foul water included as a consideration.
ENV3	+	Seeks protection of nearby protected sites.	+ GI RAMS and nutrient enrichment mitigation would be required, but that would be neutral impact.
ENV4			
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			+ Makes specific reference to design of associated cabinets.
ENV11			+ Makes specific reference to light pollution
ENV12			
SOC1			
SOC2			
SOC3			
SOC4	+	Would contribute to housing need in the area.	+ Would contribute to housing need in the area.
SOC5			
SOC6	+	Some services and facilities within walking distance of the site.	+ Some services and facilities within walking distance of the site.

		A: Keep original policy (other than adding reference to GI RAMS).		B: Amend policy to improve reference to light pollution (and adding reference to GI RAMS).
SOC7				
ECO1	+	Residential moorings could result in support of the local businesses.	+	Residential moorings could result in support of the local businesses.
ECO2				
ECO3				

Policy PUBCAN1: Cantley Sugar Beet Factory

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Refers to impacts on highways capacity and safety.	+ Refers to impacts on highways capacity and safety. Also equipment to enable cleaner fuel use.
ENV2	?		+ Policy refers to water pollution.	+ Policy refers to water pollution. Also seeks efficient use of water.
ENV3	?		+ Seeks to protect designated sites.	+ Seeks to protect designated sites. Also seeks biodiversity enhancements.
ENV4	?		+ Seeks improvements of appearance.	+ Seeks improvements of appearance.
ENV5	?			+ Refers to climate change mitigation, adaptation and resilience.
ENV6	?		+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV7				
ENV8				
ENV9	?		+ Policy refers to impact on heritage assets and landscape.	+ Policy refers to impact on heritage assets and landscape.
ENV10	?		+ Seeks improvements of appearance.	+ Seeks improvements of appearance.
ENV11	?		+ Policy generally addresses these criteria.	+ Policy generally addresses these criteria. Emphasises carbon emissions and light pollution and refers to clean fuels.
ENV12				
SOC1	?	+ Taken together, the policy intends development to have little impact on amenity.	+ Taken together, the policy intends development to have little impact on amenity.	
SOC2				
SOC3				
SOC4				

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC5	?		?	The policy helps guide how the site can change in an acceptable way which may result in additional employment.
SOC6				
SOC7				
ECO1	?		?	The policy helps guide how the site can change in an acceptable way which may result in the economy flourishing.
ECO2				
ECO3				

Policy PUBCHE1: Greenway Marine residential moorings

		A: Keep original policy (other than adding reference to GI RAMS).	B: Amend policy to improve reference to light pollution (and adding reference to GI RAMS).
ENV1	+	Policy refers to access requirements.	+
ENV2			
ENV3		GI RAMS mitigation would be required, but that would be neutral impact.	GI RAMS mitigation would be required, but that would be neutral impact.
ENV4			
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			+
ENV11			+
ENV12			
SOC1			
SOC2			
SOC3			
SOC4	+	Would contribute to housing need in the area.	+
SOC5			
SOC6	+	Many services and facilities within walking distance of the site.	+
SOC7			

		A: Keep original policy (other than adding reference to GI RAMS).	B: Amend policy to improve reference to light pollution (and adding reference to GI RAMS).
ECO1	+	Residential moorings could result in support of the local businesses.	Residential moorings could result in support of the local businesses.
ECO2			
ECO3			

Policy PUBDIL 1: Dilham Marina (Tyler’s Cut Moorings)

		A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.			
ENV2					
ENV3	?			+ Refers to impacting designating sites downstream.	
ENV4	?			+ Fundamentally, the policies requirements will help ensure the character of the area is maintained.	+ Fundamentally, the policies requirements will help ensure the character of the area is maintained.
ENV5					
ENV6					
ENV7					
ENV8					
ENV9					
ENV10					
ENV11	?				+ Policy refers to dark skies.
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					
ECO2					

	A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy
ECO3			

Policy PUBDIT1: Maltings Meadow Sports Ground, Ditchingham

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. With the sports centre being asset to the community in the Broads it seems prudent to have a policy.	+ Walking and cycling and car parking are addressed in the policy.	+ Walking and cycling and car parking are addressed in the policy. This wording is stronger than the original policy.
ENV2				
ENV3	?		+ Policy requires protection of designated nature site.	+ Policy requires protection of designated nature site.
ENV4	?		+ Policy refers to landscape.	+ Policy refers to landscape.
ENV5				
ENV6	?		+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV7				
ENV8				
ENV9				
ENV10	?		+ Policy requires good design.	+ Policy requires good design.
ENV11	?		+ Policy refers to light pollution.	+ Policy refers to light pollution. This wording is stronger than the original policy.
ENV12				
SOC1	?	+ The sports centre helps with active lifestyles.	+ The sports centre helps with active lifestyles.	
SOC2				
SOC3				
SOC4				
SOC5				
SOC6	?	+ Access by walking and cycling is referred to in the policy.	+ Access by walking and cycling is referred to in the policy.	

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC7	?		+ The venue has facilities that can be used by various groups in the community.	+ The venue has facilities that can be used by various groups in the community.
ECO1				
ECO2				
ECO3				

Policy PUBDIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck

There are no reasonable alternatives identified at this stage.

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

	A: Proposed Publication version policy	
SOC6	+	The route acts as a link through the site.
SOC7		
ECO1		
ECO2		
ECO3		

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

Policy PUBFLE1: Broadland Sports Club

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. With the sports centre being asset to the community in the Broads it seems prudent to have a policy.	+ Walking and cycling and car parking are addressed in the policy.	+ Walking and cycling and car parking are addressed in the policy. This wording is stronger than the original policy.
ENV2				
ENV3	?		+ Policy requires protection of designated nature site.	+ Policy requires protection of designated nature site.
ENV4	?		+ Policy refers to landscape.	+ Policy refers to landscape.
ENV5				
ENV6	?		+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV7				
ENV8				
ENV9				
ENV10	?		+ Policy requires good design.	+ Policy requires good design.
ENV11	?		+ Policy refers to light pollution.	+ Policy refers to light pollution. This wording is stronger than the original policy.
ENV12				
SOC1	?	+ The sports centre helps with active lifestyles.	+ The sports centre helps with active lifestyles.	
SOC2				
SOC3				
SOC4				
SOC5				
SOC6	?	+ Access by walking and cycling is referred to in the policy.	+ Access by walking and cycling is referred to in the policy.	

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC7	?		+ The venue has facilities that can be used by various groups in the community.	+ The venue has facilities that can be used by various groups in the community.
ECO1				
ECO2				
ECO3				

Policy PUBGIL1 Gillingham residential moorings (H. E. Hipperson's Boatyard)

		A: Keep original policy (other than adding reference to GI RAMS).		B: Amend policy to improve reference to light pollution (and adding reference to GI RAMS).
ENV1				
ENV2				
ENV3		GI RAMS mitigation would be required, but that would be neutral impact.		GI RAMS mitigation would be required, but that would be neutral impact.
ENV4				
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10			+	Makes specific reference to design of associated cabinets.
ENV11			+	Makes specific reference to light pollution
ENV12				
SOC1				
SOC2				
SOC3				
SOC4	+	Would contribute to housing need in the area.	+	Would contribute to housing need in the area.
SOC5				
SOC6	+	Many services and facilities within walking distance of the site.	+	Many services and facilities within walking distance of the site.
SOC7				

		A: Keep original policy (other than adding reference to GI RAMS).			B: Amend policy to improve reference to light pollution (and adding reference to GI RAMS).
ECO1	+	Residential moorings could result in support of the local businesses.	+	Residential moorings could result in support of the local businesses.	
ECO2					
ECO3					

Policy PUBGTY1: Marina Quays (Port of Yarmouth Marina)

There are no reasonable alternatives identified at this stage.

		A: Proposed Publication version policy
ENV1		
ENV2	+	Policy refers to water pollution.
ENV3	+	Policy refers to impact of any future scheme on the natural environment.
ENV4	+	Policy refers to impact on landscape.
ENV5		
ENV6	+	Policy refers to flood risk.
ENV7	+	The area is brownfield land.
ENV8		
ENV9	+	Policy refers to historic environment.
ENV10	+	Policy refers to design.
ENV11	+	Policy refers to light pollution
ENV12		
SOC1		
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		
SOC7		
ECO1		

		A: Proposed Publication version policy
ECO2		
ECO3		

Another option would be to not have a policy and not allocate the site, but this site has planning permission and so that is not deemed a reasonable alternative. The amendments to the original policy are factual.

Policy PUBHOR1: Horning Car Parking

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ENV1	+ Policy related to travel and transport and includes cycle parking.	+ Policy related to travel and transport and includes cycle parking.
ENV2	+ Policy seeks to address surface water runoff.	+ Policy seeks to address surface water runoff.
ENV3		
ENV4	+ Policy seeks to reduce visual impact of the car park.	+ Policy seeks to reduce visual impact of the car park.
ENV5		
ENV6	+ Policy seeks to address surface water runoff.	+ Policy seeks to address surface water runoff.
ENV7		
ENV8		
ENV9	+ Policy seeks to improve the site's contribution to the Conservation Area.	+ Policy seeks to improve the site's contribution to the Conservation Area.
ENV10	+ Policy seeks to reduce visual impact of the car park.	+ Policy seeks to reduce visual impact of the car park.
ENV11		+ Policy seeks to protect the dark skies of the area.
ENV12		
SOC1	+ Policy seeks to provide cycle parking. Policy recommends a flood response plan.	+ Policy seeks to provide cycle parking.
SOC2		
SOC3		
SOC4		
SOC5		

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	
SOC6	+	Policy seeks to provide cycle parking.	+	Policy seeks to provide cycle parking.
SOC7				
ECO1				
ECO2				
ECO3	+	Policy seeks to protect the car park and provide cycle parking to enable visitors to the village.	+	Policy seeks to protect the car park and provide cycle parking to enable visitors to the village.

Policy PUBHOR2: Horning Open Space (public and private)

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

Policy PUBHOR3: Waterside plots

		A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy		
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>			
ENV2						
ENV3	+	Policy refers to trees and other planting.		?	+	Policy refers to trees and other planting.
ENV4	+	The fundamental reason for the policy is to address and consider landscape impact from development.		?	+	The fundamental reason for the policy is to address and consider landscape impact from development.
ENV5						
ENV6	+	The policy refers to flood risk and surface water.		?	+	The policy refers to flood risk and surface water.
ENV7						
ENV8						
ENV9						
ENV10						
ENV11				?	+	The policy refers to light pollution.
ENV12						
SOC1						
SOC2						
SOC3						
SOC4						
SOC5						
SOC6						
SOC7						
ECO1						
ECO2						

ECO3	A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy

Policy PUBHOR4: Horning Sailing Club

		A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy		
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>			
ENV2						
ENV3						
ENV4	+	The fundamental reason for the policy is to address and consider landscape impact from development.		?	+	The fundamental reason for the policy is to address and consider landscape impact from development.
ENV5						
ENV6	+	The policy refers to flood risk and surface water.		?	+	The policy refers to flood risk and surface water.
ENV7						
ENV8						
ENV9						
ENV10	+	Design is an important consideration in the policy.		?	+	Design is an important consideration in the policy.
ENV11				?	+	The policy refers to light pollution.
ENV12						
SOC1						
SOC2						
SOC3						
SOC4						
SOC5						
SOC6						
SOC7						
ECO1						
ECO2						

		A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy	
ECO3	+	The policy helps the sailing club to change in an appropriate way and still benefit tourism and recreation.	?	+	The policy helps the sailing club to change in an appropriate way and still benefit tourism and recreation.

Policy PUBHOR5: Crabbett’s Marsh

		A: No policy	B: Proposed Publication version policy	
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>		
ENV2				
ENV3	?		+	The policy refers specifically to nature conservation.
ENV4	?		+	The policy refers specifically to landscape character.
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBHOR6: Horning - Boatyards, etc. at Ferry Road. and Ferry View Road

		A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy	
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>		
ENV2	+	Policy refers to water pollution.		?	<p>+</p> <p>Policy refers to water pollution. Also mentioned issue of capacity at Horning Water Recycling Centre.</p>
ENV3	+	Policy refers to impact on biodiversity.		?	<p>+</p> <p>Policy refers to impact on biodiversity. Also mentioned RAMs requirement.</p>
ENV4	+	Policy refers to landscaping and integrating into the landscape.		?	<p>+</p> <p>Policy refers to landscaping and integrating into the landscape.</p>
ENV5					
ENV6	+	Policy refers to issue of flood risk.		?	<p>+</p> <p>Policy refers to issue of flood risk.</p>
ENV7					
ENV8					
ENV9					
ENV10					
ENV11				?	<p>+</p> <p>Policy mentions light pollution.</p>
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					
ECO1					

	A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy
ECO2			
ECO3			

Policy PUBHOR7: Woodbastwick Fen moorings

		B: Proposed Publication version policy	C: No policy
ENV1	+	The policy states no additional moorings to protect the navigable waterways.	?
ENV2			
ENV3	+	The policy seeks to protect biodiversity.	?
ENV4	+	The policy seeks to protect landscape character.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

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

	B: Proposed Publication version policy	C: No policy
ECO3		

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

		B: Proposed Publication version policy	C: No policy	
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2				
ENV3				
ENV4				
ENV5	+	The policy reflects and highlights flood risk in the area.		?
ENV6	+	The policy reflects and highlights flood risk in the area.		?
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5	+	The units provide space for small enterprises.		?
SOC6				
SOC7				
ECO1	+	The units provide space for small enterprises.	?	
ECO2				

	B: Proposed Publication version policy	C: No policy
ECO3		

Policy PUBHOV1: Green infrastructure

		A: No policy	B: Proposed Publication version policy
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2			
ENV3	?		+ These areas will benefit biodiversity.
ENV4	?		+ These areas add to the character of the area.
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3			

Policy PUBHOV2: Station Road car park

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ By trying to keep the car parking in one area, there could be benefits to traffic and travel in the area.	+ By trying to keep the car parking in one area, there could be benefits to traffic and travel in the area.	? Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.
ENV2			
ENV3		+ The policy seeks biodiversity enhancements.	
ENV4	+ The policy seeks landscaping.	+ The policy seeks landscaping.	
ENV5			
ENV6		+ Policy refers to surface water.	
ENV7			
ENV8			
ENV9			
ENV10			
ENV11		+ The policy addresses light pollution.	
ENV12			
SOC1		+ Policy refers to flood response plan.	
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ECO1	+ By providing cycle and car parking facilities in the area, local businesses could benefit.	+ By providing cycle and car parking facilities in the area, local businesses could benefit.	?
ECO2			
ECO3	+ By providing cycle and car parking facilities in the area, local businesses could benefit.	+ By providing cycle and car parking facilities in the area, local businesses could benefit.	?

Policy PUBHOV3: Brownfield land off Station Road, Hoveton

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ The site is centrally located with good access to public transport.	+ The site is centrally located with good access to public transport.
ENV2	?		+ The policy refers to water quality.	+ The policy refers to water quality and water efficiency.
ENV3	?			+ The policy refers to need to consider impacts on biodiversity and potentially provide BNG.
ENV4	?		+ The policy seeks improvements to this area of the Broads.	+ The policy seeks improvements to this area of the Broads.
ENV5	?			+ Policy refers to energy efficiency.
ENV6	?		+ The policy refers to the schemes proposals needing to reflect the flood risk on site.	+ The policy refers to the schemes proposals needing to reflect the flood risk on site.
ENV7	?		+ This is brownfield land. The reasoned justification accepts demolition of one of the buildings but seeks retention of another building.	+ This is brownfield land. The policy accepts demolition of one of the buildings but seeks retention of another building.
ENV8	?		The reasoned justification accepts demolition of one of the buildings but seeks retention of another building.	+ The policy accepts demolition of one of the buildings but seeks retention of another building. Not demolishing the site would prevent waste from being produced.
ENV9	?		+ The policy refers to the Schedule Monument nearby.	+ The policy refers to the Schedule Monument nearby.
ENV10	?		+ Design is important for this scheme in this location and the policy reflects that.	+ Design is important for this scheme in this location and the policy reflects that.
ENV11	?			+ Policy refers to light pollution.
ENV12				
SOC1				
SOC2				
SOC3				

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC4				
SOC5	?		+ Uses discussed in the policy are likely to result in job creation.	+ Uses discussed in the policy are likely to result in job creation.
SOC6	?		+ The site is located centrally.	+ The site is located centrally.
SOC7				
ECO1	?		+ The policy is likely to result on job creation and benefit the local economy.	+ The policy is likely to result on job creation and benefit the local economy.
ECO2	?		+ The policy is likely to result on job creation and benefit the local economy.	+ The policy is likely to result on job creation and benefit the local economy.
ECO3	?		+ The policy is likely to result on job creation and benefit the local economy.	+ The policy is likely to result on job creation and benefit the local economy.

Policy PUBHOV4: BeWILDerwood Adventure Park

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy refers to travel and transport.	+ Policy refers to travel and transport and refers to cycle parking.
ENV2	?		+ Policy refers to water quality.	+ Policy refers to water quality.
ENV3	?		+ Policy seeks to protect biodiversity.	+ Policy seeks to protect biodiversity and requires biodiversity enhancements.
ENV4	?		+ Policy seeks to protect landscape character.	+ Policy seeks to protect landscape character.
ENV5				
ENV6	?		+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV7				
ENV8				
ENV9				
ENV10				
ENV11	?			+ Policy refers to light pollution.
ENV12				
SOC1	?		+ The tourist attraction helps with an active lifestyle.	+ The tourist attraction helps with an active lifestyle.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO2				
ECO3	-		+ Fundamentally, the policy seeks to ensure that the site is a success and reflects its context.	+ Fundamentally, the policy seeks to ensure that the site is a success and reflects its context.

Policy PUBHOV5: Hoveton Town Centre and areas adjacent to the Town Centre

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ Policy refers to proposals not exacerbating traffic issues in the area. Provides goods and services to the local area and is accessible by foot and cycle.	+ Policy refers to proposals not exacerbating traffic issues in the area. Provides goods and services to the local area and is accessible by foot and cycle.	?
ENV2		+ Refers to water efficiency.	?
ENV3		+ Refers to biodiversity enhancements.	?
ENV4	+ Public realm and character are considerations in the policy.	+ Public realm and character are considerations in the policy.	?
ENV5		+ Refers to overheating and shade.	?
ENV6		+ Policy refers to flood risk.	?
ENV7			
ENV8			
ENV9	+ The bridge is referred to and generally consideration of historic interest is included in the policy.	+ The bridge is referred to and generally consideration of historic interest is included in the policy.	?
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			

Not having a policy does not mean that these issues will not be considered or addressed; a policy provides certainty.

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
SOC5	+	The Town Centre land uses provide job opportunities.	+	The Town Centre land uses provide job opportunities.	?
SOC6	+	The town centre provides services and facilities in an accessible location.	+	The town centre provides services and facilities in an accessible location.	?
SOC7			+	Refers to crime and safety provisions.	?
ECO1	+	The town centre is part of the local economy.	+	The town centre is part of the local economy.	?
ECO2	+		+		?
ECO3	+		+		?

Policy PUBNOR1: Utilities Site

		A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy	
ENV1	+	Access is a key consideration for this site and the wider area.	Not having a policy does not necessarily mean these issues will not be considered. But a policy brings the important considerations together for clarity and consistency.	+	Access is a key consideration for this site and the wider area.
ENV2	+	Policy refers to water efficiency and quality.		+	Policy refers to water efficiency and quality.
ENV3	+	Policy refers to natural environment.		+	Policy refers to natural environment.
ENV4	+	Policy refers to landscaping and the character of the area.		+	Policy refers to landscaping and the character of the area.
ENV5				+	Policy refers to any proposal being resilient to a changing climate.
ENV6	+	Policy refers to flood risk.		+	Policy refers to flood risk.
ENV7	+	Site is a brownfield site.		+	Site is a brownfield site.
ENV8					
ENV9	+	Policy refers to heritage in the area.		+	Policy refers to heritage in the area.
ENV10	+	Policy seeks high quality design.		+	Policy seeks high quality design.
ENV11				+	Policy refers to lighting and light pollution.
ENV12				+	Policy encourages water source heating.
SOC1					
SOC2					
SOC3					
SOC4	+	The site could deliver around 250 homes.	+	The site could deliver 250 homes. Policy refers to self-build as well.	
SOC5					
SOC6	+	The site is located with good access to services and facilities	+	The site is located with good access to services and facilities	

		A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy	
		and the policy refers to links for pedestrians and cyclists.		and the policy refers to links for pedestrians and cyclists.	
SOC7					
ECO1	?/+	Whilst the policy is mainly about the housing element, this site is part of a larger area and therefore taken together, could rate positive against these economic objectives.	?	?/+	Whilst the policy is mainly about the housing element, this site is part of a larger area and therefore taken together, could rate positive against these economic objectives.
ECO2	?/+			?	
ECO3	?/+			?	

Policy PUBNOR2: Riverside walk and cycle path

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ The policy refers to parking for various modes of transport.	+ The policy refers to parking for various modes of transport.	?
ENV2			
ENV3		+ The policy refers to biodiversity enhancements.	?
ENV4	+ The policy refers to landscaping.	+ The policy refers to landscaping.	?
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11	+ The policy refers to dark skies.	+ The policy refers to dark skies.	?
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

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

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ECO3	+	The policy relates to attractions in the area such as footpaths and slipways.	+	The policy relates to attractions in the area such as footpaths and slipways.	?

Policy PUBORM1: Ormesby waterworks

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ENV1		
ENV2	+ Fundamentally, the policy relates to the waterworks.	+ Fundamentally, the policy relates to the waterworks.
ENV3	+ The policy refers specifically to protected sites.	+ The policy refers specifically to protected sites.
ENV4	+ The policy refers specifically to visual impact.	+ The policy refers specifically to visual impact.
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10	+ The policy refers specifically to visual impact.	+ The policy refers specifically to visual impact.
ENV11	+ The policy refers specifically to light pollution	+ Policy includes a stronger criterion on light pollution.
ENV12		
SOC1		
SOC2		
SOC3		
SOC4	+ Water availability is important to consider in terms of meeting housing needs.	+ Water availability is important to consider in terms of meeting housing needs.
SOC5		
SOC6		
SOC7		

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ECO1		
ECO2		
ECO3		

Policy PUBOUL1: Boathouse Lane Leisure Plots

		A: Proposed Publication version policy	B: No policy	
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2				
ENV3				
ENV4	+	Policy refers to landscape character.		?
ENV5	+	Policy identifies the area as important for flood capacity.		?
ENV6	+	Policy identifies the area as important for flood capacity.		?
ENV7				
ENV8				
ENV9	+	The policy refers to potential archaeology.		?
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ Policy highlights potential traffic issues.	+ Policy highlights potential traffic issues.	?
ENV2	+ Policy emphasises the issue of water quality.	+ Policy emphasises the issue of water quality.	?
ENV3	+ Policy refers to HRA requirements.	Policy refers to HRA requirements and biodiversity net gain.	?
ENV4	+ Policy requires landscaping and good design.	+ Policy requires landscaping and good design.	?
ENV5	+ Policy refers to the issue of flood risk.	+ Policy refers to the issue of flood risk.	?
ENV6	+ Policy refers to the issue of flood risk.	+ Policy refers to the issue of flood risk.	?
ENV7			
ENV8			
ENV9	+ Policy refers to conservation area and potential for archaeology.	+ Policy refers to conservation area and potential for archaeology.	?
ENV10	+ Policy requires good design.	+ Policy requires good design.	?
ENV11			
ENV12			
SOC1			
SOC2			
SOC3	+ The policy seeks retention of a boatyard use.	+ The policy seeks retention of a boatyard use.	?
SOC4	+ The site is allocated for housing.	+ The site is allocated for housing.	?
SOC5			

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

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
SOC6	+	The site has good access to services and facilities.	+	The site has good access to services and facilities.	?
SOC7					
ECO1	+	The policy seeks employment use.	+	The policy seeks employment use.	?
ECO2					
ECO3					

Policy PUBOUL3 - Oulton Broad District Shopping Centre

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ENV1	+	The District Centre provides goods and services to the local area and is accessible by foot and cycle.	+	The District Centre provides goods and services to the local area and is accessible by foot and cycle. Amended policy refers to cycle parking.	?
ENV2			+	Refers to water efficiency.	?
ENV3			+	Refers to biodiversity enhancements.	?
ENV4					
ENV5			+	Refers to overheating and shade.	?
ENV6			+	Policy refers to flood risk	?
ENV7					
ENV8					
ENV9					
ENV10					
ENV11					
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5	+	The District Centre land uses provide job opportunities.	+	The District Centre land uses provide job opportunities.	?
SOC6	+	The District Centre provides goods and services to the local area and is accessible by foot and cycle.	+	The District Centre provides goods and services to the local area and is accessible by foot and cycle.	?

Not having a policy does not necessarily mean that these considerations will not be addressed in schemes, but having a policy provides certainty.

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
SOC7			+	Refers to crime and safety provisions.	?
ECO1	+	The land uses in the District Centre are part of the local economy.	+	The land uses in the District Centre are part of the local economy.	?
ECO2	+		?		
ECO3	+		?		

Policy PUBPHRB1 Bridge Area

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ENV1	+ Policy refers to the parking provision in the area.	+ Policy refers to the parking provision in the area. Also refers to traffic management in the area.	?
ENV2			
ENV3		+ Policy seeks biodiversity enhancements.	?
ENV4	+ Policy covers an area that is quite unique in character in the Broads.	+ Policy covers an area that is quite unique in character in the Broads.	?
ENV5		+ Policy refers to resilience.	?
ENV6	+ Policy refers to flood risk in the area.	+ Policy refers to flood risk in the area. Policy refers to resilience.	?
ENV7			
ENV8			
ENV9	+ Policy refers to the Bridge.	+ Policy refers to the Bridge.	?
ENV10			
ENV11	+ Policy includes reference to light pollution.	+ Policy includes reference to light pollution.	?
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			

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

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy		C: No policy
ECO1	+	Generally, the policy seeks to continue the types of land uses that are there and these benefit to the economy and employment in the area.	Generally, the policy seeks to continue the types of land uses that are there and these benefit to the economy and employment in the area.	?	
ECO2	+			?	
ECO3	+			?	

Policy PUBPHRB2: Waterside plots

		A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy	
ENV1		Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.			
ENV2					
ENV3	?			+ Reference to flowering plants would benefit biodiversity.	+ Reference to flowering plants would benefit biodiversity. Also there is reference to biodiversity enhancements.
ENV4	?			+ Fundamentally, the policy seeks to guide what can happen in this area to preserve and enhance character.	+ Fundamentally, the policy seeks to guide what can happen in this area to preserve and enhance character.
ENV5					
ENV6	?			+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV7					
ENV8					
ENV9					
ENV10	?			+ Policy generally influences design of the chalets/bungalows.	+ Policy generally influences design of the chalets/bungalows.
ENV11	?			+ Policy refers to light pollution.	+ Policy refers to light pollution.
ENV12					
SOC1					
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					

		A: No policy	B: Proposed Publication version policy	C: Original 2019 Local Plan policy
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBPHRB3: Green Bank Zones

		A: No policy	B: Proposed Publication version policy
ENV1		<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2			
ENV3	?		+ By being undeveloped, biodiversity could benefit.
ENV4	?		+ Fundamentally, the policy seeks to guide what can happen in this area to preserve and enhance character.
ENV5			
ENV6	?		+ By being undeveloped, there is space for water.
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

	A: No policy	B: Proposed Publication version policy
ECO3		

Policy PUBSOL1: Riverside area moorings

There are no reasonable alternatives identified at this stage.

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

		A: Proposed Publication version policy
ECO1	+	The policy provisions in general assist in recreation use of the area and the Broads.

Considering the history of potential proliferation of development in this area, the alternative option of no policy is not considered reasonable.

Policy PUBSOM1: Somerleyton Marina Residential Moorings

		A: Keep original policy (other than adding reference to GI RAMS).		B: Proposed Publication version policy
ENV1	+	Policy refers to access requirements.	+	Policy refers to access requirements.
ENV2				
ENV3		GI RAMS mitigation would be required, but that would be neutral impact.		GI RAMS mitigation would be required, but that would be neutral impact.
ENV4				
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10			+	Makes specific reference to design of associated cabinets.
ENV11	+	Makes specific reference to light pollution	+	Makes specific reference to light pollution
ENV12				
SOC1				
SOC2				
SOC3				
SOC4	+	Would contribute to housing need in the area.	+	Would contribute to housing need in the area.
SOC5				
SOC6	+	Some services and facilities within walking distance of the site.	+	Some services and facilities within walking distance of the site.
SOC7				

		A: Keep original policy (other than adding reference to GI RAMS).	B: Proposed Publication version policy	
ECO1	+	Residential moorings could result in support of the local businesses.	+	Residential moorings could result in support of the local businesses.
ECO2				
ECO3				

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

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ENV1		
ENV2		
ENV3	+ Policy refers to planting, with benefits to the natural environment.	+ Policy refers to planting, with benefits to the natural environment and refers to nutrient neutrality and GI RAMS.
ENV4	+ Policy refers to views and landscape planting.	+ Policy refers to views and landscape planting.
ENV5		
ENV6		
ENV7		
ENV8		
ENV9	+ Policy refers to views the issue of archaeology.	+ Policy refers to views the issue of archaeology.
ENV10		+ Policy refers to the design guide.
ENV11		+ The policy refers to light pollution.
ENV12		
SOC1		
SOC2		
SOC3	+ The policy relates to a boatyard which enables traditional Broads’ industries as well as enabling people to enjoy and understand the Broads.	+ The policy relates to a boatyard which enables traditional Broads’ industries as well as enabling people to enjoy and understand the Broads.

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy
SOC4	+	Policy says residential moorings could be acceptable here.	Policy says residential moorings are acceptable here.
SOC5	+	Policy relates to an employment area.	Policy relates to an employment area.
SOC6			
SOC7			
ECO1	+	Policy relates to an employment area.	Policy relates to an employment area.
ECO2	+	Policy relates to an employment area.	Policy relates to an employment area.
ECO3	+	Policy relates to a tourism provider.	Policy relates to a tourism provider.

Policy PUBTSA1: Cary's Meadow

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy		C: No policy
ENV1			+ Policy refers to cycle parking.	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.
ENV2					
ENV3	+	Policy aims to protect and enhance this site which is a rather unique open space in the Norwich area.	+ Policy aims to protect and enhance this site which is a rather unique open space in the Norwich area.	?	
ENV4	+	Policy aims to protect and enhance this site which is a rather unique open space in the Norwich area.	+ Policy aims to protect and enhance this site which is a rather unique open space in the Norwich area.	?	
ENV5					
ENV6					
ENV7					
ENV8					
ENV9					
ENV10					
ENV11					
ENV12					
SOC1	+	The Meadow is used by the public with benefits to health and wellbeing.	+ The Meadow is used by the public with benefits to health and wellbeing.	?	
SOC2					
SOC3					
SOC4					
SOC5					
SOC6					
SOC7					

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
ECO1			
ECO2			
ECO3			

Policy PUBTSA2: Thorpe Island

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy reflects the restriction of the bridge.	+ Policy reflects the restriction of the bridge.
ENV2			+ Policy refers to water quality.	+ Policy refers to water quality.
ENV3				
ENV4	?		+ Policy requirements generally seek to protect and enhance landscape character.	+ Policy requirements generally seek to protect and enhance landscape character.
ENV5			+ Policy refers to flood risk.	+ Policy refers to flood risk.
ENV6				
ENV7				
ENV8				
ENV9	?		+ Policy refers to the heritage assets in the area.	+ Policy refers to the heritage assets in the area.
ENV10	?		+ Policy refers to design.	+ Policy refers to design and the Design Guide.
ENV11	?			+ Policy refers to light pollution.
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	?		+	

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO2	?		The policy generally supports boat yard uses in the area.	The policy generally supports boat yard uses in the area.
ECO3	?			

Policy PUBTSA3: Griffin Lane – boatyards and industrial area

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy reflects the lane’s constraints and the junction with the main road.	+ Policy reflects the lane’s constraints and the junction with the main road.
ENV2				
ENV3				
ENV4	?		+ Policy requires landscape improvements to the area.	+ Policy requires landscape improvements to the area.
ENV5				
ENV6				
ENV7				
ENV8				
ENV9	?		+ Policy refers to the heritage assets in the area.	+ Policy refers to the heritage assets in the area.
ENV10	?		+ Policy refers to design.	+ Policy refers to design and the Design Guide.
ENV11	?			+ Policy refers to light pollution.
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1	?	+ The policy generally supports boat yard uses in the area.	+ The policy generally supports boat yard uses in the area.	
ECO2	?			

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO3	?			

Policy PUBTSA4: Bungalow Lane – mooring plots and boatyards

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy reflects the lane’s constraints and the junction with the main road.	+ Policy reflects the lane’s constraints and the junction with the main road.
ENV2				
ENV3				
ENV4	?		+ Policy reflects the semi-rural character of the area.	+ Policy reflects the semi-rural character of the area.
ENV5				
ENV6	?		+ Flood risk is referred to in the policy.	+ Flood risk is referred to in the policy.
ENV7	?		+ Policy seeks no new development but allows replacements and extensions.	+ Policy seeks no new development but allows replacements and extensions.
ENV8				
ENV9				
ENV10	?		+ Policy refers to design.	+ Policy refers to design and the Design Guide.
ENV11	?			+ Policy refers to light pollution.
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ECO1	?		+ The policy generally supports boat yard uses in the area.	+ The policy generally supports boat yard uses in the area.
ECO2	?			
ECO3	?			

Policy PUBTSA5: River Green Open Space

There are no reasonable alternatives identified at this stage.

		A: Proposed Publication version policy	B: No policy	
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty</p>	
ENV2				
ENV3				
ENV4	+	The open space is an area important to the local character.		?
ENV5				
ENV6				
ENV7				
ENV8	+	The open space is an area important to the local character (which is a Conservation Area).		?
ENV9				
ENV10				
ENV11				
ENV12				
SOC1	+	The area will benefit the health and wellbeing of the community and visitors.		?
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				

	A: Proposed Publication version policy	B: No policy
ECO1		
ECO2		
ECO3		

Policy PUBTHU1: Tourism development at Hedera House, Thurne

		A: Keep original policy (other than updating the text relating to BNG, NN and GI RAMS).		B: Proposed Publication version policy
ENV1				
ENV2				
ENV3	+	Scheme would need to provide Biodiversity Net Gain – so positive. Note that GI RAMS and potentially Nutrient Neutrality mitigation would be required, but that would be neutral impact.	+	Scheme would need to provide Biodiversity Net Gain – so positive. Note that GI RAMS and potentially Nutrient Neutrality mitigation would be required, but that would be neutral impact.
ENV4	+	Seeks to retain hedgerows and mature trees. Policy refers to character of the village.	+	Seeks to retain hedgerows and mature trees. Policy refers to character of the village.
ENV5				
ENV6				
ENV7	+	Land is brownfield land	+	Land is brownfield land
ENV8				
ENV9				
ENV10	+	Importance of design emphasised.	+	Importance of design emphasised.
ENV11			+	Makes specific reference to light pollution
ENV12				
SOC1	+	Seeks the protection of the amenity of neighbours.	+	Seeks the protection of the amenity of neighbours.
SOC2				
SOC3				

		A: Keep original policy (other than updating the text relating to BNG, NN and GI RAMS).	B: Proposed Publication version policy	
SOC4	+	Would contribute to housing need in the Borough.	+	Would contribute to housing need in the Borough.
SOC5				
SOC6	-	Few facilities provided in the village.	-	Few facilities provided in the village.
SOC7				
ECO1	+	More dwellings could result in support of the local businesses.	+	More dwellings could result in support of the local businesses.
ECO2				
ECO3				

Note that 'no policy' was deemed an unreasonable alternative option as the site has planning permission. This site was allocated in the 2014 Sites Specifics Local Plan and then the 2019 Local Plan and subsequently received planning permission. The policy continues in the new Local Plan as it is not built out and in case the landowner seeks changes or a different approach to the site. There is one negative in relation to there being few facilities in the village. It is important to note that the site was included in the 2014 Sites Specifics Local Plan by request of the Inspector as the Authority did not support this allocation.

Policy PUBWHI1: Whitlingham Country Park plus adjacent land

		A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy	
ENV1	+	Impact of proposals on the highway is a consideration in the policy.	+	Impact of proposals on the highway is a consideration in the policy.	?
ENV2					
ENV3	+	Policy refers to enhancing biodiversity.	+	Policy refers to protecting and enhancing biodiversity.	?
ENV4	+	Policy seeks to protect the park character and refers to the historic park and garden status of the site.	+	Policy seeks to protect the park character and refers to the historic park and garden status of the site.	?
ENV5	+	Policy seeks to promote walking and cycling and use of public transport.	+	Policy seeks to promote walking and cycling and use of public transport.	?
ENV6			+	Policy refers to flood risk.	?
ENV7	+	Policy seeks the sharing of any buildings.	+	Policy seeks the sharing of any buildings.	?
ENV8					
ENV9	+	Policy seeks to protect the park character and refers to the historic park and garden status of the site.	+	Policy seeks to protect the park character and refers to the historic park and garden status of the site.	?
ENV10	+	Generally, the policy criteria emphasise good design.	+	Generally, the policy criteria emphasise good design.	?
ENV11			+	Policy refers to light pollution.	?
ENV12					
SOC1	+	Policy refers to health and wellbeing.	+	Policy refers to health and wellbeing.	?
SOC2					
SOC3					

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

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy	C: No policy
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			
ECO3	+	The use of the area is for recreation.	+
		The use of the area is for recreation.	?

Policy PUBWHI2: Land at Whitlingham Lane

		A: No policy	B: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy seeks only one access onto Whitlingham Lane and refers to walking, cycling and wheeling.
ENV2	?		+ Policy seeks water efficiency.
ENV3	?		+ Policy refers to potential for wildlife on site, the nature reserve as well as the need for biodiversity enhancements.
ENV4	?		+ Policy seeks improved frontage and good design.
ENV5	?		+ Policy refers to walking, cycling and wheeling and seeks retention of buildings due to embodied carbon.
ENV6	?		+ Policy refers to flood risk on site.
ENV7	?		+ Policy seeks retention of exiting building.
ENV8	?		+ Policy seeks retention of exiting building.
ENV9	?		+ Policy seeks retention of exiting building. Policy refers to nearby buildings that are of heritage value.
ENV10	?		+ Policy refers to design and design guide.
ENV11	?		+ Policy refers to light pollution.
ENV12			
SOC1			
SOC2			
SOC3			
SOC4			
SOC5	?		+ E Class Land use would provide some employment opportunities.
SOC6	?		? Depending on proposals, this could provide a use that benefits the community.

		A: No policy	B: Proposed Publication version policy
SOC7			
ECO1			
ECO2	?		+ The policy requirements would ensure the land use considers and addresses potential impacts on the environment for example by assessing wildlife on site, being well designed and water efficient.
ECO3			

Policy PUBSSTRI: Trinity Broads

There are no reasonable alternatives identified at this stage.

		A: Proposed Publication version policy
ENV1	+	Policy refers to controlling boat use.
ENV2	+	The policy will result in the protection of the Broad which is used for water supply.
ENV3	+	The policy will result in benefits to biodiversity.
ENV4	+	The policy seeks protection of the character of the area.
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10		
ENV11	+	The policy specifically refers to light pollution.
ENV12		
SOC1	+	Tranquillity benefits mental wellbeing.
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		

	A: Proposed Publication version policy	
SOC7		
ECO1		
ECO2		
ECO3	?	On one hand the controlling of boating activity could be seen as a negative against this objective, but on the other hand, the policy seeks to protect the tranquillity which people may come to the Broads to experience.

Considering the importance of the Trinity Broads and the constraints in the area and features of the site, the option of no policy is not considered reasonable.

Policy PUBSSUT: Upper Thurne

There are no reasonable alternatives identified at this stage.

		A: Proposed Publication version policy
ENV1	+	Policy refers to controlling boat use.
ENV2	+	The policy will result in the protection of the Broad which is used for water supply.
ENV3	+	The policy will result in benefits to biodiversity.
ENV4	+	The policy seeks protection of the character of the area.
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10		
ENV11	+	The policy specifically refers to light pollution.
ENV12		
SOC1	+	Tranquillity benefits mental wellbeing.
SOC2		
SOC3		
SOC4		
SOC5		
SOC6		

	A: Proposed Publication version policy	
SOC7		
ECO1		
ECO2		
ECO3	?	On one hand the controlling of boating activity could be seen as a negative against this objective, but on the other hand, the policy seeks to protect the tranquillity which people may come to the Broads to experience.

Considering the importance of the Upper Thurne and the constraints in the area and features of the site, the option of no policy is not considered reasonable.

Policy PUBSSPUBS Waterside Pubs Network

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy			
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+	Policy seeks benefits to river/water users	+	Policy seeks benefits to river/water users	
ENV2	?		+	Policy includes a criterion on foul drainage	+	Policy includes a criterion on foul drainage	
ENV3							
ENV4					+	Policy highlights how some pubs are important assets in terms of the building itself.	
ENV5					+	Policy refers to energy efficiency	
ENV6	?			+	Policy included a criterion on flood risk.	+	Policy included a criterion on flood risk.
ENV7							
ENV8							
ENV9					+	Policy highlights how some pubs are important assets in terms of the building itself.	
ENV10							
ENV11	?			+	Policy includes a criterion on light pollution.	+	Policy includes a stronger criterion on light pollution.
ENV12							
SOC1	?			?	On one hand pubs could enable unhealthy lifestyles but on the other hand are a place to socialise.	?	On one hand pubs could enable unhealthy lifestyles but on the other hand are a place to socialise.
SOC2							
SOC3							
SOC4							
SOC5							

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC6	?		+ Pubs are an important facility to the community.	+ Pubs are an important facility to the community.
SOC7	?		+ Pubs are a place to socialise.	+ Pubs are a place to socialise.
ECO1	?		+ Pubs are a business in themselves, and this policy seeks their protection and changes which are acceptable in relation to other policies as well as improve the viability of the pubs.	+ Pubs are a business in themselves, and this policy seeks their protection and changes which are acceptable in relation to other policies as well as improve the viability of the pubs.
ECO2				
ECO3				

Policy PUBSSROADS: Main road network

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Fundamentally, the policy relates to travel and transport.	+ Fundamentally, the policy relates to travel and transport.
ENV2				
ENV3				
ENV4				
ENV5				
ENV6				
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1	?		+ Policy refers to the impact of proposals on the amenity of nearby users.	+ Policy refers to the impact of proposals on the amenity of nearby users.
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				
ECO3				

Policy PUBSSTRACKS: Former rail trackways

A: Original 2019 Local Plan policy		B: No policy	C: Proposed Publication version policy
ENV1	+ The policy is about travel, albeit recreation.	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ The policy is about travel, albeit recreation.
ENV2			
ENV3	+ The policy seeks protection of designated sites.		+ The policy seeks protection of designated sites.
ENV4	+ The policy refers to landscape considerations.		+ The policy refers to landscape considerations.
ENV5			
ENV6			
ENV7			
ENV8			
ENV9			
ENV10			
ENV11			
ENV12			
SOC1	+ The use of the routes would benefit mental and physical health and wellbeing.		
SOC2			
SOC3			
SOC4			
SOC5			
SOC6			
SOC7			
ECO1			
ECO2			

		A: Original 2019 Local Plan policy	B: No policy	C: Proposed Publication version policy	
ECO3	+	The recreation routes may benefit tourism in the area by being attractions.	?	+	The recreation routes may benefit tourism in the area by being attractions.

Policy PUBSSSTATIONS: Railway stations/halts

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty. With stations/halts an essential element to the tourist network in the Broads it seems prudent to have a policy.</p>	<p>+ The policy seeks to protect and enables appropriate enhancements of the halts and stations that will benefit modal shift.</p>	<p>+ The policy seeks to protect and enables appropriate enhancements of the halts and stations that will benefit modal shift.</p>
ENV2				
ENV3				<p>+ The policy specifically refers to biodiversity enhancements.</p>
ENV4	?		<p>+ The policy specifically refers to improving their appearance.</p>	<p>+ The policy specifically refers to improving their appearance.</p>
ENV5	?		<p>+ The stations/halts will enable modal shift.</p>	<p>+ The stations/halts will enable modal shift.</p>
ENV6				
ENV7				
ENV8				
ENV9				<p>+ The policy highlights that some stations/halts have heritage value.</p>
ENV10	?		<p>+ The policy specifically refers to improving their appearance.</p>	<p>+ The policy specifically refers to improving their appearance.</p>
ENV11				<p>+ The policy requires light pollution to be addressed.</p>
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				

		A: No specific policy.	B: Original 2019 Local Plan policy	C: Proposed Publication version policy		
SOC5						
SOC6	?		+	Halts/stations enable modal shift.	+	Halts/stations enable modal shift.
SOC7						
ECO1						
ECO2						
ECO3						

Policy PUBSSSTAITHES: Staithes

There are no reasonable alternatives identified at this stage.

A: Proposed Publication version policy	
ENV1	+ Staithes are areas where boats can be unloaded safely thus not impacting on the navigable parts of the Broads. These facilities could also make using boats for transporting goods more appealing.
ENV2	
ENV3	
ENV4	+ Staithes can contribute to the character of an area. Staithes have the potential to benefit the local economy by being somewhere for tourists to moor as well as enabling the off-loading of goods.
ENV5	
ENV6	
ENV7	
ENV8	
ENV9	+ Using the waterways and staithes is related to the history and traditions of the Broads.
ENV10	
ENV11	
ENV12	
SOC1	+ Staithes can help access the water with the related positive impact of active lifestyles.
SOC2	
SOC3	
SOC4	
SOC5	
SOC6	

A: Proposed Publication version policy	
SOC7	
ECO1	
ECO2	
ECO3	+ Depending on any access right or ownership, staites can be used to enjoy the water, with related tourism and recreation positive impacts.

An alternative option is to not have a policy. If this option were to be taken forward, there would be no protection for staites through the planning process. This is deemed an unreasonable option and has not been taken forward for consideration. This is because the policy is in the current Local Plan and there have not been any suggestions to remove it. Also, fundamentally, the policy provides a level of protection for staites, which are important locally.

Policy PUBSSCOAST: The Coast

		A: Proposed Publication version policy	B: No policy	
ENV1			<p>Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.</p>	
ENV2				
ENV3	+	Policy identifies the area as a seal and wild bird refuge and seeks to protect that.		?
ENV4	+	The policy seeks to protect the character of the area.		?
ENV5	+	The policy refers to the flood risk and tidal inundation.		?
ENV6	+	The policy refers to the flood risk and tidal inundation.		?
ENV7				
ENV8				
ENV9				
ENV10				
ENV11				
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				
SOC7				
ECO1				
ECO2				

		A: Proposed Publication version policy	B: No policy
ECO3	+	The policy refers to recreation use of the area.	?

Policy PUBSSMILLS: Drainage Mills

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ENV1		
ENV2	+ The policy refers to water.	+ The policy refers to water.
ENV3	+ The policy refers to timing of works.	+ The policy refers to timing of works, recreation and nutrient enrichment impacts.
ENV4	+ Mills are a prominent feature in the landscape and the policy seeks their protection and enhancement.	+ Mills are a prominent feature in the landscape and the policy seeks their protection and enhancement.
ENV5		
ENV6		+ Policy refers to flood risk.
ENV7	+ The policy seeks restoration and reuse of the Mills.	+ The policy seeks restoration and reuse of the Mills.
ENV8		
ENV9	+ The policy seeks improvements to the mills which are heritage assets and important to the cultural heritage of the area.	+ The policy seeks improvements to the mills which are heritage assets and important to the cultural heritage of the area.
ENV10		
ENV11		+ The policy specific mentions dark skies and light pollution.
ENV12		
SOC1		
SOC2		
SOC3	+ Generally, by seeking improvements to the mills, this will benefit traditional skills.	+ Generally, by seeking improvements to the mills, this will benefit traditional skills.

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
SOC4		
SOC5		
SOC6		
SOC7		
ECO1		
ECO2		
ECO3	+ Generally, by seeking improvements to the mills, this will benefit this objective.	+ Generally, by seeking improvements to the mills, this will benefit this objective.

Policy PUBSSLGS: Local Green Space

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
ENV1		
ENV2		
ENV3	+ The areas of land, to a lesser or greater extent, have benefits for biodiversity.	+ The areas of land, to a lesser or greater extent, have benefits for biodiversity.
ENV4	+ The areas of land are local in character and enhance the area.	+ The areas of land are local in character and enhance the area.
ENV5		
ENV6		
ENV7		
ENV8		
ENV9		
ENV10		
ENV11		
ENV12		
SOC1	+ Generally, the areas have been put forward as they are important to the community, with many being areas for quite relaxation and walking around so benefitting mental and physical health and wellbeing.	+ Generally, the areas have been put forward as they are important to the community, with many being areas for quite relaxation and walking around so benefitting mental and physical health and wellbeing.
SOC2		
SOC3		
SOC4		
SOC5		

	A: Original 2019 Local Plan policy	B: Proposed Publication version policy
SOC6		
SOC7		
ECO1		
ECO2		
ECO3		

Policy PUBSSA47: Road schemes on the Acle Straight (A47T)

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
ENV1	?	Not having a policy does not mean that these issues will not be considered or addressed. A policy does however provide more certainty.	+ Policy refers to the A47.	+ Policy refers to the A47.
ENV2	?		+ Policy emphasises the issue of water quality.	+ Policy emphasises the issue of water quality.
ENV3	?		+ Policy emphasises the issue of impact on biodiversity.	+ Policy emphasises the issue of impact on biodiversity. Also raises issue of peat.
ENV4	?		+ Policy emphasises the issue of impact on landscape.	+ Policy emphasises the issue of impact on landscape.
ENV5	?			+ Policy refers to climate change resilience.
ENV6	?		+ Policy emphasises issue of flood risk.	+ Policy emphasises issue of flood risk.
ENV7				
ENV8				
ENV9	?		+ Policy emphasises issue of impact on heritage.	+ Policy emphasises issue of impact on heritage.
ENV10	?		+ Taken as a whole, the aim of the policy is for a well-designed scheme.	+ Taken as a whole, the aim of the policy is for a well-designed scheme.
ENV11	?		+ Light pollution is referred to in the policy.	+ Light pollution is referred to in the policy.
ENV12				
SOC1				
SOC2				
SOC3				
SOC4				
SOC5				
SOC6				

		A: No policy	B: Original 2019 Local Plan policy	C: Proposed Publication version policy
SOC7				
ECO1				
ECO2				
ECO3				

Appendix 6 – Comments received during the Issues and Options consultation

Organisation	Comment	Response
East Suffolk Council	Overall, East Suffolk Council welcomes the Sustainability Appraisal and considers it to provide clear and comprehensive consideration of the key Sustainability issues affecting the Broads Authority area.	Noted
East Suffolk Council	The baseline chapter acts as a comprehensive overview of the existing environmental, economic and social characteristics of the area. We welcome acknowledgement of the emerging Census data and commitment to reflecting the latest data releases in future SA work. As per our comments on the SA Scoping report, there may be value in clarifying that where 2011 census data has been used this refers to 'Waveney' which no longer exists as a local authority. While overall the baseline is considered comprehensive, the Broads Authority may want to consider expanding the data in relation to health. Currently the health topic is only covered with self-reported health status which means this does not provide a sufficient evidence base for identifying key health challenges.	Noted. The Census 2021 data will be used.
East Suffolk Council	<p>We have reviewed the Literature Review and consider that there may be value in reviewing the following additional documents in future iterations of the SA:</p> <ul style="list-style-type: none"> • East Suffolk Sustainable Construction SPD; • East Suffolk Cycling and Walking Strategy; • Building for a Healthy Life (https://www.designforhomes.org/project/building-for-life/) • Suffolk Design: Streets Guide (https://www.suffolk.gov.uk/planning-waste-and- 	Noted. We will look into these documents.

Organisation	Comment	Response
	environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/)	
East Suffolk Council	<p>East Suffolk Council consider that the Sustainability Objectives reflect the identified characteristics, baseline data, and SWOT analysis set out in the Issues and Options document. We welcome the amendments made in response to our comments on the Scoping Report. Within the specific wording of the objectives, we have the following suggestions:</p> <ul style="list-style-type: none"> • ENV3- consider adding specific reference to habitat restoration and creation • ENV11- consider adding specific reference Dark Skies as part of the objective, although we note and welcome that it forms part of the decision making criteria against a number of the objectives • SOC1- as per comment above, this objective could benefit from more baseline data in relation to health 	<p>ENV3 – added to decision making questions.</p> <p>EVV11 – wording considered adequate.</p> <p>SOC1 - The Census 2021 data will be used.</p>
East Suffolk Council	<p>Subject to the comments above, East Suffolk Council consider that the Sustainability Framework in Appendix 4 represents an appropriate mechanism for assessing the Plan against the identified SA objectives. Against the specific wording of the criteria, we have the following suggestions/ comments:</p> <ul style="list-style-type: none"> • ENV5 <ul style="list-style-type: none"> o consider adding criteria/ question relating to solar shade/solar gain and mitigating/adapting to overheating o consider adding adaptable and flexible design of buildings o Consider adding support for nature based solutions over hardscape (SuDS, attenuation, screening, etc.), where relevant • ENV10 	<p>ENV5 – amended</p> <p>ENV10 – difference is not obvious, so no change made. Criteria amended.</p>

Organisation	Comment	Response
	<ul style="list-style-type: none"> o ENV10 is worded slightly differently in the appendix to the main body (p. 6) o Consider adding criteria in relation to the efficient use of land in sustainable locations for higher density development o Consider adding criteria in relation housing design that promotes good space standards 	

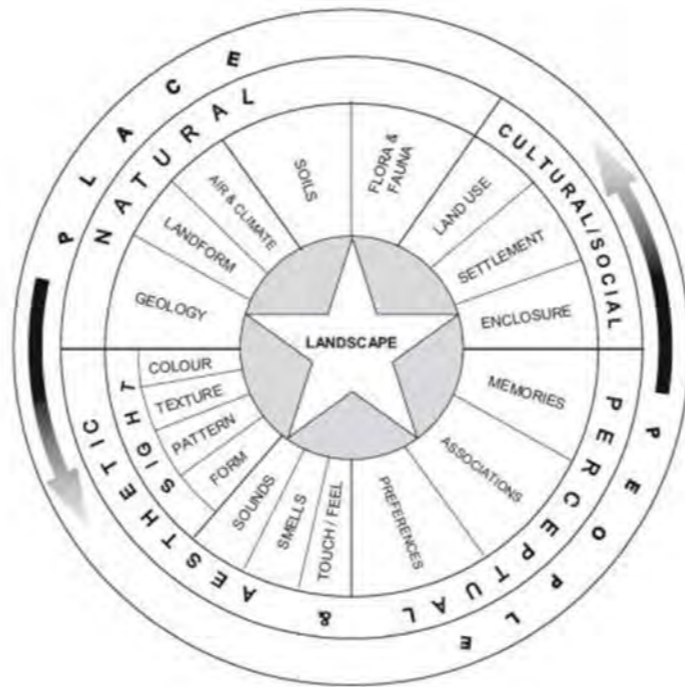
Appendix 7 – Other effects and monitoring indicators

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBDM1: Major Development in the Broads	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary	Not topic specific so has many potential effects, secondary effects and synergistic effects but depends on the scheme being determined using this policy.		None identified.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBDM2: Embodied Carbon	This policy does not rectify what has happened in the past but seeks to reduce the impact in the future. So Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Reducing carbon dioxide emissions as well as reducing waste to waste streams.		None identified.	Planning applications in accordance (or otherwise) with this policy.
PUBDM3: Pollution and Hazards in development and protecting environmental quality	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary	Some aspects of this policy would result in betterment.		None identified.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBSP1: Responding to the Climate Emergency	Reducing emissions (mitigating) – an individual’s reduction on their own will not have a major impact on climate change, but collectively, there can be impacts beyond thirty years or so as we are ‘locked in’ to the scenario that will arise over the coming few decades.	Intended to be permanent.	By reducing emissions, such as through walking rather than going by car or by using less energy, not only will emissions be reduced and resources saved but user would save money.		None identified.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBDM4: Climate change adaption and resilience checklist	Adapting - Effects can be felt from the short term after policy used to inform/determine relevant applications. But the policy emphasises the need to look long term to see what the effects could be.					Development proposals that have completed the checklist
Policy PUBDM5: Water Quality and foul drainage	Water quality can improve within a few years of the source of pollution being removed.	Intended to be permanent.	Good water quality not only benefits biodiversity but also continues to attract visitors.		Require a statement to set out approach taken for foul water disposal.	Applications involving sewage treatment works and what type of system used.
Policy PUBDM6: Boat wash down facilities	This policy does not rectify what has happened in the past but seeks to reduce the impact in the future. So Effects felt	Intended to be permanent.	Boats could be moved to other waterways than the Broads. Boats coming out of the Broads and then into other waterways could protect those from any issues as well.		None identified.	Boat wash down areas and filtration devices delivered

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
	from the short term after policy used to inform/determine relevant applications.					because of relevant planning applications.
Policy PUBDM7: Water Efficiency	Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Whilst housing development numbers in the Broads is small when compared to other Authorities, by being water efficient there is less need for extraction with associated energy savings and potentially less impact on habitats from where water is extracted.		Refer to greywater recycling and rainwater harvesting. Make sure policy includes to non-residential schemes like camping facilities for example. Seek further water efficiency.	Dwellings permitted at 110 l/h/d. Schemes incorporating greywater recycling/rainwater harvesting. Non-resi schemes with water efficient measures.
Policy PUBSP2: Flood Risk	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Policy emphasises that it is important to not make flood risk worse elsewhere and also could result in better water quality.		Refers to SuDS treating water.	Permissions granted contrary to Environment Agency Flood Risk advice.
Policy PUBDM8: Flood Risk	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Policy emphasises that it is important to not make flood risk worse elsewhere.		Refer to resilience to climate change.	
Policy PODM9: Surface water run-off	Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	SuDS contributes to a network of Green Infrastructure which benefits people and wildlife. They are a response to seeking to not make flood risk worse elsewhere. By addressing surface water run-off, also addresses water quality as pollutants could be carried in the water.		Include general design principles.	SuDS delivered in line with the hierarchy.
Policy PUBDM10: Open Space on land, play, sports fields and allotments	Note that the policy seeks to protect what is in place now/what the situation is now. Also defers to district policies which sets standards for relevant development. Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria and guides provision of new. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Contributes to a network of Green Infrastructure which benefits people and wildlife. Enables healthy lifestyles. Permeable so allows water to infiltrate rather than run off thus not contributing to flood risk.		Potential to include wildlife enhancements. Refer to tenure blind design and parking for scooters and cycles.	Open space lost. Open space delivered in line with the policy.
Policy PUBDM11: Green and blue infrastructure and Public Rights of Way	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Contributes to a network of Green Infrastructure which benefits people and wildlife on land and on water.		Add resilience to climate change. Ensure maintenance is considered. Deliver benefits to biodiversity. Refer to play.	Green Infrastructure lost. Green Infrastructure delivered in line with this policy.
Policy PUBSP3: Soils	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy	Intended to be permanent.	Soils are important for carbon sequestration and also for food supply amongst other benefits.		None identified.	Planning applications in accordance (or otherwise) with this policy.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
	used to inform/determine relevant applications.					Number of planning approvals leading to permanent loss of 'best and most versatile' (BMV) agricultural land'
Policy PUBDM12: Peat	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	<p>Policy has many effects:</p> <ul style="list-style-type: none"> • Climate change through the continued sequestration of carbon. • Preserving archaeology and the paleoenvironment • Benefitting water quality • Benefitting biodiversity 		None identified.	Development on areas of peat permitted in line with this policy.
Policy PUBSP4: Heritage assets and Policy PUBDM13: Historic Environment	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Maintains a link, knowledge and appreciation to the past. Such assets are an attraction in the area (on their own and in combination). Reduction in waste-to-waste stream.		Public engagement relating to archaeology. Refer to demolition. Seek betterment where there is a negative impact. Refer to high quality materials.	Heritage at risk Archaeological field evaluations 'Unknown' assets identified. Applications with an interpretation element.
Policy PUBDM14: Re-use of Historic Buildings	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Bringing an asset into use maintains the link to the past. Can also save energy from using materials and building already in place as well as releasing the embodied energy of the building. Provides space for use by businesses for example with wider benefits to the economy through the supply chain.		None identified.	Heritage assets re-used. Applications granted contrary to Historic Environment Manager advice.
Policy PUBSP5: Biodiversity	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Such assets are an attraction in the area. Biodiversity provides many varied benefits. For example, a larger number of plant species means a greater variety of crops Greater species diversity ensures natural sustainability for all life forms Healthy ecosystems can better withstand and recover from a variety of disasters.		Refer to Nature Recovery Strategy. Ensure refer to non-native species.	Brownfield sites with open mosaic habitat of intrinsic biodiversity value and how incorporated in schemes. Biodiversity and geodiversity features incorporated into schemes.
Policy PUBDM15: Natural Environment	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Such assets are an attraction in the area. Biodiversity provides many varied benefits. For example, a larger number of plant species means a greater variety of crops Greater species diversity ensures natural sustainability for all life forms Healthy ecosystems can better withstand and recover from a variety of disasters.		Stronger wording relating to biodiversity enhancements. Refer to Nature Recovery Strategy. Ensure refer to non-native species.	Planning Application Habitat Regulation Assessments completed to an acceptable quality (endorsed by Natural England and/or Broads Authority ecologist. Applications permitted against the advice of Natural England.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
						Applications permitted against the advice of Norfolk or Suffolk Wildlife Trust.
Policy PUBDM16: Biodiversity Net Gain	Only required on certain schemes. May take some time to embed. Depending on the type of gain, effects could be felt from the short term, but maybe medium term. Some enhancements required to be maintained for 30 years.	Gain features maintained for at least 30 years.	Biodiversity provides many varied benefits. For example, a larger number of plant species means a greater variety of crops Greater species diversity ensures natural sustainability for all life forms Healthy ecosystems can better withstand and recover from a variety of disasters.		None identified.	BNG secured.
Policy PUBDM17: Mitigating Recreation Impacts	For a scheme to be proven to be successfully mitigated, likely that the effects will start from short term.	Mitigation intended to be permanent.	Mitigation might become an attraction to the area. Likely also benefit human health and wellbeing.		None identified.	Mitigation secured.
Policy PUBDM18: Mitigating Nutrient Enrichment Impacts	For a scheme to be proven to be successfully mitigated, likely that the effects will start from short term.	Mitigation intended to be permanent.	Depending on the type of mitigation, effects could be generally enhancements to biodiversity in area and improved water quality.		None identified.	Mitigation secured.
Policy PUBDM19: Trees, woodlands, hedges and shrubs and development	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications. Also sets standards for replacing trees.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Trees have biodiversity and habitat benefit as well as landscape character benefits and carbon sequestration.		None identified.	Applications permitted against the advice of the Broads Authority's Tree Officer. Replacement trees provided in line with policy.
Policy PUBDM20: Energy demand and performance of new buildings (including extensions)	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Not only reduces carbon emissions but also running costs of the home. Could help with energy security.		Refer to existing buildings.	Relevant schemes meeting 10% of predicted energy requirements as per the hierarchy.
Policy PUBDM21: Renewable and low carbon energy	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Permitted schemes will contribute to the energy needs of the population. Reduced carbon emissions.		None identified.	Renewable energy development type and scale

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBSP6: Landscape character	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	 <p>A graphic showing what landscape character means and its benefits.</p>		Refer to seascapes as well.	Applications permitted contrary to Landscape Architect advice. Applications permitted contrary to Tree Officer advice.
Policy PUBDM22: Development and Landscape	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.			Refer to special qualities of the Broads. Consider water stress in area. Refer to seascapes as well.	Applications permitted contrary to Landscape Architect advice.
Policy PUBDM23: Land Raising	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	See graphic above re landscape. Flood risk can be made worse elsewhere by raising land.		None identified.	Applications permitted contrary to Landscape Architect advice. Applications permitted contrary to Tree Officer advice.
Policy PUBDM24: Excavated material	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Ensures waste disposed of in appropriate way and seeks to ensure this is planned at the start of the scheme rather than afterwards.		None identified.	Planning applications in accordance with the disposal hierarchy.
Policy PUBDM25: Utilities Infrastructure Development	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Still enables utilities infrastructure with associated benefits such as mobile phone coverage, gas and electricity supply. Such infrastructure is part of a network. Policy is relevant to all utilities infrastructure.		Refer to impact on dark skies.	Planning applications in accordance (or otherwise) with this policy.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBDM26: Protection and enhancement of settlement fringe landscape character	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	See graphic above re landscape.		None identified.	Applications permitted contrary to Landscape Architect advice.
Policy PODM27: Amenity	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Amenity policy benefits wellbeing and health of people. Can also contribute to tranquillity of an area. Considering amenity issues early on can prevent expensive retrofit measures.		Refer to loss of privacy and impacts during construction.	Applications refused on amenity grounds.
Policy PUBSP7: Tranquillity in the Broads	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Tranquillity benefits health and wellbeing of people. Also benefits wildlife. Could also be an attraction for people.		None identified.	Applications refused on tranquillity grounds. Lighting schemes in accordance with zone the application is located in.
Policy PUBDM28: Light pollution and dark skies	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Reduces energy costs, does not harm wildlife and benefits wellbeing through tranquillity. Can be an attraction to tourists.		Refer to how internal light can be mitigated. Cover issue of introducing lighting to an area with no lighting. Provide information relating to design.	Lighting schemes in accordance with zone the application is located in.
Policy PUBSP8: Accessibility and Transport	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Will enable visitors to arrive to enjoy the Broads and contribute to the economy. More sustainable modes of transport can have health benefits as well as emit less air pollution and carbon and save money.		Consider disabled and neurodiverse people.	Parking areas provided as part of relevant applications/schemes. Schemes permitted contrary to Highways Authority advice. Schemes permitted contrary to Highways England advice.
Policy PUBSP9: Recreational access around the Broads	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Will enable visitors to enjoy the Broads once here. Part of the attractions to the area as well. Paths etc are part of a Green Infrastructure network.		Refer to canoe launch pontoons.	Changes to Acle Straight in accordance with policy. Changes to the PROW network.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBDM29: Transport, highways and access	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	More sustainable modes of transport can have health benefits as well as emit less air pollution and carbon. Safety is an important consideration in relation to highways.		Minimise need to travel. Deter pavement parking.	Launch facilities for small craft gained or lost. Travel Plans produced.
Policy PUBDM30: Recreation Facilities Parking Areas	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Could help to ensure the facility is well used bringing more visitors to the area to benefit the economy.		Address biodiversity enhancements, litter bins and disabled parking.	
Policy PUBSP10: A prosperous local economy	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally, businesses tend to be part of a supply chain or customer of other businesses. They provide employment.		Support start-ups and small businesses.	
Policy PUBDM31: New employment development	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally, businesses tend to be part of a supply chain or customer of other businesses. They provide employment.		Refer to cycle and wheeling parking. Refer to resilience to climate change	
Policy PUBDM32: Protecting general employment	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally, businesses tend to be part of a supply chain or customer of other businesses. They provide employment.		None identified.	
Policy PUBDM33: Farm Diversification	Effect could be long term, depending on success of the diversification.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Provide employment. Help the farm to continue. Depending on the diversification, could benefit health and help the visitor economy.		Refer to conversion of existing buildings.	

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBSP11: Waterside sites	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally, businesses tend to be part of a supply chain or customer of other businesses. They provide employment.		Refer to green infrastructure and special qualities of the Broads.	
Policy PUBDM34: Development on waterside sites in employment or commercial use, including boatyards	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally, businesses tend to be part of a supply chain or customer of other businesses. They provide employment.		Refer to resilience to climate change.	
Policy PUBDM35: Retail development in the Broads	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally, businesses tend to be part of a supply chain or customer of other businesses. They provide employment.		Reflect the heritage of centres.	<p>Planning applications in accordance (or otherwise) with this policy and the relevant district council's policy.</p> <p>Total amount of retail gaining planning permission.</p> <p>Loss of retail.</p>
Policy PUBSP12: Sustainable Tourism	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Generally the policy seeks to minimise the impacts felt on the special qualities of the Broads as a result of any schemes. So there would be many varied secondary and synergistic effects related to the special qualities of the Broads. Tourism benefits the economy and the health and wellbeing of people. It provides employment.		None identified.	<p>Tourism development located as set out in policy</p> <p>Tourism land use</p> <p>Provision of new holiday accommodation.</p> <p>Holiday accommodation changed to permanent residential use.</p>
Policy PUBDM36: Sustainable Tourism and Recreation Development	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Generally the policy seeks to minimise the impacts felt on the special qualities of the Broads as a result of any schemes. So there would be many varied secondary and synergistic effects related to the special qualities of the Broads. Tourism benefits the economy and the health and wellbeing of people. It provides employment.		None identified.	
Policy PUBDM37: Holiday Accommodation – New Provision and Retention	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	Provides accommodation for visitors. Benefits local economy and supply chain. Network of holiday accommodation around the Broads.		None identified.	

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBSP13: Navigable Water Space	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Intended to be permanent.	Would benefit users of the water, both individuals and businesses. Ensures the Broads continues to be a top attraction for fun on the water which benefits health and wellbeing of users as well as the local economy.		None identified.	Number/percentage of short stay visitor moorings delivered on site or via off-site contributions in line with part m in policy DM33. Moorings provided – type and in line with guide. Riverbank stabilisation provided – type and in line with guide. Provision for launching of small vessels. Schemes permitted deemed to have significant impact on navigation. Materials used for quay heading in line with policy.
Policy PUBDM38: Access to the Water	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Would benefit users of the water, both individuals and businesses. Ensures the Broads continues to be a top attraction for fun on the water which benefits health and wellbeing of users as well as the local economy.		None identified.	
Policy PUBDM39: Bank stabilisation	Effects felt from the short term after policy used to inform/determine relevant applications.	The effect would depend on the type of stabilisation used and if it were maintained well. Different methods have different lifetimes and need different maintenance regimes.	Other than stabilising riverbanks, the method chosen can benefit biodiversity or landscape character. The policy applies all around the Broads and therefore the benefits could materialise around the entire system.		None identified.	
Policy PUBSP14: Mooring Provision	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Enables people to enjoy the Broads from the water. Can provide an income to some organisations. Moorings are part of a network around the Broads so boats can travel around knowing there is somewhere to moor.		Refer to electric hook ups.	
Policy PUBDM40: Moorings, mooring basins and marinas.	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Enables people to enjoy the Broads from the water. Can provide an income to some organisations. Moorings are part of a network around the Broads so boats can travel around knowing there is somewhere to moor.		Refer to dark skies in relation to hook ups.	
Policy PUBDM41: The impact of replacement quay heading on navigation.	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	None identified.		None identified.	

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBDM42: Materials used for quay heading, capping and waling, small bridges, viewing platforms, landing stagings and boardwalks.	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Potential enabling the use of recycled plastic could provide a use of plastic that is recycled.			
Policy PUBSP15: Residential development	Housing is intended to be delivered within the Local Plan period (2036). Effects felt from the short term after policy used to inform/determine relevant applications.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years.	Enabling market housing can bring affordable housing in certain schemes. Contributes to the housing need of the wider housing market area. Meets the Government's targets for home delivery.		None identified.	
Policy PUBDM43: Affordable Housing	Housing is intended to be delivered within the Local Plan period (2041). Effects felt from the short term after policy used to inform/determine relevant applications.	Affordable housing will provide benefits for as long as it is affordable housing. There is however the right to buy scheme. That being said, a particular house that changes from affordable to market is still providing for a need. The lifetime of homes, in relation to flood risk in the NPPG, is 100 years.	Such homes provide some of the community with suitable accommodation at an acceptable cost to them. There will be benefits to their wellbeing at the very least, but other benefits to their lives.		Clarify delivery on site preferred.	Number of dwellings delivered. Development in line with spatial strategy. Housing delivery against target. Five-year land supply against housing trajectory. Affordable housing delivered. Development within development boundaries.
Policy PUBDM44: Residential Development within Defined Development Boundaries	Effects felt from the short term after policy used to inform/determine relevant applications.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	By ensuring residential development is located near to services and facilities, there could be reduced trips by motor vehicles for the school run or to see the GP for example. A scheme could be more financially viable by being located in these areas in relation to, for example, the opening costs (linking to the highway or sewerage network) as facilities and services could already be in place.		None identified.	
Policy PUBDM45: Gypsy, Traveller and Travelling Show People	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	The various criteria address the special qualities of the Broads as well as the likely needs of the user of the site. There will be many varied secondary effects depending on the final scheme.	Sites are part of a network around the country enabling Gypsy and Travellers to move around and have somewhere to stay.	None identified.	Gypsy and Traveller and Travelling Show People sites delivered in line with this policy.

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Policy PUBDM46: New Residential Moorings	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Whilst living on boats is a lifestyle choice, it can still help to meet people's accommodation needs. It can be a more affordable way to live. By ensuring these are located near to services and facilities, there could be reduced trips by motor vehicles for the school run or to see the GP for example.		Refer to cabinets.	Provision of residential moorings in line with this policy.
Policy PUBDM47: Permanent and Temporary Dwellings for Rural Enterprise Workers	Effects felt from the short term after policy used to inform/determine relevant applications.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	Enables rural businesses to run effectively.	Benefits the local economy and supply chain.	Emphasise importance of design.	Rural enterprise dwellings permitted in accordance (or otherwise) with this policy.
Policy PUBDM48: Elderly and specialist needs housing	Effects felt from the short term after policy used to inform/determine relevant applications.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	Provides employment. Such homes provide some of the community with suitable accommodation at an acceptable cost to them. There will be benefits to their wellbeing at the very least, but other benefits to their lives.		Refer to water efficiency.	Elderly and specialist housing delivered in line with this policy.
Policy PUBDM49: Residential ancillary accommodation	Effects felt from the short term after policy used to inform/determine relevant applications.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	Allows for family members to live nearby and to have support provided if needed. Could reduce demand on other type of accommodation.		None identified.	Residential ancillary accommodation permitted (integral or not integral) in line with this policy.
Policy PUBDM50: Replacement Dwellings	Effects felt from the short term after policy used to inform/determine relevant applications.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	Allows the dwelling to be built to modern standards regarding space and energy efficiency.		Stronger stance on re-using the existing dwelling rather than demolition.	Replacement dwellings permitted in line with this policy
Policy PUBDM51: Custom/self-build	Effects felt from the short term after policy used to inform/determine relevant applications.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	Allows owner to have control of the design and function of their future house to ensure it meets their needs.	None identified.	Emphasise importance of design.	Permissions for self-build Schemes of 100 dwellings or more providing self-build.
Policy PUBPS16: Strategic Design Policy	Effects felt from the short term after policy used to inform/determine relevant applications	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally the policy seeks to minimise the impacts felt on the special qualities of the Broads as a result of schemes. So there would be many varied secondary and synergistic effects related to the special qualities of the Broads.		None identified.	Schemes permitted contrary to design expert, landscape consultant advice.
Policy PUBDM52: Design	Effects felt from the short term after policy used to inform/determine relevant applications. That being said, some landscaping could take until the medium or long term to be fully in place as intended.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally the policy seeks to minimise the impacts felt on the special qualities of the Broads as a result of schemes. So there would be many varied secondary and synergistic effects related to the special qualities of the Broads.		Refer to mature trees and thatching.	Schemes permitted contrary to design expert, landscape consultant advice.

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Policy PUBDM52A: Proposals for residential extensions.	Effects felt from the short term after policy used to inform/determine relevant applications	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Generally the policy seeks to minimise the impacts felt on the special qualities of the Broads as a result of schemes. So there would be many varied secondary and synergistic effects related to the special qualities of the Broads.		Supporting text refers to other policies like water efficiency and biodiversity enhancements.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBDM53: Source of heating	Effects felt from the short term after policy used to inform/determine relevant applications	Intended to be permanent – lifetime of homes is deemed to be around 100 years.	Aim is to reduce carbon dioxide emissions. Potential to have lower running costs.		None identified.	Source of heating provided in line with policy.
Policy PUBDM54: Heat resilient design	Effects felt from the short term after policy used to inform/determine relevant applications	Intended to be permanent	Potential to have lower running costs.		None identified.	Heat resilience measures provided.
Policy PUBDM55: Non-residential development and BREEAM	Effects felt from the short term after policy used to inform/determine relevant applications	Intended to be permanent	Aim is to reduce carbon dioxide emissions. Potential to have lower running costs.		None identified.	Schemes meeting BREEAM standard.
Policy PUBDM56: Electric Vehicle (EV) Charging Points – fire safety, design, location and lighting.	Effects felt from the short term after policy used to inform/determine relevant applications	Permanent.	Aim is to reduce carbon dioxide emissions. Potential to have lower running costs.		Refer to impact on dark skies.	EV points provided in line with policy.
Policy PUBDM57: Fibre to the Premises	Effects felt from the short term after policy used to inform/determine relevant applications	Intended to be permanent	Various benefits associated with access to good broadband such as being able to keep in touch with people (social exclusion) and working from home (reducing the need to travel).		None identified.	Developments with fibre to premises.
Policy PUBSP17: New Community Facilities	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Such venues can be at the heart of communities and benefit community pride and inclusion.		None identified.	Visitor and community services and facilities delivered in accordance with this policy.
Policy PUBDM58: Visitor and Community Facilities and Services	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Such venues can be at the heart of communities and benefit community pride and inclusion.		Address diversification of facilities.	Visitor and community services and facilities delivered in accordance with this policy.

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Policy PUBDM59: Designing places for healthy lives	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Enabling walking and cycling for example can reduce air pollution and emissions from motor vehicles.		None identified.	Planning applications in accordance (or otherwise) with this policy. Checklists – small sites. Checklists – large sites.
Policy PUBDM60: Planning Obligations and Developer Contributions	Effects felt from the short term after policy used to inform/determine relevant applications. Also depends on the particular infrastructure which development contributes and if it has a delivery timeline or not.	Depends on the actual infrastructure the contributions are towards. Could be temporary or permanent.	Can make development more acceptable. Can provide needed infrastructure.		None identified.	Developer Contributions monitoring statement – by the Broads Authority as well as Norfolk and Suffolk County Council. RAMS mitigation.
Policy PUBDM61: Advertisements and Signs	Effects felt from the short term after policy used to inform/determine relevant applications. Note that what the policy seeks to protect are in place now.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Policy still enables signs and adverts to benefits users of the Broads and businesses.		Refer to dark skies and clutter.	Adverts and signs permitted in accordance with policy
Policy PUBDM62: Re-use, conversion or change of use of buildings	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Bringing a building into use maintains the link to the past. Can also save energy from using materials and building already in place as well as releasing the embodied energy of the building. Provides space for use by businesses for example with wider benefits to the economy through the supply chain.		Refer to climate change resilience.	Buildings converted and final use.
Policy PUBDM63: Leisure plots and mooring plots	Effects felt from the short term after policy used to inform/determine relevant applications.	Policy allows change that meets certain criteria. It is intended that the resultant scheme has positive effects which are permanent, and any negative effects are temporary.	Environmental improvements can be Contributed to a network of Green Infrastructure which benefits people and wildlife. The owners of the moorings will be able to moor their boats and enjoy the Broads benefitting health and wellbeing.		Refer to hook ups and dark skies.	Mooring and leisure plots provided in line with this policy.
Policy PUBACL1: Acle Cemetery Extension	Short term	Intended to be permanent.	Contributes to a network of Green Infrastructure which benefits people and wildlife.		None identified.	Cemetery delivered as per policy.
Policy PUBACL2: Acle Playing Field Extension	Short term	Intended to be permanent.	Contributes to a network of Green Infrastructure which benefits people and wildlife. Benefit health of users.		None identified.	Sports field delivered as per policy

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Policy PUBBRU 1: Riverside chalets and mooring plots	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Depends on the type of change or development. Intended to be permanent. The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	Environmental improvements can contribute to a network of Green Infrastructure which benefits people and wildlife	None identified.	Refer to climate change resilience.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBBRU2: Riverside Estate Boatyards, etc., including land adjacent to railway line	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Depends on the type of change or development. Intended to be permanent.	Environmental improvements can contribute to a network of Green Infrastructure which benefits people and wildlife Those hiring boats from this area can benefit the local and wider economy	This boatyard is part of the network of boatyards around the Broads.	Refer to schemes providing public moorings and slipways.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBBRU3: Mooring Plots	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Depends on the type of change or development. Intended to be permanent.	Environmental improvements can contribute to a network of Green Infrastructure which benefits people and wildlife. The owners of the moorings will be able to moor their boats and enjoy the Broads benefitting health and wellbeing.	None identified.	Refer to dark skies.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBBRU4: Brundall Marina	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Depends on the type of change or development. Intended to be permanent.	Businesses will provide wider benefits to the economy through supply chains. Those hiring boats from this area can benefit the local and wider economy.	This boatyard is part of the network of boatyards around the Broads.	Refer to visitor moorings and dark skies.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBBRU5: Land east of the White Heron public house	Seeks to protect the current land use for the long term. Effects will be felt from the short term	Intended to be permanent.	Contributes to a network of Green Infrastructure which benefits people and wildlife.		None identified	Open space lost/negatively affected by development.
Policy PUBBRU6: Brundall Gardens	Residential moorings set to come forward by 2041.	Intended to be permanent.	Residential moorings do meet the housing needs of some.		Make consistent with other similar policies so issues like cabinets, dark skies and facilities are referred to.	Residential moorings provided as per policy.
Policy PUBCAN1: Cantley Sugar Factory	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	The lifetime of new buildings will depend on the type and their use.	Environmental improvements can be Contributes to a network of Green Infrastructure which benefits people and wildlife. Wider benefits to economy through supply chain.	None identified.	Consider impacts of schemes on the nearby pub and dark skies. Seek reduction in carbon emissions and refer to resilience to climate change.	Planning applications in accordance (or otherwise) with this policy.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBCHE1: Greenway Marine residential moorings	Residential moorings set to come forward by 2041.	Intended to be permanent.	Residential moorings do meet the housing needs of some.		Make consistent with other similar policies so issues like cabinets, dark skies and facilities are referred to.	Residential moorings provided as per policy.
Policy PUBDIL 1: Dilham Marina (Tyler's Cut Moorings)	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Depends on the type of change or development. Intended to be permanent.	Environmental improvements can be Contributed to a network of Green Infrastructure which benefits people and wildlife. The owners of the moorings will be able to moor their boats and enjoy the Broads benefitting health and wellbeing.	None identified.	None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBDIT1: Maltings Meadow Sports Ground, Ditchingham	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	The lifetime of new buildings will depend on the type and their use.	Benefit health of users. Employment.	None identified.	Refer to walking and cycling.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBDIT2: Ditchingham Maltings Open Space, Habitat Area and Alma Beck	Seeks to protect the current land use for the long term. Effects will be felt from the short term	Intended to be permanent.	Contributes to a network of Green Infrastructure which benefits people and wildlife.		None identified	Habitat area/open space/Beck lost/negatively affected by development.
Policy PUBFLE1: Broadland Sports Club	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	The lifetime of new buildings will depend on the type and their use.	Benefit health of users. Employment.	None identified.	Refer to walking and cycling.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBGIL1: Gillingham residential moorings (H. E. Hipperson's Boatyard)	Residential moorings set to come forward by 2041.	Intended to be permanent.	Residential moorings do meet the housing needs of some.		Make consistent with other similar policies so issues like cabinets, dark skies and facilities are referred to.	Residential moorings provided as per policy.
Policy PUBGTY 1: Marina Quays (Port of Yarmouth Marina)	Change is envisaged in the short term.	The lifetime of new buildings will depend on the type and their use.	Depending on use, economy could benefit, and jobs could be provided.	The site is quite prominent from the water so regeneration will benefit views from the river.	Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBHOR1: Horning Car Parking	Seeks to protect the current land use for the long term. Effects will be felt from the short term.	Intended to be permanent.	Environmental improvements can be part of a network of green infrastructure	The car park will enable people to visit the village for work, recreation, tourism or to use the shops.	Refer to light pollution and disabled parking.	Car parking lost/negatively affected by development.
Policy PUBHOR2: Horning Open Space (public and private)	Seeks to protect the current land use for the long term. Effects will be felt from the short term.	Intended to be permanent.	Retaining flood capacity continues to benefit the wider catchment. Contributes to a network of Green Infrastructure which benefits people and wildlife.		None identified	Open space lost/negatively affected by development.

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Policy PUBHOR3: Waterside plots	Seeks to protect the current land use for the long term. Effects will be felt from the short term.	Allows the maintenance and upgrading or appropriate replacement of existing buildings subject to other criteria.	Environmental improvements can be part of a network of green infrastructure		Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy. Capacity of Horning Water Recycling Centre.
Policy PUBHOR4: Horning Sailing Club	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Depends on the type of change or development. Intended to be permanent.	Enables people to enjoy the Broads through sailing benefitting health and wellbeing.	Sailing club is part of a network of sailing clubs around the Broads.	None identified.	Planning applications in accordance (or otherwise) with this policy. Capacity of Horning Water Recycling Centre.
Policy PUBHOR5: Crabbett's Marsh	Seeks to protect the current land use for the long term. Effects will be felt from the short term.	Intended to be permanent.	Contributes to a network of Green Infrastructure which benefits people and wildlife.		None identified.	Marsh lost/negatively affected by development.
Policy PUBHOR6: Horning - Boatyards, etc. at Ferry Rd. & Ferry View Rd.	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Depends on the type of change or development. Intended to be permanent.	Environmental improvements can be Contributed to a network of Green Infrastructure which benefits people and wildlife. Those hiring boats from this area can benefit the local and wider economy	This boatyard is part of the network of boatyards around the Broads.	None identified.	Planning applications in accordance (or otherwise) with this policy. Capacity of Horning Water Recycling Centre.
Policy PUBHOR7: Woodbastwick Fen moorings	Effects will be felt from the short term.	Intended to be permanent.	General appearance of the area could be improved.	Reducing the impact on navigation will enable smooth use of the waterway.	None identified.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBHOR8: Land on the Corner of Ferry Road, Horning	Seeks to protect the current land use for the long term. Effects will be felt from the short term.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years. Other land uses could have a similar lifetime, but that depends on the actual use.	Live work units can enhance security of the property and business. Businesses will provide wider benefits to the economy through supply chains.	None identified	None identified	Planning applications in accordance (or otherwise) with this policy. Capacity of Horning Water Recycling Centre.
Policy PUBHOV1: Green Infrastructure	Seeks to protect the current land use for the long term. Effects will be felt from the short term.	Intended to be permanent.	Retaining flood capacity continues to benefit the wider catchment. Contributes to a network of Green Infrastructure which benefits people and wildlife.		None identified	Green Infrastructure lost/negatively affected by development.
Policy PUBHOV2: Station Road car park	Seeks to protect the current land use for the long term. Effects will be felt from the short term.	Intended to be permanent.	Environmental improvements can be part of a network of green infrastructure	The car park will enable people to visit the village for work, recreation, tourism or to use the shops.	Refer to light pollution and disabled parking. Refer to cycle parking and charging points.	Car parking lost/negatively affected by development.
Policy PUBHOV3: Brownfield land off Station Road, Hoveton	Change is likely to happen short term to medium term.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years. Other land uses could have a similar	It could also provide some employment opportunities.		Improve access to the river. Ensure scheme incorporates trees and hedges. Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
		lifetime, but that depends on the actual use.				
Policy PUBHOV4: BeWILDerwood Adventure Park	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Intended to be permanent.	It could also provide some employment opportunities.		Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBHOV5: Hoveton Village Centre and areas adjacent to the Village Centre	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Intended to be permanent.	It could also provide some employment opportunities.		None identified	Planning applications in accordance (or otherwise) with this policy. Land use of each unit.
Policy PUBNOR1: Utilities Site	Likely to be delivered towards the end of the plan period.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years. Other land uses could have a similar lifetime, but that depends on the actual use.	This would provide market houses thus contributing to the OAN. It could also provide some employment opportunities. Potential for more to enjoy the river.		Refer to climate change resilience and light pollution.	Planning applications in accordance (or otherwise) with this policy. Number of houses delivered.
Policy PUBNOR2: Riverside walk and cycle path	The effects will materialise if and when routes are developed. There is no set time frame for delivering the sites. Once in place, the effects are likely to be long term/permanent.		These trackways, if delivered, can bring more people to the area which could benefit the local economy.		Refer to light pollution.	Delivery of path in line with policy.
Policy PUBORM1: Ormesby waterworks	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Intended to be permanent.	Such a policy will enable the waterworks to continue to provide water for the local population and improve or amend operations in an appropriate way.		None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBOUL1: Boathouse Lane Leisure Plots	It is intended that the effects from the policy will be felt from the short term and last for the long term. Does allow certain changes but there is no timeline.	Intended to be permanent	Retaining flood capacity continues to benefit the wider catchment.	None identified	None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBOUL2: Oulton Broad - Former Pegasus/Hamptons Site	Likely to be delivered in the short term.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years. Other land uses could have a similar lifetime, but that depends on the actual use.	This would provide market houses thus contributing to the OAN. It could also provide some employment opportunities.		None identified	Planning applications in accordance (or otherwise) with this policy. Number of houses delivered.
Policy PUBOUL3 - Oulton Broad District Shopping Centre	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Intended to be permanent.	It could also provide some employment opportunities.		None identified	Planning applications in accordance (or otherwise) with this policy. Land use of each unit.
Policy PUBPHRB1: Bridge Area	Seeks to protect the current land use for the long term. Effects will be felt from the	Intended to be permanent.	It could also provide some employment opportunities. Improvements could enhance the bridge.		Improve reference to surface water and flood risk.	Planning applications in accordance (or otherwise) with this policy.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
	short term. Does allow certain changes but there is no timeline.					
Policy PUBPHRB2: Waterside plots	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Allows the maintenance and upgrading or appropriate replacement of existing buildings subject to other criteria. According to the NPPF, in flood risk terms, such buildings have a lifetime of 100 years.	Undeveloped plots are Contributes to a network of Green Infrastructure which benefits people and wildlife. The owners of the plots will be able to moor their boats and enjoy the Broads benefitting health and wellbeing.	The areas together, if meeting the policy, will provide interesting and appreciated landscape and views for people to enjoy.	None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBPHRB3: Green Bank Zones	Seeks to protect the current land use for the long term. Effects will be felt from the short term.	Intended to be permanent.	Contributes to a network of Green Infrastructure which benefits people and wildlife.	The areas combined gives open areas to enable the enjoyment of the landscape.	None identified	Green Banks lost/negatively affected by development.
Policy PUBSOL1: Riverside area moorings	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Intended to be permanent	The owners of the plots will be able to moor their boats and enjoy the Broads benefitting health and wellbeing.	None identified	None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBSOM1: Somerleyton Marina Residential Moorings	Residential moorings set to come forward by 2041.	Intended to be permanent.	Residential moorings do meet the housing needs of some.		Make consistent with other similar policies so issues like cabinets, dark skies and facilities are referred to.	Residential moorings provided as per policy.
Policy PUBSTA1: Land at Stalham Staithe (Richardson's Boatyard)	Residential moorings set to come forward by 2041.	Intended to be permanent	Those hiring boats from this area can benefit the local and wider economy. Environmental improvements can contribute to a network of Green Infrastructure which benefits people and wildlife. Residential moorings do meet the housing needs of some.	This boatyard is part of the network of boatyards around the Broads.	Refer to dark skies and resilience to climate change.	Planning applications in accordance (or otherwise) with this policy. Residential moorings provided as per policy.
Policy PUBTSA1: Carey's Meadow	It is intended that the open space remains in such a land use for the long term and permanently. Does allow certain changes but there is no timeline.	Intended to be permanent	Being maintained as open space allows these areas to be Contributes to a network of Green Infrastructure which benefits people and wildlife.		Refer to cycle parking.	Meadow lost/negatively affected by development.
Policy PUBTSA2: Thorpe Island	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Intended to be permanent	Contributes to a network of Green Infrastructure which benefits people and wildlife.		Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBTSA3: Griffin Lane – boatyards and industrial area	Seeks to protect the current land use for the long term. Effects will be felt from the short term. Does allow certain changes but there is no timeline.	Intended to be permanent	Those hiring boats from this area can benefit the local and wider economy. Environmental improvements can be part of a network of green infrastructure	This boatyard is part of the network of boatyards around the Broads.	Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBTSA4: Bungalow Lane – mooring plots and boatyards	It is intended that the effects from the policy will be felt from the short term and last for the long term. Does allow certain changes but there is no timeline.	Intended to be permanent	Those hiring boats from this area can benefit the local and wider economy. Environmental improvements can contribute to a network of Green Infrastructure which benefits people and wildlife. The owners of the plots will be able to moor their boats and enjoy the Broads benefitting health and wellbeing.	This boatyard is part of the network of boatyards around the Broads.	Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBTSA5: River Green Open Space	It is intended that the effects from the policy will be felt from the short term and last for the long term.	Intended to be permanent.	Contributes to a network of Green Infrastructure which benefits people and wildlife.		None identified	Open space lost/negatively affected by development.
Policy PUBTHU1: Tourism development at Hedera House, Thurne	Likely to be delivered in the short term.	The lifetime of homes, in relation to flood risk in the NPPG, is 100 years	This would provide market houses thus contributing to the OAN. This would also provide holiday accommodation contributing to the network of holiday accommodation in the Broads.		Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy. Number of houses delivered.
Policy PUBWHI1: Whitlingham Country Park	It is intended that the effects from the policy will be felt from the short term and last for the long term. Does allow certain changes but there is no timeline	It is intended that the Country Park and changes are permanent.	Whitlingham gives a taster of what the Broads can offer, including using the water and could enable people to be more active and see more of the Broads benefitting health and wellbeing and the local economy.		Emphasise woodland and character. Refer to light pollution.	Planning applications in accordance (or otherwise) with this policy.
Policy PUBWHI2: Land at Whitlingham Lane	It is intended that the effects from the policy will be felt from the short term and last for the long term.	Intended to be permanent.	It could also provide some employment opportunities.		None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBSSTRI: Trinity Broads	Effects will be felt in the short term and intended to last for the long term.	The area could change but proposals are required to meet the aims of the policy.	By maintaining the tranquillity of the area, there could be benefits for the wildlife in the area.	These two policies are similar in their approach and when combined provide a large area of the Broads which is tranquil in nature for people and wildlife to get away from it all.	None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBSSUT: Upper Thurne	Effects will be felt in the short term and intended to last for the long term.	Towards permanent. One of the main reasons this area is tranquil is Potter Heigham Bridge which is a Scheduled monument. This prevents larger boats heading towards the Upper Thurne because of the low air draught.	By maintaining the tranquillity of the area, there could be benefits for the wildlife in the area.		None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBSSPUBS: Pubs network	Effects will be felt in the short term. Policy seeks to retain in long term use. Further benefits could arise from changes that the policy permits but there is no set timeline or guarantee of improvements. Whilst the policy may protect the pubs, change could still occur.		Waterside pubs can benefit the wider economy through supply chains. They provide an area for people to meet and socialise.		Refer to water efficiency and crime.	Improvements to pubs in line with policy. Pubs lost from public house land use.

Policy	Short / medium / long term effects	Permanent/ Temporary	Secondary Effects	Synergistic Effects	Mitigating negatives / maximising positives	Monitoring Indicator
Policy PUBSSROADS: Main road network	This depends on if and when applications that can impact highways come forward. The effects can be from short to long term.		Roads can change to reflect how they are used and any safety issues. Whilst the route maybe permanent, perhaps the actual road provided can be temporary. The economy of the area could benefit from a smooth-running highway network.		None identified	Schemes permitted contrary to Highways advice.
Policy PUBSSTRACKS: Former rail trackways	The effects will materialise if and when routes are developed. There is no set time frame for delivering the sites. Once in place, the effects are likely to be long term/permanent.		These trackways, if delivered, can bring more people to the area which could benefit the local economy.		None identified	Recreation routes delivered on these schemes. Development that encroaches onto these trackways.
Policy PUBSSSTATIONS: Railway stations/halts	It is intended that the effects from the policy will be felt from the short term and last for the long term. Does allow certain changes but there is no timeline.		It is intended that the halts and improvements will be permanent. Visitors and workers (those using the trains that stop at these halts) originate elsewhere. They can spend money etc at that origin as well as the destination. The stations are part of a network of rail halts.		Refer to biodiversity enhancements.	Improvements to stations in line with policy. Stations lost to other uses.
Policy PUBSSSTAITHES: Staithes	Note that the policy seeks to protect what is in place now/what the situation is now. Effects felt from the short term after policy used to inform/determine relevant applications.		Intended to be permanent. Benefit economy through enabling the loading and unloading of goods.		None identified.	Staithes lost/negatively affected by development.
Policy PUBSSCOAST: The Coast	The policy is in conformity with the Shoreline Management Plan. According to the Shoreline Management Plan, in the short and medium, term the present defences are to be maintained while a retired line option is fully investigated in terms of its social, economic and environmental consequences.		The policy is in conformity with the Shoreline Management Plan for the entire area which relates to the approach to coastal erosion.		None identified	Planning applications in accordance (or otherwise) with this policy.
Policy PUBSSMILLS: Drainage Mills	This depends on if and when applications for changes to mills come forward. The effects can be from short to long term.	If mills are restored, it is envisaged this will be permanent.	The mills could become more of an attraction for the area.	The landscape could change if mills are restored. This would be a positive change.	Refer to design and light pollution.	Mills brought back into use. Changes to mills in line with this policy.
Policy PUBSSLGS: Local Green Space	Effects will be felt in the short term. Allocation intended to be permanent (and long term), but the NPPF states that change can happen if under very special circumstances.		Being maintained as open space allows these areas to be Contributes to a network of Green Infrastructure which benefits people and wildlife.		None identified	Local Green Spaces lost/negatively affected by development.
Policy PUBSSA47: Road schemes on the Acle Straight (A47T)	Some changes could occur in the short and medium term, but larger scale changes are likely to be felt (as the scheme is delivered) beyond 2041. Effects felt from the short term after policy used to inform/determine relevant applications.		Policy guides change that meets certain criteria.		. Refer to resilience to a changing climate.	Changes to A47 in line with this policy.

Appendix 8 – Comments received as part of Preferred Options consultation

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
SA	Dickon Povey	East Suffolk Council	The Introduction section could provide more of an overview of the structure of the document, and the inclusion of the SEA Regs in the SA process.	Noted. The various chapters at the start of the SA adequately set the scene.	No change to SA.
SA	Dickon Povey	East Suffolk Council	Section 2. Previous versions of the SA – the reference to the former Waveney District Council needs to be corrected to East Suffolk Council, which was created in 2019.	Agreed.	Change made.
SA	Dickon Povey	East Suffolk Council	The in-text hyperlinks to Appendix 2: The Baseline, the source of Geodiversity information and the additions to the Literature Review are broken.	Links will be checked.	Ensure links are checked.
SA	Dickon Povey	East Suffolk Council	Sustainability Appraisal. Policy POSP4: Historic Environment Page 171 – Under ‘Secondary Effects’ there is a typo: ‘Maintains’ should be spelt ‘Maintains’.	Noted. Amend typo.	Typo amended.
SA	Dickon Povey	East Suffolk Council	Sustainability Appraisal ODM13: Reuse, Conversion or Change of Use of Historic Buildings Page 171 – Under ‘Secondary Effects’ there is a typo: ‘reasling’ should be spelt ‘releasing’.	Noted. Amend typo.	Typo amended.
SA	Sarah Morrison	Natural England	As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity.	There are monitoring indicators in the SA - see last column of appendix 7.	No change to SA.
SA	Sarah Morrison	Natural England	It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.	There are monitoring indicators in the SA - see last column of appendix 7.	No change to SA.
SA	Sarah Morrison	Natural England	Whilst it is not Natural England’s role to prescribe what indicators should be adopted, the following indicators may be appropriate. Biodiversity: •Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. •Percentage of major developments generating overall biodiversity enhancement. •Hectares of biodiversity habitat delivered through strategic site allocations. Green infrastructure: •Percentage of the city's population having access to a natural	Noted. The implementation and monitoring framework is in the Local Plan.	No change to SA other than referring to monitoring indicators in the Local Plan.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
			<p>greenspace within 400 metres of their home.</p> <ul style="list-style-type: none"> •Length of greenways constructed. •Hectares of accessible open space per 1000 population. 		
SA Appendix 3 literature review	Dickon Povey	East Suffolk Council	It was raised through the previous consultation that The Broadland Rivers Catchment Abstraction Management Strategy, The Natural Capital Evidence Compendium for Norfolk and Suffolk (2020) and The STEAM Report had not been scoped into the literature review but would be included at the next stage. These documents do not appear to have been scoped into the literature review at this stage, and it is suggested that they are for the next stage.	Noted. We will add this to the literature review.	Add those documents to the literature review.
SA Appendix 3 literature review	Dickon Povey	East Suffolk Council	The East Suffolk Rural Development SPD was adopted in April 2024 and is suggested to be added to the literature review.	Noted. We will add this to the literature review.	Add those documents to the literature review.
SA Appendix 3 literature review	Dickon Povey	East Suffolk Council	The East Suffolk Custom & Self Build SPD was adopted in May 2024 and is suggested to be added to the literature review.	Noted. We will add this to the literature review.	Add those documents to the literature review.
SA Appendix 3 literature review	Dickon Povey	East Suffolk Council	The East Suffolk Healthy Environments SPD is set to be adopted in June 2024 and is suggested to be added to the literature review. Once adopted this document will supersede the Waveney Open Space Provision & Developer Contributions SPD (2012).	Noted. We will add this to the literature review.	Add those documents to the literature review.
SA Appendix 4 SA Framework	Dickon Povey	East Suffolk Council	It is acknowledged that the changes identified from East Suffolk Council's comments on the SA Scoping Report's proposed decision-making criteria/prompting questions have been actioned and included where the Broads Authority have agreed with the suggestions. SOC1 is suggested to cover safety and security and environmental protection and residential amenity matters, which could be integrated through merging ENV11 and SOC7 into SOC1.	Noted. We are content with carrying on with the SA objectives as they are for consistency through the various stages of the Local Plan.	No change.
SA Appendix 4 SA Framework	Dickon Povey	East Suffolk Council	SOC2 – lack of accessibility, planning that incurs the need to travel longer distances, and/or lack of public transport are key barriers to employment, health, education and leisure/socialising and therefore forms of social exclusion. Although employment, income, and disability cover some of the primary drivers of reduced access to transport, transport accessibility could be included as its own item in the decision-making criteria list. Alternatively, these points could be integrated into SOC6, which is suggested to be considered.	Agreed. Add another decision-making criterion to SOC2.	Add this: Does the allocation/policy mean lack of accessibility or the need to travel longer distances?

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
SA Appendix 4 SA Framework	Dickon Povey	East Suffolk Council	SOC2 is also suggested to consider matters related to tenure blind design, as this isn't necessarily covered by the current list of decision-making criteria/prompting questions.	Noted, but this is more of a design response rather than fitting with the type of criteria listed against this SA objective.	No change.
SA Appendix 4 SA Framework	Dickon Povey	East Suffolk Council	SOC3 – lack of accessibility/need to travel and/or lack of public transport are key barriers to employment/skills.	Agreed. Add another decision-making criterion to SOC3.	Add this: Does the allocation/policy mean lack of accessibility or the need to travel longer distances?
SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy PODM2: Embodied Carbon and Policy POSP1: Responding to the Climate Emergency – The benefits of responding to climate change challenges on health and wellbeing (e.g. eco-anxiety) is suggested to be acknowledged through the assessment – i.e. a '+' under SOC1.	Agreed. SA assessment amended.	Amend SA assessment.
SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy PODM9: Open space on land, play space, sports fields and allotments – free to use equipped play areas are important for widening access to children of all income groups to opportunities for informal active play. Allotments provide the opportunity to grow food, reducing food costs, improving the quality of nutrition, and providing a free of charge space for informal, varied-intensity physical activity for those keeping allotment plots; allotments are also important social spaces, particularly for some groups that might otherwise be at risk of social isolation. This policy is therefore recommended to be recognised as positively performing against SOC2, and expanded in how it positively impacts SOC1. Could be considered against SOC3 (as spaces for social prescribing/volunteering and skills building activities) SOC7 and ECO3 as well.	Agreed. SA assessment amended.	Amend SA assessment.
SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy PODM24: Trees, woodlands, hedges, scrub and shrubs and development – the health and wellbeing benefits of retaining plantings could be reflected in the assessment, i.e. under SOC1.	Agreed. SA assessment amended.	Amend SA assessment.
SA Appendix 5 Assessment of each policy and reasonable alternatives	Dickon Povey	East Suffolk Council	Policy POSP8: Accessibility and Transport - impacts of transport challenges on employment, income and social inclusion/exclusion are suggested to be recognised in the assessment, i.e. via SOC2.	Agreed. SA assessment amended.	Amend SA assessment.

Part of document	Name	Organisation	Comment	Broads Authority Response	Action for next version of the Local plan
against the SA Objectives					
SA Appendix 5 Assessment of each policy and reasonable alternatives against the SA Objectives	Dickon Povey	East Suffolk Council	Policy PODM51: Design – it is suggested that the health and wellbeing benefits if well designed places, and in particular ensuring a minimum quantum of higher accessibility homes, is reflected in the assessment, i.e. SOC1.	Agreed. SA assessment amended.	Amend SA assessment.